



Department  
for Environment  
Food & Rural Affairs

## Introducing a deposit return scheme in England, Wales and Northern Ireland

Summary of consultation responses

23<sup>rd</sup> July 2021





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## Executive Summary

### Introduction

In 2019, Defra ran a consultation on introducing a deposit return scheme in England, in conjunction with the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland (Scotland set out their own plans to implement a deposit return scheme). The consultation set out Government's aims of introducing a deposit return scheme, which would be to:

- reduce the amount of littering;
- boost recycling levels for relevant material;
- offer the enhanced possibility to collect high quality materials in greater quantities;
- promote recycling through clear labelling and consumer messaging; and
- incentivise moves to push more material up the waste hierarchy and move towards a more circular economy.

The consultation was met with support for the introduction of a scheme. In response to the 2019 consultation, noting the high level of public and stakeholder interest in introducing a deposit return scheme for drinks containers, Government committed to continuing to develop proposals further and stated that it was minded to implement a scheme from 2023, subject to further evidence and analysis on the costs and benefits of such a scheme.

In 2021, a consultation on the updated proposals was launched, building on the 2019 consultation. The 2021 consultation presented Government's updated policy positions on the deposit return scheme and sought further information on any outstanding areas of design. The findings of this consultation will contribute to the finalising of the deposit return scheme proposals and to lay out the powers required to implement the scheme in the forthcoming Environment Bill.

The consultation opened on 24<sup>th</sup> March 2021 and ran until midnight on 4<sup>th</sup> June 2021. 2,590 responses were received to the consultation. This report summarises those responses. It describes the principle suggestions, concerns and expressions of support given by respondents in their responses, as well as all answers to closed questions.

In parallel to the deposit return scheme consultation, a consultation was run on Defra's proposals for Extended Producer Responsibility for Packaging. On 7<sup>th</sup> May 2021, Defra also opened a consultation on Consistency in Household and Business Recycling in England, which ran until 4<sup>th</sup> July 2021.

### A deposit scheme in a post-Covid context

Over eight in ten respondents support Defra's proposals to implement a deposit return scheme for drinks containers by 2024 in the context of the Covid-19 pandemic. Many respondents state that a deposit return scheme would help increase recycling rates and reduce the amount of litter left outdoor spaces. Similarly some respondents argue a scheme would help reduce the amount of waste and have a positive impact on the economy.

One in ten oppose Defra's proposals. Some respondents say increases in home recycling rates as a result Covid-19 could undermine the proposed scheme's effectiveness and



others highlight the additional responsibilities a scheme would place on businesses already stretched from dealing with the impacts of the pandemic. The remainder of respondents are neutral or not sure.

Two-thirds of respondents say their views on the implementation of a deposit return scheme have not changed following the economic and social impacts of the Covid-19 pandemic.

A quarter of respondents say that their views have changed because of both social and economic impacts. Just under one in twenty say their views have changed because of either social or economic impacts. Some respondents express concerns about the economic impact of the scheme, such as the costs of implementation and/or the ability of businesses to absorb implementation costs. Some respondents state that Covid-19 has demonstrated that existing kerbside collection of recyclable materials is adequate. Some respondents say that Covid-19 has made them more supportive of the implementation of a deposit return scheme, for instance the pandemic has led to an increase in outdoor littering.

Over eight in ten respondents say they do not believe that the introduction of a deposit return scheme will have a detrimental impact on their everyday life. Among those who say the scheme will have an impact, over a third say it would be large but still manageable, a third say it will have no significant impact and just under a third that it would have some impact but would be manageable. A small number say the impact would be large and impossible to comply with.

### **Scope of the deposit return scheme**

Nine in ten respondents consider an all-in one scheme to be the best option for the deposit return scheme. Many say they support Defra's assessment that an all-in scheme is the most viable option for implementation. Many respondents argue that it would maximise the likelihood of return rates, be easier for consumers to understand, will ensure that manufacturers do not alter existing product sizes to escape the requirements of the scheme and provides a financial critical mass.

Respondents who express support for an on-the-go deposit return scheme argue that it would be a better option for addressing littering.

Over three-quarters of respondents say they do not believe that an on-the-go scheme would be less disruptive to consumers in the context of the impact Covid-19.

Nine in ten respondents say they foresee issues if the final scope of a deposit return scheme in England and Northern Ireland does not match the all-in decision taken in Wales. Many respondents argue this would lead to a lack of clarity, inconsistency and confusion among consumers and would deter individuals from participating. Some respondents also express concerns about increased administrative costs, more littering and the potential of greater fraud.

Almost nine in ten of respondents disagree with Defra's proposed definition of an on-the-go scheme (restricting the drinks containers in-scope to less than 750ml in size and excluding multipack containers). Many respondents express concern that manufacturers may increase product sizes or attach two products together and argue against excluding



multipacks from any on-the-go scheme. Some respondents feel there may be an increase in littering as a result of the proposed definition.

In response to what should be included as part of the deposit item, most respondents agree that plastic bottle caps on plastic bottles should be and similar numbers think the same about aluminium bottle caps on glass bottles. The third most popular option is foil on the top of a can/bottle. Some respondents suggest that containers should be accepted as part of the deposit return scheme with or without a cap, as any requirement that the cap must be included could lead to lower participation in the scheme.

## Materials

Over eight in ten respondents agree that the scope of a deposit return scheme should be based on container material rather than product.

Seven in ten agree with the proposed list of materials to be included in scope. Some respondents say that glass should be excluded because current methods of kerbside collection are effective and including glass in food service environments could be hazardous. Some argue that all plastics should be incorporated into the scheme, whilst others suggest specific types of plastic which should be included.

Three-quarters of respondents think there will be material switching as a result of the proposed scope. In terms of specific materials, respondents suggest that producers may switch from PET to HDPE plastic. Some respondents raise concerns about producers switching to bioplastics because they are not compatible with organic or dry recycling and can cause contamination problems in waste streams.

Some respondents suggest avoiding material switching through Government legislation, regular reviews of which materials are in scope, and using a digital deposit return scheme to increase the scope of packaging materials in a cost-effective way.

Many respondents express concerns on health and safety grounds about the possibility of broken glass around reverse vending machines and the handling of glass more broadly. Many respondents say that compaction would limit the amount of glass available for remelt and that it is a less circular option.

## Targets

Respondents are split on which approach should be taken to phase in a 90% collection target over 3 years. The two most popular of the four options given are i) 80% in year 1, 85% in year 2 and 90% in year 3 and thereafter, and ii) 70% in year 1, 80% in year 2 and 90% in year 3 and thereafter. About two-fifths of respondents favour the first of these options and just over a third the second.

Eight in ten respondents think a collection rate of 90% should be achieved as a minimum for all materials after 3 years, making it far more popular than the other two options suggested (80% and 85%).

Three-fifths of respondents think it would not be reasonable to assume that the same collection targets could be met with an on-the-go scheme as an all-in scheme for in-scope materials. Respondents highlight differences in scope and more general concerns about an on-the-go scheme having lower collection rates.



Two-thirds of respondents say that both the producer/importer and retailer should report on volumes of deposit return scheme material placed on the market. They argue that this would make reporting more accurate and more transparent.

Just under three in ten think reporting should be the responsibility of the producer. Some argue producers have greater capacity to carry out such reporting, particularly compared to smaller retailers. Others state that producers, rather than retailers, should take responsibility for products they have placed on the market.

One in twenty think reporting should be the responsibility of the retailer. Some argue that retailers rather than producers are better placed to provide more accurate data.

Many respondents express concerns about the cost and time burden reporting may place on retailers or producers.

### **Scheme governance**

Opinion is split on what length of contract would be most appropriate for the successful bidder to operate as the Deposit Management Organisation. Three in ten say it should be 3-5 years, around a quarter 5-7 years or 7-10 years, while two in ten think it should be over 10 years.

Almost all respondents think that the issues specified in the consultation document should be covered by the tender process.

Many respondents make suggestions about the tender process, such as the need for applicants to provide evidence on how they will liaise with key stakeholder and the possibility of applications being made public. Many respondents argue that the successful bidder should command support from producers and retailers and demonstrate appropriate experience.

Many respondents say that the tender process should provide clarification of the role of local authorities. Respondents also argue that local authorities should have representation in the Deposit Management Organisation and that if they do not the tender process should require liaison with local authorities and include a formalised dispute resolutions process.

Almost all respondents think that the issues specified in the consultation document should be monitored as Key Performance Indicators. Some respondents suggest that the Deposit Management Organisation's contract be reviewed as part of the monitoring process.

Three-quarters of respondents agree that Government should design, develop and own the digital infrastructure required to register and receive evidence on containers placed on the market on behalf of the Deposit Management Organisation and regulators.

Some respondents express support for Government oversight but suggest that there should be independent auditing of the digital infrastructure. Some respondents question Government's ability to design, develop and own this infrastructure, with some arguing that the performance of the private sector has been better in this area. Many respondents say they would support a digital infrastructure which would ensure continuity across the geographical regions of the UK.



## **Financial flows**

### ***Producer registration fees***

Respondents are most likely to think that drinks containers placed on the market would be an appropriate measure of small producers for the purposes of determining the payment of registration fees. This is more than four times as popular as taxable turnover, the other proposed option.

Some respondents suggest alternative measures, including deducting fees from accounting procedures, basing it on environmental impact, or excluding small businesses altogether.

### ***Unredeemed deposits***

Three-fifths of respondents agree that a high level of unredeemed deposits funding the scheme is problematic. Some respondents express concern that this would mean that fewer people may wish to engage with the scheme or producers may not get full return on money put into the scheme. Some respondents say that unreturned deposits are not problematic or argue that there would not be high levels of unreturned deposits.

Just over half of respondents prefer option 1 (allowing unredeemed deposits to part-fund the scheme) to option 2 (unredeemed deposits part fund the scheme but there is a minimum producer fee per annum and excess funds are asked about during tender).

Some respondents raise concerns that option 2 would not align with the proposed Scottish deposit return scheme, arguing this will increase costs, add complexity, or inhibit the ability of the Deposit Management Organisation to work with the administrator of the Scottish scheme. Other respondents believe option 2 may adversely affect smaller producers.

Many respondents say that the unintended consequences of option 1 would be greater than those of option 2 or that they do not foresee any unintended consequences for option 2. Some respondents express support for option 2 because it would provide consistency in producer costs and would drive producer efficiency.

Opinion is split on the minimum percentage of the net costs of the scheme that must be met through the producer fee. If such a floor is set, just under a quarter of respondents favour 25%, one in ten a 33% and just over a third a 50%.

Just under a third select 'other' in response to this question, with some of these respondents putting forward an alternative percentage (not necessarily higher or lower than the proposed range). Others suggest a flat fee similar to that proposed for Scotland, a variable producer fee or the use of glass industry fees to calculate the level of producer fees. Many say that it is difficult to specify a percentage without further information, or argue that the level should be determined by the Deposit Management Organisation.

Almost two-thirds of respondents say that any excess funds should be reinvested in the scheme, while the other third favour these funds being spent on other environmental causes.

### ***The deposit level***

Three-fifths of respondents think the minimum deposit level set in legislation should be 20p and a fifth say it should be 10p. Just under one in five make other suggestions, with a few





variously offering support for a level set at less than 10p, 10p, 15p, 20p, more than 20p, 50p or £1. Some argue that it is important that the level is the same across the UK.

Just over half of respondents disagree that there should be a maximum deposit level set in legislation.

Among respondents who think there should be a maximum level set, one in six support 30p and almost a quarter 50p. Over half select 'other' in response to this question, with proposing a variable deposit level, with suggestions that this is based on inflation, the material used, the number of containers in a pack, the size of the container or the value of the product.

Many respondents express a general concern that if the deposit is too high, this could disadvantage certain groups, particularly those from low income households.

Just over half of respondents agree with the approach to letting the Deposit Management Organisation decide on whether to adopt a fixed or variable deposit level, particularly with regard to multipacks. Some respondents say there should be independent assessment to help determine the level of deposit set. Some respondents feel that it is important for the views of local authorities to be represented, either through membership of the Deposit Management Organisation or through the consultation process for key stakeholders.

In response to the consultation question on how to minimise the impact of the scheme on consumers buying multipacks, respondents express a range of views. Many respondents support the proposal for a variable deposit rate where, for example, the charge could be proportionate to the volume purchased. Others suggest that the same deposit level should apply for single items and multipacks. Many respondents say that it should not be necessary to minimise the impact of the deposit return scheme for consumers buying multipacks.

## **Return points**

### ***Retailer obligations***

Over three-quarters of respondents agree that all retailers selling in-scope drinks containers should be obliged to host a return point, whether it is an all-in or on-the-go deposit return scheme. Respondents argue that consumers should be able to take any used in-scope containers to any retailer or that if a retailer can sell an in-scope item they should be able to accommodate its return.

Some respondents suggest digital kerbside collections as an alternative to a comprehensive network of return points or that small retailers near one another should be able to share a return point.

Almost seven in ten respondents think that consumers would not be likely to experience delays/inconveniences in returning drinks contained given the proposed extensive distribution and availability of return points. Many respondents make specific suggestions to ensure there are no delays, including having enough reliable reverse vending machines, placing these in busy, accessible areas and ensuring return points are easy to use. Some respondents express concerns about possible delays at peak shopping times, holidays and special events, or if consumers opt to make infrequent trips with large



numbers of items, or if return points are not effectively managed.

### **Online purchases of in-scope drinks containers**

Respondents were asked which option they favour with regards to online takeback obligations for retailers:

- Six in ten support option 1 (obligate all retailers selling in-scope containers online to offer a takeback service). Respondents argue this would ensure that online retailers have the same responsibilities as high street retailers, would make it easier for consumers, would be important for accessibility and would reduce litter and waste, including single-use plastics. However, some respondents believe that it would be difficult for small retailers to facilitate an online takeback scheme.
- Three in ten support option 2 (use a de minimis based approach to obligate qualifying retailers selling in-scope containers to offer a takeback service). Many respondents believe that some should be exempt from the takeback service, particularly small businesses and this approach would restrict retailer obligations to sales.
- Just under one in ten support option 3 (no obligation placed on retailers selling in-scope containers to offer a takeback service). Respondents argue that online retailers should not have to collect items due to the additional cost, complexity and carbon emissions of the extra journeys.

### **Handling fee**

Over-four-fifths of respondents agree with the criteria proposed in the consultation document for the calculation of the handling fee.

Some respondents propose that the handling fee should be determined by the Deposit Management Organisation.

Many respondents commenting on this question express concern that a handling fee would have an adverse impact on small businesses.

### **Exemptions to hosting a return point**

Respondents are almost twice as likely to select breach of safety than close proximity as exemptions which should be included under the scheme. Some respondents oppose close proximity exemptions on the grounds of inconvenience, queues, consumers becoming disengaged and unfair competition between supermarkets and local shops.

Some respondents say there should be no exemptions from return points. Conversely some respondents suggest that the size/capacity of retailers should provide grounds for exemption because the deposit return scheme places a disproportionate burden on small retailers.

In terms of suggestions on exemptions, some respondents say they should be aligned with the Scottish Deposit return scheme as this would lead to consistency across the UK, others say there should be a robust set of criteria or that retailers exempt from hosting a return point should be regularly reviewed and monitored.

Almost two-thirds of respondents disagree with Defra's rationale for not requiring retailers exempted on the basis of a breach of safety to signpost to another retailer. Many



respondents say that there should be a requirement for retailers to signpost return points or that they oppose the rationale given.

Some respondents state that retailers should not have to advertise potential competitors if they are unable to host a return point due to safety considerations. Some respondents suggest that retailers which do not host a return point could direct consumers to locations that do using signage which does not advertise or specifically identify a competitor.

Almost two-fifths of respondents think that exemptions should be granted for a period of three years until a review is required, a third favour a year and one in twelve five years or longer.

### **Using technology in a deposit return scheme**

Nine in ten respondents think the scheme could benefit from technological solutions being incorporated as a method of return, alongside reverse vending machines and manual return points.

Many respondents express support for the implementation of a digital deposit return scheme, arguing that it would be simpler to use, more cost effective and that it is sensible to make this type of provision in an increasingly digital society.

Some respondents oppose the implementation of a digital deposit return scheme because it would affect the successful functioning of the current kerbside collection system and could be confusing or difficult to use for some people.

Some respondents say that a digital deposit return scheme could put pressure on local authorities in terms of financial and administrative burdens and shift responsibility away from producers and retailers and onto local authorities as they manage kerbside collections.

Many respondents provide varied suggestions about how a digital deposit return scheme could be integrated with other existing waste collection infrastructure. They suggest the use of barcodes or QR codes so containers can be identified during kerbside collection or the use of tracking technology such as blockchain.

Many respondents propose as potential fraud control measures for a digital deposit return scheme that containers should have a unique barcode or QR code so they can only be redeemed once. Many respondents express concern that scanning containers as a measure to control fraud has the potential to lead to scan misuse, with some stating that systems would need to check containers are put in the correct bins and/or not littered.

Some respondents make general suggestions of fraud control measures, for instance tracking technology, having a cashless scheme, auditing returns, and having a standard deposit price to prevent cross-border fraud. Some respondents suggest that the deposit could be redeemed by an application or online account.

Just over half of respondents think that a digital deposit return scheme could ensure the same level of material quality in the returns compared to a traditional return to retail model. Some of these respondents point to familiarity with kerbside collections requiring dry/clean recyclables. Some respondents believe that a digital deposit return scheme would increase the quality of material returns, for instance because of greater public engagement and less material getting broken during sorting.



Conversely many respondents believe that the digital deposit return scheme would result in worse quality material returns, highlighting contamination issues and arguing that consumers may return low quality items because of a lack of monitoring.

Many respondents say that costs would be lower if the digital deposit return scheme could be integrated into existing waste collection infrastructure, with some arguing that less staff time would be required. However some respondents think that a digital deposit return scheme would not be cheaper and may even be more expensive.

### ***Planning permission for hosting a reverse vending machine***

Almost nine-tenths of respondents support the proposal to introduce a new permitted development right for reverse vending machines. Many respondents answering this question say their support is conditional on strict criteria being applied, such as specified designs for the installation of reverse vending machines, where they will be located and their size.

Many respondents express concerns about the environmental impacts of using reverse vending machines, and argue that factors such as light, noise and air pollution need to be taken into account. Some of these respondents suggest expanding the types of area which can be excluded.

Some respondents state that planning permission should be required for reverse vending machines to check if proposed sites are suitable and to give local communities the opportunity to raise concerns.

### **Labelling**

Almost all respondents agree with Defra's proposals to introduce mandatory labelling. Nine in ten respondents disagree that leaving any labelling requirements to industry would be a better option than legislating for mandatory labelling requirements. Many respondents express concern that if businesses have different labelling systems it will lead to inconsistency or create confusion and some respondents argue that industry should not be trusted with responsibility for labelling requirements.

Many respondents say that they are not aware of any further measures to reduce fraud. Some respondents suggest the use of a unique identifier such as barcode or digital solutions, for instance blockchain technology or digital personal payment systems.

Just over half of respondents think there is a significant risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland. Some respondents suggest that labelling should be consistent across the four nations, while others say that labelling that is clear and easy to understand may mitigate the risks.

Regarding solutions for smaller producers who may not currently label their products, many respondents propose providing them with stickers to attach to their products. Some respondents argue that all producers, regardless of size, should be required to label their products.

Three-quarters of respondents agree that 18 months is a sufficient period of time for the necessary labelling changes to be made. Some of those who disagree argue that 18 months is not long enough for producers to make the necessary changes, while others believe that 18 months is too long.



One in five respondents say their processes will change as a result of mandatory labelling, mentioning in particular the need for additional technology. Almost two in five say their processes will not change, and the remainder that they do not know.

Two-fifths of respondents agree that Defra's proposed approach to labelling will be able to accommodate any future changes and innovation, one in twenty disagree and the remainder say they do not know. While many respondents comment that they are unsure or do not know of any upcoming technologies, others highlight the potential of digital printing, digital watermarking technology, blockchain technology, radio-frequency identification devices (RFID) and smart devices.

### **Local authorities and local councils**

Defra has identified three options to deal with these deposit return scheme containers in local authority waste streams. Of these, option 2 is the most popular option among respondents.

- i) Option 1: Do nothing. Local authorities redeem deposits of deposit return scheme containers in collection streams.

A quarter of respondents think that option 1 best deals with the issue. Respondents argue in favour of this option on the grounds that it is the simplest solution, it aligns with other schemes and aligns best with the deposit return scheme which is to be implemented in Scotland. Some respondents oppose option 1 as they feel it means local authorities will have to pay to deal with materials in the scope of the scheme. Respondents also highlight the challenges of sorting deposit return scheme materials from other materials either kerbside or at material recovery facilities.

In relation to option 1, just over half of respondents agree that local authorities will be able to separate deposit return scheme containers either themselves or via agreements with material recovery facilities to regain the deposit value. Respondents disagreeing say that the practice of mixing collected materials would make it difficult to accurately identify materials and that containers collected kerbside may be too damaged to correctly identify. Many respondents express concern about the cost and administrative burden of this to local authorities and some highlight the impact this could have on the viability of contracts which local authorities hold with Materials Recycling Facilities.

Three-fifths of respondents agree that local authorities will be able to negotiate agreements with material recovery facilities to ensure gate fees reflect the increased deposit values in waste streams or a profit-sharing agreement on returned deposit return scheme containers was put in place. Some respondents raise concerns about the cost to local authorities of negotiating gate fees as they may incur additional cost or the impact on existing contracts with Materials Recycling Facilities.

- ii) Option 2: The Deposit Management Organisation makes payments for deposit return scheme containers appearing in all local authority waste streams (preferred option)

Almost two-thirds favour option 2. Respondents support this option on the grounds that it guarantees appropriate financial flows to cover local authority expenses related to the scheme, it would ensure the robustness and fairness of the scheme, it ensures the



responsibility for implementing the scheme would fall upon a specific actor, (e.g. the Deposit Management Organisation or local authorities) and it aligns with other schemes. Some respondents prefer option 2 because they feel it is the simplest solution. Most of the respondents expressing concern about the complex which the scheme could have on waste streams managed by local authorities select option 2 as their preferred option.

In relation to this option, the consultation document asked where to collect data regarding the compositional analysis to prevent containers being allowed to be redeemed via return points and thereby minimising the risk of double payments from the Deposit Management Organisation to local authorities.

Many respondents say that the data for compositional analysis should be collected at the materials recovery facility because it is the first sorting point and they have the expertise, as well as the space and resources. However, some feel the data should be collected from the first point of entry into the system, including kerbside where this is the relevant entry point.

Some respondents say that the data should be collected by local authorities as they would be unlikely to abuse the system, or already have the capacity to collect and transport kerbside waste. Other respondents suggest that data should be collected by the Deposit Management Organisation because they are responsible for eliminating fraud and would have access to data from the materials recovery facility and reverse vending machines.

- iii) Option 3 Hybrid option. The Deposit Management Organisation pays a deposit value on containers that are returned and any additional deposit return scheme material in local authority waste streams is covered by a funding formula

Only one in eight favour option 3. Respondents argue it would ensure the robustness and fairness of the scheme or that it would not be more difficult than the other options proposed.

In relation to this option, the consultation asked how difficult it would be to administer, given the need to have robust compositional analysis in place. Many respondents commenting on the difficulty of implementation say that it would be difficult to secure accurate data for a compositional analysis, that the technology required would be complex and could go wrong, that a hybrid option would be difficult to manage and there would be risk of misreporting. This misreporting may result in local authorities benefiting unfairly from payments. Some say that the costs associated with option 3 are too high and there is not enough evidence of risk of double payment to take this option forward.

## **Compliance monitoring and enforcement**

### ***Regulation of producer obligations***

Many respondents say that there are not any other producer obligations which the Environmental Regulators should be responsible for monitoring and enforcing.

Among those who propose additional obligations, some suggest monitoring the sale, disposal, and recycling of end materials to improve levels of closed loop applications or providing information to consumers or businesses about the deposit return scheme and



deposit levels.

### **Regulation of retailer obligations**

Nine in ten respondents agree that local authorities (through the role Trading Standards and the Primary Authority Scheme) are best placed to enforce certain retailer obligations, with some saying this would be added to existing duties carried out with retailers. Many respondents raise concerns about the cost implications for local authorities and question whether they would have the funds or staff required.

### **Breaches**

Many respondents say that they are not aware of any further potential breaches of regulation which should be added to the list in the consultation document.

Additional breaches which are identified by respondents include improper sale of material; incorrect labelling of in-scope containers; fraud (across all four nations of the UK); failure to meet key performance indicators; failure by the Deposit Management Organisation to accurately calculate the handling fees of return points; failure by the Deposit Management Organisation to undertake due diligence in relation to the waste collector and its treatment of packaging waste; provision of inaccurate data to the Deposit Management Organisation; failure to meet mandatory reporting requirements in relation to breaches or non-compliance; and failure by a retailer to direct customers to the closest available return point.

Many respondents say that there are no further vulnerabilities in the system to identify. Some respondents suggest areas of concern which include: the potential for fraud; hotels, restaurants, and cafes, and how they would be able to engage with a deposit return scheme; a lack of consistency across the four nations of the UK; the ability of regulators, the Deposit Management Organisation and Government to enforce proposed measures; the potential for fly-tipping or littering if return sites are not well managed; the security of reverse vending machines; provision of inaccurate data; and the complexity of the scheme.

Many respondents agree that the Deposit Management Organisation has a role to play in seeking compliance before escalating any issues with the regulator. Some argue it should have this role to encourage compliance by encouraging remedial action before escalating to the regulator or that it is best placed to understand the issues and communicate with relevant stakeholders and can alleviate the administrative burden on the regulator by addressing less significant issues.

Some respondents generally disagree that the Deposit Management Organisation should have a role in seeking compliance before escalating with the regulator, with some arguing it would make the system too complicated, or add undesired layers of bureaucracy.

### **Enforcement response options**

Four-fifths of respondents agree with the position set out in the consultation document regarding enforcement response options.

Some respondents support a tiered approach and for resolutions of increasing significance before time-consuming legal approaches. Some respondents feel that there



is not enough detail about tackling organised crime.

### **Implementation timeline**

Many respondents express support for a speedy implementation of the scheme, arguing that it is needed as soon as possible. Some respondents say that the proposed delivery timeline is too long, and a quicker rollout of the scheme is required.

Conversely, some respondents argue that the timeline for the implementation of the scheme needs to be extended or propose later start dates, saying that it is unrealistic or too fast. Some respondents express concern about introducing a scheme before 2024 because they would prefer that an Extended Producer Responsibility scheme is reviewed first, or that any impacts of Covid-19 are reviewed before a deposit return scheme is implemented.

Some respondents express general support for the proposed implementation timeline for the deposit return scheme, for instance commenting that the timeline is reasonable or achievable.

Some respondents suggest that the implementation of the scheme should be aligned with Scotland and other UK nations, arguing that an aligned scheme across devolved administrations will reduce the risks of cross-border fraud, confusion and would be less expensive.

Just over half of respondents say the Deposit Management Organisation needs 12 months from appointment to the scheme going live. Less than one in 50 choose a timeframe of 14 months, one in seven say 18 months and just over a quarter select 'other.' These respondents suggest timescales ranging from a few months to more than two years, with many of these respondents saying they would support a 24-month timescale and others a timescale of between 18 months and 24 months. Many simply argue that the sooner the scheme can be taken live the better.

Many respondents think that an on-the-go deposit return scheme would be quicker or easier to implement than an all-in scheme. Some of these respondents refer to potential difficulties with developing appropriate scheme infrastructure. Conversely, a few respondents think that an all-in deposit return scheme would be quicker and easier to implement, saying for instance that the multipack aspect of an on-the-go scheme would take longer. Some respondents believe the final decision to implement an on-the-go or an all-in deposit return scheme would not have a significant impact on implementation timescales.

### **Summary of approach to Impact Assessment**

Just over half of respondents say they disagree with the analysis presented in Defra's Impact Assessment.

Many respondents question the accuracy of calculations or scope of the analysis. For instance respondents query the anticipated costs to business, the adequacy of the underlying principles used in the risk assessment, the accuracy of calculations of the potential benefits of the scheme, how the cost projections have been calculated, the proposed disamenity value for litter or the inclusion of glass recycling within the scheme.

Many respondents also express concern about the lack of information provided, with





some saying the assessment of cost implications for small businesses is incomplete or that the assessment should consider the implications on existing schemes, such as kerbside recycling, or the potential impact of digital scheme solutions.

### **Extended Producer Responsibility scheme and Consistency in Household and Business Recycling**

In parallel to the deposit return scheme consultation, a consultation was run on Defra's proposals for Extended Producer Responsibility for Packaging. On 7th May 2021, Defra also opened a consultation on Consistency in Household and Business Recycling in England, which ran until 4th July 2021.

In the deposit return scheme consultation, some respondents state there should be alignment and consistency with the Extended Producer Responsibility scheme and Consistency in Recycling policies during the implementation of the deposit return scheme. Some respondents suggest that start dates should be co-ordinated, tender processes aligned and that responsibility for reporting on volumes of in-scope materials placed on the market should align with the Extended Producer Responsibility scheme.

Some respondents suggest that Extended Producer Responsibility scheme and/or Consistency in Recycling policies should be developed and implemented before any deposit return scheme to ensure consistency and make sure the scheme complements existing recycling schemes.




# 1. How to read this report

## 1.1. Narrative

This report summarises all the comments made in consultation responses. These are summarised by question. Within each question summary, comments summaries are grouped into categories indicating the sentiment of the comments. For most questions, these categories are **expressions of support**, **concerns** and **suggestions**.

In order to indicate the weight of sentiment behind each summarised comment, relative to the other comments made in response to that question, the following quantifiers have been used. These have been used on a per-question basis and are not directly comparable between questions:

- many
  - some
  - a few
- 

Many of the responses received used very similar text in some parts of their answers, suggesting that the response text had been coordinated between multiple respondents. This co-ordinated text constituted a significant proportion of the responses, and therefore of this report. In addition, the Campaign to Protect Rural England coordinated a response to the consultation. Suggested text, which respondents could incorporate into their responses, along with a link to the consultation response form, was placed on their website. Because respondents chose which parts of the suggested text to include in their responses, and because respondents also frequently added their own text or amended the campaign text, the responses prompted by this campaign were not identical, but had sections of overlapping text and raised similar issues. Where this text is reported on in this report, it is referred to as a 'campaign template response'.

The number of respondents who answered each question is given at the beginning of the question summary. For the closed question graphs, the figure caption includes the base number indicated as  $n = [\text{number}]$ . For single select questions, the base is the number of respondents who answered the question. For multi-select questions, the base is the number who selected one or more of the available options.

