

Response ID ANON-JZGE-SNMZ-R

Submitted to **Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland**

Submitted on **2019-05-13 13:15:06**

Introduction

1 Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason: :

2 What is your name?

Name:

Jamie Blake

3 What is your email address?

Email:

nicola.cross@barnet.gov.uk

4 Please provide information about the organisation/business you represent

Which of the following best describes you?:

Local Authority

If you answered 'other' above, please provide details:

What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):

London Borough of Barnet

What is the approximate number of staff in your organisation? (if applicable):

5 Please provide any further information about your organisation or business activities that you think might help us put your answers in context.

Please answer below:

We serve a population of 377,000.

6 Does your organisation have any recent experience of a DRS or related schemes? If so, can you please briefly explain your experiences?

Please answer below:

No.

7 Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation?

Yes

Background

Our approach

8 Do you agree with the basic principles for a DRS?

Yes

Please briefly state the reasons for your response. Where there are principles you do not agree with, please outline them here. Where available, please share evidence to support your view:

The use of DRS should be integrated within the wider principle of extended producer responsibility, and should be designed to fit alongside it. There should also be a consideration of value for money.

9 Should the following materials be in scope of a DRS?

Type of material included - PET bottles:

Yes

Type of material included - HDPE bottles:

Yes

Type of material included - Aluminium cans:

Yes

Type of material included - Steel cans:

Yes

Type of material included - Glass bottles:

Yes

Other (please specify):

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Many drinks containers are made of PET and it has a value in the commodities market.

There is a value for HDPE bottles and they are widely used for drinks containers.

Recycling aluminium is very efficient from an energy perspective and the material has a high market value.

Steel is easy to recycle.

Glass is easy to recycle and widely available.

10 Should the following materials be in scope of a DRS?

Materials in-scope - Cartons e.g. Tetrapacks:

Yes

Materials in-scope - Pouches and sachets e.g. energy gels:

Yes

Other (please specify):

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Cartons e.g. tetrapacks are widely used but there needs to be a long term recycling market for them.

Pouches and sachets e.g. for energy gels are not widely collected in kerbside recycling schemes. There needs to be a long term market for them.

11 If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

This is in line with the waste hierarchy.

12 Should the following drinks be in scope of a DRS?

Should drinks be included? - Water:

Yes (all)

Should drinks be included? - Soft drinks (excluding juices):

Yes (all)

Should drinks be included? - Juices (fruit and vegetable):

Yes (all)

Should drinks be included? - Alcoholic drinks:

Yes (some)

Should drinks be included? - Milk containing drinks:

Yes (all)

Should drinks be included? - Plant based drinks (soya, rich almond and oat drinks):

Yes (all)

Should drinks be included? - Milk:

Yes (all)

Other (please state which)::

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Water is provided in the target containers for a DRS and will contribute towards the recycling performance. Although the wider campaign to get people to use reusable containers and filling points should be continued, in line with the waste hierarchy.

Soft drinks are provided in the target containers for a DRS and will contribute towards the recycling performance.

Juices (fruit and vegetable) are provided in the target containers for a DRS and will contribute towards the recycling performance.

Alcoholic drinks are provided in the target containers for a DRS and will contribute towards the recycling performance.

Milk containing drinks are provided in the target containers for a DRS and will contribute towards the recycling performance. The DRS should be as inclusive as possible.

Plant-based drinks are provided in the target containers for a DRS and will contribute towards the recycling performance. The DRS should be as inclusive as possible.

Milk is provided in the target containers for a DRS and will contribute towards the recycling performance. The DRS should be as inclusive as possible.

13 Do you think disposable cups should be in scope of a DRS?

Should disposable cups be included? - Disposable cups made from paper with a plastic lining (used for coffee):

I don't know/ I don't have enough information

Should disposable cups be included? - Disposable cups made of plastic (used in vending machines):

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view. The Government is particularly interested in any evidence on whether or not it would be practical or cost effective to include disposable cups in the scope of a DRS.:

In line with the waste hierarchy the use of single use cups should be discouraged. This composite material is difficult to recycle and is regularly littered. It is a product that could be considered at a later date.