This document summarises the responses submitted to the consultation. Traverse have read and analysed all comments, and this report encompasses all of these comments, with the only exception being those which were wholly unrelated to the consultation and the broader topic area. As such, comments which do not answer the question being asked but which do address the broader area of packaging, waste and recycling have been included for the sake of transparency. It is important to note that Traverse have not attempted to judge the factual accuracy of statements made by respondents, and what is written by respondents, and therefore summarised in this report, should be taken as opinion, not necessarily fact.

For full context to the information presented in the report, including information discussed in the responses, please refer to the full consultation document, available on the Defra website.



## 1.2. Coding tables

As stated in the Methodology, Traverse's analysis process involves reading every word in every response and assigning 'codes' to sections of responses to capture their meaning. In each question of this report a code table has been included, showing the five codes which were used the most when capturing the meaning of the answers to the question. The 'All respondents' column shows the percentage of consultation respondents that had the code applied to their answer to the question. The following five columns show the percentage of respondents from each stakeholder group which had the code applied to their answer to the question. This is used to illustrate which groups raised each suggestion, concern or positive comment the most. Stakeholder classification was based on the answer given to the consultation question 'Which best describes you?'. Stakeholders were then grouped into five groups as specified by Defra:

Stakeholder Group 1 (1915 respondents)	Stakeholder Group 2 (239 respondents)	Stakeholder Group 3 (57 respondents)	Stakeholder Group 4 (63 respondents)	Stakeholder Group 5 (37 respondents)	
Charity or social enterprise	Local Government	Packaging designer/ manufacturer/ converter	Product designer/ manufacturer/ pack filler	Exporter	
Community group		Distributor	Retailer (including Online Marketplaces)	Operator / reprocessor	
Non-Governmental Organisation					Waste management company
Consultancy					
Academic or research					
Individual					

Any respondents whose answer to this question was not one of the stakeholder groups named above has not been included in one of the stakeholder columns, but has been included in the 'all respondents' column.

**It is important to note that all responses were read, reported on and treated equally in the narrative and the graphs.** Analysts were not able to see who each response had come from when analysing it, in order to eliminate any possible bias. It is also important to note that the percentages shown in the table are of the number of respondents in each stakeholder category. If there is only a small number of stakeholders in a category, then the percentage shown may be high even if only a small number had the code applied to their answer. Further, it is important to note that the coding per question cannot reflect what was written by respondents in response to other questions. For example, a respondent who is concerned about carbon emissions may raise this concern in many, but not all, questions, and their concern will only be shown in the questions in which they raised it.



## 2. Methodology

For the consultation data processing, coding and reporting, Defra commissioned Traverse, an independent employee-owned organisation specialising in public consultation and engagement, with a focus on positive social impact and democratic decision making (<https://traverse.ltd/>).

### 2.1. Responses and response channels

Responses could be submitted to the consultation via three channels:

- Defra created an online form, hosted by Citizen Space, to which respondents could submit responses. A link to the online form was provided on the consultation page on Defra's website.
- Defra also provided an email address, [drs@defra.gov.uk](mailto:drs@defra.gov.uk), to which respondents could submit responses via email.
- Defra also provided an address for any postal responses. However, no postal responses were received.

All responses imported from Citizen Space into Traverse's database, Magpie, passed immediately to the coding stage of Traverse's work. Emails and their attachments were processed into the Magpie database such that email answers to questions could be analysed alongside answers from the online form, creating consistency of analysis. Email data processing went through a quality assurance process, with the lead data processor checking the work of individuals to ensure all text was accurately entered before coding began. Any responses to Defra's Extended Producer Responsibility consultation which were marked for the deposit return scheme consultation were moved to the appropriate database so that all relevant answers were reviewed together.

### 2.2. Coding

Coding was managed by a dedicated lead. Thematic coding was used to capture all the comments made in all consultation responses. Coding involved reading every answer given to a consultation question and assigning codes to sections of text. Codes are designed to capture the meaning of the text, where all text assigned to the same code has approximately the same meaning. Codes continued to be added until all text was covered.

The codes formed part of a coding framework – a means of structuring all the codes used. Each consultation question was given a theme in the coding framework, within which sub-themes captured the sentiment of the coded text, which was primarily divided into **reasons given for support**, **expressions of concern** and **suggestions**. Within each sub-theme was a set of codes which captured the details of the text. The coding framework began with the lead coder reading a sample of responses and creating the initial sub-themes and codes. The coding framework then evolved, with new issues being given new codes. For a consultation of this size, a large team of coders was required, who were brought on board gradually in order to maintain quality control. The lead coder briefed each individual and managed the team.

To ensure quality and consistency of coding, the lead reviewed an early sample of each



individual coder's work. Findings of this review were logged and discussed with the individual. If the coding was confirmed to be of high quality, there was an ongoing check of a smaller portion of the individual's work throughout the consultation. If the coding was not of sufficient quality, the lead coder corrected the work and reviewed a much higher proportion of the work until the quality had improved. By managing both the coding team, including team meetings and discussions regarding the coding, as well as the coding framework, the lead ensured quality and consistency of the coding throughout the consultation. Traverse's Magpie database has a series of checks in place which ensures that all words are processed, coded and reported on.

### 2.3. Reporting

This report was developed in two stages:

- The ideas captured within each code were summarised, so that there was a set of summaries for each question. These summaries were based on the coded data – a table of all text captured by each code, so that they were true to the original responses.
- Once this was complete, for each question, its set of summaries was edited together to form a coherent narrative describing the main points made by respondents. Themes in the coding framework are reflected using sub-sections in the report. Within each sub-section, thematically similar points are grouped together, to make for a readable narrative. Any points in the narrative which appeared unclear were re-checked against the original data in the responses.

The report then went through a quality assurance process, where it was read through and thoroughly checked for quality and consistency, with updates and changes made where necessary.



### 3. Participation

The consultation received 2,590 responses. The following shows the breakdown of how those responses were sent and how many were from each stakeholder group (respondents self-identified their stakeholder category).

#### 3.1. Number of responses received by channel

	Number of responses	Percentage
Citizen Space	2270	87.6%
Email	320	12.4%

#### 3.2. Number of responses received by stakeholder type

Stakeholder Type	Number of responses	Percent
Academic or researcher	40	1.5%
Business representative organisation or trade body	72	2.8%
Charity or social enterprise	25	1.0%
Community group	84	3.2%
Consultancy	28	1.1%
Distributor	16	0.6%
Individual	1721	66.4%
Local government	239	9.2%
Non-governmental organisation	17	0.7%
Operator/ Reprocessor	23	0.9%
Other	149	5.8%
Packaging designer/ manufacturer/ converter	41	1.6%
Product designer/ manufacturer/ pack filler	29	1.1%
Retailer including online marketplace	34	1.3%
Waste management company	14	0.5%
Not Answered / blank	58	2.2%



## 4. A deposit return scheme in a post-Covid context

### 4.1. Question 6

4.1.1. **Given the context of the Covid-19 pandemic we are currently experiencing, do you support or oppose our proposals to implement a deposit return scheme for drinks containers by 2024?**

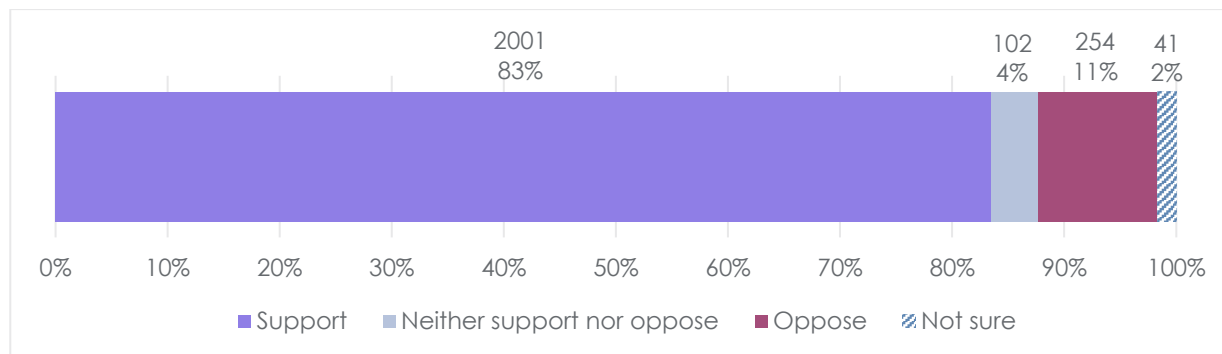


Figure 1: Question 6 (n=2398)

4.1.2. **Please elaborate on your answer if you wish.**

This question was answered by 1910 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
0 Introduction   6a: Given Covid support or oppose proposals   Concern   timeline (sooner rollout)	46%	58%	5%	0%	5%	0%
0 Introduction   6a: Given Covid support or oppose proposals   Support   recycling - DRS will improve	22%	26%	8%	11%	13%	8%
0 Introduction   6a: Given Covid support or oppose proposals   Support   littering (reduces)	22%	27%	3%	0%	6%	0%
0 Introduction   6a: Given Covid support or oppose proposals   Support   employment	18%	23%	1%	0%	2%	0%
0 Introduction   6a: Given Covid support or oppose proposals   Support   other and general support	13%	14%	10%	4%	16%	11%



## Support

Many respondents, including a number who based their responses on a campaign template response, express general support for the introduction of a deposit return scheme.

Many respondents, including a number who based their responses on a campaign template response, say that a deposit return scheme would help increase recycling rates and/or public confidence in recycling. Furthermore, many respondents, including a number who based their responses on a campaign template response, say that a deposit return scheme would reduce the amount of litter people leave in outdoor spaces. Some also think that the introduction of a deposit return scheme would help reduce the amount of waste, saying for example that the scheme would contribute to a reduction in the use of single-use plastic.

Some respondents, including a number who based their responses on a campaign template response, believe that the implementation of the deposit return scheme would have a positive impact on the economy, saying for example that the scheme would help a sustainable economic recovery. In addition, some respondents, again including a number who based their responses on a campaign template response, think that the introduction of a deposit return scheme would create additional employment, including green jobs and jobs in areas with high unemployment rates at present.

*“A deposit return scheme will also create new local green jobs so would be a positive strand of a green economic recovery, of building back better.”*

*User ID 116620, Individual*

A few respondents say they support a deposit return scheme because it would reduce pollution and/or carbon emissions.

## Concerns

Some respondents express general concern about the introduction of a deposit return scheme. Comments include that it would be costly, complicated or inconvenient to consumers.

Many respondents, including a number who based their responses on a campaign template response, believe that the revised proposed date of 2024 for the introduction of the deposit return scheme would be too late, saying that an earlier introduction would be essential to be able to address waste and environmental issues.

However, some respondents express concern about introducing a deposit return scheme before 2024. They would prefer that an Extended Producer Responsibility scheme is reviewed first, or that any impacts of Covid-19 (on the behaviours and financial position of consumers, for example) are reviewed before a deposit return scheme is implemented. Meanwhile, a few respondents say they are unsure about the best timeline for rolling out the deposit return scheme.





*“We should be starting this scheme as quickly as possible, much sooner than 2024. The scale of plastic waste is an emergency for the environment and the climate right now.”*

*User ID 26451, Individual*

Some respondents comment on the possible environmental impact of the proposals. Of these, a few suggest that a deposit return scheme would lead to increased traffic movements. However, many outline the need case for a deposit return scheme, referring in some cases to existing volumes of plastic waste or to a ‘climate emergency’ and argue that the scheme should be implemented sooner. .

Some respondents believe that changes caused by Covid-19 could undermine the proposed scheme's effectiveness. For example, they say that people are working and consuming more at home and that this has helped to increase home recycling rates. Some respondents also express concern about the additional responsibilities a deposit return scheme would place on businesses, which they say are already stretched because of having to deal with the impacts of Covid-19.

*“We are aware of drinks producers experiencing significant difficulties during the Covid - 19 pandemic, due to the extended closure of much of the hospitality sector. Their focus is now on recovery from lost sales and have little resource to prepare for the implementation of any new legislation, or capacity to absorb the additional costs.”*

*User ID 127807, Business representative organisation or trade body*

Some respondents express concern with existing recycling schemes, saying that rates are too low or that materials are shipped and dumped abroad instead of being processed for recycling, but some respondents express a preference for existing recycling processes over the deposit return scheme because they are satisfied with current kerbside recycling rates. Meanwhile, some respondents say that the introduction of a deposit return scheme would not lead to an overall improvement in recycling as materials would be shifted from existing kerbside collection to return points at a potentially increased cost to businesses and consumers.

Some respondents question why the deposit return scheme for England, Wales and Northern Ireland is not being introduced at the same time as the scheme for Scotland. They often call for alignment and suggest that consistency across the four nations is important. A few refer to the fact that the Scottish scheme is due to start earlier than other schemes (in 2022) and argue that this means interoperability between schemes is more important than would otherwise have been the case. However, a few believe that Government should wait and review the implementation of a scheme in Scotland before implementing one across the rest of the four nations.

A few respondents express concern that the amount of the deposit would be insufficient to encourage consumers to return containers, failing to bring about behaviour change.

A few respondents say there is not enough information available about the end market for in-scope materials.



## Suggestions

Many respondents suggest that Extended Producer Responsibility, which would make manufacturers responsible for the life cycle of their products, could complement or replace a deposit return scheme, and help to create a circular economy.

Some respondents suggest introducing a digital deposit return scheme, which they say could be integrated with the existing kerbside recycling system, while a few respondents suggest the introduction of a plastic tax to encourage manufacturers to use materials which can be recycled instead of non-recyclable plastics.

Some respondents provide a range of suggestions on how to encourage the use and effectiveness of a deposit return scheme. They suggest that the scheme should be simple and easy to use for consumers and that consumers should get some extra encouragement to return containers as the scheme is first introduced.

### 4.2. Question 7

#### 4.2.1. Do you believe the introduction of a deposit return scheme will have an impact on your everyday life?

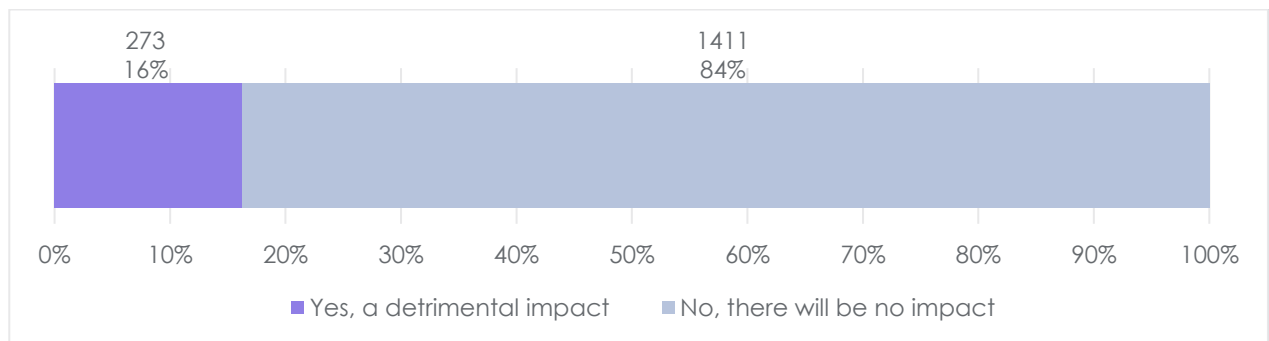


Figure 2: Question 7 part 1 (n=1684)

#### 4.2.2. If you answered yes, the scheme would have a detrimental impact, how significant would this impact be?

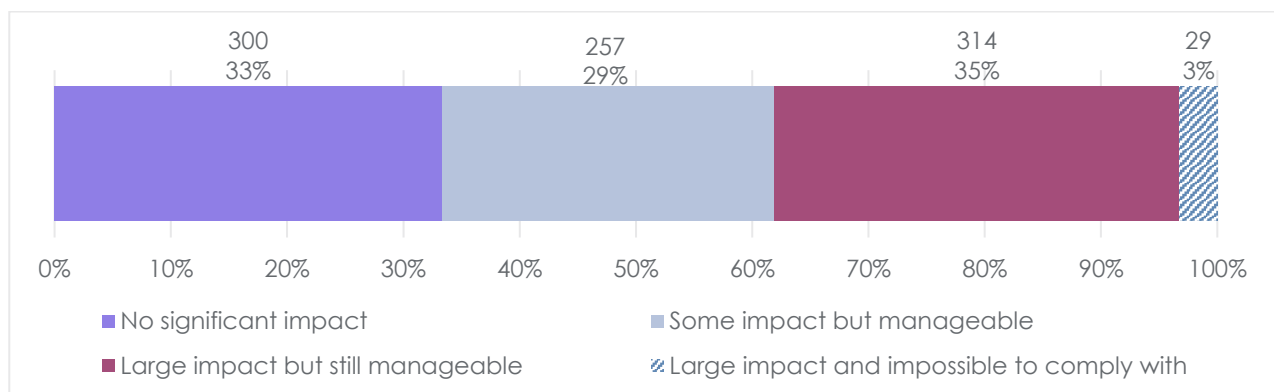


Figure 3: Question 7 part 2 (n=900)



### 4.2.3. Additional comments

Although question 7 does not include an open text question, some respondents have provided comments in addition to their closed question answers.

Some respondents express concern about the possibility of additional costs for businesses, increased costs and workload for local authorities, environmental impacts and potentially disproportionate impacts on those from lower socio-economic backgrounds or with mobility issues. Respondents add that the impact of the scheme may be different in a post-pandemic context.

However, a few respondents believe that the deposit return scheme would have a positive environmental impact and would create positive societal and behavioural change.

A few respondents say that the question is unclear or that they don't feel able to answer.

## 4.3. Question 8

### 4.3.1. Have your views towards implementation of a deposit return scheme been affected following the economic and social impacts of the Covid-19 pandemic?

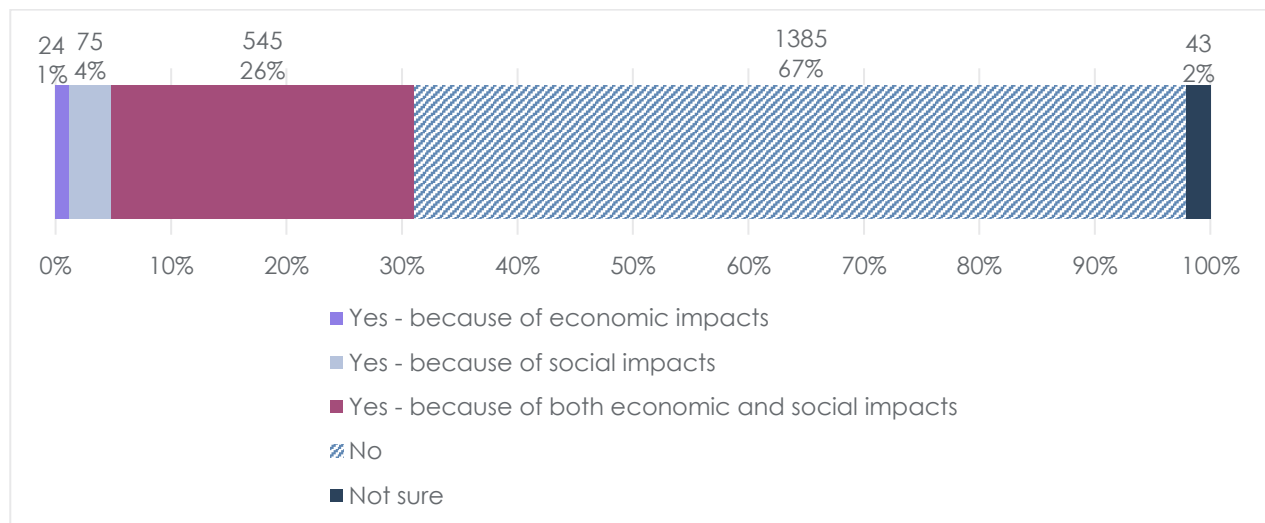


Figure 4: Question 8 (n=2072)

### 4.3.2. Please elaborate on your answer if you wish.

This question was answered by 1005 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.



	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
0 Introduction   8a: Views affected by impacts of Covid   Views not affected by Covid-19   other and general support	6%	7%	4%	2%	6%	5%
0 Introduction   8a: Views affected by impacts of Covid   More supportive because of Covid-19   littering (increased)	6%	7%	7%	0%	0%	3%
0 Introduction   8a: Views affected by impacts of Covid   Suggestion   review/delay in light of Covid-19	6%	0%	33%	28%	13%	19%
0 Introduction   8a: Views affected by impacts of Covid   Views not affected by Covid-19   covid impact not relevant/short term	5%	5%	3%	0%	3%	0%
0 Introduction   8a: Views affected by impacts of Covid   Views not affected by Covid-19   concerned about economic impact	4%	2%	8%	19%	16%	35%

### Views not affected by Covid-19

Many respondents say that Covid-19 has not impacted upon their views as to the need to implement a deposit return scheme.

Some respondents argue that Covid-19 is not relevant to whether the scheme should be introduced or argue that it should not alter its original ambition or implementation.

*"The same elements previously raised in the first consultation still exist whether or not Covid is present."*

*User ID 135425, Local government*

Some respondents highlight the concerns they have about the economic impact of the scheme. For example, they express concern about the costs associated with scheme implementation and/or the ability of businesses to absorb implementation costs.

*"The pub and wider hospitality sector recovery period will also be a long and fragile one and this is why we need to ensure that the industry is helped through this. The implementation timeline will be a challenge for every producer retailer and hospitality operator."*

*User ID 130453, Product designer/ manufacturer/ pack filler*

A few respondents are hopeful the scheme would result in a reduction in litter in outdoor spaces. Similarly, a few believe the introduction of a deposit return scheme would lead to an overall reduction in waste, and/or an increased awareness of the need to reduce waste.

Meanwhile, a few respondents highlight the positive environmental impact that they believe the scheme will have on the planet, whilst a few argue that the scheme is still urgently required.



On the matter of timing, a few respondents believe that the scheme should be implemented earlier than 2024. For example, they say that the original 2023 deadline should be adhered to, that the scheme should be implemented ASAP, or that any delay would exacerbate waste problems.

### **More positive because of Covid-19**

Some respondents state that Covid-19 has made them more positive about the implementation of a deposit return scheme.

Many respondents believe that Covid-19 has led to an increase in outdoor littering. Similarly, a few respondents believe Covid-19 has resulted in harm to the environment. They say that changes in people's behaviours caused by the pandemic are resulting in more waste and therefore there is a need for a deposit return scheme.

*"The increase in the waste linked to e-commerce and limitation in local waste collection services at the beginning of the COVID-19 pandemic have made the importance of DRS, recycling, and waste reduction programs more relevant."*

*User ID 135435, Community group*

Some respondents believe the scheme will help boost economic recovery and/or create new jobs. For example, respondents highlight the number of green jobs that would be created, the potential boost to the economy, or how the scheme could provide an income stream for some individuals.

A few respondents argue that Government has demonstrated that it can act where needed to tackle difficult and/or urgent situations. For example, respondents refer to how Government has taken action to fight the pandemic and/or galvanise public support and how Government has managed to implement initiatives despite the challenges posed by a pandemic.

A few respondents also think that the Covid-19 pandemic has demonstrated that people are able to adopt new behaviours for the greater good and suggest that this could benefit the successful introduction of a deposit return scheme, whilst others say that they have become more positive about a deposit return scheme because Covid-19 has led to increased use and/or appreciation of outdoor spaces. A few respondents assert that they have become more positive about the introduction of a deposit return scheme because Covid-19 has made them personally more aware of the need to protect and/or improve the quality of the environment, locally as well as globally.

Meanwhile, a few respondents argue that Covid-19 has highlighted the urgent need for a deposit return scheme, whilst others emphasise their positivity towards the proposed deposit return scheme and argue that Covid-19 has made them feel more strongly about it.

### **Less positive because of Covid-19**

Some respondents state that Covid-19 has made them less positive about the implementation of a deposit return scheme. Their reasons and additional comments include:

A few respondents have existing and/or general concerns about the proposed scheme,



such as its cost or its impact on (groups of) consumers.

Some respondents believe that Covid-19 has demonstrated that existing kerbside collection of recyclable materials is adequate. For example, respondents doubt whether the proposed deposit return scheme would be better than kerbside collections during a pandemic.

*"Local authorities managed to keep kerbside recycling going through the pandemic and have seen increased tonnages in material being collected. This trend is likely to continue and needs to be assessed before the introduction of any DRS scheme."*

*User ID 125443, Local authority*

A few respondents say that Covid-19 has led them to question the potential health and safety and/or hygiene issues that may occur if the scheme is implemented. For example, respondents express concern as to whether disease/germs may be transmitted through returning products to vending machines and/or retailers.

Meanwhile, a few respondents question whether there is a need for this type of scheme. They argue that Government could prioritise an Extended Producer Responsibility and wonder whether this would not address most of the issues that the deposit return scheme would seek to resolve.

## **Comments on potential impacts**

A few respondents express concern about potential impacts of a deposit return scheme on households and/or communities in the context of Covid-19. For example, they believe that people may lack space in their homes to store empty bottles or say that reverse vending machines would blight the community environment. They highlight how in their view the pandemic has exacerbated social inequalities, arguing that the scheme would disproportionately impact people on lower incomes or people with limited access to deposit return scheme facilities.

## **Suggestions**

Many respondents suggest that implementation of a deposit return scheme should be delayed or subject to review because of Covid-19. They say that the pandemic has delayed business preparations or that the terms of the proposed scheme should be reviewed in light of the experience of the pandemic.

*"There will be lessons to learn in how society and public services responded to the Covid-19 pandemic and the lasting impacts it may have on services and behaviour. Reviews about this will take time to be completed but could have useful insights in relation into how a future DRS might need to be designed to take account of changes and lessons learned."*

*User ID 135282, Waste management company*

Other suggestions include:

- proposals for the locations of return banks
- suggestions as to what products should be included in the scheme; and



- suggested producer/manufacture responsibilities.



## 5. Scope of the deposit return scheme

### 5.1. Question 9

#### 5.1.1. Do you agree that the cap should be included as part of the deposit item in a deposit return scheme for the following?

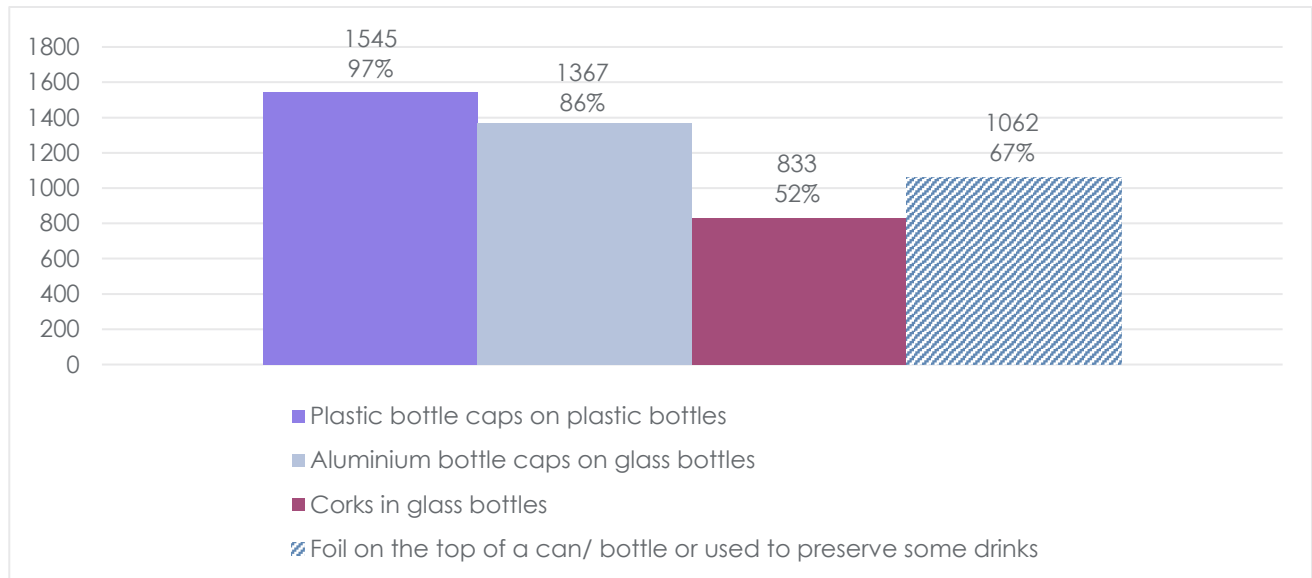


Figure 5: Question 9 – Respondents could select more than one option and the base number (n) is the number of respondents who selected at least one option, with all percentages calculated in relation to this figure (n=1590)

#### 5.1.2. Additional comments

Although question 9 does not include an open text question, some respondents have provided comments in addition to their closed question answers.

Some respondents suggest that containers should be accepted as part of the deposit return scheme with or without a cap, as any requirement that the cap must be included could lead to lower participation in the scheme and possibly increased littering. Similarly, a few respondents say that caps should not be included in the scope of a deposit return scheme. However, a few also argue conversely that caps should be included in the scope of the scheme.

A few respondents offer various suggestions about how to deal with caps in the context of a deposit return scheme, including the development of caps that can be secured to the back of the container.





## 5.2. Question 10

### 5.2.1. Do you believe we have identified the correct pros and cons for the all-in and on-the-go schemes described above?