14 Do you agree with the proposed material flows as described?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

The material flow shows all the material being returned to the return point/retailer, which then forward this to collection systems. The material which a consumer places in the kerbside collection and other local authority waste management systems is not shown in the diagram.

15 Do you agree with the proposed financial flows described?

I neither agree nor disagree

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

Local authorities are not included in the financial flows, although a significant proportion of material will continue to come through our waste management systems, and the consultation indicates that local authorities will be paid for DRS materials collected, although this will need to be linked to the EPR scheme.

16 Should producers obligated under a DRS be:

Also be obligated under the reformed packaging producer responsibility system for the same packaging items

Other (please explain):

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

In our opinion DRS is an element of an extended producer responsibility scheme. Producers must cover the full costs incurred for the collection of material they put on the market, whether this is from kerbside or via another collection scheme such as a DRS.

17 If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'?

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

This is a question for others to answer.

18 Do you agree that the DMO should be responsible for meeting high collection targets set by Government?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

The DMO has a strategic overview and tools to affect performance against targets so they should be accountable.

19 Should the DMO also be responsible for meeting high recycling targets set by government?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

20 Should unredeemed deposits be used to part-fund the costs of the DRS system?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

Yes if there is a deficit in the system and as long as Producers have covered the full costs (collection, reprocessing and disposing) incurred for the collection of material they put on the market by local authorities, including those related to contractual commitments.

21 If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view :

We do not see a clear rationale for unredeemed deposits to be passed to the government. Excess funding should be used to increase awareness or make the scheme more accessible where there is poor coverage.

22 Do you have alternative suggestions for where unredeemed deposits could be allocated?

Please explain your answer:

We believe the unredeemed deposits should be allocated to local authorities, to support the costs that they will incur in managing in-scope containers that have not been returned for deposit including those that have been littered.

23 If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:

Industry (drinks producers)

Other (please specify):

A representative of local government and a representative of a consumer group.

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

The management board should be made up of a range of parties and not dominated by one view point. Therefore there should be a representative from: industry, government, trade associations representing those hosting return points, companies representing those hosting return points, local government and consumer groups.

24 Should there be government involvement in the set-up/running of the DMO body?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

There should be government involvement in the setting up of the DMO, alongside other stakeholders. We believe there should be little or no actual government involvement in running the DMO but it should have strong oversight of it and suitably strong tools to call it to account if proved necessary. This could be through a regulator, directly, or a combination of both depending on the nature of the issue that needs oversight and remedial action.

25 Do you agree with the government's proposals that a DMO would:

A DMO should: - Advise Government on setting of the deposit level/s:

Yes

A DMO should: - Set producer import fees:

Yes

A DMO should: - Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers:

Yes

A DMO should: - Set and distribute the handling fees for return points:

Yes

A DMO should: - Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?:

Yes

A DMO should: - Be responsible for maintenance of Reverse Vending Machines (RVMs) and provision of bags/containers to those running manual return points:

Yes

A DMO should: - Own the material returned by consumers:

Yes

A DMO should: - Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts:

Yes

A DMO should: - Fund counting sorting/centres – and manage the contracts for counting/sorting centres:

Yes

A DMO should: - Be legally responsible for meeting the high collection targets set by Government for drinks containers within scope of the DRS.:

Yes

A DMO should: - Measure and report recycling rates to Government:

Yes

A DMO should: - Run communications campaigns to aid consumer understanding of the DRS:

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

It is appropriate for the DMO to provide the advice on the setting of the deposit level/s, although government should retain the ability to determine the deposit to ensure there is a balance between the consumer and producer interest.

The DMO will have the best information on the costs of running the system and therefore be able to reflect true producer costs in setting the producer/importer fees.

The DMO should have the best information on where deposits have been redeemed and other associated costs, so should be responsible for tracking deposits and financial flow in the DRS.

The DMO will have an overview of the whole system so are in the best position to manage fees relating to all aspects of the system.

Based on the design of the proposed DRS, it seems necessary for the DMO to own the material returned by consumers for the scheme to work as the costs are transferred around the system.

Generally agree that the DMO should reimburse those transporting returned drinks containers but should also look at existing transportation/collection infrastructure to optimise these rather than relying on a new resource.

The DMO have a strategic overview of the systems and finances so can better manage the counting /sorting centres. They are in a position where they can make adjustments anywhere in the DRS process if required.

Any targets should only be for the areas which the DMO has realistic influence over and should not be seen to be competing with local authorities.

The DMO should be required to comply with the same level of scrutiny that local authorities have, via WasteDataFlow. For this information to be transparent a new reporting system may need to be developed to allow data to be integrated in one place. In addition the DMO should provide data to local authorities on what has happened in their area.

National and Local Education and Awareness programmes and campaigns are essential to enable increased engagement. The DMO should assist in promoting the message locally by developing key messages and templates for adoption by local authorities, that are in conformity with other communication messages in relation to extended producer responsibility activities.

26 Do you agree with our proposed definition of a producer?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

27 Should there be a de-minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

There should be no de minimis applied as the compliance monitoring is likely to be overburdensome and there is concern this may fall to local authorities.

28 Should a de-minimis be based on:

Should a de-minimus be based on: - Number of employees:

Should a de-minimus be based on: - Sales figures:

Should a de-minimus be based on: - Volume/ weight of drinks put on the market:

Should a de-minimus be based on: - None of these:

If yes, please provide more information (how many employees, what sales figure, what volume/ weight):

Other (please specify):

Not applicable.

29 If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run?

Please provide more information:

No.

30 In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO?

Do you agree with this proposal?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

DRS is a form of EPR and so it is right producers should fund the set-up costs of the DMO. The costs of this could be incorporated into the DMO business model to maximise the efficiency.

31 Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMs and an IT system?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

A DRS is a form of EPR, producers should therefore be responsible for the set-up and operation of the scheme. The costs of these elements could be incorporated into the DMO business model to maximise the efficiency.

32 Should producers of drinks within a DRS be responsible for DRS operational costs?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

In line with the principles of full net recovery, the producers should cover all aspects of the DRS including operational costs. This will need to be considered as part of EPR, so that the same activities are not paid for twice.

33 Which of the following should be obligated to host a return point?

Retailers who sell drinks containers in scope

Other (please specify):

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

Retailers who sell drinks containers in scope should be obligated to host a return point, and these are likely to be at supervised locations.

For Transport hubs, leisure centres and event centres there should not be an obligation to host a return point but there should be an assessment on a local basis to review geographical spread to ensure a comprehensive distribution.

Reverse Vending Machines should be at supervised locations and not placed on the street, where they risk becoming street clutter and could attract litter and fly tipping.

34 What might the impacts be on those hosting:

(a) Reverse vending machines? Where available, please share evidence to support your view.:

There is the potential for vandalism of the machine to either access deposited material or cash if the machines provide cash payments. To minimise this risk machines would need to be emptied on a regular basis. Other commitments would include managing the RVMs when faulty and dealing with queries from householders.

They may also become a focal point for litter and fly tipping, particularly of materials not accepted at the RVMs.

(b) Manual return points? Where available, please share evidence to support your view.:

Counter error could be an issue and so would need to be counted again or be verified electronically in another location to minimise fraud. Despite the material having a value through the deposit there might be a small chance of material being dumped if the return point is unavailable or there could be litter and fly tipping, particularly of materials not accepted at the manual return point.

35 Are there any Health and Safety-specific implications that may be associated with hosting return points?

I don't know/ I don't have enough information

Please provide more information:

This is a question for others to answer.

36 Is there a de minimis level under which businesses who sell drinks in scope should be exempt?:

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

For smaller businesses hosting a take back scheme may be an unreasonable burden depending on their available storage space, staffing levels and location.

37 Should a de-minimis be based on:

Other (please specify):

If yes, please provide more information (what floor size, what sales figure, how many employees):

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

This is a question for others to answer.

38 Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers?

Please provide details.:

No.

39 For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?

Please explain your answer:

It may be appropriate for home delivery services to offer a take back service to ensure no-one is discriminated against.