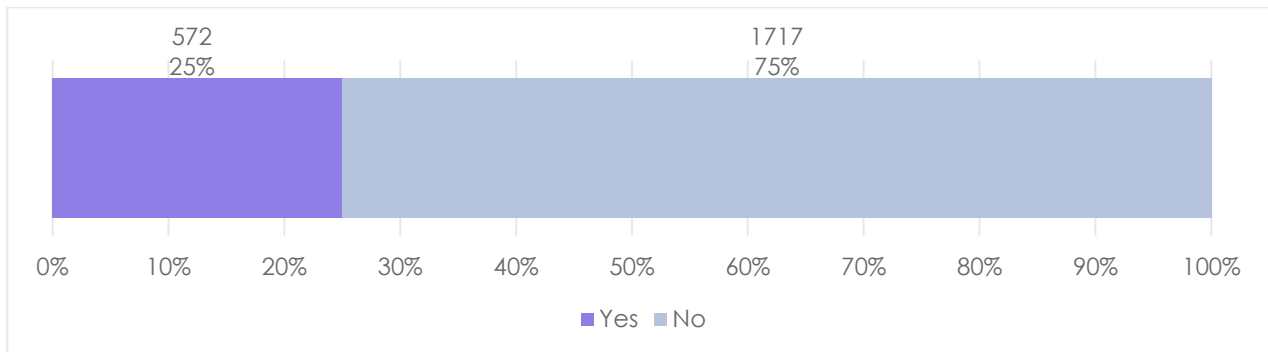


Figure 6: Question 10 (n=2289)

### 5.2.2. Please elaborate on your answer.

This question was answered by 1733 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
1 Chapter 1 Scope of the DRS (9-19)   10a: Correct pros and cons   Concern   on-the-go (general)	48%	58%	8%	5%	24%	22%
1 Chapter 1 Scope of the DRS (9-19)   10a: Correct pros and cons   Concern   producers (switching)	32%	40%	5%	0%	5%	3%
1 Chapter 1 Scope of the DRS (9-19)   10a: Correct pros and cons   Concern   environment / pollution	20%	22%	29%	2%	5%	8%
1 Chapter 1 Scope of the DRS (9-19)   10a: Correct pros and cons   Support   all-in	12%	12%	3%	11%	14%	32%
1 Chapter 1 Scope of the DRS (9-19)   10a: Correct pros and cons   Concern   effectiveness of scheme (general)	6%	1%	44%	11%	8%	24%



## Concerns

Some respondents express general concern about the effectiveness of a deposit return scheme, whilst many respondents, including a number who based their responses on a campaign template response, raise concerns about the concept and viability of an on-the-go deposit return scheme. Some respondents say that an on-the-go deposit return scheme could cause confusion about which products are part of the scheme, and may not reflect consumer habits, impacting on compliance, whilst a few believe that an on-the-go deposit return scheme could affect competition between retailers and producers.

*“On the go is meaningless to me – I use all different sizes of bottles and cans in and out of the home. I just want all sizes in.”*

*User ID 124576, Consultancy*

Many respondents, including a number who based their responses on a campaign template response, say that producers will change the products they manufacture to operate outside the scope of a deposit return scheme.

*“Limiting materials or sizes could create market distortions as, to avoid fees, firms would be incentivised to switch from one material to another (perhaps even from one plastic polymer to another if only PET is included) and to create containers just above the threshold volume. These are avoidable perverse outcomes.”*

*User ID 127811, Charity or social enterprise*

Many respondents, including a number who based their responses on a campaign template response, also express concern that implementation of a deposit return scheme may lead to an increase in pollution and carbon emissions because of increased transportation.

Some respondents raise concerns about the scope of a deposit return scheme, including what will happen to products not covered by the scheme and how consumers will know which products are included, whilst a few respondents believe that the scheme may vary by nation, and this could lead to confusion and lack of consistency. These respondents sometimes refer to, for example, varying deposit levels or differing rules for multipacks across the four nations of the UK.

Some respondents say a deposit return scheme could impact on local authorities' recycling processes and associated costs, whilst a few express concerns that a deposit return scheme may create accessibility concerns for people with poor mobility.

A few respondents believe that a deposit return scheme could inconvenience households in terms of time and cost, whilst others say that implementation of a deposit return scheme could disproportionately impact small retailers and low-income households. A few respondents say it is difficult to know what impact a deposit return scheme would have because of the Covid-19 pandemic.

Meanwhile, a few respondents feel an all-in scheme could have potential negative impacts, including on transportation and storage requirements, as well as recycling levels.



## Support

A few respondents comment positively on the implementation of a deposit return scheme, suggesting it could provide an efficient means of sorting and recycling materials and could contribute to the development of a circular economy.

*"I just want all sizes in. Deposit systems separate materials, which is more efficient for recycling, and it makes no sense to spend time and money setting up such a great system and then limit what's included."*

*User ID 104430, Individual*

Many respondents who express positive comments towards an all-in scheme say that, for example, all bottle sizes should be included and that any deposit return scheme needs to be comprehensive.

Meanwhile, a few respondents who express positive comments towards an on-the-go scheme say it would be cheaper and easier to implement than an all-in scheme.

## Suggestions

Some respondents think that the Extended Producer Responsibility should be implemented before a deposit return scheme as this would be consistent and complementary.

Meanwhile some respondents make suggestions about the implementation of the scheme, including whether other specific recycling initiatives should be continued or introduced to complement a deposit return scheme.

A few respondents make suggestions about the scope of a deposit return scheme, including the size and type of products or materials which should be included. A few suggest that caps should be included in the scope.

## 5.3. Question 11

**5.3.1. Do you foresee any issues if the final scope of a deposit return scheme in England and Northern Ireland does not match the all-in decision taken in Wales? E.g. An on-the-go scheme in England and an all-in scheme in Wales.**

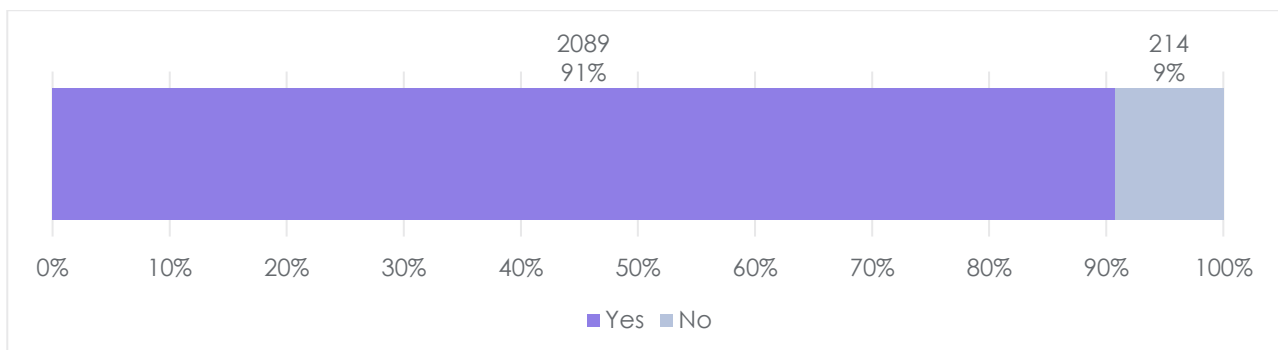


Figure 7: Question 11 (n=2303)



### 5.3.2. Please elaborate on your answer.

This question was answered by 1917 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
1 Chapter 1 Scope of the DRS (9-19)   11a: Issues with All-in in Wales   Concern   devolved administrations (consistency)	49%	53%	30%	49%	48%	41%
1 Chapter 1 Scope of the DRS (9-19)   11a: Issues with All-in in Wales   Concern   devolved administrations (confusion)	19%	12%	56%	33%	38%	46%
1 Chapter 1 Scope of the DRS (9-19)   11a: Issues with All-in in Wales   Support   all-in (support)	11%	12%	0%	4%	14%	35%
1 Chapter 1 Scope of the DRS (9-19)   11a: Issues with All-in in Wales   Concern   devolved administrations (cost/economy)	9%	3%	37%	18%	43%	41%
1 Chapter 1 Scope of the DRS (9-19)   11a: Issues with All-in in Wales   Concern   devolved administrations (clarity/simplicity)	8%	5%	21%	9%	24%	38%

## Concerns

Many respondents, including a number who based their responses on a campaign template response, raise concerns about a different scope in England and Northern Ireland because it would be inconsistent and deter individuals from participating. A few argue that if schemes differ across the UK it could undermine the Consistency in Household and Business Recycling proposals.

*We need an 'all-in' system across the UK. We need recycling systems that are consistent so that people are not confused by differing rules.*

*User ID 128930, Individual*

Furthermore, many respondents feel that a deposit return scheme which is different in scope in England and Northern Ireland compared to Wales would lack clarity and could cause confusion amongst consumers. They suggest that this may deter individuals from taking part in the scheme.



*“Campaigns will have to be more localised and could lead to consumer confusion, reduced participation, thus reduced environmental benefits.”*

*User ID 128711, Product designer/ manufacturer/ pack filler*

Some respondents say that a deposit return scheme which is different in scope in England and Northern Ireland compared to Wales could lead to an increase in administrative costs or create a burden on the economy if, for example, different packaging is required. Meanwhile, a few respondents think that a different scope in England and Northern Ireland may create practical difficulties for implementation, including labelling and distribution.

Some respondents say that cross-border issues such as an increase in littering could arise if the deposit return scheme in England and Northern Ireland is not aligned with that in Wales. A few respondents also express concern that if England and Northern Ireland do not adopt an all-in approach as Wales has done then this could undermine public perceptions of a united response to the issue of climate change.

Some respondents believe that if a deposit return scheme is not consistent across the UK, then this may lead to fraud or the creation of loopholes which can be exploited.

Meanwhile, a few respondents argue that because Scotland has already decided on the scope of its deposit return scheme, other nations will have to fall in line with its approach.

## **Support**

Some respondents express positive comments towards the introduction of an all-in scheme across the UK.

*“All four regions should have the same all-in system, so everyone knows what happens, wherever they are.”*

*User ID 112285, Individual*

A few respondents say that having separate schemes would not cause problems between England, Northern Ireland and Wales as environmental policies can currently vary across the four nations of the UK, as is the case with carrier bag charges. Meanwhile, a few respondents would support having separate deposit return schemes for each of the nations of the UK as this would best reflect the individual needs of each nation.

However, a few respondents express positive comments towards the introduction of an on-the-go scheme, irrespective of the fact that Wales has already opted for an all-in scheme.

## **Suggestions**

Suggestions include:

- a deposit return scheme which is aligned across the UK;
- an educational campaign about the deposit return scheme to support its success;
- a delay to implementation until all details are decided;
- implementation at the same time across the UK;
- a review of the inclusion of glass in the scope of any scheme;
- reviews of the scheme scope at regular intervals ; and



- a key aim to reduce overall waste by reducing plastic waste and production and promoting use of reusable containers.

A few respondents also suggest ways of resolving differences arising from having different scopes across the countries of the UK.

## 5.4. Question 12

### 5.4.1. Having read the rationale for either an all-in or on-the-go scheme, which do you consider to be the best option for our deposit return scheme?

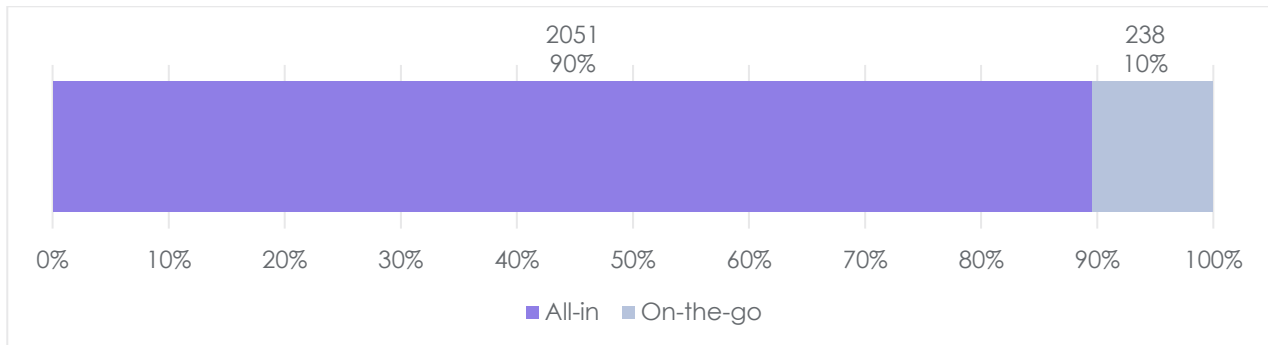


Figure 8: Question 12 (n=2289)

### 5.4.2. Please elaborate on your answer.

This question was answered by 1673 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
1 Chapter 1 Scope of the DRS (9-19)   12a: Preference All-in- or OTG   All-in   all-in (support)	51%	56%	28%	42%	46%	38%
1 Chapter 1 Scope of the DRS (9-19)   12a: Preference All-in- or OTG   All-in   all-in (supports defra recommendation)	14%	17%	5%	0%	0%	0%
1 Chapter 1 Scope of the DRS (9-19)   12a: Preference All-in- or OTG   Other and general   prefer EPR or consistency	8%	2%	47%	23%	10%	22%
1 Chapter 1 Scope of the DRS (9-19)   12a: Preference All-in- or OTG   On-the-go   on-the-go (oppose)	7%	4%	1%	40%	16%	30%



1 Chapter 1 Scope of the DRS (9-19)   12a: Preference All-in- or OTG   Other and general   devolved administrations	6%	2%	20%	18%	35%	30%
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## Support for an all-in deposit return scheme

Many respondents, including a number who based their responses on a campaign template response, express positive comments towards the implementation of an all-in deposit return scheme and outline the positive impact they feel it could have.

*"We support an all-in scheme, where all size containers are included, for four reasons: it will maximise the likelihood that high return rates are achieved; it is a more consistent system and far easier for consumers to understand; it will ensure that manufactures do not alter existing product sizes to escape the requirements of a DRS; and it provides the financial critical mass."*

*User ID 128745, Packaging designer/ manufacturer/ converter*

Similarly, many respondents, including a number who based their responses on a campaign template response, say that they support Defra's assessment that an all-in scheme is the most viable option for implementation.

Some respondents believe that an all-in deposit return scheme would have a positive environmental impact, with a reduction in pollution or increase in recycling rates, whilst others suggest that an all-in deposit return scheme would reduce littering.

*"This aligns with the green recycling agenda as a whole. It will avoid confusion among customers and will encourage recycling behaviours generally. It will also make people more conscious about the recycling they put into their bin at home."*

*User ID 26478, Non-governmental organisation*

Meanwhile, some respondents express opposition to the introduction of an on-the-go deposit return scheme. Some believe that the exclusion of some sizes or types of containers limits the scope of any potential on-the-go deposit return scheme, whilst a few respondents raise concerns that implementation of an on-the-go deposit return scheme would be confusing for consumers, particularly in terms of what containers would be included.

## Support for an on-the-go deposit return scheme

Some respondents express positive comments towards the implementation of an on-the-go deposit return scheme. Some say that it would be a better option for addressing littering, whilst a few say implementation of an all-in deposit return scheme may impact households as it could require additional effort to sort materials.

*"Of the 2 systems the on the go would be preferred as it would address the litter issue concerns, allow continued kerbside recycling, and suit consumer behaviours better. "*

*User ID 26478, Local government*



## Other comments

Many respondents suggest that Extended Producer Responsibility should be developed and implemented before any deposit return scheme to ensure consistency and make sure any deposit return scheme complements existing recycling schemes.

Some respondents express concern about the implementation of any deposit return scheme which is not aligned in scope across the UK. They say that having different schemes in different parts of the UK could create confusion.

Some respondents suggest that implementation of a deposit return scheme should be delayed so that the impact of consumer behaviour changes post-Covid-19, and the rollout of Extended Producer Responsibility can be considered.

Some respondents say that deposit return schemes place additional burden on both consumers (with additional sorting of materials) and businesses, who they say have already been impacted by the Covid-19 pandemic.

A few respondents say digital solutions can be used to create an effective deposit return scheme by assisting collection processes or reducing the potential for transmission of viruses between people.

Meanwhile, few respondents suggest specific materials which they feel should be excluded from the scope of the scheme, such as glass or metal.

A few respondents say that there are disadvantages to both all-in and on-the-go deposit return schemes and therefore either should be implemented or existing recycling systems should remain in place, whilst a few respondents do not express a preference between all-in or on-the-go deposit return schemes.

### 5.5. Question 13

#### 5.5.1. *Given the impact Covid-19 has had on the economy, on businesses and consumers, and on everyday life, do you believe an on-the-go scheme would be less disruptive to consumers?*

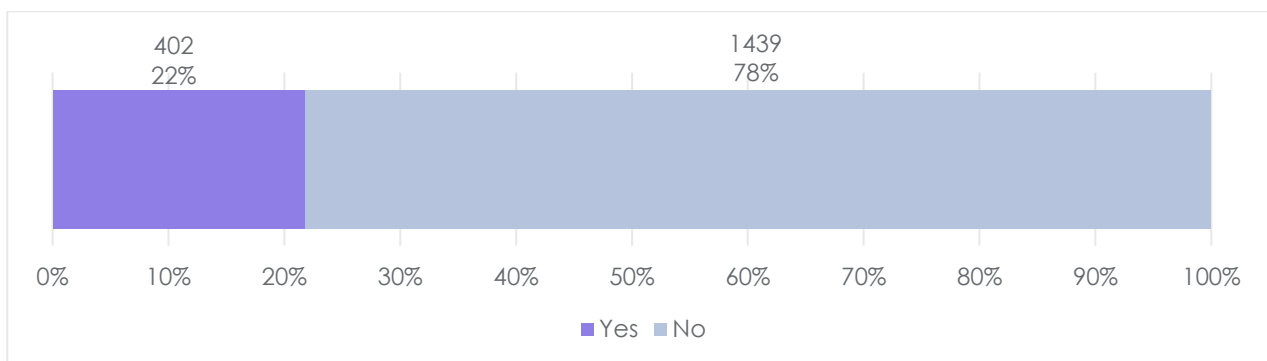


Figure 9: Question 13 (n=1841)

#### 5.5.2. *Additional comments*

Although question 13 does not include an open text question, some respondents have provided comments in addition to their closed question answers.

Some respondents variously say that an on-the-go scheme would be less disruptive, more





disruptive or the same as an all-in scheme. A few respondents suggest that any scheme should be aligned across the United Kingdom whilst others say that any scheme may impact on other local authority programmes. A few respondents argue there is a need to review any scheme considering the Covid-19 pandemic and others say it should be deferred until a later date.

## 5.6. Question 14

### 5.6.1. Do you agree with our proposed definition of an on-the-go scheme (restricting the drinks containers in-scope to less than 750ml in size and excluding multipack containers)?

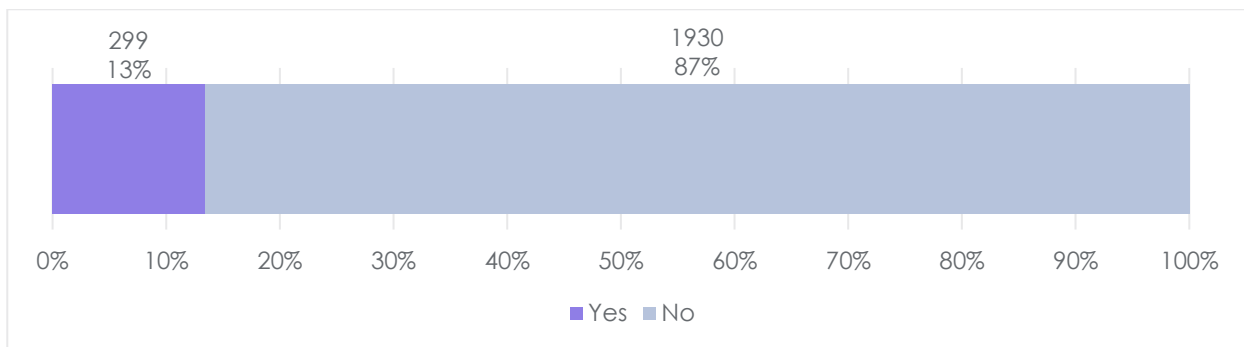


Figure 10: Question 14 (n=2229)

### 5.6.2. If no, how would you change the definition of an on-the-go scheme?

This question was answered by 1793 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
1 Chapter 1 Scope of the DRS (9-19)   14a: Scope of an OTG   Concern   on-the-go (definition)	36%	45%	8%	2%	10%	5%
1 Chapter 1 Scope of the DRS (9-19)   14a: Scope of an OTG   Concern   on-the-go (multipacks)	34%	33%	69%	11%	25%	8%
1 Chapter 1 Scope of the DRS (9-19)   14a: Scope of an OTG   Concern   on-the-go (general concern)	14%	13%	15%	9%	21%	19%



1 Chapter 1 Scope of the DRS (9-19)   14a: Scope of an OTG   Concern   on-the-go (bottle size)	12%	10%	29%	11%	19%	30%
1 Chapter 1 Scope of the DRS (9-19)   14a: Scope of an OTG   Support   all-in	10%	9%	5%	11%	16%	27%

## Concerns about the proposed definition

Many respondents express general concern about the definition of an on-the-go deposit return scheme.

Furthermore, many respondents, including a number who based their responses on a campaign template response, express concern about the proposal to limit the size of returnable products as manufacturers may increase product sizes or attach two product together to take them out of scope to take them out of scope. They say that all shapes and sizes of containers should be covered in any definition.

*“All kinds and sizes of bottles and cans litter my local beach and park - all sizes and materials need to be included in the scheme.”*

*User ID 128590, Individual*

Similarly, many respondents, including a number who based their responses on a campaign template response, raise concerns about the proposal to exclude multipacks from any on-the-go scheme.

*“The fact that multi-packs are excluded, despite most of these containing smaller containers, does not make sense to me.”*

*User ID 128653, Individual*

Some respondents feel that there may be an increase in littering as a result of the proposed definition limiting the size of returnable products.

Meanwhile, some respondents express general positive comments towards any implementation of an all-in deposit return scheme.

## Support for the proposed definition

A few respondents express general positive comments towards implementation of an on-the-go deposit return scheme, whilst a few are specifically positive about the proposed upper limit of 750ml for bottles falling within the scope of an on-the-go deposit return scheme.

## Suggestions

A few respondents say that glass should not be included within the scope of an on-the-go deposit return scheme because glass packaged products are often consumed at home.

Other suggestions relate to a variable deposit rate for multipacks, the types of containers which should be included in the scheme and the number of drop-off points.



## 5.7. Question 15

### 5.7.1. Do you agree that the size of containers suggested to be included under an on-the-go scheme are more commonly consumed out of the home than in it?

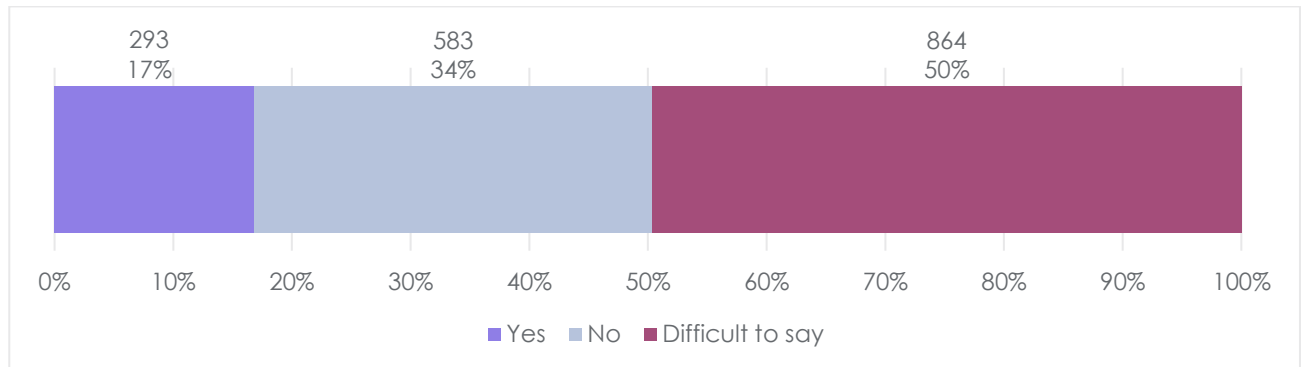


Figure 11: Question 15 (n=1740)

### 5.7.2. Additional comments

Although question 15 does not include an open text question, some respondents have provided comments in addition to their closed question answers.

A few respondents agree that the size of the containers included in the scope of an on-the-go scheme are more commonly consumed outside the house than in it, but a few respondents disagree, and a few say that Covid-19 has impacted on consumer behaviour.

A few respondents say that more research is needed to inform decisions about the size of containers to be included in the scope whilst a few believe that all sizes of container should be included.

## 5.8. Question 16

### 5.8.1. Please provide any information on the capability of reverse vending machines to compact glass?

This question was answered by 657 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.



	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
1 Chapter 1 Scope of the DRS (9-19)   16a: Reverse Vending Machines   don't know/no expertise	8%	3%	51%	4%	8%	5%
1 Chapter 1 Scope of the DRS (9-19)   16a: Reverse Vending Machines   Concern   health/safety	4%	2%	7%	7%	19%	35%
1 Chapter 1 Scope of the DRS (9-19)   16a: Reverse Vending Machines   Concern   compaction affects recycling	4%	0%	18%	9%	10%	14%
1 Chapter 1 Scope of the DRS (9-19)   16a: Reverse Vending Machines   Example of technology   general	3%	2%	0%	7%	13%	30%
1 Chapter 1 Scope of the DRS (9-19)   16a: Reverse Vending Machines   Concern   higher cost of including glass	3%	1%	0%	7%	11%	27%

## Concerns

Many respondents say that they do not know or do not have sufficient expertise to answer the question.

Of those who do comment on this question, many respondents express concerns on health and safety grounds about the possibility of broken glass around reverse vending machines and the handling of glass more broadly. Other concerns raised by some of these respondents include the safety of manual lever machines, the hygiene of residual liquids from bottles and the possibility of germs spread by touching the machine.

*“Glass breaks and could become a safety issue once broken for those handling the returned glass bottles.”*

*User ID 109728, Community group*

Many respondents also say that compaction would limit the amount of glass available for remelt and that it is a less circular option. They believe that breaking glass would result in small pieces and are concerned that it would lower the quality of the glass available.

Some respondents also comment on the cost of including glass reverse vending machines in the scheme, arguing that it would be too high. Some of these respondents also say that glass items would be more expensive for consumers.

Meanwhile, some respondents comment on reverse vending machines themselves. They express concern about their ability to process glass containers which are damaged prior to processing, their ability to process thicker glass and the frequency of machine maintenance which would be required. A few feel that these machines would require qualified technicians who had been trained to deal with the risks of broken glass.

A few respondents raise concerns about the noise which could be created by reverse vending machines, whilst others express concern about where they would be located, particularly as businesses may not have space for the machines.



A few respondents argue that kerbside collection and recycling of glass is already effective in meeting regulatory targets for remelting of glass and therefore there is no need to include glass reverse vending machines in the deposit return scheme.

A few respondents express other concerns, which include:

- how materials would be collected from glass reverse vending machines;
- challenges of implementing glass reverse vending machines;
- conflicts of interest amongst those providing information on the capability of glass reverse vending machines; and
- the accessibility of machines.

## Support

Some respondents express positive comments towards for the use of glass reverse vending machines. They say variously that they are sensible, easy to implement, sustainable, would reduce littering and would be cost effective in the long term, would modernise recycling systems and benefit the environment. A few respondents caveat their positive comments by saying that the machines should, for example, be able to handle the required volumes, sort glass by colour or avoid breaking glass into pieces which are too small to be recycled into high quality glass.

A few respondents express positive comments towards the deposit return scheme more broadly or argue that all materials, including glass, should be included in the deposit return scheme.

## Suggestions

Many respondents provide examples of glass vending machines and say that they are capable of compacting, collecting natural broke glass, and collecting glass containers as a whole, as well as cutting glass containers in half. A few of these respondents refer to such machines which could previously be found within Tesco stores.

*"The technology to collect glass, either by compaction or 'soft drop' where the bottle stays intact, exists in schemes around the world, and it would not be a problem to adopt these technologies in the UK."*

*User ID 128657, Non-governmental organisation*

Some respondents suggest that those with expertise in glass recycling and glass reverse vending machines should be consulted.

Meanwhile, some say that glass containers should be collected whole, washed and re-used instead of being compacted. They say this would use less energy and be easier to implement.

Other suggestions include:

- separating glass by colour to ensure the best quality glass recycle;
- using natural breakage or soft-drop technology rather than compaction; and
- specific remelt targets for glass collected within the deposit return scheme.



## 5.9. Question 17

### 5.9.1. Do you agree that the scope of a deposit return scheme should be based on container material rather than product?

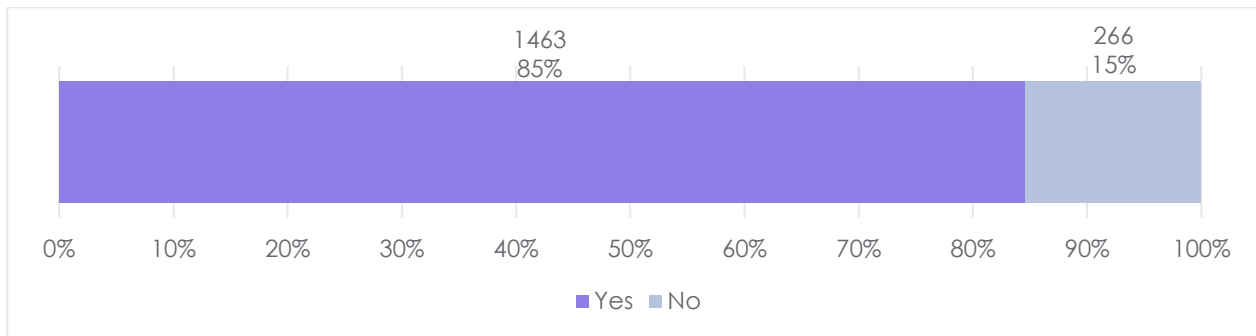


Figure 12: Question 17 (n=1729)

## 5.10. Question 18

### 5.10.1. Do you agree with the proposed list of materials to be included in scope?

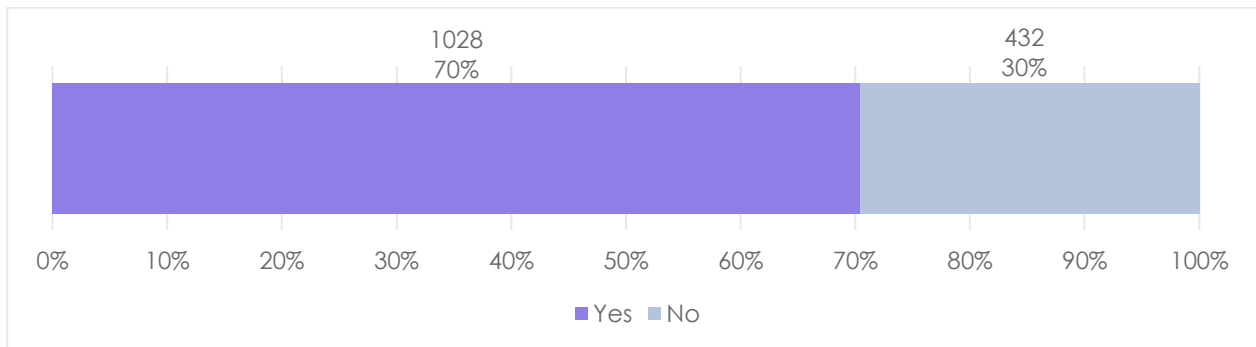


Figure 13: Question 18 (n=1460)

## 5.11. Question 19

### 5.11.1. Do you consider there will be any material switching as a result of the proposed scope?

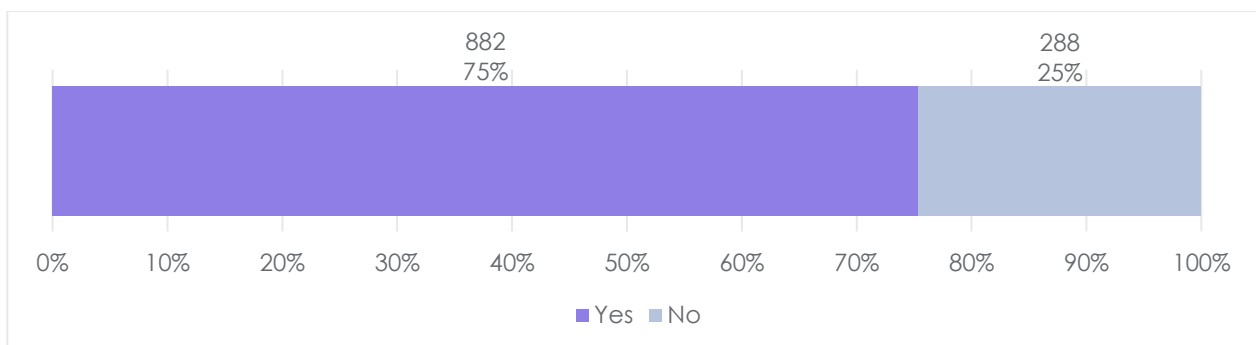


Figure 14: Question 19 (n=1170)

### 5.11.2. Please provide evidence to support your response.

This question was answered by 793 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or



make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
1 Chapter 1 Scope of the DRS (9-19)   19a: Material switching   Concern   producers (switching) - to avoid costs	7%	2%	32%	40%	16%	16%
1 Chapter 1 Scope of the DRS (9-19)   19a: Material switching   Concern   producers (switching) - general	7%	3%	34%	2%	10%	8%
1 Chapter 1 Scope of the DRS (9-19)   19a: Material switching   Suggestion   general	5%	0%	0%	0%	0%	0%
1 Chapter 1 Scope of the DRS (9-19)   19a: Material switching   Concern   consumer behaviour change - cost	5%	1%	29%	21%	13%	16%
1 Chapter 1 Scope of the DRS (9-19)   19a: Material switching   Concern   producers (switching) - detailed	4%	1%	18%	12%	11%	19%

## Concerns

Many respondents express concern about producers switching materials and say they may try to find loopholes or switch to materials outside the scope of the deposit return scheme. Respondents who provide specific details on this point say that, for example, producers may switch from PET to HDPE plastic. Some of these respondents also believe that producers may switch to cheaper materials or materials which are outside the scope of deposit return scheme to save costs.

*“Industry may try to avoid the scheme by selling drinks in containers that are not included. This may cause the opposite effect in that materials that are less recyclable or reusable will be sold and litter reduction may not be achieved.”*

*User ID 112093, Individual*

Furthermore, many respondents express concern that consumers would be unlikely to change which materials they buy due to the cost of doing so and may switch to buying multipacks or larger containers if they are excluded from the scheme.

Some respondents say that switching materials could impact the health of consumers if they buy larger containers of unhealthy products. Some of these respondents suggest that smaller containers help to control portion sizes.

A few respondents argue that a deposit return scheme could lead to consumers



purchasing more materials which are not as recyclable. Some of these respondents say consumers could prefer lighter materials and therefore choose non-recyclable plastic over recyclable glass.

Some respondents raise concerns about producers switching to bioplastics because they are outside the scope of the deposit return scheme. They say that bioplastics are not compatible with organic or dry recycling and can cause contamination problems in waste streams.

Some respondents say that material switching could lead to increased waste as consumers may buy more than they need or increase their use of larger containers.

A few respondents argue that implementation of a deposit return scheme would not lead to material switching, or would have negligible impact.

Some respondents say that they do not have an opinion, do not have enough evidence, or lack the expertise to provide a response to this question.

### **Support**

Some respondents express positive comments towards an all-in approach and say that all materials should be included in the deposit return scheme as this would prevent materials switching and include multipacks in scope.

Some respondents express general positive comments towards a deposit return scheme, and some say that producers will switch to more environmentally friendly or 'greener' options as a result of its implementation.

### **Suggestions**

Some respondents suggest that the deposit return scheme should align with Extended Producer Responsibility and consistent collection policies as this would help to avoid confusion.

Some respondents say that glass should be excluded from a deposit return scheme because current methods of kerbside collection are effective and including glass in food service environments could be hazardous. Others say that all plastics should be incorporated into the scheme, whilst others suggest specific types of plastic which should be included.

*"Drinks are already sold in HDPE and LLDPE containers which should be included the scheme."*

*User ID 112031, Other*

Some respondents suggest ways in which material switching could be avoided including:

- the introduction of Government legislation;
- regular reviews of which materials are in scope;
- including principles to discourage waste of materials in the scheme; and
- use of a digital deposit return scheme to increase the scope of packaging materials in a cost-effective way.





## 6. Targets

### 6.1. Question 20

6.1.1. Which of the following approaches do you consider should be taken to phase in a 90% collection target over 3 years?

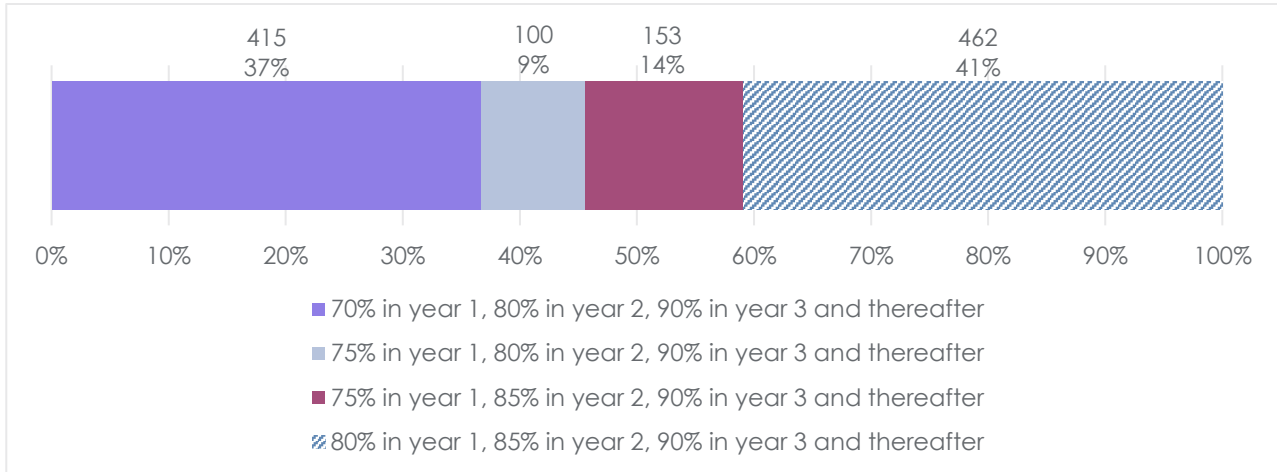


Figure 15: Question 20 (n=1130)

### 6.2. Question 21

6.2.1. What collection rate do you consider should be achieved as a minimum for all materials after 3 years?

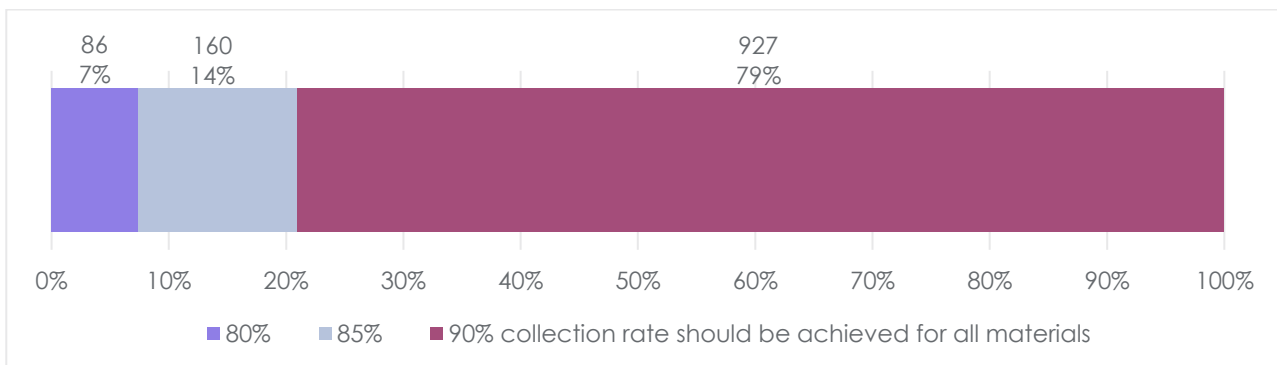


Figure 16: Question 21 (n=1173)



### 6.3. Question 22

#### 6.3.1. Is it reasonable to assume that the same collection targets could be met with an on-the-go scheme as those proposed for an all-in scheme for in-scope materials?

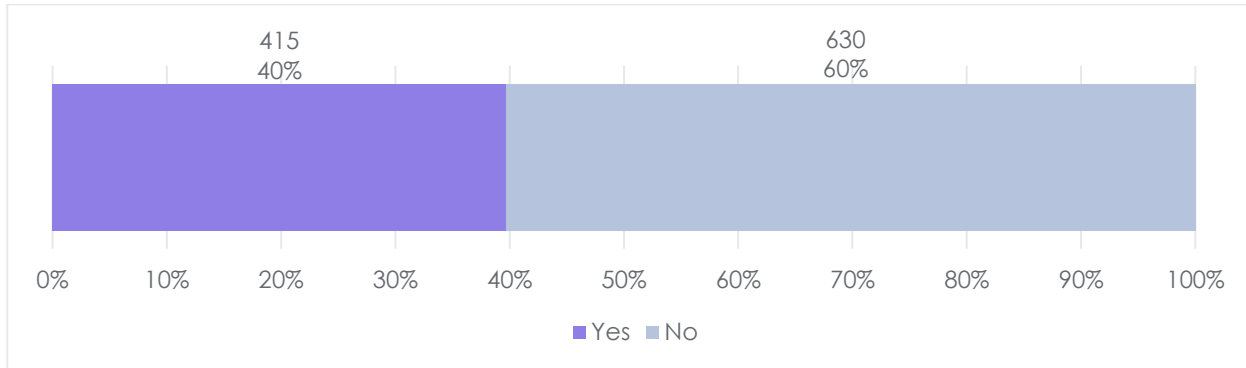


Figure 17: Question 22 (n=1045)

#### 6.3.2. Please provide any evidence to support your answer.

This question was answered by 637 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
2 Chapter 2 Targets (20-24)   22a: Same collection targets for OTG and All-in   Concern   different targets	8%	4%	31%	21%	17%	24%
2 Chapter 2 Targets (20-24)   22a: Same collection targets for OTG and All-in   Concern   on-the-go (general)	4%	3%	8%	9%	8%	5%
2 Chapter 2 Targets (20-24)   22a: Same collection targets for OTG and All-in   Concern   general	4%	0%	0%	0%	0%	0%
2 Chapter 2 Targets (20-24)   22a: Same collection targets for OTG and All-in   Support   all-in (preferred)	4%	2%	3%	30%	6%	11%
2 Chapter 2 Targets (20-24)   22a: Same collection targets for OTG and All-in   Concern   on-the-go (confusing)	3%	3%	8%	5%	13%	5%



## Concerns

Many respondents say that all-in and on-the-go collection schemes should not be expected to reach the same collection targets for various reasons, including differences in scope.

Many respondents express concerns about an on-the-go scheme and say it would not support the results which they would expect from a deposit return scheme. Some respondents suggest that an on-the-go scheme could be confusing for consumers as it will be less clear which containers can be returned. A few respondents feel that an all-in scheme would have a greater impact on reducing littering than an on-the-go scheme.

*“An on the go scheme and/or limited containers will lead to confusion and producers obviating the deposit return scheme and consumers not knowing or caring.”*

*User ID 26574, Individual*

Some respondents express concern about how other recycling schemes, including the Extended Producer Responsibility, could impact collection targets for a deposit return scheme. Some respondents say that high return and collection rates would be needed for the deposit return scheme to be effective and financially viable.

A few respondents say there is a need for good communication and availability of information to consumers to achieve collection targets and make the scheme successful.

A few respondents say the deposit amount must be set high enough to encourage consumers to participate in the scheme.

A few respondents raise concerns about the consistency of the scheme across the devolved administrations of the UK, particularly with the model already adopted in Scotland.

A few respondents feel that the deposit return scheme could impact consumers and householders by, for example, causing changes in buying habits or people's interactions with other recycling schemes.

A few respondents say that producers may take advantage of loopholes in the scheme and switch their container materials.

Some respondents believe they do not have enough information to determine whether the same collection targets should be expecting from both all-in and on-the-go collection schemes. They encourage Government to include more information in their Impact Assessments.

## Support

Many respondents express general positive comments towards an all-in scheme over an on-the-go scheme as they feel it would achieve higher collection rates and be clearer for consumers.



*“An all-in scheme with a minimum collection target across all materials would make a lot more sense and achieve its purpose more effectively in the long term.”*

*User ID 99249, Individual*

However, some respondents argue that an on-the-go scheme could achieve higher return rates than an all-in scheme, particularly if the scheme is to operate without a digital option.

A few respondents say that the same collection targets could be achieved with either type of scheme.

## Suggestions

A few respondents make a range of diverse suggestions, including specific collection targets and deposit amounts.

### 6.4. Question 23

#### 6.4.1. Who should report on the volumes of deposit return scheme material placed on the market in each part of the United Kingdom (England, Wales and Northern Ireland) for the proposed deposit return scheme?

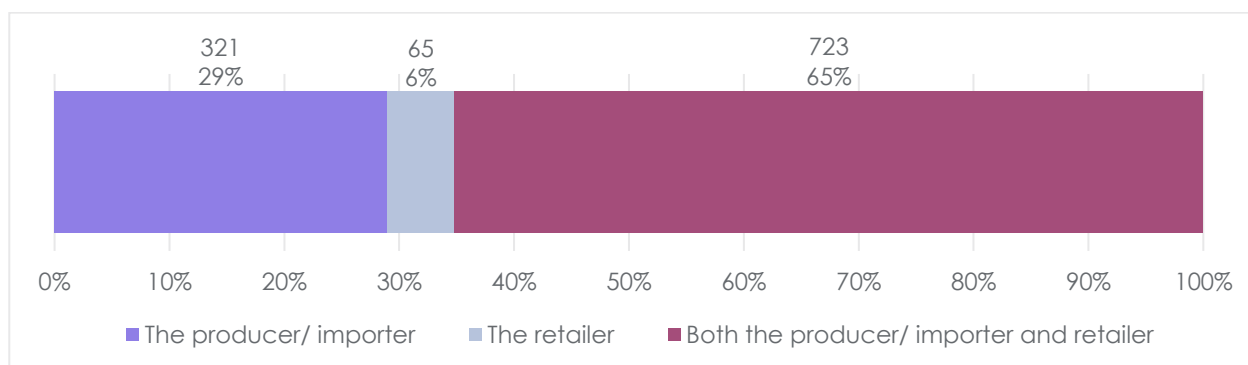


Figure 18: Question 23 (n=1109)

#### 6.4.2. What would be the implication of these obligations?

This question was answered by 538 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.



	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
2 Chapter 2 Targets (20-24)   23a: Report on volumes for producers, importers and retailers   Other and general   concern about added cost/time	3%	1%	18%	5%	3%	8%
2 Chapter 2 Targets (20-24)   23a: Report on volumes for producers, importers and retailers   Producer/Importer   producer should report (general)	3%	2%	13%	4%	6%	5%
2 Chapter 2 Targets (20-24)   23a: Report on volumes for producers, importers and retailers   Other and general   suggestions	3%	1%	8%	4%	10%	3%
2 Chapter 2 Targets (20-24)   23a: Report on volumes for producers, importers and retailers   Both producer/importer and retailer   both should report - general	2%	2%	6%	2%	10%	3%
2 Chapter 2 Targets (20-24)   23a: Report on volumes for producers, importers and retailers   Producer/Importer   producer should report - more expertise/capacity	2%	2%	5%	4%	3%	8%

### Both retailers and producers should report

Some respondents say that both producers and retailers should have a shared responsibility to report on the amount of in-scope material placed on the market. They believe that this would make reporting of in-scope material placed on the market more accurate and would be more transparent.

### Producers should report

Many respondents suggest that it should be the responsibility of the producer to report on the volume of in-scope material within the deposit return scheme. Some say that this is because they have greater capacity and are more likely to be able to carry out such reporting whilst some say they should take responsibility for products which they have played on the market.

Some respondents argue that retailers should not be responsible for reporting on the volume of in-scope materials within the deposit return scheme as they are not responsible for what is on the market, whilst some respondents express concern about the impact which reporting in-scope material may have on smaller retailers and say they may lack the capacity to carry out such tasks.

*“The producer/importer will be in the best position to do this, due to existing reporting systems within the current packaging regulations.”*

*User ID 128609, Individual*



## Retailers should report

Some respondents believe that producers should not be responsible for reporting the volume of material within scope of the deposit return scheme as they do not always know what happens to their product once it has been sold to a retailer and therefore the data may be less accurate.

*“Producers are unlikely to have knowledge of the eventual destinations of where their products are actually placed onto the market. It is not always the case that manufacturers know who the final seller of their packaging is and what nation those sellers are based in.”*

*User ID 124293, Retailer including online marketplace*

Meanwhile, some respondents say that retailers should be responsible for reporting volumes of in-scope material within the deposit return scheme as they are better placed to provide more accurate data.

A few respondents feel that it should be the responsibility of large retailers to report on the volume of in-scope items within the deposit return scheme.

## Other comments, concerns and suggestions

Many respondents express concern about the added cost and time burden which reporting may place on retailers or producers.

Some respondents say that the responsibility for reporting on volumes of in-scope materials placed on the market should align with the Extended Producer Responsibility. A few respondents say the Deposit Management Organisation should be responsible for deciding who reports on volumes of material within the scope of the deposit return scheme.

Some respondents feel there is a need to clarify the definition of 'placed on the market'.

A few respondents believe the deposit return scheme in England, Wales and Northern Ireland should align with the scheme to be introduced in Scotland to reduce complexity and confusion for businesses.

A few respondents say that retailers or producers should be fined if they do not report to a sufficient standard, whilst a few raise concerns that reporting may be open to fraud.

Some respondents provide a range of other specific suggestions, including reporting provided by recycling centres or by an independent body.

## 6.5. Question 24

### 6.5.1. **What evidence will be required to ensure that all material collected is passed to a reprocessor for the purpose of calculating the rate of recycling of deposit return scheme materials?**

This question was answered by 677 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.



The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
2 Chapter 2 Targets (20-24)   24a: Evidence of recycling   Suggestion   audit/control	6%	4%	8%	32%	14%	8%
2 Chapter 2 Targets (20-24)   24a: Evidence of recycling   follow local authorities protocol	4%	0%	42%	0%	2%	5%
2 Chapter 2 Targets (20-24)   24a: Evidence of recycling   DMO responsibility/should determine	3%	1%	3%	26%	16%	8%
2 Chapter 2 Targets (20-24)   24a: Evidence of recycling   Suggestion   general	3%	0%	0%	0%	0%	0%
2 Chapter 2 Targets (20-24)   24a: Evidence of recycling   existing protocols (general)	2%	1%	16%	4%	3%	5%

## Suggestions

Many respondents say that there should be regular auditing to ensure that claims about recycling rates are being met. They suggest how an audit or control scheme could work, with procedures for weighing and recording material type, stages of gathering information and non-compliance penalties.

*“This is best left to the DMO to propose but it must be auditable by a third party and matched to a database.”*

*User ID 128837, Local government*

Many respondents say that the approach to calculating recycling rates should be similar to existing local authority protocols which people are already familiar with in order to ensure transparency and increase public trust.

Some respondents suggest that the rate of recycling should be calculated based on weight. This could be done, for example, by comparing the weight put on the market to the weight collected by reprocessors. A few respondents feel that evidence of recycling levels could be derived from any reduction in the amount of materials going to landfill.

Some respondents say the Deposit Management Organisation should be responsible for calculating and reporting the rate of recycling, whilst others say that the reprocessor should be responsible for calculating the recycling rate by, for example, issuing receipts when material is received and when it has been processed. A few respondents say that evidence should be given by retailers as to the amount of waste collected by them. This



amount could then be compared to the amount which the reprocessor has recycled.

Some respondents say that processes currently used to measure rates of recycled materials should also be used to calculate recycling rates for the deposit return scheme materials in the market.

A few respondents believe that applying a unique identifier (such as a barcode) to in-scope containers would ensure identification throughout the container's journey, which would enable better calculation of recycling rates.

A few respondents say that the approach to calculating recycling rates should be made to align with the approach for the Extended Producer Responsibility to avoid confusion and ensure a streamlined reporting system.

A few respondents believe that further consultation or research is required to agree how to calculate the rates of deposit return scheme materials in the market.

A few respondents say that recycling should be done in the UK because otherwise a deposit return scheme will be no different from current recycling efforts and waste will be sent overseas, adding to global pollution.

### **Concerns**

A few respondents express concern about the feasibility of obtaining accurate evidence of recycling rates within the scheme, as well as the UK's capacity to recycle materials or send them overseas.

Some respondents say they are unsure how to calculate the rate of recycling.

### **Support**

Some respondents say they agree that evidence will be required and that the proposals brought forward in the consultation are appropriate.





## 7. Scheme governance

### 7.1. Question 25

#### 7.1.1. What length of contract do you think would be most appropriate for the successful bidder to operate as the Deposit Management Organisation?

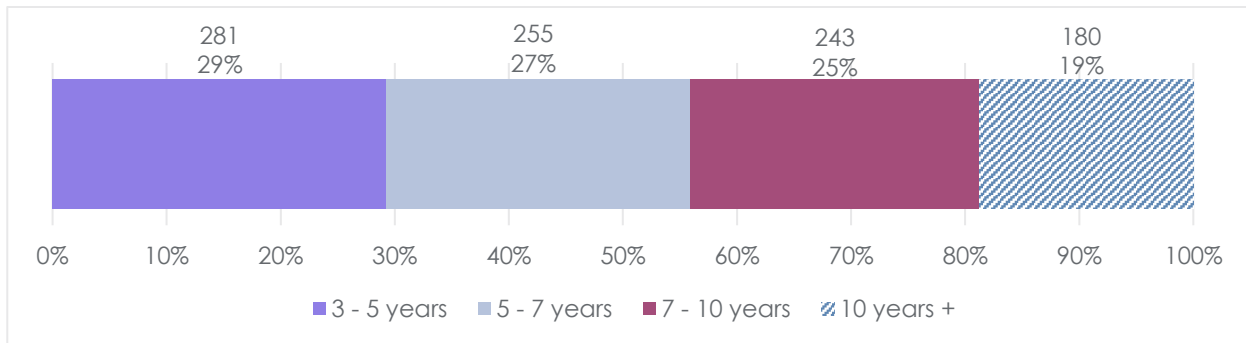


Figure 19: Question 25 (n=959)

#### 7.1.2. Additional comments

Although question 25 does not include an open text question, a few respondents have provided comments in addition to their closed question answers.

Many of these respondents express positive comments towards the suggestion of a long-term contract, whilst some respondents suggest specific contract lengths, usually somewhere between 5 and 10 years, or say that contracts should have an option to extend. A few argue that contract reviews should be built into any agreement.

### 7.2. Question 26

#### 7.2.1. Do you agree that the above issues should be covered by the tender process?

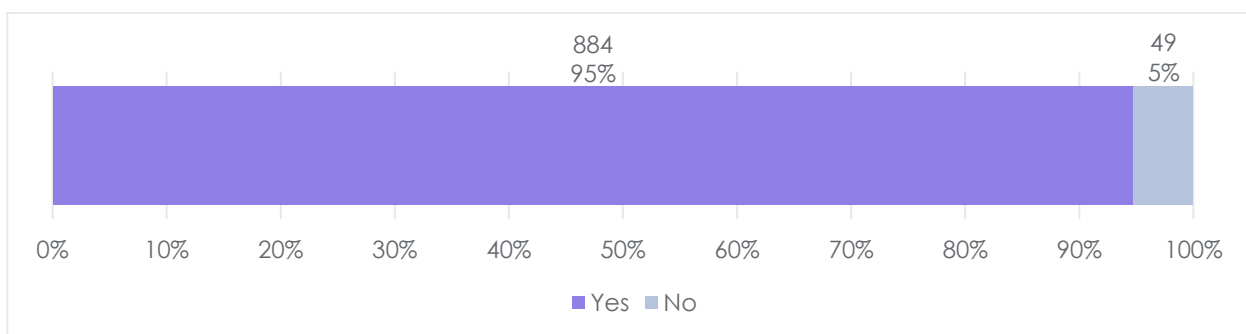


Figure 20: Question 26 (n=933)

#### 7.2.2. Please list any further issues you believe should be covered as part of the tender process.

This question was answered by 424 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:



- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
3 Chapter 3 Scheme Governance (25-29)   26a: Issues to cover by tender process   Concern   representation of local authorities in DMO	4%	0%	43%	0%	0%	3%
3 Chapter 3 Scheme Governance (25-29)   26a: Issues to cover by tender process   Suggestion   issues to cover by tender	4%	1%	14%	14%	17%	14%
3 Chapter 3 Scheme Governance (25-29)   26a: Issues to cover by tender process   Concern   suitability of applicant	3%	1%	7%	19%	21%	14%
3 Chapter 3 Scheme Governance (25-29)   26a: Issues to cover by tender process   Other and general   digital kerbside collection	2%	0%	25%	0%	0%	5%
3 Chapter 3 Scheme Governance (25-29)   26a: Issues to cover by tender process   Other and general   role of the DMO	2%	0%	3%	16%	14%	14%

## Concerns

Many respondents state that local authorities should have representation in the Deposit Management Organisation and that if this is not the case, the tender process should refer to the need to liaise with local authorities and for there to be a formalised dispute resolutions process.

Many respondents also say that the successful applicant to oversee the scheme should command support from producers and retailers across the sector and demonstrate appropriate experience. A few of these respondents add that they should not be selected purely based on the lowest price.

*“The DMO will need to demonstrate a clear understanding not just of producers, but also how the retailers work to fully understand the customer journey and complexity in the system.”*

*User ID 129098, Retailer including online marketplace*

A few respondents express concern about the tender process and say that it must be open, transparent and competitive. Others believe that non-compliance following receipt of the contract is a concern and suggest that there should be financial penalties for failing to meet targets.

A few say the tender process is too complicated. A few also say that the process must



avoid the creation of a monopoly.

Some respondents say that they do not believe the decision on a digital deposit return scheme should be left to the Deposit Management Organisation and argue that it should instead be integrated into the scheme design. Other respondents make general comments about what the role of the Deposit Management Organisation should be, with some of these respondents suggesting that it should work with packaging manufacturers to ensure the highest possible quantity and quality of recycled material or that it should have the flexibility to determine producer fees.

Some respondents say that the sale of materials by the Deposit Management Organisation should be a fair and transparent process.

A few respondents question the ability of the Deposit Management Organisation to accommodate vulnerable groups who may struggle to use reverse vending machines.

A few respondents do not feel able to comment on the issues which should be covered as part of the tender process.

## Support

A few respondents make general positive comments about the tendering process. Where they make more specific comments, a few respondents express positive comments towards the proposal for appropriate auditing and monitoring of the deposit return scheme, whilst others are positive about the Deposit Management Organisation being a non-profit.

*"The organisation that runs the scheme should be a not-for-profit organisation, preferably a Government Department or a charity / NGO, [which is] not biased by the need for profit."*

*User ID 112189, Individual*

## Suggestions

Many respondents suggest issues which should be covered by the tender process. These include:

- clarification of the role of the digital deposit return scheme;
- clarification of the role of local authorities;
- the need for applicants to provide evidence around how they will liaise with key stakeholders;
- the possibility of applications being made public.

Some respondents say that the tender process should be aligned with the process for the Extended Producer Responsibility and Consistency in Household and Business Recycling, or that the Deposit Management Organisation's contract should have similar terms to the system administrator for the Extended Producer Responsibility.

*"Considerations should be given to adopting the same length and timing of contract as for the EPR contract with the Scheme Administrator... Tendering should be undertaken within the remit of EPR and not separate to it."*

*User ID 128734, Local government*



A few respondents say that those designing the tendering process should learn from Scotland's experience by, for example, understanding how supply chains and IT systems will work.

Meanwhile, a few say that a legal obligation should be placed upon the Deposit Management Organisation to ensure that any glass recovered as part of the scheme is sent to be remelted.

### 7.3. Question 27

#### 7.3.1. Do you agree that the above issues should be monitored as Key Performance Indicators?

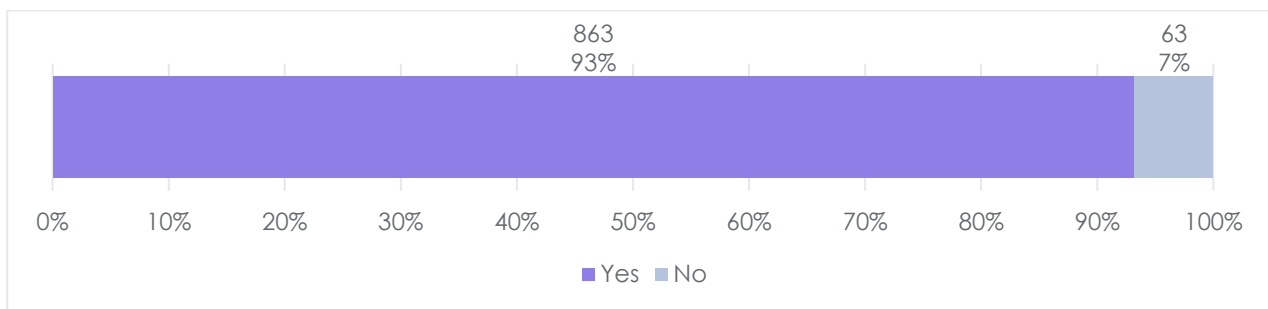


Figure 21: Question 27 (n=926)

#### 7.3.2. Please list any further issues you believe should be covered by Key Performance Indicators.

This question was answered by 297 respondents. Their comments are summarised below. The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
3 Chapter 3 Scheme Governance (25-29)   27a: Issues to cover by KPIs   need for assessments	8%	2%	41%	32%	22%	19%
3 Chapter 3 Scheme Governance (25-29)   27a: Issues to cover by KPIs   suggestion (general)	3%	1%	9%	2%	17%	5%
3 Chapter 3 Scheme Governance (25-29)   27a: Issues to cover by KPIs   suggestion - DMO contract	2%	0%	17%	0%	0%	5%



3 Chapter 3 Scheme Governance (25-29)   27a: Issues to cover by KPIs   support (general)	1%	0%	8%	0%	11%	3%
3 Chapter 3 Scheme Governance (25-29)   27a: Issues to cover by KPIs   concern (general)	1%	1%	7%	2%	3%	0%

## Suggestions

Many respondents comment on the key performance indicators (KPIs) which they feel are needed. These suggestions are varied but include indicators relating to:

- environmental impacts (including indicators relating to carbon emissions);
- volume of material recycled;
- producer fees;
- collection rates;
- level of material switching; and
- accessibility of the scheme (including the social equity of the scheme).