Online sellers should be obligated under a DRS. The way their products are available to be returned for a person to redeem a deposit would be a matter for the producers involved and the DMO to establish.

40 What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?

Please explain your answer:

Obligated producers, through the DMO would need to ensure that a suitable return provision is in place in rural areas. A different set of return points compared to urban areas could be considered, such as community halls and buildings, use of wider community groups to host return points and existing local authority collection services.

41 Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?

Please explain your answer:

No.

42 Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?

Neither

Please briefly state the reasons for your response. Where possible, please provide supporting information.:

On line sellers should be obligated under a DRS, if one were to be introduced, but this obligation may not extend to the actual pickup and refund of DRS material. The way their products are available to be returned for a person to redeem a deposit would be a matter for the producers involved and the DMO to establish.

43 Should there be a de-minimis under which online retailers would not be obligated to pick up and refund DRS material?

No

Please provide more information:

44 If yes, should a de-minimis for online retailers be based on:

Other (please specify):

45 Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.

Yes

Please briefly state the reasons for your response. Where possible, please provide supporting information:

The DRS should concentrate on capturing the material while "on the go".

46 Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'?

Yes

Please briefly state the reasons for your response. Where possible, please provide supporting information. :

This would be appropriate if in the opinion of the DMO this adds value to the overall scheme and does not duplicate facilities that are mandated under the regulations.

There should be a minimum collection criterion set before a pickup, otherwise there is a risk the service costs would rise if a considerable number of small collectors must be serviced (although this may also need a geographical/rurality weighting applied).

47 Do you have any further views, comments or evidence in relation to retailers not already covered above?

Please provide more information:

No.

48 How should a DRS account for 'on-trade' sites such as bars and restaurants?

Please provide more information:

This is a question for others to answer.

49 What do you consider to be the optimum deposit level to incentivise return of drinks containers?

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

We do not have an opinion on what the value should be set at. The value needs to be sufficiently high that it can drive behaviour change, without having a significant adverse impact on the commercial viability of the product or disproportionately impact any social group.

50 Should the deposit level be a flat rate across all drinks containers covered by the DRS?

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

The deposit should reflect how easy the drinks container is to recycle, the contribution they currently make to litter (so reflects how much is currently spent on collecting them as litter) and it should encourage reuse. We also think that it should encourage innovation so producers are encouraged to redesign packaging to one that is less environmentally damaging.

However the scheme needs to be as simple as possible for householders to understand. So a single price would allow for a consistent message with less chance of ambiguity and minimise administration.

51 Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

These cans should be treated as if they were sold individually as they are likely to still be consumed on-the-go even though initially, they will be taken back to the household.

52 How do you think deposits should be redeemed? Please tick all that apply.

Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop off), Digitally (e.g. a digital transfer to a smartphone application), Return to debit card, Option to donate deposit to charity

Other (please state):

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

All should be considered except cash, as holding cash within a RVM is more likely to encourage theft and vandalism.

53 Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

This will be necessary for assessing performance against targets and for managing the income from the materials.

54 In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

In line with their duty of care requirements the DMO should know what has been recycled and therefore this would provide a transparent consistency to the DRS.

55 How do you think transparent financial flows in a DRS could be achieved most effectively?

Please explain your answer, providing evidence where available:

An online portal could be developed to identify systems inputs, outputs and balances. It would need to be configured to account for all parts of the supply chain.

Monitoring and Enforcement

56 Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?

Yes

If no, why and is there another body that would be better suited to perform this function?:

Please explain your answer:

The DMO should be regulated by an impartial body to eliminate any potential conflict of interest. If these bodies are to take on the additional duties, they would need to be fully resourced to ensure the appropriate checks could be made. The respective roles of both the DMO and regulator must be clear.

57 How frequently should the DMO be monitored? (This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))

Bi-annually

Other (please specify):

58 How often should producers be checked for compliance with the DRS (if compliance is obligated)?

Bi-annually

Other (please specify):

59 Should enforcement focus on:

A sample of producers

Other (please specify):

60 Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

The regulator will be able to provide an impartial opinion and recognise what penalty levels are appropriate.