Meanwhile, some respondents make suggestions around the general principle of KPIs – for example, that they should allow time for adjustments to be made during implementation or that KPIs should be reviewed and revised as required.

A few respondents argue that the ‘How long does it take for broken machines to be repaired?’ indicator would sit more appropriately with return point operators.

A few respondents say that consumer satisfaction should be included as a key performance indicator for the deposit return scheme whilst a few feel that additional information is required to allow them to answer this question.

## Concerns

Some respondents express concern about the key performance indicators which will be used and whether they measure, for example, how and where products are recycled.

## Support

Some respondents express positive comments towards the proposed issues covered by key performance indicators and say that they have nothing further to add.



## 7.4. Question 28

### 7.4.1. Do you agree that Government should design, develop and own the digital infrastructure required to register and receive evidence on containers placed on the market on behalf of the Deposit Management Organisation and regulators?

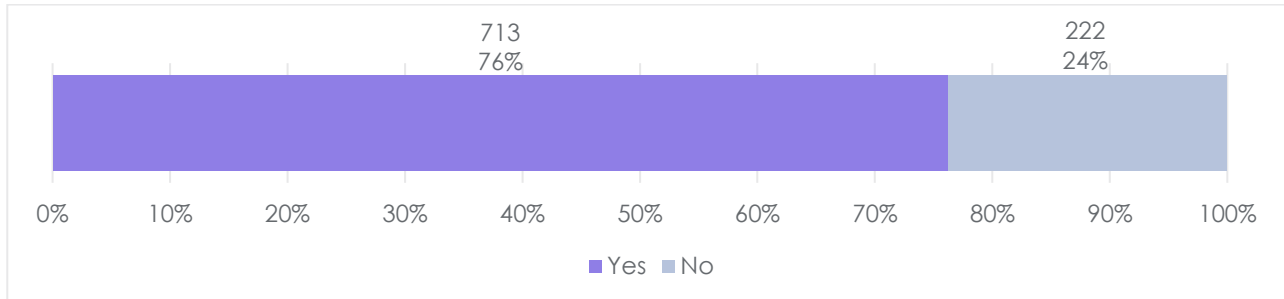


Figure 22: Question 28 (n=935)

### 7.4.2. Please elaborate on your answer.

This question was answered by 482 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
3 Chapter 3 Scheme Governance (25-29)   28a: Digital infrastructure   support (continuity)	6%	1%	47%	11%	11%	16%
3 Chapter 3 Scheme Governance (25-29)   28a: Digital infrastructure   support (general)	5%	2%	20%	33%	3%	8%
3 Chapter 3 Scheme Governance (25-29)   28a: Digital infrastructure   DMO should be responsible	4%	0%	15%	25%	22%	8%
3 Chapter 3 Scheme Governance (25-29)   28a: Digital infrastructure   concern (general)	2%	1%	9%	7%	3%	8%
3 Chapter 3 Scheme Governance (25-29)   28a: Digital infrastructure   concern (government bad track record)	2%	2%	4%	2%	0%	5%



## Concerns

Some respondents express concern about how effectively digital infrastructure could support the deposit return scheme.

Some respondents question Government's ability to design, develop and own this infrastructure. Some of these respondents offer their interpretation of Government's past performance as evidence of this, whilst others argue that the performance of the private sector has been better in this area.

A few respondents say that they do not have an opinion on this matter or feel unqualified to comment.

## Support

Many respondents express positive comments towards the idea that Government should design, oversee and own the digital infrastructure for a deposit return scheme. Some, similarly, believe that Government should oversee digital infrastructure but feel that this should be independently audited. Conversely, a few respondents feel there should be independent oversight of the digital infrastructure with an audit conducted by Government.

*"This digital infrastructure will be critical in the effective running of the DRS. It is vital that it is owned by the Government as otherwise it would act as a barrier to changing the DMO."*

*User ID 124315, Business representative organisation or trade body*

Many respondents say they would support a digital infrastructure which would ensure continuity across the geographical regions of the UK.

## Suggestions

Some respondents say that the Deposit Management Organisation should be responsible for the design and maintenance of the digital infrastructure for a deposit return scheme.

A few respondents say there should be continued engagement with the relevant stakeholders and organisations during the design, development and implementation of the digital infrastructure.



## 7.5. Question 29

**7.5.1. Government will need to understand the needs of users to build digital services for a deposit return scheme. Would you like your contact details to be added to a user panel for deposit return scheme so that we can invite you to participate in user research (eg. surveys, workshops, interviews) or to test digital services as they are designed and built?**

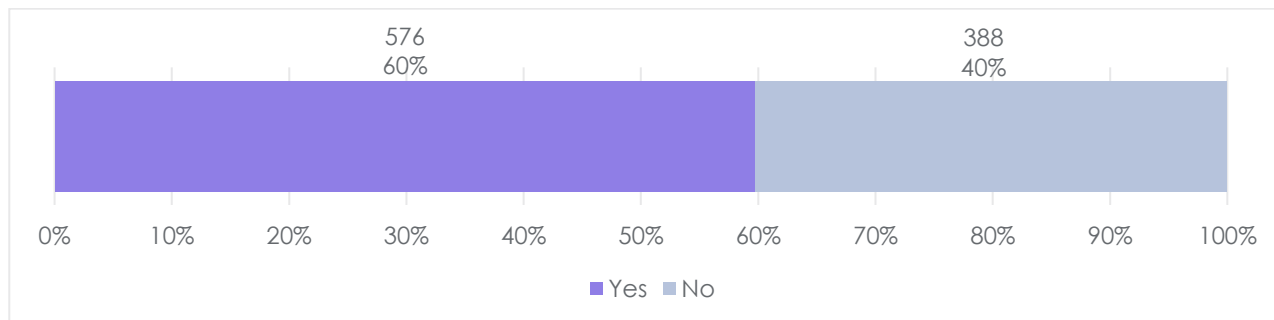


Figure 23: Question 29 (n=964)





## 8. Financial flows

### 8.1. Question 30

#### 8.1.1. What is an appropriate measure of small producers for the purposes of determining the payment of registration fees?

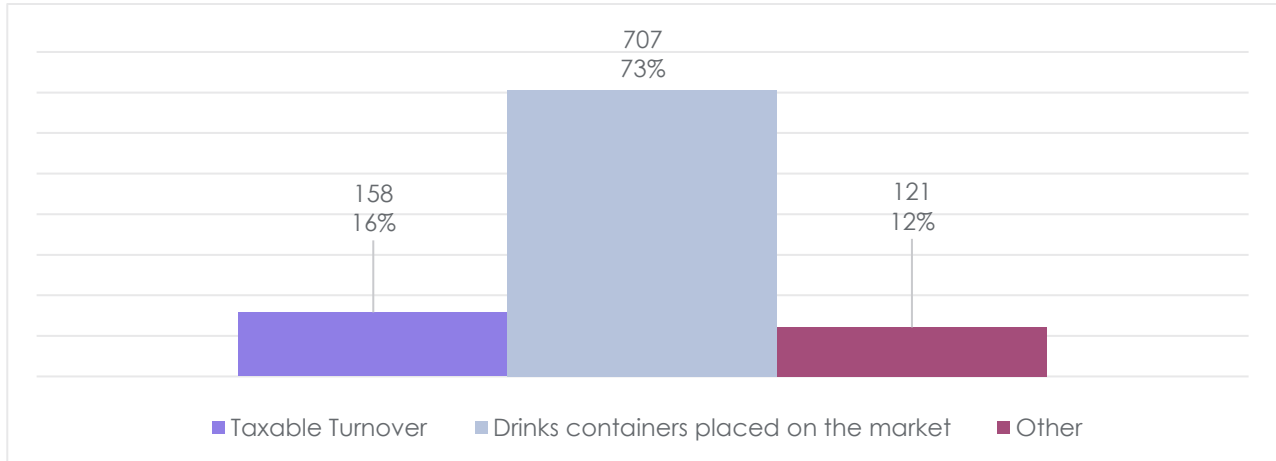


Figure 24: Question 30 – Respondents could select more than one option and the base number (n) is the number of respondents who selected at least one option, with all percentages calculated in relation to this figure (n=973)

#### 8.1.2. If 'other' please specify.

This question was answered by 263 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   30: Small producers registration fee   Support   both	4%	2%	4%	5%	21%	32%
4 Chapter 4 Financial Flows (30-39)   30: Small producers registration fee   Support   drink containers	3%	1%	18%	0%	5%	0%
4 Chapter 4 Financial Flows (30-39)   30: Small producers registration fee   Suggestion   alternative initiatives	2%	1%	5%	4%	13%	8%
4 Chapter 4 Financial Flows (30-39)   30: Small producers registration fee   Concern   taxable turnover	2%	0%	13%	0%	3%	3%



4 Chapter 4 Financial Flows (30-39)   30: Small producers registration fee   Support   taxable turnover	1%	0%	6%	0%	0%	3%
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## Support

Some respondents say that both taxable turnover and the number of drinks containers placed on the market are appropriate measures to determine any registration fees for producers, whilst a few specifically express their support for one measure or the other.

## Concerns

A few respondents express general concerns about the possible imposition of registration fees on small producers. Meanwhile, a few respondents say that registration fees for small producers should not be linked to taxable turnover because, for example, drinks containers may only represent a small proportion of the products they produce and so they would be placed at an unfair disadvantage.

## Suggestions

Some respondents suggest alternative measures, including deducting it from accounting procedures, basing it on environmental impact, or excluding small businesses altogether. A few respondents say that any registration fee should consider the quality of the recyclate produced.

## 8.2. Question 31

### 8.2.1. Is a high level of unredeemed deposits funding the scheme problematic?

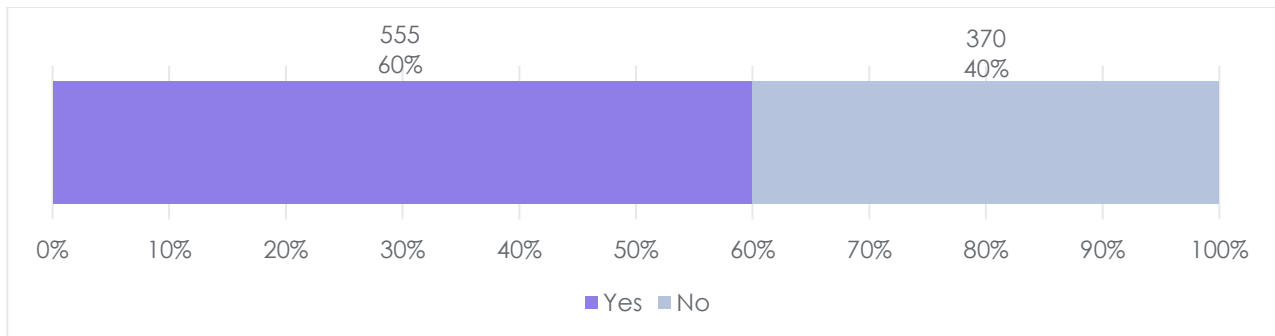


Figure 25: Question 31 (n=925)

### 8.2.2. Please explain your answer.

This question was answered by 660 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code



applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   31: Unredeemed deposits funding   Unredeemed deposits problematic	13%	7%	58%	9%	21%	14%
4 Chapter 4 Financial Flows (30-39)   31: Unredeemed deposits funding   Unredeemed deposits not problematic	6%	3%	6%	40%	24%	11%
4 Chapter 4 Financial Flows (30-39)   31: Unredeemed deposits funding   Suggestion   scheme operation	4%	1%	23%	9%	21%	8%
4 Chapter 4 Financial Flows (30-39)   31: Unredeemed deposits funding   Concern   producer fees	4%	1%	29%	2%	6%	8%
4 Chapter 4 Financial Flows (30-39)   31: Unredeemed deposits funding   Support   part fund scheme	4%	2%	4%	47%	8%	11%

## Concerns

Many respondents say that unreturned deposits are problematic. Some of these respondents say that in this situation the scheme may be deemed ineffective and fewer people may wish to engage with it.

*“A high level of unredeemed deposits for any DRS would be problematic, as it means that the scheme is not working as envisaged. This would mean the scheme is not achieving high recycling rates, operating inefficiently and costing producers more than envisaged.”*

*ID 116602, Local government*

Some respondents express concern that if unreturned deposits are used to fund the deposit return scheme and offset producer fees then producers may face uncertainty around costs as the level of unreturned deposits will vary.

Some say that a high level of unredeemed deposits may be due to social inequity as those with lower incomes may be less able to recycle.

A few respondents say that a high level of unredeemed deposits would indicate that the scheme was not sufficiently tackling the litter problem, whilst others believe that glass would be less likely to be returned owing to its weight and greater cost (meaning the deposit makes up a smaller proportion of the cost of the product).

Meanwhile, a few respondents argue that a high level of unredeemed deposits would indicate that the deposit level had been set too low.

A few respondents also express concern about the transparency of a deposit return scheme, arguing that it must be clear how unredeemed deposits are spent.



## Support

Some respondents say that unreturned deposits are not problematic or argue that there would not be high levels of unreturned deposits.

*“The governments should be aware that the retention of unredeemed deposits within the system is observed in best-practice DRS systems internationally.”*

*ID 128944, Business representative organisation or trade body*

## Suggestions

Many respondents say that unredeemed deposits could be reinvested in the scheme, whilst some say they could be used to support environmental or recycling projects, some argue they could be used to fund local authorities, and a few say they could fund charities.

Some respondents suggest that the Deposit Management Organisation should be responsible for increasing engagement with a deposit return scheme and should have detailed plans for if there is a high level of unredeemed deposits.

Some respondents believe that unredeemed deposits could be used to promote the scheme and educate the public on how to recycle effectively. Others offer mixed suggestions on how deposits could be used, including the suggestion of limits on how much money can be reinvested into the scheme and how much should be spent on ensuring interoperability between recycling schemes.

Other suggestions include:

- ensuring the deposit return scheme operates within existing waste disposal and recycling schemes;
- incentivising particular producer behaviours; and
- offering alternative recycling methods to increase the recycling of glass.

## 8.3. Question 32

### 8.3.1. Which option to treatment of unredeemed deposits do you support?

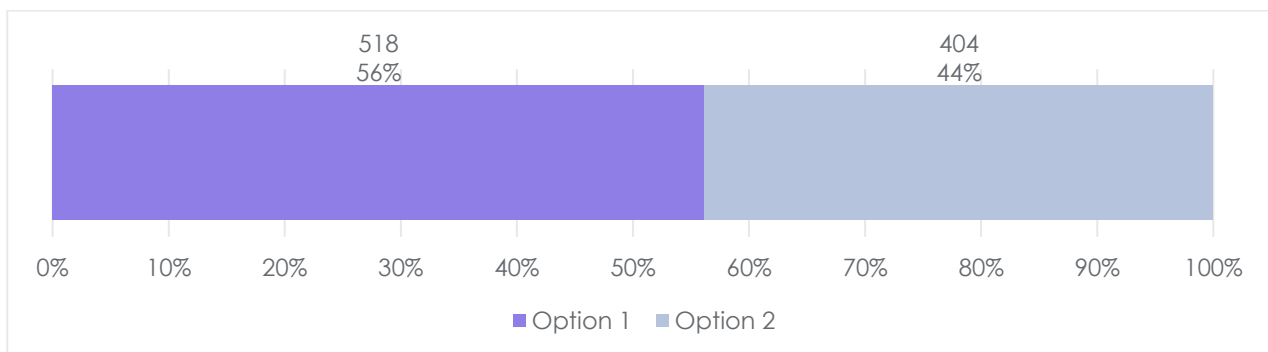


Figure 26: Question 32 (n=922)



## 8.4. Question 33

### 8.4.1. *With option 2, do you foresee any unintended consequences of setting a minimum percentage of the net costs of the deposit return scheme that must be met through the producer fee?*

This question was answered by 560 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   33a: Treatment of unredeemed deposits   Support   option 2 (no consequences)	7%	3%	37%	39%	3%	16%
4 Chapter 4 Financial Flows (30-39)   33a: Treatment of unredeemed deposits   Suggestion   cannot identify/don't know	3%	2%	15%	4%	2%	3%
4 Chapter 4 Financial Flows (30-39)   33a: Treatment of unredeemed deposits   Concern   option 2 (general)	3%	0%	0%	0%	0%	0%
4 Chapter 4 Financial Flows (30-39)   33a: Treatment of unredeemed deposits   Support   option 2 (general)	3%	0%	0%	0%	0%	0%
4 Chapter 4 Financial Flows (30-39)   33a: Treatment of unredeemed deposits   Concern   option 2 (cost)	2%	0%	14%	0%	10%	3%

## Concerns

Some respondents express general concerns about potential unintended consequences of option 2. Some of these comments suggest that Government's main objective is to make money from the scheme rather than reduce waste. Meanwhile, some respondents believe option 2 may adversely affect smaller producers and their finances, whilst a few respondents argue that option 2 could negatively affect levels of competition between retailers and reduce entry to the market, may increase costs for producers, or could disincentivise producer compliance with the scheme.



*“With a large number of small drinks companies such as small craft beers, this puts greater pressure on small businesses compared to larger businesses. This will mean smaller businesses suffer more.”*

*User ID 26478, Non-governmental organisation*

Some respondents raise concerns about the fact that option 2 would not align with the proposed Scottish deposit return scheme. They say this will increase costs, add complexity, or inhibit the ability of the Deposit Management Organisation to work with the administrator of the Scottish deposit return scheme.

Furthermore, a few respondents suggest that option 2 may lead to producers switching materials or moving away from recyclable materials in order to reduce fees, whilst a few say that unintended impacts may fall upon consumers through higher prices which would disproportionately impact those on lower incomes.

A few respondents express concerns about both option 1 and option 2, saying that there may be unintended consequences regardless of what scheme is chosen.

Some respondents say that they do not have enough information, are not aware of evidence or do not have the knowledge to offer an opinion on this matter.

## **Support**

A few respondents express support for option 1, with some saying that it would allow for unredeemed deposits to partly fund the scheme.

However, many respondents say that the unintended consequences of option 1 would be greater than those of option 2 or that they do not foresee any unintended consequences for option 2. Some respondents express support for option 2 because it would provide consistency in producer costs and would drive producer efficiency.

*“Option 2 is not supported. Unintended consequences could include brands moving to packaging with lower producer fees. These may not be the most recyclable or beneficial environmentally.”*

*User ID 129043, Packaging designer/ manufacturer/ converter*

## **Suggestions**

Some respondents make suggestions which include:

- producers covering the costs of the scheme under the 'polluter pays' principle;
- undertaking further research before choosing an option; and
- suggestions about how to spend unredeemed deposits.



## 8.5. Question 34

### 8.5.1. If a floor is set do you consider that this should be set at...?

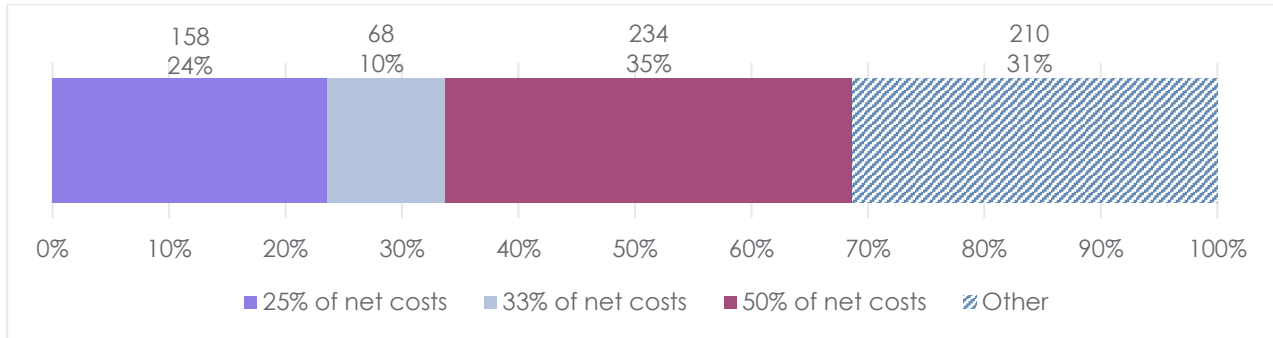


Figure 27: Question 34 (n=670)

### 8.5.2. Please provide any evidence to support your response.

This question was answered by 395 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   34a: Floor for producers   Other and general   suggestion	5%	0%	0%	0%	0%	0%
4 Chapter 4 Financial Flows (30-39)   34a: Floor for producers   don't know/unsure	3%	1%	21%	0%	0%	0%
4 Chapter 4 Financial Flows (30-39)   34a: Floor for producers   Comments about Option 2   support a minimum producer fee   50%	3%	1%	9%	28%	0%	3%
4 Chapter 4 Financial Flows (30-39)   34a: Floor for producers   Comments about Option 2   support a minimum producer fee   other percentage	2%	1%	7%	7%	19%	0%
4 Chapter 4 Financial Flows (30-39)   34a: Floor for producers   Comments about Option 1   support for option 1	2%	0%	0%	18%	25%	5%



## Support

Respondents often state their support for various levels of minimum producer fee. Some support 25%, a few support 33% and many support 50%. Meanwhile, a few support a minimum producer fee of less than 25% or simply say that the percentage should be low. However, a few believe that a high percentage of the net costs of the deposit return scheme should be met through producer fees. Some respondents suggest an alternative percentage to those proposed (not necessarily higher or lower than the proposed range). Many say that it is difficult to specify a percentage without further information, or argue that the level should be determined by the Deposit Management Organisation.

Some respondents support option 1 for the treatment of unredeemed deposits, with some of these respondents suggesting that option 2 (including the use of a producer floor fee) is unsuitable.

## Suggestions

Other suggestions for the determination of a producer fee or the operation of the scheme include:

- use of a flat fee similar to that proposed for Scotland;
- use of a variable producer fee;
- a consultation process to be undertaken once a draft tender has been prepared;
- reinvestment of any excess funding secured from unredeemed deposits into the deposit return scheme.
- use of glass industry fees to calculate the level of producer fees; and
- regular reviews of the producer fee level.

## 8.6. Question 35

### 8.6.1. Do you agree that any excess funds should be reinvested in the scheme or spent on other environmental causes?

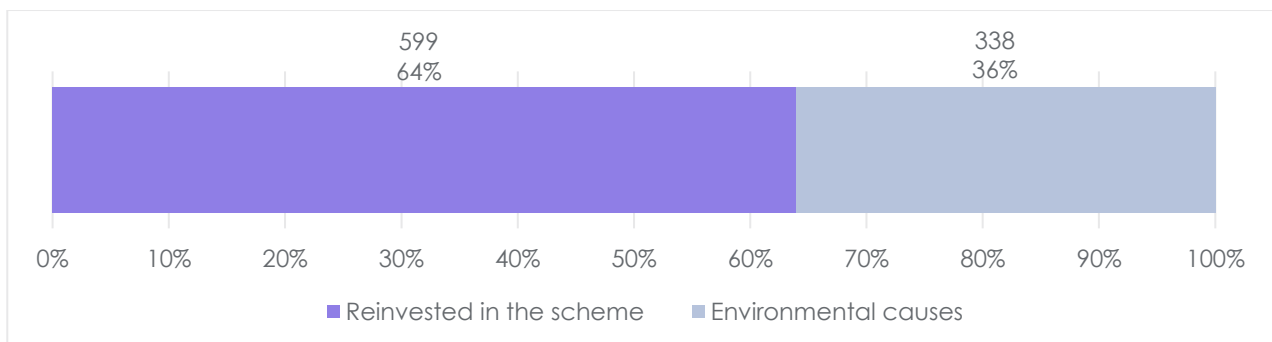


Figure 28: Question 35 (n=937)





## 8.7. Question 36

### 8.7.1. What should be the minimum deposit level set in legislation?

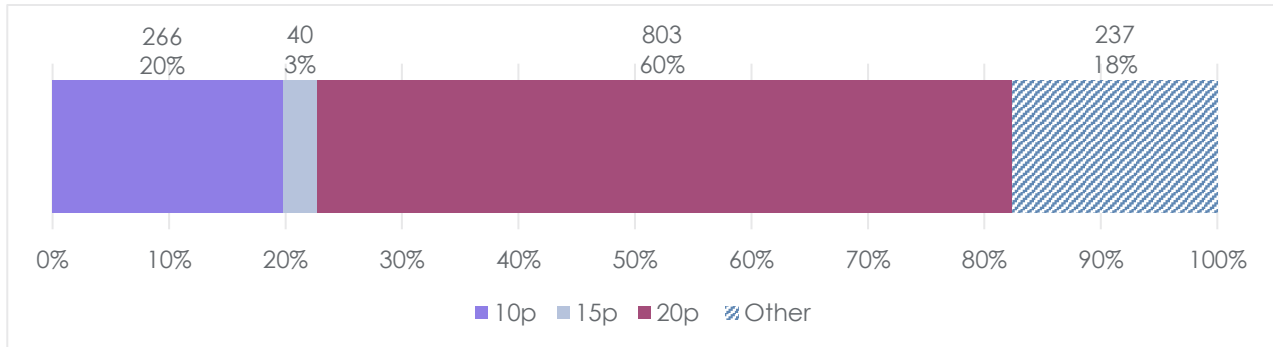


Figure 29: Question 36 (n=1346)

### 8.7.2. If 'other' please specify.

This question was answered by 497 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   36a: Deposit level   Suggestion   DMO should set level	8%	1%	22%	67%	33%	43%
4 Chapter 4 Financial Flows (30-39)   36a: Deposit level   Suggestion   devolved administrations (consistency)	4%	1%	4%	9%	22%	30%
4 Chapter 4 Financial Flows (30-39)   36a: Deposit level   Support   scottish model	4%	3%	5%	0%	11%	3%
4 Chapter 4 Financial Flows (30-39)   36a: Deposit level   Concern   deposit amount (as incentive)	3%	1%	13%	2%	5%	3%
4 Chapter 4 Financial Flows (30-39)   36a: Deposit level   Support   minimum level	2%	1%	1%	5%	6%	27%



## Support

Some respondents would support any minimum deposit return level which mirrors the level set for the Scottish deposit return scheme. Meanwhile, some respondents support a minimum level without necessarily specifying what it should be.

*"I believe it should be sufficient to truly deter the end user from not redeeming the deposit."*

*User ID 26450, Individual*

Some respondents state what minimum level they would prefer, with a few variously offering support for a level set at less than 10p, 10p, 15p, 20p, more than 20p, 50p or £1.

## Concerns

Some respondents express concern that the level of deposit set may not be sufficient to encourage behaviour change amongst consumers, or that it may cause behaviour change other than that which is intended. Some respondents also say that there is a need for an independent assessment to help determine the level of deposit set and question whether this should be undertaken by the Deposit Management Organisation.

A few respondents say that they are unsure what the minimum deposit level should be.

## Suggestions

Many respondents say that the Deposit Management Organisation should be responsible for setting the level of the minimum deposit. Meanwhile, some argue that it is important that the level is the same across the UK.

Some respondents suggest a variable deposit level based on:

- inflation (or which varies over time as required);
- the material used;
- the number of containers in a pack;
- the size of the container; or
- the value of the product.

## 8.8. Question 37

### 8.8.1. Do you agree that there should be a maximum deposit level set in legislation?

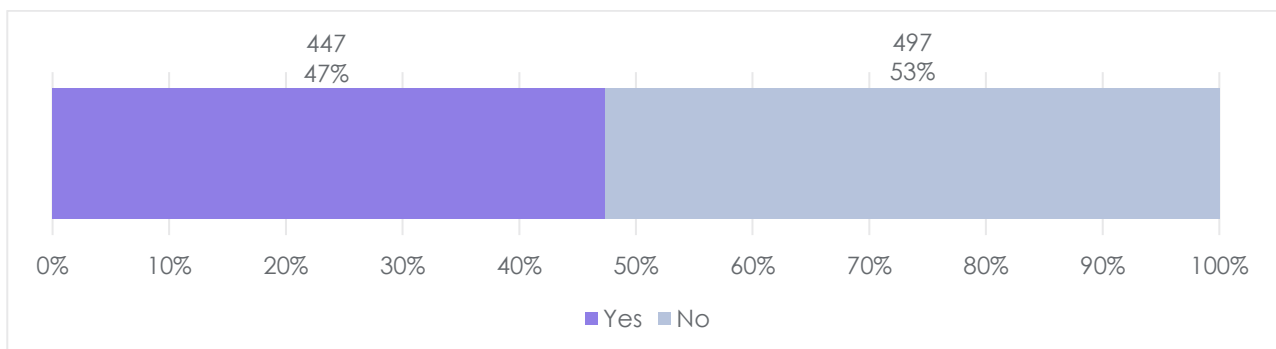


Figure 30: Question 37 part 1 (n=944)



### 8.8.2. If yes, what should be the maximum deposit level set in legislation?

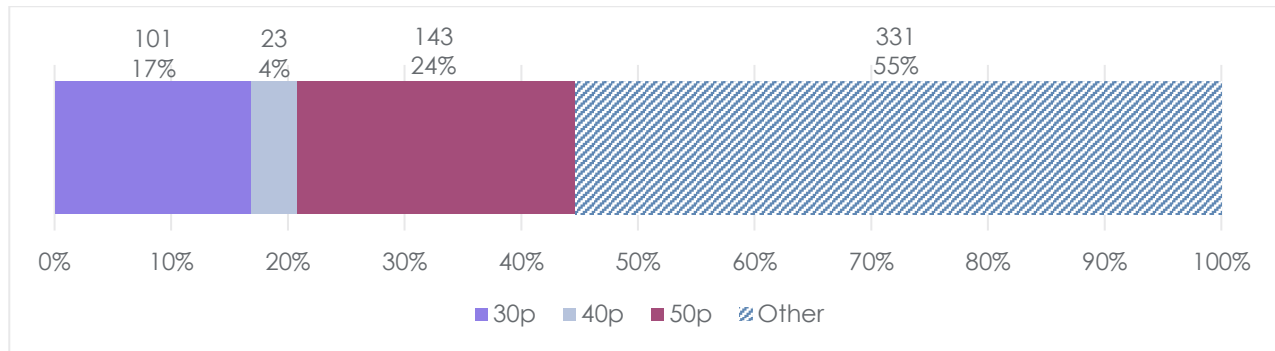


Figure 31: Question 37 part 2 (n=598)

### 8.8.3. If 'other' please specify.

This question was answered by 464 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   37a:Deposit level   Suggestion   DMO should set level	8%	1%	14%	65%	32%	46%
4 Chapter 4 Financial Flows (30-39)   37a:Deposit level   Suggestion   Devolved administrations (consistency)	5%	1%	18%	5%	25%	35%
4 Chapter 4 Financial Flows (30-39)   37a:Deposit level   Concern   disadvantage for certain social groups	5%	0%	39%	5%	6%	8%
4 Chapter 4 Financial Flows (30-39)   37a:Deposit level   Suggestion   variable (number in packs)	2%	0%	22%	4%	2%	8%
4 Chapter 4 Financial Flows (30-39)   37a:Deposit level   Suggestion   local authority representation	2%	0%	20%	0%	0%	3%

### Concerns

Many respondents express a general concern that if the deposit required by the deposit return scheme is too high then this could disadvantage certain groups, particularly those from low income households.



A few respondents also raise concerns about the potential for fraud if the maximum deposit level is set too high.

Meanwhile, a few respondents say that they do not know the level at which it should be set.

## Support

A few respondents express general positive comments towards the principle of a maximum deposit level without necessarily specifying what that should be. Some respondents also say the level at which they think the maximum deposit should be set, ranging from less than 10p to more than £2.

## Suggestions

Many respondents argue that the Deposit Management Organisation should be responsible for setting and changing deposit levels. Many also say that the maximum deposit rate should be the same across all parts of the UK.

Some respondents feel that it is important for the views of local authorities to be represented, either through membership of the Deposit Management Organisation or through the consultation process for key stakeholders.

Meanwhile, some suggest that the deposit level set in legislation should be variable, depending on:

- the number of containers in a pack;
- inflation (or a level which varies over time as required);
- the material used;
- the size of the container; or
- the value of the product.

*"[A fixed maximum deposit] ignores inflation and restricts the ability to trial the effectiveness of changes if the initial scheme doesn't work as hoped - it may be necessary to significantly increase the amount to make people act."*

*User ID 112253, Individual*

However, a few respondents argue that the maximum deposit should be set in legislation at a fixed level.

## 8.9. Question 38

### 8.9.1. **Recognising the potentially significant deposit costs consumers could pay on a multipack purchase, how best can we minimise the impact of the scheme on consumers buying multipacks?**

This question was answered by 753 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.



The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   38: Minimise impact on consumers buying multipacks   support - variable rate	8%	3%	31%	47%	14%	16%
4 Chapter 4 Financial Flows (30-39)   38: Minimise impact on consumers buying multipacks   same rate for single and multipacks	6%	3%	24%	2%	11%	5%
4 Chapter 4 Financial Flows (30-39)   38: Minimise impact on consumers buying multipacks   not necessary	5%	5%	3%	2%	5%	5%
4 Chapter 4 Financial Flows (30-39)   38: Minimise impact on consumers buying multipacks   support - minimise impact on consumers buying multipack	3%	1%	15%	18%	6%	8%
4 Chapter 4 Financial Flows (30-39)   38: Minimise impact on consumers buying multipacks   suggestion - deposit level	3%	1%	8%	4%	6%	8%

## Support

Many respondents express positive comments towards the proposal for a variable deposit rate where, for example, the charge could be proportionate to the volume purchased.

*“In order to minimise the impact on consumers, especially lower income consumers, it is vital that a variable rate of deposit is introduced and specified in legislation.”*

*User ID 127802, Packaging designer/ manufacturer/ converter*

Meanwhile, some respondents express positive comments towards the principle of minimising the impact of the deposit return scheme on consumers buying multipacks.

## Concerns

Many respondents say that it should not be necessary to minimise the impact of the deposit return scheme for consumers buying multipacks because deposits are returned when the item is recycled, so there is not financial impact for the consumer.



*"It is a deposit, not a permanent cost, so when it is working the shopper will be getting their deposit back by returning the units from their last shopping trip, covering the added cost for the deposit for this shop. The scheme won't work unless people can get their money back when they return the bottles/cans individually, so each item in the multipack needs to work the same as an individual item."*

*User ID 112079, Individual*

Some respondents feel that multipacks should be discouraged whilst a few respondents say that a low deposit level would not incentivise consumers to return containers.

Some respondents express concern that a flat rate deposit on multipacks would change consumer behaviour and result in less multipacks being bought. Some also argue that this could have a negative economic impact due to reduced sales, or conversely that it could increase waste and lead to more littering.

Meanwhile, a few respondents feel that the inclusion of deposits for multipacks could complicate the scheme and lead to consumer confusion, over, for example, instances where the sum of the return values of the individual items in a multi-pack appears to be less than the total deposit. A few are concerned that a deposit per item could cause a shift towards larger containers and therefore consuming larger amounts.

A few responses raise concerns about the definition of a multipack and ask what would fall within this category. They ask, for example, how many items would constitute a multipack or whether mixed materials would be included.

## **Suggestions**

Many respondents suggest that the same deposit level should apply for single items and multipacks. They say the deposit levels should be consistent, that multipack items are consumed as single items, that each item has the same environmental impact, or that a single rate would prevent some parts of society benefitting more than others.

*"A bottle causes the same amount of litter whether purchased as a single bottle or part of a multi pack. There should be no difference in deposit levels."*

*User ID 111778, Individual*

Some respondents give suggestions in relation to the deposit level for multipacks. They say that there should be a maximum deposit rate, a minimum deposit rate, or they suggest a specific price for the deposit level for multipacks. Meanwhile, some respondents say that the Deposit Management Organisation should be responsible for setting or changing the deposit level for multipacks.

Some respondents suggest that good use of infrastructure and technology could help to minimise the impact of deposits for consumers purchasing multipacks by, for example, making the scheme accessible and easy to use. Meanwhile, some respondents argue that communication and education about deposit levels could minimise the impact of deposit levels for consumers purchasing multipacks by demonstrating that deposits are redeemable.



A few respondents say that producers or retailers could absorb some of the deposit, offer special promotions, or clearly label multipack items to lessen the impacts of the deposit scheme for consumers.

Other suggestions include:

- a standard rate for multipacks;
- a reduction in the size of multipacks; and
- specific exemptions or exclusions.

## 8.10. Question 39

### 8.10.1. Do you agree with our approach to letting the Deposit Management Organisation decide on whether to adopt a fixed or variable deposit level, particularly with regard to multipacks?

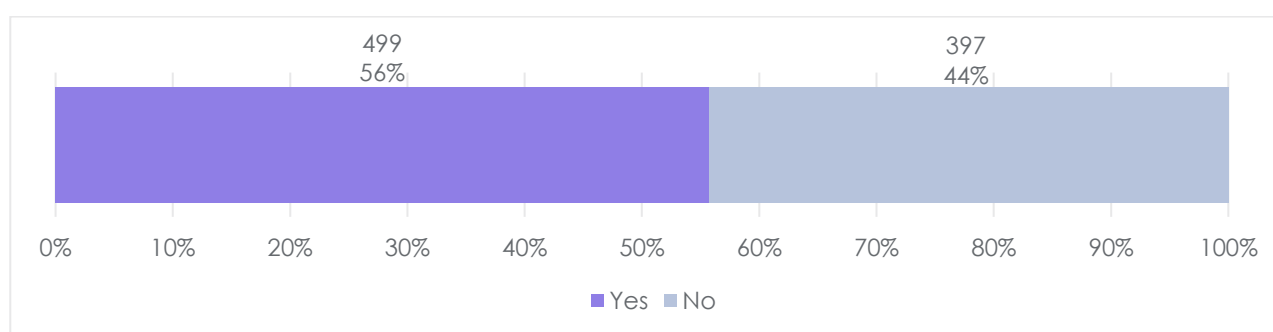


Figure 32: Question 39 (n=896)

### 8.10.2. Please provide evidence to support your answer.

This question was answered by 594 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
4 Chapter 4 Financial Flows (30-39)   39: DMO decides on variable or fixed deposit level   Support   DMO should decide	8%	3%	23%	61%	25%	22%
4 Chapter 4 Financial Flows (30-39)   39: DMO decides on variable or fixed deposit level   Concerns   multipack	7%	4%	38%	2%	11%	5%
4 Chapter 4 Financial Flows (30-39)   39: DMO decides on variable or fixed deposit level   Support   variable rate	4%	1%	23%	12%	8%	11%



4 Chapter 4 Financial Flows (30-39)   39: DMO decides on variable or fixed deposit level   Concerns   need for government oversight	3%	1%	8%	21%	6%	3%
4 Chapter 4 Financial Flows (30-39)   39: DMO decides on variable or fixed deposit level   Concerns   DMO role and accountability	3%	1%	4%	23%	5%	8%

## Support

Many respondents think that the Deposit Management Organisation is best placed to set the deposit level and should be responsible for this.

*“The deposit level should not be set in legislation and should be the responsibility of the DMO and based on participation of the scheme and deal with any unintended consequences arising from material switching.”*

*User ID 128971, Operator/ Reprocessor*

## Concerns

Some respondents express positive comments towards a variable rate for a variety of reasons. For example, they suggest that it could provide more flexibility, minimise the impact on consumers, or discourage the use of difficult-to-recycle products. Many respondents also specifically suggest that multipacks should be subject to a variable deposit rate.

*“There has to be a degree of flexibility so the scheme can respond to how it influences purchasing patterns.”*

*User ID 124334, Individual*

However, some respondents express positive comments towards a fixed rate deposit level and suggest that such an approach would provide clarity for consumers. They comment that Government could alter the level at a later date if required.

Some respondents express concern that a Deposit Management Organisation would be unsupervised and run by private organisations. They think that this could result in it choosing a deposit level which favours industry, rather than consumers. Meanwhile, some respondents think that Government should set the deposit level or should have a mechanism to intervene if the deposit level set by the Deposit Management Organisation is too high or too low.

## Suggestions

A few respondents offer various suggestions about what the deposit level should be. For example, some of these respondents suggest that the deposit level should be like the one used in Scotland.





## 9. Return points

### 9.1. Question 40

9.1.1. **Do you agree that all retailers selling in-scope drinks containers should be obliged to host a return point, whether it is an all-in or on-the-go deposit return scheme?**

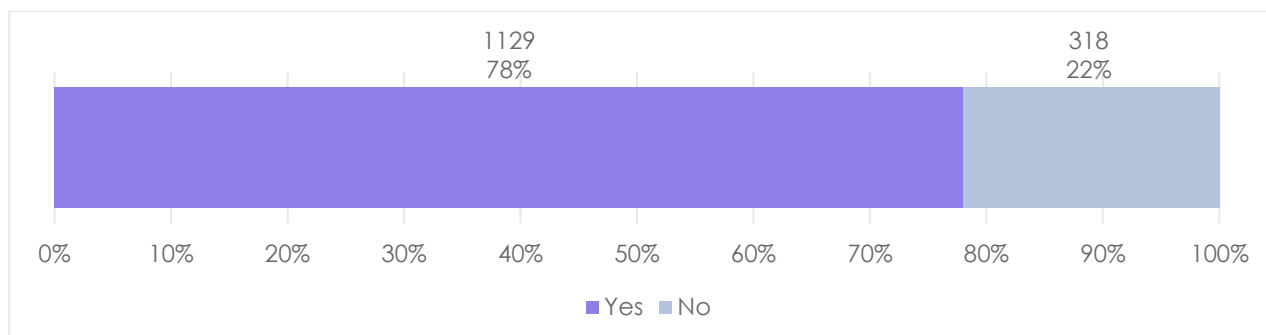


Figure 33: Question 40 (n=1447)

9.1.2. **Please provide any evidence to further explain your answer.**

This question was answered by 1031 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   40a: Hosting a return point   concern - small businesses	10%	3%	55%	14%	19%	11%
5 Chapter 5 Return Points (40-54)   40a: Hosting a return point   Suggestion   campaign	9%	12%	0%	0%	0%	0%
5 Chapter 5 Return Points (40-54)   40a: Hosting a return point   yes - general	9%	6%	15%	21%	22%	16%
5 Chapter 5 Return Points (40-54)   40a: Hosting a return point   yes - easier for consumers	5%	4%	10%	5%	16%	8%
5 Chapter 5 Return Points (40-54)   40a: Hosting a return point   concern - space	4%	2%	17%	9%	22%	5%



## Support

Many respondents agree that all retailers selling in-scope containers should host return points. Some of these respondents say that if a retailer can sell an in-scope item, then they should be able to accommodate its return. Some respondents also argue that having a single return point for all used in-scope containers would be important from a consumer convenience point of view.

Some respondents think that consumers should be able to take any used in-scope containers to any retailer, saying this would enable the scheme to run smoothly. They add that by making the scheme as clear, comprehensive, and convenient as possible, more consumers would be encouraged to use it.

*"This will provide greater ease of use for consumers - it will be significantly simpler to return containers if I can do so at any place I can buy drinks."*

*User ID 124548, Individual*

Some respondents state that online retailers should also be obliged to host a return point or equivalent. They add that in their view, it is important that online retailers are not exempt from the scheme, as the volume of online purchasing by customers has increased.

## Concerns

Many respondents express concern that small businesses may find it difficult to host and operate a return point. They think that small businesses should be given the choice to opt in or out or be exempt from hosting a return point completely. Further to this, some respondents make specific comments about businesses with a lack of physical space to conduct a return point facility, saying that space should be a consideration as to whether a retailer would be obliged to host a return point.

*"There does need to be consideration of how very small businesses and on street sellers are impacted. They will often not have the space to site a RVM or the capacity to store containers if they operate a manual take back point. It seems reasonable that "retailers" on this scale are treated separately to larger retail sites and are considered for exemptions from hosting a return point. "*

*User ID 128813, Local government*

Some respondents state that retail points where the selling of in-scope items is completed through vending machines should be exempt from hosting a return point and suggest that there should be signage stating where the nearest return point is. A few respondents express concern about the implications of the scheme, and any obligation to host a return point, on voluntary sector organisations which have vending machines selling in-scope products.

Some respondents believe that retailers should be able to apply to the Deposit Management Organisation for an exemption from an obligatory return point. They say that such exemptions could be awarded based on practical considerations or other specific circumstances.

A few respondents express concern that if all retailers selling in-scope products were



obliged to host return points, this could cause health and safety issues (such as contamination), for example in restaurants. They believe there should be exemptions for retailers for whom a return point could compromise health and safety compliance.

Meanwhile, a few respondents express concern that return points would not always be easy to access for all (groups of) consumers, for example because of disability or location. They believe this should be a consideration in discussions about where return points would be hosted.

A few respondents express concern that the proposals around return points do not seem to include online retailers, whilst others believe that the scheme could generate additional traffic and carbon emissions from additional vehicle movements to and from return points.

## **Suggestions**

Many respondents, including a number who based their responses on a campaign template response, state that it would be easier if consumers could return all empty in-scope containers to any retailer they were able to purchase the products from.

Some respondents suggest that digital kerbside collections could provide an alternative to a comprehensive network of return points, and that this would suit consumers. Some respondents also suggest that small retailers near one another should be able to share a return point, which they believe would accommodate retailers in small towns and villages.

Some respondents make a range of suggestions about how to deal with retailers that are constrained for space. They include suggestions to make return points mandatory for retailers with more space and suggestions for retailers and local authorities to work together to identify appropriate spaces outside retailers' premises.

A few respondents think that a return-to-retail model would align with the Scottish model which would make it easier for both consumers and businesses to understand and operate within the scheme.

Meanwhile, a few respondents offer a variety of suggestions about the implementation of return points. These include the suggestion of a gradual introduction, suggestions about operating hours, and suggestions about putting return points in busy locations, such as stations and car parks.



## 9.2. Question 41

### 9.2.1. Given the proposed extensive distribution and availability of return points for consumers to return bottles to, do you think consumers would be likely to experience delays / inconveniences in returning drinks containers?

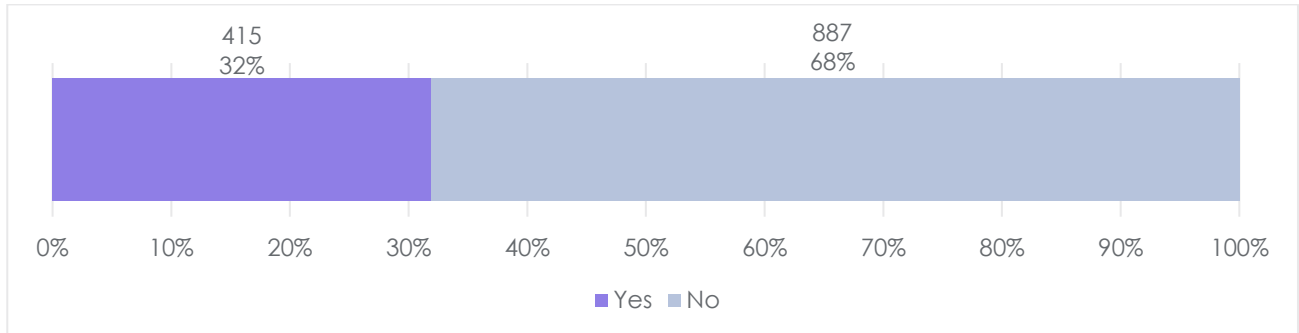


Figure 34: Question 41 (n=1302)

### 9.2.2. If so, how long or how frequently would such delays be likely to arise for?

This question was answered by 839 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   41a: Delays/inconvenience returning containers   Support   sufficient return points	15%	15%	13%	46%	11%	22%
5 Chapter 5 Return Points (40-54)   41a: Delays/inconvenience returning containers   Concern   accessibility/usability	5%	0%	22%	42%	16%	8%
5 Chapter 5 Return Points (40-54)   41a: Delays/inconvenience returning containers   Concern   difficult to know/don't know	5%	1%	29%	9%	13%	11%
5 Chapter 5 Return Points (40-54)   41a: Delays/inconvenience returning containers   Concern   queueing	4%	1%	15%	16%	6%	11%
5 Chapter 5 Return Points (40-54)   41a: Delays/inconvenience returning containers   Concern   consumers storing/bulk returns	4%	1%	30%	4%	10%	5%



## Support

Many respondents, including a number who based their responses on a campaign template response, suggest that consumers would not experience any delays or inconveniences if there would be enough reliable reverse vending machines and if these were placed in busy, accessible areas.

*“We would urge the Government in the DMO tender specification to include elements that focus on the DMO’s implementation plan including specifically how they intend to deal with this dynamic such that returns points (including manual points and RVMs) do not become quickly overloaded and therefore unavailable which would clearly potentially act as a significant disincentive in terms of participation.”*

*User ID 135271, Local government*

Some respondents say that delays caused by return points would be limited if the system would be easy to use or if it aims to maximise convenience for consumers at return points. They assert that any delays would be justified when considering the environmental benefits the deposit return scheme would achieve. A few respondents believe that returning in-scope containers to return points could quickly become a habit and that this could promote individuals’ sense of responsibility regarding waste.

A few respondents think that consumer convenience would be best served by ensuring that there are return points for all in-scope containers at all retailers where in-scope products are sold. However, a few respondents believe that there would be no inconveniences to consumers using return points, saying that similar deposit return schemes in other countries work well. A few caveat this by saying that there would be no delays or inconveniences to consumers, provided that the technology of the reverse vending machines is robust.

## Concerns

Some respondents say that return points need to be inclusive and accessible for all, so that no one is deterred from utilising them.

*“The process assumes that all consumers are able to collect, and the process must cater for the vulnerable consumer for whom the take back may actually become a major issue.”*

*User ID 124619, Business representative organisation or trade body*

Some respondents express concern that queues would be likely at return points in busy places at busy times, especially where no alternative return points are available nearby. Some respondents believe that delays would be likely during peak shopping times, as many consumers would be trying to return empty containers at the same time, whilst others assert that delays and inconveniences to consumers would be likely to happen around holidays and special events, as there would be heavier use of the reverse vending machines.

Some respondents express concern that consumers would experience delays and inconveniences if return points are not effectively managed. They highlight the importance of monitoring capacity, addressing technical faults, and keeping consumers



informed of where they can return their containers alternatively, or when a return point would be back in working order.

Meanwhile, some respondents think that delays or inconveniences to other consumers could occur if some consumers opt to return large numbers of items periodically, rather than making smaller, frequent container returns.

Some respondents think that immediately after the scheme introduction, there would be delays and inconveniences, as consumers and retailers are getting to grips with the new system. They believe that any delays or inconveniences would relatively quickly be overcome, as everyone adjusts their behaviours.

A few respondents express concern that consumer vehicle movements triggered by the need to return containers could cause inconveniences and delays, especially near return points. Some add that parking charges would add to the inconvenience.

Some respondents say that it is difficult to know how frequently or for how long consumers would face delays or inconveniences when using return points.

### 9.3. Question 42

#### 9.3.1. Do you have a preference, based on the 3 options described, on what the schemes approach to online takeback obligations should be?

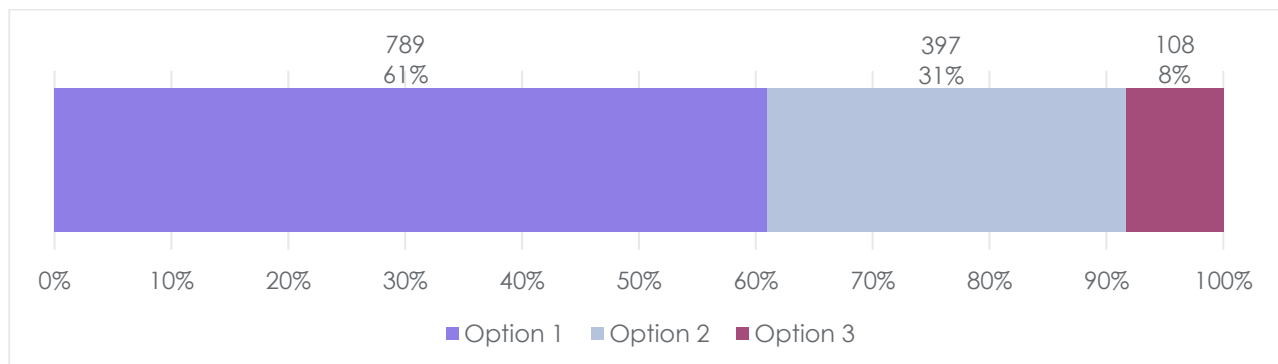


Figure 35: Question 42 (n=1294)

#### 9.3.2. Please explain your answer.

This question was answered by 897 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.



	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   42a: Options for online takeback   Support   option 1 (mandatory takeback service)	20%	21%	10%	37%	21%	14%
5 Chapter 5 Return Points (40-54)   42a: Options for online takeback   Support   option 2 (some exempt from takeback service)	10%	2%	66%	12%	16%	22%
5 Chapter 5 Return Points (40-54)   42a: Options for online takeback   Suggestion   general/	3%	2%	11%	4%	16%	8%
5 Chapter 5 Return Points (40-54)   42a: Options for online takeback   Concern   option 1 (pressure on small businesses)	2%	1%	4%	14%	10%	3%
5 Chapter 5 Return Points (40-54)   42a: Options for online takeback   Support   option 3 (no obligation to have takeback service)	2%	1%	2%	11%	21%	8%

## Option 1

Many respondents, including a number who based their responses on a campaign template response, support the takeback service being mandatory for all retailers. They say that this would ensure that online retailers have the same responsibilities as high street retailers, would make it easier for consumers, would be important for accessibility and would reduce litter and waste, including single-use plastics.

*“Online retailers must be obliged to accept returns. As online sales continue to increase, they must share the same responsibilities as other retailers.”*

*User ID 112070, Individual*

However, some respondents believe that it would be difficult for small retailers to facilitate an online takeback scheme. This includes suggestions that it would be impractical for small retailers to offer an online takeback scheme and they would not have the space to do so.

A few respondents say that more road journeys could be needed for option 1 to accommodate demand, which would lead to increased vehicle use and carbon emissions.

## Option 2

Many respondents believe that some should be exempt from the takeback service, particularly small businesses. These respondents say that a de minimis approach would restrict retailer obligations to sales.

*“I can imagine a few retailers, such as mobile vans, where it would be difficult for consumers and the retailers, but exemptions must be very limited.”*

*User ID 111917, Other*



A few of these respondents say that online retailers should be included but small retailers should be excluded.

### Option 3

Some respondents say there should not be an obligation to offer an online takeback service. They argue that online retailers should not have to collect items due to the additional cost, complexity and carbon emissions of the extra journeys.

*"I feel it unnecessary to offer a take back service, and the logistics are prohibitive to the scheme outputs. If the service is planned well from the off, with a number of key return points, it seems pointless."*

*User ID 116604, Local government*

Some respondents express concern about residents having to make additional journeys and the environmental impact of this if option 3 were selected.

### General comments and suggestions

A few respondents express concern that there may be hygiene or safety implications arising from an online takeback scheme. They say that there could be issues with couriers collecting containers or contamination and storage issues with packaging.

Meanwhile, a few respondents say they do not know which option to select or that none of the options listed are ideal.

In terms of suggestions, some respondents say that online businesses should still have to contribute even if they are exempt from the online takeback scheme. Some of these respondents think that online retailers could pay a nominal fee per container to ensure it is returned.

A few respondents make other suggestions, including:

- alignment with the Scottish deposit return scheme;
- a digital deposit return scheme;
- allowing the Deposit Management Organisation to decide whether retailers should have to offer the option of an online takeback scheme;
- high street retailers and online retailers combining to provide a joint service; and
- offering online takeback at an additional cost to the consumer without it being mandatory.





## 9.4. Question 43

### 9.4.1. Do you agree with the proposed criteria for the calculation of the handling fee?

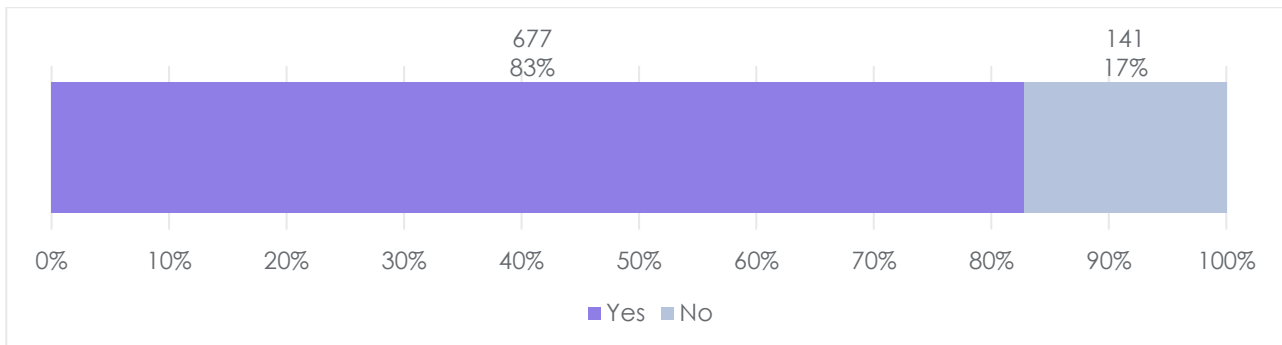


Figure 36: Question 43 (n=818)

### 9.4.2. Would you propose any additional criteria are included for the calculation of the handling fee?

This question was answered by 323 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   43a: Handling fee   Concern   concerns about small businesses	3%	1%	16%	5%	14%	3%
5 Chapter 5 Return Points (40-54)   43a: Handling fee   Suggestion   DMO should determine	2%	0%	2%	11%	27%	5%
5 Chapter 5 Return Points (40-54)   43a: Handling fee   Concern   need for an appeals procedure	2%	0%	15%	0%	0%	5%
5 Chapter 5 Return Points (40-54)   43a: Handling fee   general support for a handling fee	2%	1%	5%	4%	13%	5%
5 Chapter 5 Return Points (40-54)   43a: Handling fee   Suggestion   general/	1%	0%	3%	12%	3%	0%



## Suggestions

Some respondents do not suggest any additional criteria being included in the calculation of the handling fee.

Some respondents propose that the handling fee should be determined by the Deposit Management Organisation. They suggest regular audits to drive efficiency.

A few respondents suggest a higher handling fee for glass to encourage retailers to switch to plastic from glass. or that the fee should not be too different to prevent market distortion.

A few respondents think that online retailers should be able to take a handling fee if they offer an online takeback service, requesting clarity on this issue.

A few respondents propose that the handling fee rate should be set in relation to retailers' sales, for instance calculating this using a per unit cost methodology. Some of these respondents argue that incentivising retailers to collect returns in relation to their sales will address issues of littering and prevent a closed loop mindset.

A few respondents think there should be flexibility within the handling fee scheme and make suggestions for it to be reviewed at set periods in consultation with retailers, for example to identify additional costs.

## Support

Some respondents express general positive comments towards the introduction of a handling fee. Some of these respondents say that the handling fee should cover reasonable costs and that the criteria should be clearly defined. Others draw attention to examples from other countries, such as Denmark, where a handling fee has worked well.

*"We suggest a fixed, transparent handling fee for the retailers. There are successful examples where additional services over and beyond collection at return points – such as back-hauling, baling, sorting, etc. – provided by retailers has been compensated through additional service fees. (i.e. Lithuania)."*

*User ID 129034, Retailer including online marketplace*

## Concerns

A few respondents oppose the idea of having a handling fee, with some arguing that it should be a legal obligation of retailers to facilitate returns and others saying that extra fees could have negative impacts such as corruption or lead to a fall in consumer confidence.

Many respondents commenting on this question express concern that a handling fee would have an adverse impact on small businesses, highlighting issues such as limited space. They state that small businesses would need to have the handling fee re-imbursed.