61 Are there any points in the system which you think would be particularly susceptible to fraud?

Please state :

Ensuring there is a clear reporting framework for a DRS should minimise the potential for fraud for all stages.

62 Which labelling/markings on drinks containers in scope would best protect against fraud? Please select all that apply:

Deposit value amount, Marking indicating inclusion in DRS, Existing product barcode (containing DRS information when scanned)

Other (please specify):

Please explain your answer. We are particularly interested in evidence of effective fraud prevention in existing DRS systems. :

63 How could return via Reverse Vending Machines (RVMs) best be protected against fraud?

We are particularly interested in any evidence you may have to support suggestions.:

Non cash payments.

64 How could the process of manual returns best be protected against fraud?

We are particularly interested in any evidence you may have to support suggestions. :

This is a question for others to answer.

65 How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)?

Please explain your answer:

This would depend on what the differences are, where possible a uniform system should be adopted.

DRS Options - 'all-in' and 'on-the-go'

66 Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?

Yes

Please state the reasons for your response. Where available, please share evidence to support your view:

A DRS scheme should focus on items which currently regularly end up in the residual waste or littered and therefore offer a genuine potential to increase recycling rates. Larger drinks containers are already extensively recycled and therefore inclusion in a DRS is more likely to result in the transfer of material from one recycling stream to another rather than an increase in recycling tonnage collected.

67 If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?

>3 litres

Other (please specify):

Please state the reasons for your response. Where available, please share evidence to support your view:

A DRS scheme should focus on items which currently regularly end up in the residual waste or as litter and therefore offer genuine potential to increase recycling rates.

68 Do you agree with our definition of 'on-the-go' as less than 750mls in size?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

We believe that this definition is an appropriate one to use at this stage of the consultation.

69 Do you agree with our definition of 'on-the-go' as excluding multipack containers?

No

Please briefly state the reasons for your response, including in which cases multipack containers should not be excluded from our definition of 'on-the-go'. Where available, please share evidence to support your view:

Although multi pack purchases are usually purchased as part of the general grocery shop, these are then regularly used in packed lunches etc for consumption away from the home. It is therefore the product which should define the inclusion and not how it is purchased (i.e. single or multipack). This would also minimise confusion on which items are eligible under the scheme.

70 Based on the information, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised in this consultation) which is your preferred DRS option?

All-in

Please state the reasons for your response. Where available, please share evidence to support your view:

A similar network of reverse vending machines and scheme administration is likely to be required for an "on the go" model or an "all in" model. Defining the right cut off between "on the go" and everything else is very difficult. It will be easier to communicate all commonly used household sizes of container, that would be part on an "all in" system. The focus of a DRS is to increase the recycling rate and reduce littering, these objectives are more likely to be met with an "all in" scheme.

A particular area of concern for London authorities is fast food packaging. If this type of product could also be brought within a DRS, the combined effect on litter would be far more dramatic than targeting beverage containers alone.

While a DRS may significantly reduce the amount of certain types of waste that is littered, it is not clear or certain that there will be a similar impact on the costs to local authorities of keeping the streets clean. Busy London thoroughfares attract litter of all kinds, and are likely to still need to be swept frequently, even with a highly effective DRS on beverage containers. Government should not base any policies or funding decisions on the presumption that savings on street cleansing will be achieved until there is evidence to support this.

Summary of approach to Impact Assessment

71 Do you agree with our impact assessment?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

While a DRS may significantly reduce the amount of certain types of waste that is littered, it is not clear or certain that there will be a similar impact on the costs to local authorities of keeping the streets clean. Busy London thoroughfares attract litter of all kinds, and are likely to still need to be swept frequently, even with a highly effective DRS on beverage containers. Government should not base any policies or funding decisions on the presumption that savings on street cleansing will be achieved until there is evidence to support this.

The estimated return rate also needs to be considered alongside a EPR scheme and greater consistency in local authority collections.