*"Need to consider costs for specific types of retailers (e.g. small corner stores with limited storage space and high space and labour costs) in determining the handling fee. Need higher handling fee for such small stores where costs could be higher."*

*User ID 124608, Community group*

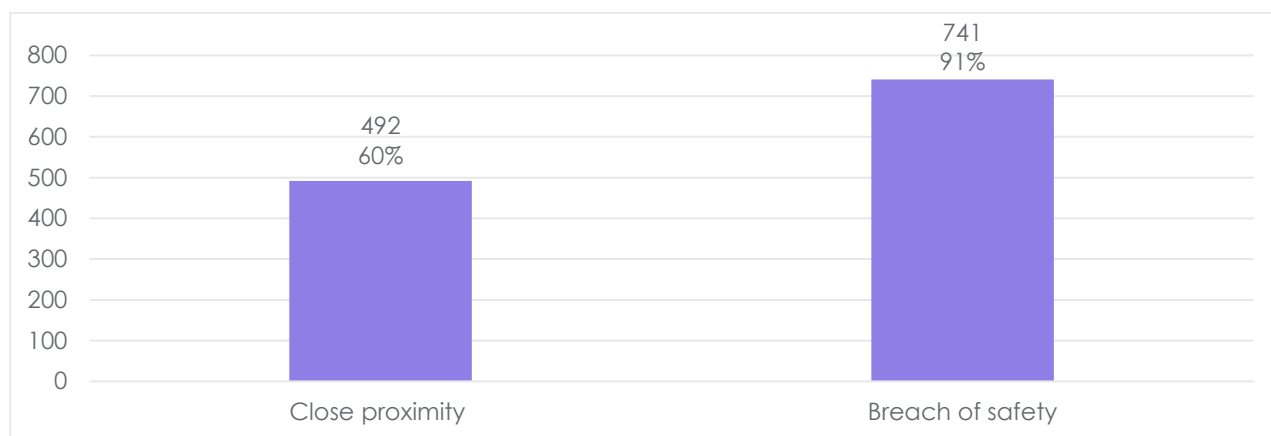


Some respondents state that there is a risk that some retailers could be adversely impacted when costs are not paid on actual costs and argue that an appeals procedure should therefore be allowed.

A few respondents say they are unable to answer this question.

## 9.5. Question 44

### 9.5.1. Please tick which exemptions you agree should be included under the scheme.



**Figure 37: Question 44 – Respondents could select more than one option and the base number (n) is the number of respondents who selected at least one option, with all percentages calculated in relation to this figure (n=814)**

### 9.5.2. Any further comments you wish to make.

This question was answered by 392 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   44a: Exemptions to hosting a RP   Suggestion   other exemptions - size of retailer	3%	1%	20%	0%	8%	3%
5 Chapter 5 Return Points (40-54)   44a: Exemptions to hosting a RP   Suggestion   regular monitoring	3%	1%	24%	0%	5%	5%
5 Chapter 5 Return Points (40-54)   44a: Exemptions to hosting a RP   Support   health/safety	3%	1%	19%	2%	8%	8%



5 Chapter 5 Return Points (40-54)   44a: Exemptions to hosting a RP   Concern   health and safety exemption - clearer criteria	3%	0%	22%	0%	0%	3%
5 Chapter 5 Return Points (40-54)   44a: Exemptions to hosting a RP   Concern   close proximity exemption - general	2%	0%	20%	0%	2%	8%

## Support

Some respondents state that health/safety concerns should be included as exemption criteria.

*"Safety of retailers, staff and consumers should always be a first priority so we agree with this exemption."*

*User ID 128973, Local government*

Some respondents say there should be close proximity exemptions for hosting a return point.

Some respondents state that both close proximity and breach of safety should be included as grounds for exemption.

Some respondents express general positive comments towards the idea of hosting a return point because it will create an incentive for consumers to return containers and may also drive footfall.

## Concerns

Some respondents say there should be no exemptions from return points, with some arguing that if retailers can stock products, they should be obliged to host a return point. A few say exemptions would decrease convenience and accessibility for consumers.

Some respondents state that health and safety concerns should not qualify for an exemption or that there should be a robust set of criteria to be met, which would need regular review and monitoring.

*"Under a suitable system [respondent name] would not want to see this reason for exemption used to circumvent retailer compliance and obligations. This would need to include regular review and monitoring."*

*User ID 135221, Local government*

Some respondents oppose close proximity exemptions, giving as reasons inconvenience, queues and consumers becoming disengaged. Some believe that close proximity exemptions would lead to unfair competition between supermarkets and local shops and/or cause a free-rider problem where neighbouring retailers share return points.

## Suggestions

Some respondents suggest that retailers exempt from hosting a return point should be regularly reviewed and monitored.

Some respondents suggest that the size/capacity of retailers should provide grounds for



exemption because the deposit return scheme places a disproportionate burden on small retailers. A few respondents also propose allowing exemptions on the grounds of cultural and/or religious beliefs, for instance for retailers that do not sell alcohol for religious reasons.

*“The government should consider an exemption for small stores which have limited sales and storage space to facilitate a deposit return scheme. Regardless of the method of take back (automated or manual), a retailer would be required to sacrifice space in-store to operate a deposit return scheme – either by storing drinks containers nearby the till and at back of house for collection, or with a reverse vending machine taking up significant space in store.”*

*User ID 130451, Business representative organisation or trade body*

A few respondents make a number of suggestions about the close proximity exemption including allowing it for small shops, requiring the exempted retailer to pay towards the cost of a return point and allowing retailers in close proximity to share return points.

Some respondents suggest that the exemptions should be aligned with the Scottish Deposit return scheme as this would lead to consistency across the UK.

Some respondents make the more general point that return points should be strategically located to encourage use by consumers, for instance by having a good spread of locations.

## 9.6. Question 45

### 9.6.1. **Please can you provide any evidence on how many small and micro sized retail businesses we might likely expect to apply for an exemption to hosting a return point, on the grounds of either close proximity to another return point or on the compromise of safety considerations?**

This question was answered by 481 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   45: Evidence of small businesses applying for exemption   not known	9%	4%	42%	5%	10%	14%



5 Chapter 5 Return Points (40-54)   45: Evidence of small businesses applying for exemption   exemption - health/safety	2%	0%	6%	9%	6%	3%
5 Chapter 5 Return Points (40-54)   45: Evidence of small businesses applying for exemption   exemption - lack of space	1%	1%	2%	9%	6%	3%
5 Chapter 5 Return Points (40-54)   45: Evidence of small businesses applying for exemption   suggestions - other	1%	1%	2%	2%	2%	3%
5 Chapter 5 Return Points (40-54)   45: Evidence of small businesses applying for exemption   further research needed	1%	0%	10%	2%	0%	3%

## Suggestions

A few respondents provide a specific percentage of how many small businesses they expect will apply for exemption, with estimates ranging from 20% to 90%.

*“71% of retailers responded that they either did not have the space to process bottle returns in-store or would have to make significant changes to their stores to facilitate a deposit return scheme.”*

*User ID 135215, Business representative organisation or trade body*

A few respondents say that the number of small businesses applying for exemption will vary by location, for example the number is likely to be higher in London.

A few respondents state that all small businesses will apply for exemption because retailers will want to avoid the time and money involved.

A few respondents say that Government needs to undertake further research to better understand the evidence, with some of them arguing that this should be considered on a national basis. A few respondents suggest learning from the experience in Scotland of why small businesses apply for exemption.

Some respondents make general points about exemptions, for instance the reasons why retailers will apply for exemptions (lack of space is mentioned) and a few put forward arguments against exemptions being allowed at all.

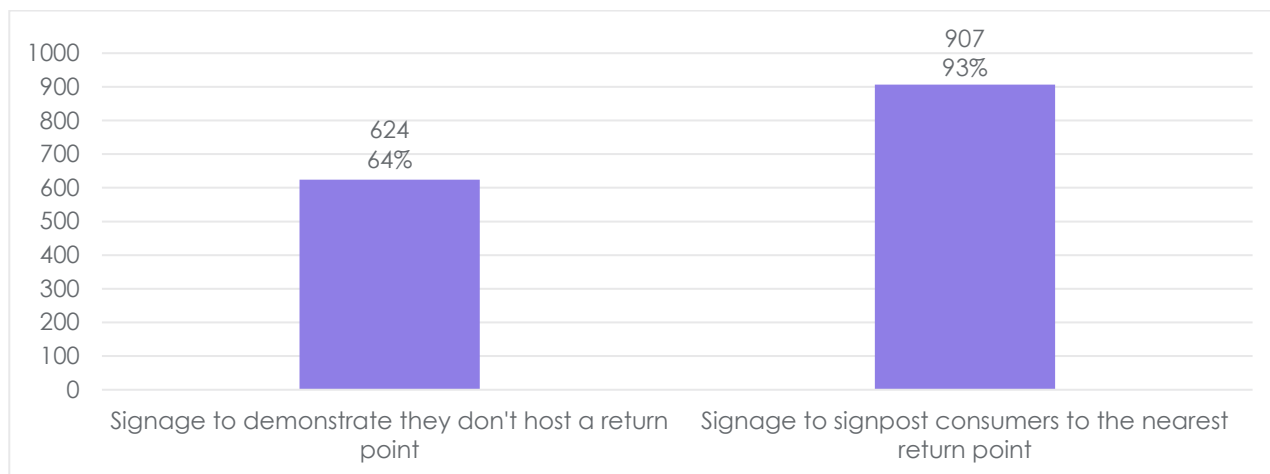
Some respondents comment on the scheme more broadly, for instance making suggestions on how to offer return points and delaying the rollout of the scheme because of the impact of Covid-19.

Many respondents state that they do not have enough knowledge to be able to provide a response to this question.



## 9.7. Question 46

**9.7.1. Do you think obligations should be placed on retailers exempted from hosting a return point to display specific information informing consumers of their exemption? If yes, please tick what information retailers should be required to display.**



**Figure 38: Question 46 – Respondents could select more than one option and the base number (n) is the number of respondents who selected at least one option, with all percentages calculated in relation to this figure (n=971)**

## 9.7.2. Additional comments

This question was answered by 348 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   46: Exempt retailer obligation to inform consumers   suggestion - signage/information about other return point	4%	1%	26%	4%	11%	5%
5 Chapter 5 Return Points (40-54)   46: Exempt retailer obligation to inform consumers   suggestion - signage about exemption	4%	1%	15%	4%	16%	32%
5 Chapter 5 Return Points (40-54)   46: Exempt retailer obligation to inform consumers   suggestion - signage/branding about drs	3%	1%	13%	21%	6%	5%



5 Chapter 5 Return Points (40-54)   46: Exempt retailer obligation to inform consumers   concern - mandatory signage	2%	1%	8%	5%	2%	0%
5 Chapter 5 Return Points (40-54)   46: Exempt retailer obligation to inform consumers   oppose/limit exemptions	1%	1%	1%	0%	0%	3%

## Support

Many of the respondents who provide additional comments support the proposals that retailers exempted from hosting a return point should display signage to signpost customers to the nearest return point and that they should display signage indicating that they do not host a return point.

A few respondents make positive comments which are general in nature.

## Concerns

Some respondents oppose allowing exemptions for retailers, or support exemptions only on limited and specific grounds.

Meanwhile, some respondents express concern about the nature of the information which retailers may be obliged to display if they do not host a deposit return point. They say it may be difficult to provide up-to-date information about return points they do not manage or that the provision of such information may encourage consumers to shop at other retailers.

A few respondents raise concerns about the opening hours which retailers hosting a return point may be permitted to operate under, or about the noise which may be generated by consumers returning products.

## Suggestions

Many respondents comment on the information which should be displayed when a retailer is granted an exemption from hosting a return point, such as the grounds for exemption.

Among respondents who support the proposal to display signage which signposts the nearest return point, a few suggest that information should be kept up to date, whilst some suggest the creation of a website or app which shows consumers where their nearest return point is.

*“Information about return points could also be included on the retailers website, and perhaps an app could be produced to show where return points are, this would be especially helpful for residents wanting to return something while they are away from home as they could locate their nearest RVM.”*

*User ID 116618, Local government*

Some respondents say that signage should be clear and consistent to support recognition amongst consumers.

A few suggest that signage promoting the message that consumers must not litter should





be displayed in premises which have been granted an exemption, whilst others say that consumers should be provided with information which would allow them to challenge a retailer's exemption.

A few respondents believe that the Deposit Management Organisation should be obliged to provide consumer information as to how and where deposit return points can be accessed and to ensure that any information provided by retailers is up-to-date.

A few also say that any retailer obligation should be aligned with the proposed Scottish deposit return scheme.

## 9.8. Question 47

### 9.8.1. Do you agree with our rationale for not requiring retailers exempted on the basis of a breach of safety not to be required to signpost to another retailer?

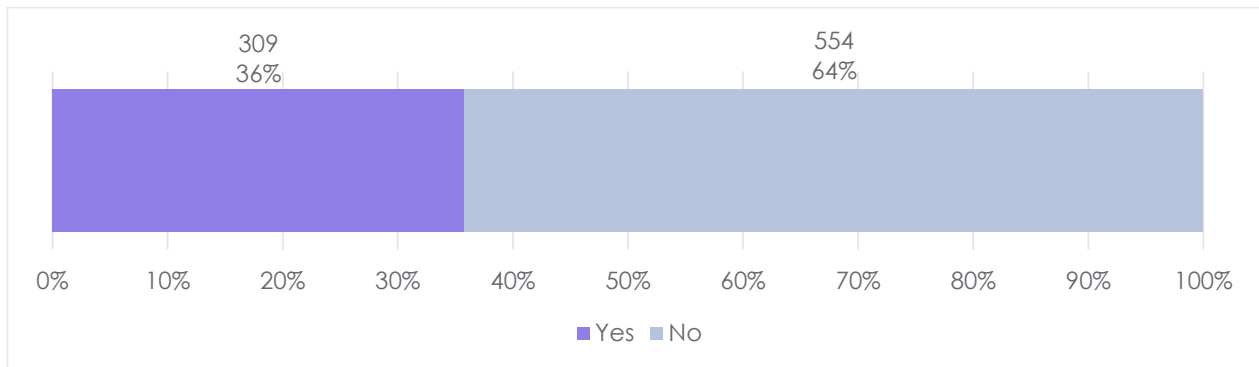


Figure 39: Question 47 (n=863)

### 9.8.2. Please explain your answer.

This question was answered by 509 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   47: Rationale to not signpost to competitor   support - signage about other return point	7%	3%	26%	49%	13%	16%
5 Chapter 5 Return Points (40-54)   47: Rationale to not signpost to competitor   oppose rationale about competitors	3%	2%	3%	32%	2%	3%



5 Chapter 5 Return Points (40-54)   47: Rationale to not signpost to competitor   prioritise convenience	3%	2%	3%	2%	14%	8%
5 Chapter 5 Return Points (40-54)   47: Rationale to not signpost to competitor   agree with rationale about competitors	2%	0%	8%	14%	11%	11%
5 Chapter 5 Return Points (40-54)   47: Rationale to not signpost to competitor   oppose exemptions	1%	1%	0%	0%	3%	0%

## Concerns

Many respondents say that there should be a requirement for retailers to signpost return points if they do not host one themselves or that they oppose the rationale that retailers who do not host a return point should have not have to signpost to a competitor.

*“To make it as easy as possible for the consumer to return their container, they need to be informed of the nearest location. All retailers should be obliged to support the scheme.”*

*User ID 125434, Local government*

Meanwhile, some respondents say that retailers should not be able to exempt themselves from hosting a return point.

A few respondents say that the priority must be the environment and not whether retailers should advertise competitors.

A few respondents believe this question is confusingly phrased.

## Support

Some respondents agree that retailers should not have to advertise potential competitors if they are unable to host a return point due to safety considerations.

However, some respondents do agree that retailers should have to display signage indicating whether they do or do not host a return point. A few express positive comments towards the proposal that retailers who opt out of hosting a return point, rather than being unable to host one due to safety considerations, should have to signpost to the nearest point.

## Suggestions

Some respondents believe that retailers should prioritise consumer convenience and therefore be obliged to direct customers to the nearest location which hosts a return point.

Meanwhile, some respondents suggest that retailers which do not host a return point could direct consumers to locations that do using signage which does not advertise or specifically identify a competitor.



## 9.9. Question 48

### 9.9.1. How long do you think exemptions should be granted for until a review date is required to ensure the exemption is still required?

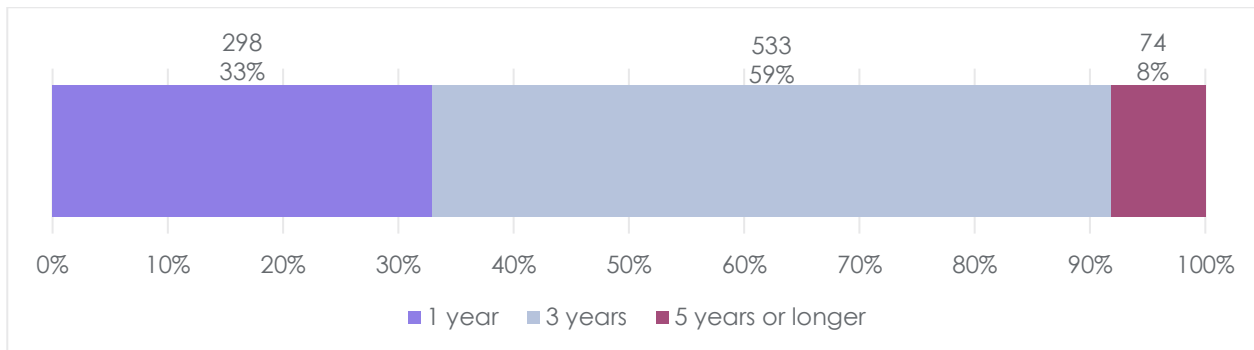


Figure 40: Question 48 (n=905)

## 9.10. Question 49

### 9.10.1. Do you think the scheme could benefit from technological solutions being incorporated as a method of return, alongside reverse vending machines and manual return points?

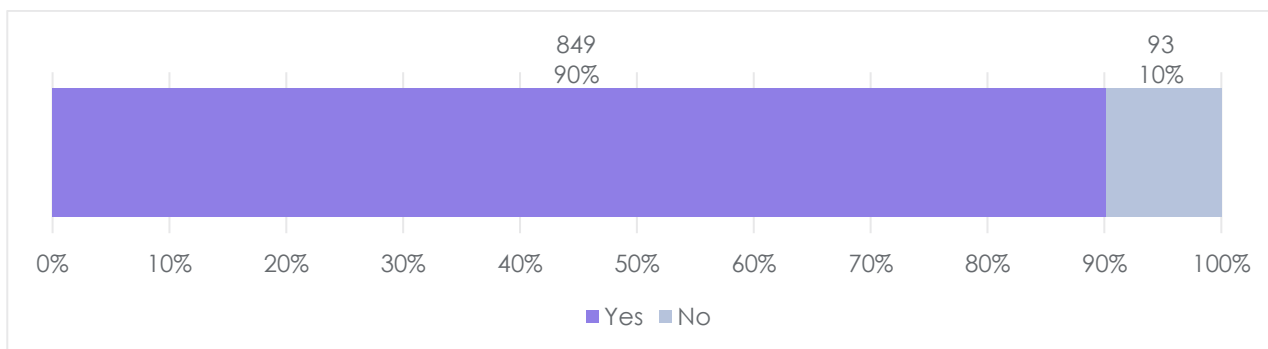


Figure 41: Question 49 (n=942)

## 9.11. Question 50

### 9.11.1. How could a digital deposit return scheme solution be integrated into existing waste collection infrastructure? Please explain your answer.

This question was answered by 597 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.



	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   50. Digital Deposit Return Scheme   general support for digital drs	7%	1%	30%	49%	21%	35%
5 Chapter 5 Return Points (40-54)   50. Digital Deposit Return Scheme   suggestion - integrate with current recycling systems	7%	1%	37%	18%	14%	30%
5 Chapter 5 Return Points (40-54)   50. Digital Deposit Return Scheme   suggestions - unique barcode/qr code	6%	1%	32%	9%	14%	22%
5 Chapter 5 Return Points (40-54)   50. Digital Deposit Return Scheme   don't know/no expertise	4%	3%	11%	5%	6%	5%
5 Chapter 5 Return Points (40-54)   50. Digital Deposit Return Scheme   suggestion - app/online accounts	4%	1%	15%	16%	14%	11%

## Support

Many respondents express positive comments towards the implementation of a digital deposit return scheme, arguing that it would be simpler to use, more cost effective and that it is sensible to make this type of provision in an increasingly digital society.

*"We believe there are numerous benefits to be gained from digital DRS systems. Not least consumer convenience, accessibility to those who cannot access physical return points, and the ability to apply unique variable deposits to individual items. Allowing for digital return system will future-proof the DRS."*

*User ID 129011, Other*

## Concerns

Some respondents oppose the implementation of a digital deposit return scheme. They feel it would affect the successful functioning of the current kerbside collection system and that it could be confusing or difficult to use for some people.

Some respondents say that a digital deposit return scheme could put pressure on local authorities in terms of financial and administrative burden. They argue that such a scheme could shift responsibility away from producers and retailers and onto local authorities as they manage kerbside collection.

*"Local authorities are obligated to collect paper, card, metals, plastic and glass and include the proposed in-scope materials in existing collection systems. We believe the use of unique bar codes / scanning to redeem deposits is overly complex, costly and problematic."*

*User ID 135247, Local government*

Meanwhile some respondents raise concerns that a digital deposit return scheme could be open to fraud if there are no mechanisms to guarantee a container is actually



returned after it is scanned. They call for the scheme to implement verification methods to avoid such a situation.

Some respondents argue that the intention to implement a digital deposit return scheme demonstrates the need to delay implementation of a deposit return scheme in general. They say that it would be better to wait until other waste management schemes have been implemented and the impacts of Covid-19 have been understood, or until a consistent scheme can be rolled out across all four nations of the UK.

Some respondents say that a digital deposit scheme could face challenges when dealing with damaged labels or barcodes and that this needs to be taken into account when designing the scheme.

Some respondents say that a digital deposit return scheme may impact the quality of recycle or the volume of other waste schemes.

A few respondents also express concerns about consumers who do not have access to technology or smartphones and say that they may find it more difficult or might not be able to participate in the scheme.

A few respondents say that a digital deposit return scheme may lead to problems at the time of redemption. For example, households with more than one family may struggle to decide who should receive the payment.

Many respondents say that they do not feel able to answer this question.

## Suggestions

Many respondents provide varied suggestions about how a digital deposit return scheme could be integrated with other existing waste collection infrastructure. They feel this would simplify the scheme and make data collection more consistent.

Many respondents also suggest the use of barcodes or QR codes to identify specific containers so that they can be identified during kerbside collection and the deposit value redeemed by the consumer. Similarly, some respondents suggest the use of tracking technology such as blockchain as a means of implementing a digital deposit return scheme.

*“A successful digital DRS could see a deposit system in place but utilise existing recycling infrastructure such as the kerbside system and on-the-go bins with the use of smartphone app, QR code labelling and blockchain technology.”*

*User ID 129157, Product designer/ manufacturer/ pack filler*

Some respondents say that phone applications or online accounts should be used as part of a digital deposit return scheme. They feel this could make the experience easier for the user and offer valuable data about the functioning of the scheme.

Some respondents suggest that trials should be carried out to gather more information about the functioning of a digital deposit return scheme.

Some respondents say that a digital deposit return scheme should function separately from existing kerbside recycling mechanisms, as integration may lead to lower quality recycle or not be viable.



A few respondents make other suggestions, which include:

- making the Deposit Management Scheme responsible for innovation, design and implementation of a digital deposit return scheme;
- making any digital deposit return scheme simple and convenient for users;
- learning from experiences of other countries which have implemented digital deposit return schemes; and
- use of smart bins.

## 9.12. Question 51

### 9.12.1. What are the potential fraud control measures a digital deposit return scheme could bring? Please explain your answer.

This question was answered by 567 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   51: Potential fraud control measures for a digital deposit return scheme   suggestion - unique barcode/qr code	8%	1%	50%	19%	25%	27%
5 Chapter 5 Return Points (40-54)   51: Potential fraud control measures for a digital deposit return scheme   concern about fraud - scan misuse	5%	0%	44%	2%	13%	8%
5 Chapter 5 Return Points (40-54)   51: Potential fraud control measures for a digital deposit return scheme   don't know/no expertise	5%	3%	23%	9%	8%	3%
5 Chapter 5 Return Points (40-54)   51: Potential fraud control measures for a digital deposit return scheme   DMO should enforce	3%	0%	18%	30%	2%	11%
5 Chapter 5 Return Points (40-54)   51: Potential fraud control measures for a digital deposit return scheme   digital drs reduces fraud	3%	0%	3%	40%	13%	14%



Many respondents answering this question propose that containers should have a unique barcode or QR code to ensure the containers are only redeemed once and reduce risk of fraud.

*"Use barcodes that can only activate a return on one single transaction- afterwards, once used, they will be incapable of creating a return transaction."*

*User ID 104440, Individual*

Some respondents argue that tracking technology would reduce fraud, for instance because information will be personally identifiable and tracking a unique ID would ensure multiple deposit collections do not occur.

A few respondents suggest that each pack should have a distinct identifying label, although some of them think that this would be expensive and/or impractical.

Many respondents express concern that scanning containers as a measure to control fraud has the potential to lead to scan misuse, with some stating that systems would need to check containers are put in the correct bins and/or not littered.

*"Systems would also be required to confirm that the product, once scanned ends up in the correct recycling collection bin/box and not placed in the residual waste. Similarly, there would need to be controls that prevents items being scanned in the shop, but not purchased and then the deposit requested via the kerbside system."*

*User ID 128542, Waste management company*

Some respondents make general suggestions of fraud control measures, for instance having a cashless scheme, auditing returns, and having a standard deposit price to prevent cross-border fraud. Some respondents suggest that the deposit could be redeemed by an application or online account.

A few respondents state the digital deposit return scheme would be complicated and that keeping the scheme simple will make it harder for fraud to occur.

Some respondents believe that the enforcement of a digital deposit return scheme should not be left to local authorities and that the Deposit Management Organisation should manage/enforce it.

A few respondents say there are risks to data storage with a digital deposit return scheme such as IT glitches, systems being hacked and breaches of confidentiality.

Some respondents suggest that digital deposit return schemes outside of the UK should be researched to see what lessons on controlling fraud can be learned from them.

Respondents make some general observations on the likelihood of fraud. Some respondents believe that a digital deposit return scheme would reduce fraud and for instance would control the risk of organised crime and assist in reducing cross-border fraud. Some other respondents express opposition to a digital scheme because it would lead to opportunities for fraud.

Some respondents believe that fraud is unavoidable and will happen regardless of which scheme is chosen because there is always the potential for fraud when money is involved.



Some respondents say that fraud due to a digital deposit return scheme is not a concern for instance because the market will identify solutions to deal with fraud and the fraud from a digital scheme will be less than from a reverse vending machine scheme.

Some respondents state that the scheme would lead to bin-mining/bin diving where consumers pull containers out of bins and scan items to see if they can reclaim a deposit from in-scope materials.

A few respondents argue that the implementation of a digital deposit return scheme needs to be delayed, for instance to test it at scale to understand its limitations.

Some respondents say that they do not have the knowledge or expertise to respond to this question, with some of these respondents saying that this issue should be guided by current research and evidence.

*“We are not best placed to answer this however; experiences elsewhere should be used to inform any decisions on control measures.”*

*User ID 128826, Local government*

### 9.13. Question 52

**9.13.1. Do you think a digital deposit return scheme could ensure the same level of material quality in the returns compared to a tradition return to retail model, given containers may not be returned via a reverse vending machine or manual return point where there is likely to be a greater scrutiny on quality of the container before being accepted?**

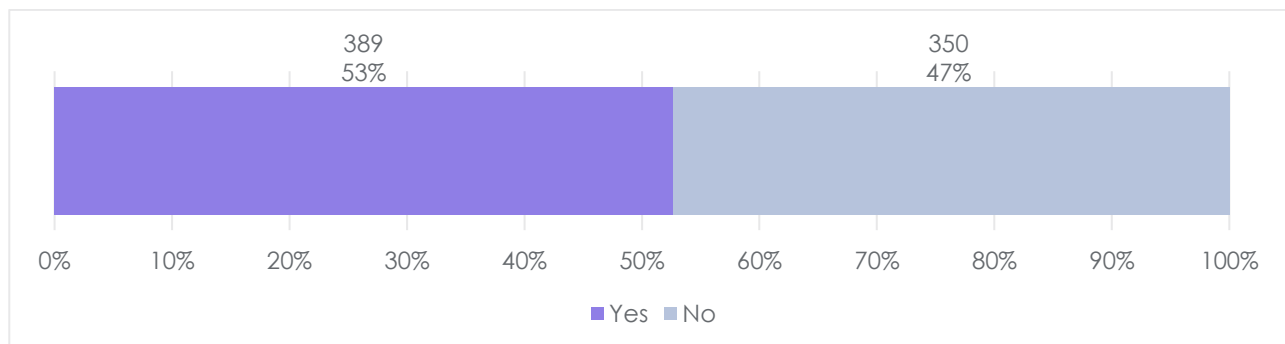


Figure 42: Question 52 (n=739)

### 9.13.2. Please explain your answer

This question was answered by 522 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.





	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   52: Material quality in the returns   yes - same quality	8%	2%	33%	42%	13%	30%
5 Chapter 5 Return Points (40-54)   52: Material quality in the returns   no - worse quality	7%	2%	41%	2%	16%	8%
5 Chapter 5 Return Points (40-54)   52: Material quality in the returns   no difference	5%	1%	34%	2%	8%	11%
5 Chapter 5 Return Points (40-54)   52: Material quality in the returns   new technology needed	4%	2%	7%	30%	6%	5%
5 Chapter 5 Return Points (40-54)   52: Material quality in the returns   unsure/no expertise	3%	2%	9%	16%	10%	11%

## Support

Many respondents state that a digital deposit return scheme would capture similar quality of returns or not make any difference to the quality of material returns compared to a traditional return model. Some of these respondents point out that we are already used to kerbside collections needing dry/clean recyclables to be accepted.

*"We are positive that with the right level of engagement, investment and consistency from all stakeholders, this complementary route for DRS material would deliver sufficient quantity and high-quality material."*

*User ID 128833, Retailer including online marketplace*

Some respondents believe that a digital deposit return scheme would increase the quality of material returns, for instance because of greater levels of public engagement and less material is likely to get broken during sorting.

## Concerns

Conversely many other respondents believe that the digital deposit return scheme would result in worse quality material returns, with reasons given including the potential for consumers to return low quality items because of a lack of monitoring and contamination issues.

*"DRS should remove the contamination problems associated with kerbside and comingled collections whereas a 'Digital DRS' – unless every kerbside recycling bin were to be separated at source – would not be able to achieve this."*

*User ID 128684, Product designer/ manufacturer/ pack filler*

Other respondents express general concerns about a digital deposit return scheme, with some saying that there is potential for misuse of scanning materials and a few that some consumers may not be able to access the necessary technology. A few respondents state



that the digital scheme is not viable. A few respondents suggest delaying the implementation of the scheme, for instance until the experience in Scotland has been evaluated.