72 Do you think more data is needed?

Yes

If yes, please state where:

We would urge the estimated return rate to be reassessed, particularly in relation to anticipated increases in recycling achieved through Consistency. If comparisons with other countries are to be made, it should be only against those countries which offer similar recycling opportunities for the proposed DRS materials. If no direct comparisons can be made further trials should be completed to provide assurance the required capture rate can be achieved to ensure the scheme does not operate at a loss.

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

We would encourage costs to be further scrutinised to allow this to be broken down by areas rather than a single countrywide calculation due to regional differences. Calculations should represent actual costs and include, but not exclusively, collection and delivery costs to reprocessors and avoided cost of residual disposal.

73 Are there other costs and benefits which we have not covered in our impact assessment?

I don't know/ I don't have enough information

If yes, please provide further information:

74 Do you have further comments on our impact assessment?

Please be specific.:

No.

75 The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives?

If so please briefly describe it, making reference to any available evidence:

No.

76 A potential option for introducing a DRS could be to start with the 'on-the-go' model, and then expand/phase roll-out to 'all-in'. Do you think this would be an effective way to introduce a DRS?

No

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

We believe that it will be more cost effective and easier to transition for local authorities and consumers if we move straight to the system that the Government wishes to adopt.

Outcomes of what we are hoping to achieve

77 Do you think a DRS would help us to achieve these outcomes?

Do you think a DRS will help achieve these outcomes? - Reduction in litter and litter disamenity (include expected % decrease where possible):

Yes

Do you think a DRS will help achieve these outcomes? - More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go':

Yes

Do you think a DRS will help achieve these outcomes? - Higher quality recycling:

I don't know/ I don't have enough information

Do you think a DRS will help achieve these outcomes? - Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials:

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

Yes there should be a reduction in litter and litter disamenity although we do not agree with the calculated benefits presented.

There will be more recycling of drinks containers in scope of a DRS as people will have more options to recycling and will directly benefit from taking back their drink containers.

Items recycling through a DRS will be cleaner, but there may be a fall in the quality of the kerbside recycling that is provided by local authorities.

There is the potential that reprocessing capacity could increase, although this would be very long term as there would need to be evidence of long-term security of material supply before investors would be prepared to commit. This could also be very regionally based. In reality the levels of material involved is unlikely to deliver the step change in end markets that is desired given that the comprehensive collections already in place have not had a huge impact on investment in UK processing facilities.

78 Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Yes if it performs as the impact assessment suggests.

79 Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?

No

Other (please state):

Please explain your answer, providing evidence where available. :

80 Do you think an alternative approach would be a better way of achieving the outcomes?

No

Other (please state):

Please explain your answer, providing evidence where available. :

Further detailed questions

81 Are there particular local authority considerations that should be taken into account when considering whether to implement either an “all-in” or “on-the-go” model?

Please provide more information:

No further considerations.

82 Are there specific considerations associated with your local authority that DRS policy makers should consider?

Specific examples and any cost estimates, where applicable, would add value to this response.:

No further considerations.

83 What benefits and/or disadvantages can a DRS provide to your local authority?

Specific examples and any cost estimates, where applicable, would add value to this response:

No further considerations.

84 Are there any specific considerations associated with local authorities that collect waste from designated DRS return points that we should consider?

Specific examples and any cost estimates, where applicable, would add value to this response:

No further considerations.

85 How should a DRS drive better design of packaging? Please select all that apply:

Varying producer feed that reflect the environmental cost of the products that producers are placing on the market, An additional producer fee for producers using unnecessary and/ or difficult to recycle

Other (please specify):

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

It is essential that packaging design is incentivised as part of the DRS scheme to be consistent with the EPR proposals.

86 Who should be involved in informing and advising on the environmental cost of products? Select all that apply

Government, Reprocessers, Producers, Local Authorities, Waste Management companies

Other (please specify):

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

Government should be responsible for gathering and verifying of the data to provide an impartial view, informed by the other listed organisations. Local authorities will be able to assist in determining costs associated with littering, recycling and collecting products.

87 Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?

Agree

Please briefly state the reasons for your response. Where available, please share evidence to support your view.:

88 Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS?

Please specify.:

No.

Further comments

89 Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?

Please specify.:

No.