Some respondents say they do not know enough to be able to answer this question.

## Suggestions

Some respondents propose that new technology is needed to check the quality of material returns, with suggestions including that the technology could check weights and detect materials and could refuse some collections.

Some respondents state that trials are needed to identify if a deposit return scheme would have the same level of material quality returns as a traditional return model. Some of these respondents comment that the level of quality returns cannot be determined without experience and/or further research.

### 9.14. Question 53

#### 9.14.1. *If the digital deposit return scheme system can be integrated into the existing waste collection infrastructure would its implementation and running costs be lower? Please provide evidence to support your answer.*

This question was answered by 522 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   53: Digital DRS system less expensive?   running costs would be lower (general)	7%	2%	34%	19%	10%	24%
5 Chapter 5 Return Points (40-54)   53: Digital DRS system less expensive?   don't know/unsure	4%	3%	13%	5%	5%	8%
5 Chapter 5 Return Points (40-54)   53: Digital DRS system less expensive?   lower costs would be lower - existing infrastructure	4%	1%	28%	0%	8%	8%
5 Chapter 5 Return Points (40-54)   53: Digital DRS system less expensive?   needs to be assessed/researched	3%	0%	12%	40%	13%	14%
5 Chapter 5 Return Points (40-54)   53: Digital DRS system less expensive?   concern - pressure on local authorities	2%	0%	20%	2%	2%	5%



## Lower costs

Many respondents say that costs would be lower if the digital deposit return scheme could be integrated into existing waste collection infrastructure. Some respondents say that less staff time would be required to implement and run the scheme.

*“Evidence published by The Digital DRS Industry Working Group says that a digital scheme could reduce the cost of implementation by £3.3bn over 11 years compared with an all-in reverse vending machine DRS as well as a benefit to cost ratio more than twice the value calculated in the RVM option.”*

*User ID 128834, Business representative organisation or trade body*

Some respondents say that running costs may be cheaper but that, for example, a decision should only be taken once the results of any trial schemes have been properly evaluated.

Some respondents express positive comments towards the integration of a digital deposit return scheme with existing waste collection infrastructure but do not necessarily comment on whether this would reduce running costs.

## Same or increased costs

Some respondents say that a digital deposit return scheme would not be cheaper if integrated into existing waste collection infrastructure and may be more expensive. A few respondents say that aspects such as labelling and sorting waste would be too complex and costly, a few cite previous digital systems which have proven to be expensive, and a few say there would be a need to mitigate for higher levels of contamination.

*“While on paper it may look attractive from a capital cost perspective, there may be many other costs incurred both for producers, operators and local authorities which would in fact amount to higher overall costs. For example, the increased waste levels from articles entering kerbside collections would require further sorting, and potentially increase costs.”*

*User ID 129032, Business representative organisation or trade body*

A few respondents oppose the proposed integration of a digital deposit return scheme with existing waste collection services without necessarily raising its impact on costs.

## General comments and suggestions

Many respondents say that they have insufficient knowledge or would need more evidence to be able to answer this question adequately. Some respondents argue there is a need to properly research and assess the costs associated with the integration of a digital deposit return scheme and existing waste collection infrastructure.

Some respondents say that a digital deposit return scheme would increase pressure on local authorities.

A few respondents say that a digital deposit return scheme would still be dependent on other recycling options, such as outdoor reverse vending machines.

A few respondents express concern that if a network of external reverse vending machines were installed then these would be at risk of anti-social behaviour.



In terms of suggestions, a few respondents say that implementation of the deposit return scheme should be delayed because of the need for research, the impact of Covid-19 and the possibility that existing waste collection is adequate.

## 9.15. Question 54

### 9.15.1. Do you support the proposal to introduce a new permitted development right for reverse vending machines, to support the ease of implementation for the scheme?

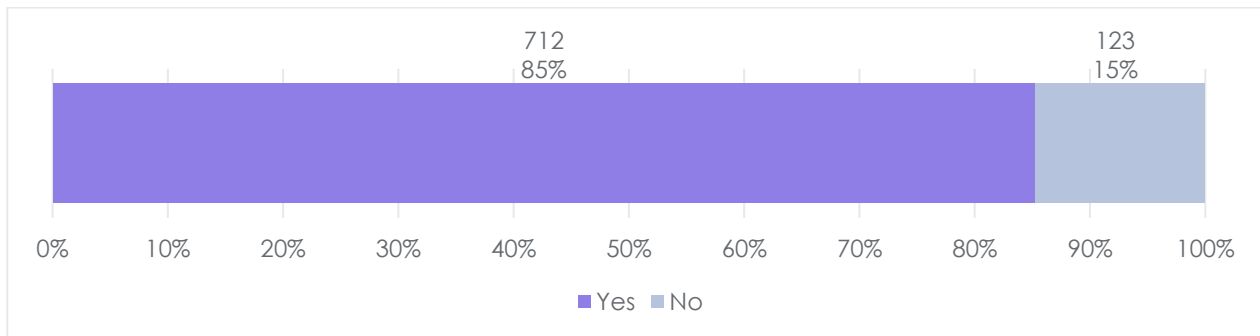


Figure 43: Question 54 (n=835)

### 9.15.2. Do you have any amendments or additional parameters you would propose are reflected in the permitted development right?

This question was answered by 361 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
5 Chapter 5 Return Points (40-54)   54: New permitted development right for reverse vending machines   support development right (if strict criteria apply)	6%	1%	41%	5%	13%	5%
5 Chapter 5 Return Points (40-54)   54: New permitted development right for reverse vending machines   impact on environment	5%	1%	33%	9%	2%	5%
5 Chapter 5 Return Points (40-54)   54: New permitted development right for reverse vending machines   oppose - planning permission	3%	0%	26%	0%	0%	8%



5 Chapter 5 Return Points (40-54)   54: New permitted development right for reverse vending machines   concerns about size/appearance	3%	1%	16%	5%	0%	8%
5 Chapter 5 Return Points (40-54)   54: New permitted development right for reverse vending machines   accessibility	2%	0%	18%	0%	3%	3%

## Support

Many respondents answering this question say their support for the permitted development right is conditional on strict criteria being applied, such as specified design for the installation of reverse vending machines, where they will be located and their size.

*“Providing that strict criteria for size, location and design for installation is developed. We have seen issues with textile bank operators siting banks without permission causing issues for residents, landowners and LA in dealing with the issues, so strict guidance would avoid these issues.”*

*User ID 128985, Local government*

A few respondents state they do not have any amendments, with some of these respondents saying that this was because they do not want to suggest any amendment which may hinder the implementation of the scheme, as this needs to happen urgently.

## Concerns

Many respondents express concerns about the environmental impacts of using reverse vending machines as part of a deposit return scheme, and argue that factors such as light, noise and air pollution need to be taken into account. Some of these respondents suggested expanding the types of area which can be excluded.

*“We believe that RVM’s should not be allowed on listed buildings or conservation areas, and there should be controls on how many are located within a given area.”*

*User ID 135283, Local government*

Some respondents think that reverse vending machines may be too big and obstruct pavements, with some also saying they may be visually unattractive.

A few respondents express general concerns about the costs and issues businesses would face if reverse vending machines were implemented as part of the scheme. A few other respondents said the machines should be simple and easy to use.

A few respondents say they do not have the expertise to answer this question or do not have any opinion on it.

## Suggestions

Some respondents state that planning permission should be required for reverse vending machines to check if proposed sites are suitable and to give local communities the opportunity to raise concerns. Conversely, some respondents argue that if the setting up



of reverse vending machines requires planning permission, their implementation will not be complete within the suggested timeframe.

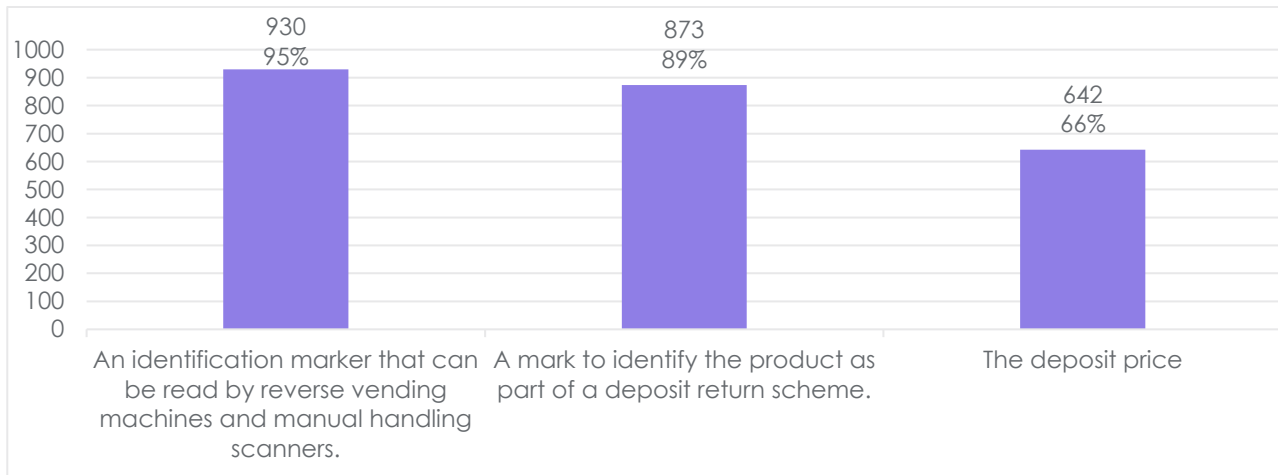
Respondents also make a number of suggestions about the location of reverse vending machines, with some saying that pavements should be kept clear to ensure accessibility, a few saying they should be located inside rather than outside retailers and others that they should be placed alongside other recycling schemes' units.



## 10. Labelling

### 10.1. Question 55

#### 10.1.1. Do you agree that the following should be part of a mandatory label for deposit return scheme products?



**Figure 44: Question 55 – Respondents could select more than one option and the base number (n) is the number of respondents who selected at least one option, with all percentages calculated in relation to this figure (n=980)**

### 10.2. Question 56

#### 10.2.1. Are you aware of further measures that can be taken to reduce the incidence and likelihood of fraud in the system?

This question was answered by 568 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   56a: Measures to reduce fraud   no/don't know	9%	4%	53%	2%	2%	14%
6 Chapter 6 Labelling (55-63)   56a: Measures to reduce fraud   Concern   devolved administrations - consistency	6%	1%	17%	61%	30%	16%
6 Chapter 6 Labelling (55-63)   56a: Measures to reduce fraud   Suggestion   unique identifier	4%	1%	18%	4%	11%	11%



6 Chapter 6 Labelling (55-63)   56a: Measures to reduce fraud   Suggestion   digital solutions/ digital drs	2%	0%	10%	5%	8%	8%
6 Chapter 6 Labelling (55-63)   56a: Measures to reduce fraud   Suggestion   general/	2%	1%	7%	0%	10%	14%

## Concerns

Many respondents say that they are not aware of any further measures to reduce fraud.

Meanwhile, many respondents express concern that if a deposit return scheme were to be inconsistent across the devolved administrations, then the likelihood of fraud would increase. A few also argue that fraud would be incentivised if the deposit level were to be set too high.

However, a few say that fraud is unavoidable and should not be a priority concern.

## Suggestions

Some respondents suggest the use of a unique identifier such as barcode on bottles which are in scope, whilst a few suggest an unremovable label.

Some respondents suggest that digital solutions, such as blockchain technology or digital personal payment systems, could be used to lessen the incidence of fraud, whilst some say that lessons should be learnt from schemes which have already been implemented.

A few respondents say that fraud may be lessened by auditing the deposit return scheme, whilst a few say that machinery which can accurately measure the weight of returned items would prevent fraud where someone attempted to take multiple deposits for one item.

### 10.3. Question 57

#### 10.3.1. Do you agree with our proposals to introduce mandatory labelling, considering the above risk with regards to containers placed on the market in Scotland?

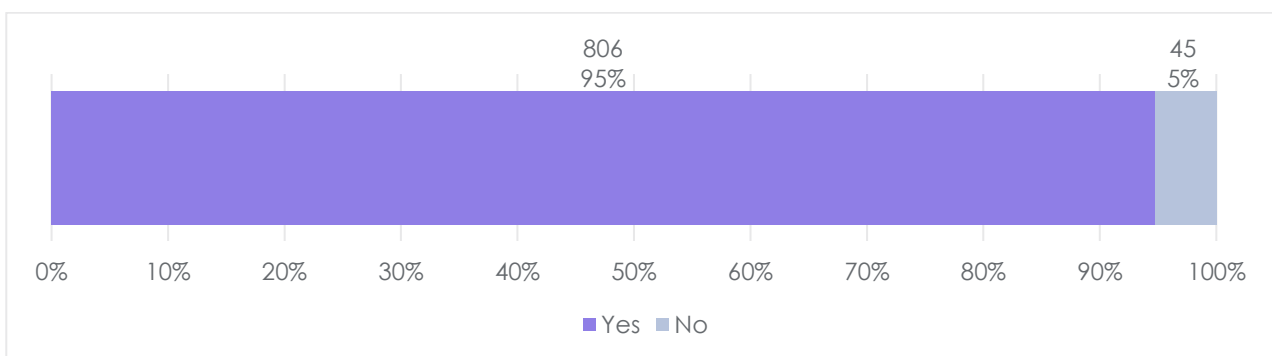


Figure 45: Question 57 (n=851)





## 10.4. Question 58

### 10.4.1. Do you consider the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland to be a significant risk?

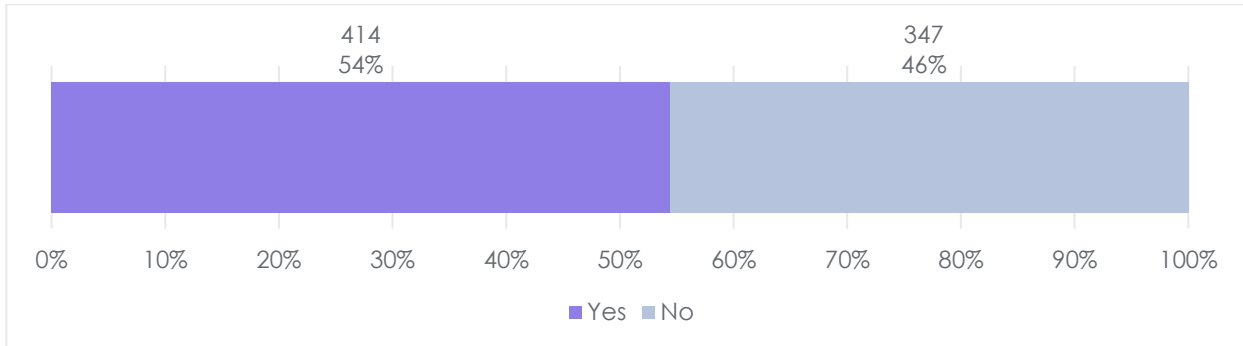


Figure 46: Question 58 (n=761)

### 10.4.2. Please provide any evidence to support your answer.

This question was answered by 455 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   58a: Incorrectly labelled products   Support   uk-wide labelling	4%	1%	20%	9%	17%	11%
6 Chapter 6 Labelling (55-63)   58a: Incorrectly labelled products   Concern   confusing	4%	1%	24%	11%	14%	14%
6 Chapter 6 Labelling (55-63)   58a: Incorrectly labelled products   don't know/no evidence	4%	0%	31%	0%	0%	5%
6 Chapter 6 Labelling (55-63)   58a: Incorrectly labelled products   Support   clear labelling	4%	1%	15%	11%	11%	19%
6 Chapter 6 Labelling (55-63)   58a: Incorrectly labelled products   risk (general)	3%	2%	8%	11%	13%	8%



## Support

Some respondents do not consider the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland to be a significant risk.

## Concerns

Some respondents do consider the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland to be a significant risk. Some respondents are concerned that incorrectly labelled products, or inconsistent labelling between Scotland and the rest of the UK, may cause confusion for users of a deposit return scheme. A few respondents also feel that littering may increase near borders.

*“Drink containers originating in Scotland are imported to the UK market. As they would be unlabelled, that could cause confusion regarding the operating of the deposit return scheme in England and Wales.”*

*User ID 112089, Individual*

Some respondents say that they do not know whether it would pose a significant risk or that they do not have enough evidence to answer the question.

## Suggestions

Some respondents suggest that labelling should be consistent across England, Scotland, Wales and Northern Ireland to remove the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland. Furthermore, some respondents say that the deposit return scheme should be consistent across the four nations.

Meanwhile, some respondents suggest that if labelling is clear and easy to understand then this may mitigate the significance of the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland.

Other suggestions include:

- keeping the scheme simple;
- greater enforcement through border controls;
- quality controls; and
- regular audits and penalties.



## 10.5. Question 59

### 10.5.1. Do you consider leaving any labelling requirements to industry to be a better option than legislating for mandatory labelling requirements?

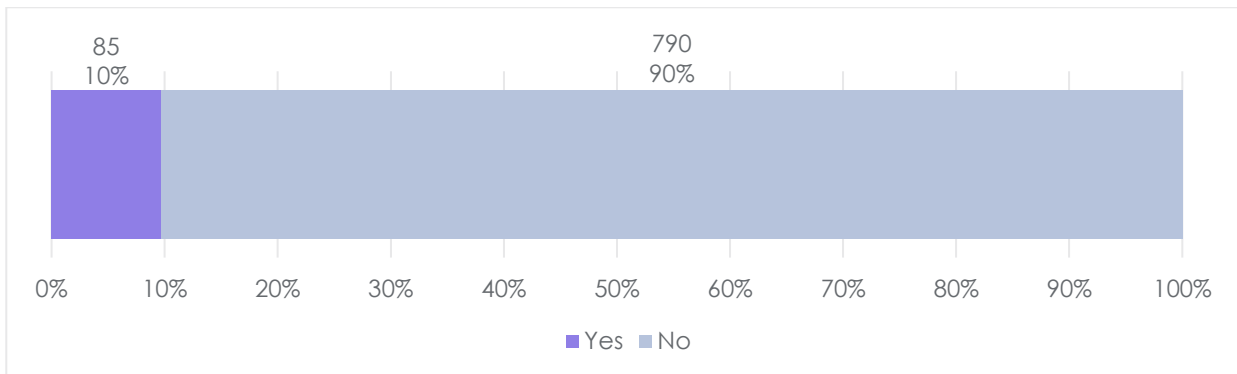


Figure 47: Question 59 (n=875)

### 10.5.2. Please explain your answer.

This question was answered by 611 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   59a: Labelling requirements   Support   legislation (consistency)	13%	5%	58%	49%	25%	32%
6 Chapter 6 Labelling (55-63)   59a: Labelling requirements   Suggestion   industry lead but follow legislation	6%	1%	20%	51%	38%	16%
6 Chapter 6 Labelling (55-63)   59a: Labelling requirements   Concern   industry (different labelling)	5%	2%	32%	0%	6%	8%
6 Chapter 6 Labelling (55-63)   59a: Labelling requirements   Concern   industry (general)	3%	3%	5%	0%	2%	3%
6 Chapter 6 Labelling (55-63)   59a: Labelling requirements   Support   general support for labelling requirements	2%	0%	9%	2%	8%	5%



## Support

Some respondents express general support for industry deciding on labelling requirements, whilst some say that having specialist knowledge of industry would help to make decisions around labelling requirements.

Meanwhile, some respondents express positive comments towards the principle of labelling requirements more broadly.

A few respondents say that mandatory labelling may affect or have a disproportionate impact on certain industries in the UK.

## Concern

Many respondents express concern that if businesses have different labelling systems it will lead to inconsistency or create confusion and therefore argue that mandatory labelling is required. Some of these respondents say that local authorities would have to deal with queries about different labelling.

*“Mandatory labelling would simplify messaging to householders, and help to reduce confusion on what is in scope and alignment with mandatory labelling under EPR for materials which are not in-scope but can be recycled at the kerbside.”*

*User ID 127830, Local government*

Some respondents say that industry would not be right or cannot be trusted with responsibility for labelling requirements.

## Suggestion

Many respondents emphasise the importance of consistency to reduce confusion for consumers.

Many also suggest the industry should lead on labelling requirements but should follow legislation.

## 10.6. Question 60

### **10.6.1. Are you aware of any other solutions for smaller producers who may not currently label their products? Please explain your answer.**

This question was answered by 533 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.



	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   60: Labelling for small producers   no/not sure/don't know	10%	4%	35%	37%	24%	14%
6 Chapter 6 Labelling (55-63)   60: Labelling for small producers   Suggestion   stickers	6%	1%	39%	2%	13%	11%
6 Chapter 6 Labelling (55-63)   60: Labelling for small producers   Suggestion   standard labelling	2%	2%	4%	0%	10%	5%
6 Chapter 6 Labelling (55-63)   60: Labelling for small producers   not a problem for small producers	1%	1%	2%	0%	8%	3%
6 Chapter 6 Labelling (55-63)   60: Labelling for small producers   support exemption for small producers	1%	0%	8%	0%	3%	3%

Many respondents answering this question propose providing small producers who do not currently label their products with stickers to attach to their products. Some of these respondents argue that this would make it easier for producers who use all sizes and types of container and/or do not have the capacity to produce their own labels.

*"The application of self-adhesive labels, purchased from the DMO, are the usual practise in other DRS schemes."*

*User ID 128948, Packaging designer/ manufacturer/ converter*

Some respondents argue that all producers, regardless of size, should be required to label their products, with some stating that it is already the case that they have to label their products. A few say in addition to this point that there should be no exemptions to the scheme based on this. A few state that small producers should adhere to the minimum requirement of adding barcodes to their containers.

*"If Government can set out its final Regulations with sufficient lead time for producers, it is reasonable for smaller producers to adopt the minimum requirement of an identification marker that can be read by reverse vending machines and manual handling scanners (i.e. ensure all in-scope containers carried a barcode)."*

*User ID 127804, Operator/ Reprocessor*

A few respondents make specific suggestions such as making free downloadable and printable labels available to small producers and allowing producers to mark the container with something such as symbol which identifies it as being in scope.

A few respondents think that labelling should be the responsibility of the Deposit Management Organisation.

A few respondents suggest that grants or loans should be provided to small producers who are not able to label their products to help them do so.



Some respondents believe there will not be any issues for smaller producers who do not currently label their products saying, for example, that it is only a small change.

Some respondents express concern that if stickers were to be made available for small producers who do not label their products, they could come off, become damaged, or not be clear enough for consumers.

Some respondents state that they would support the exemption of small producers from the deposit return scheme if they are not able to label their products because, for example, small producers have little negative impact on the environment. Respondents also state that extra costs for small producers would be a burden.

A few respondents argue that there is no need to label in-scope containers.

Many respondents say that they do not know or do not have any suggestions for smaller producers who do not currently label their products.

## 10.7. Question 61

### 10.7.1. We believe 18 months is a sufficient period of time for necessary labelling changes to be made. Do you agree?

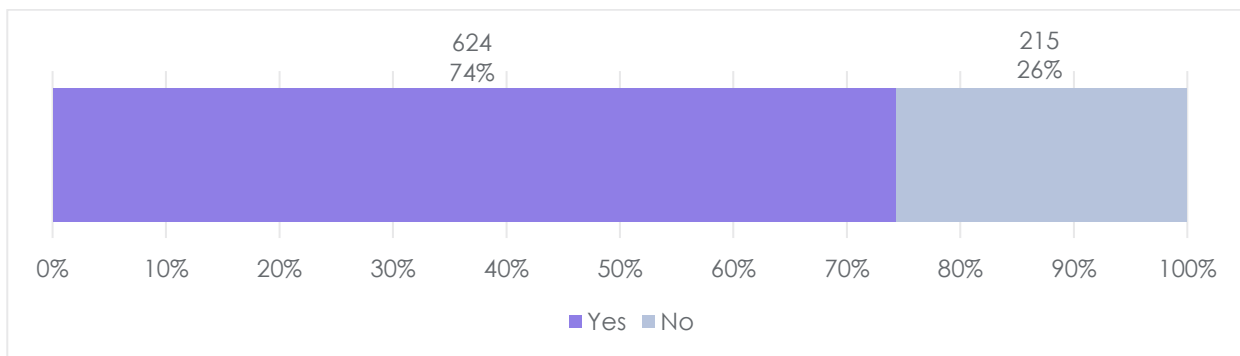


Figure 48: Question 61 (n=839)

### 10.7.2. Can you provide any evidence to support your answer?

This question was answered by 414 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   61a: Time for labelling changes   more than 18 months	5%	1%	3%	60%	41%	14%



6 Chapter 6 Labelling (55-63)   61a: Time for labelling changes   18 months	3%	2%	7%	5%	8%	5%
6 Chapter 6 Labelling (55-63)   61a: Time for labelling changes   no (general)	2%	1%	17%	5%	2%	11%
6 Chapter 6 Labelling (55-63)   61a: Time for labelling changes   less than 18 months	2%	3%	2%	0%	2%	3%
6 Chapter 6 Labelling (55-63)   61a: Time for labelling changes   concerns about timeline/	2%	0%	13%	0%	8%	5%

## Concerns

Many respondents answering this question argue that 18 months is not long enough for producers to make the necessary labelling changes. They state that producers will need more time, but do not give specific suggestions as to how long this should be.

*"With Government noting that respondents to previous consultation proposals said that lead times of 2 to 3 years may apply to them, we firmly believe that the Government's proposed 18-month lead time is unrealistic, especially as new secure technology may need to be developed and rolled out at scale."*

*User ID 124293 Retailer including online marketplace*

Conversely, some respondents believe that 18 months is too long for producers to make the necessary labelling changes. These respondents also do not give specific suggestions on a suitable period of time is.

Some respondents disagree that 18 months is a suitable period of time for producers to make the necessary labelling changes, but offer no alternative suggestions.

Some respondents query how the timeline fits with the overall roll-out of the deposit return scheme, for instance whether this period will start when producers find out which containers are in scope. Some of these respondents argue that the sufficiency of the 18 months depends on when this period will start in relation to the scheme.

## Support

Some respondents agree that 18 months is a sufficient period of time for producers to make the necessary labelling changes, with some of these respondents commenting that 18 months should be the maximum time considered.

*"Industry has referenced 18 months being required to make sufficient changes and use up existing stocks. This would be 18 months from the point of which the label requirements are set."*

*User ID 128677, Distributor*

## Suggestions

In terms of specific suggestions for a shorter time period, some respondents propose 12



months, while a few recommend 6 months or 6-9 months.

Some of these respondents say that the question of timings should be left to producers to decide and that they feel unqualified to answer this question themselves.

## 10.8. Question 62

### 10.8.1. Will your processes change as a result of mandatory labelling?

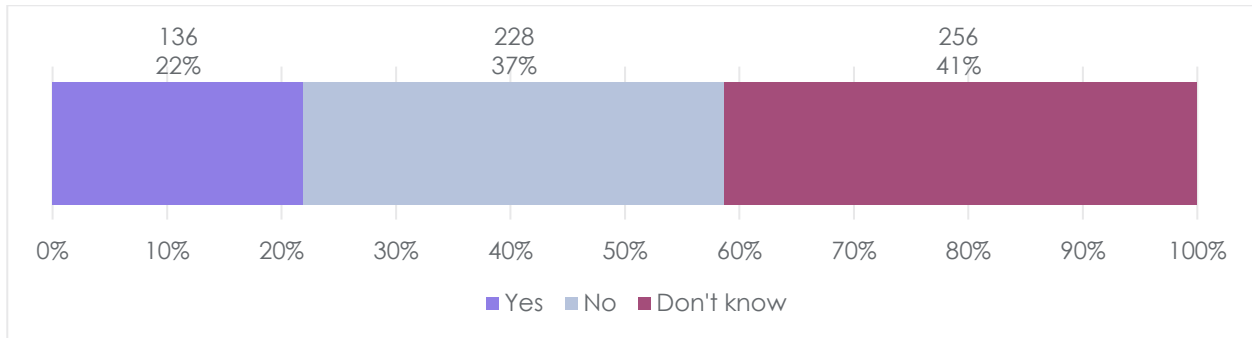


Figure 49: Question 62 (n=620)

### 10.8.2. Please explain your answer.

This question was answered by 389 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   62a: Process change due to labelling requirements   not a producer / can't answer	8%	2%	49%	12%	3%	11%
6 Chapter 6 Labelling (55-63)   62a: Process change due to labelling requirements   concern - processes and technology	4%	1%	3%	37%	37%	22%
6 Chapter 6 Labelling (55-63)   62a: Process change due to labelling requirements   concern - time to change	2%	0%	0%	37%	6%	3%
6 Chapter 6 Labelling (55-63)   62a: Process change due to labelling requirements   process won't change	1%	0%	3%	0%	2%	0%
6 Chapter 6 Labelling (55-63)   62a: Process change due to labelling requirements   process will change	1%	0%	3%	4%	6%	0%





## Concerns

Many respondents answering this question state that additional technology will be required for the change in labelling requirements.

*"[Respondent] will need to put significant investment into our internal IT systems and online customer facing systems across thousands of lines. We will also need to change our shelf edge labelling within store. We will also need to make changes to our logistics at a depot level to track items through the supply chain and track any waste items which fall within DRS. We will also need to ensure stores which offer online deliveries across borders are able to properly track in-scope items e.g. Carlisle delivering to Scotland and Welsh/English border. "*

*User ID 129098, Retailer including online marketplace*

Some respondents comment that the printing of labels is a complex process, highlighting factors such as inventory rotation, design and fraud measure testing.

A few respondents express concern that re-producing labels will involve significant costs, as many different stock-keeping units (SKUs) are involved.

A few respondents comment more generally that they expect changes to their processes.

## Support

A few respondents make general positive comments, for instance saying that they are happy to make changes to their processes due to the scheme's labelling requirements.

Some respondents state that there will be no change to their processes or that they see no reason to change processes. Some of these respondents state that there will be no foreseeable impact on local authorities.

*"Stock may need to be different for different parts of the world but we already have details of other deposit schemes."*

*User ID 104419, Other*

A few respondents say that they are unsure or that it will depend upon factors such as the minimum requirements and interoperability across schemes in the UK.

Many respondents state that they are unable to answer this question, with some saying that this is because they are not a producer.

## Suggestions

A few respondents suggest that changes need to be promoted to consumers, with some saying they expect to signpost consumers to the scheme once it is up and running.

A few respondents make more general suggestions about labelling requirements, for instance to extend the timeline is extended or make the scheme UK wide.



## 10.9. Question 63

### 10.9.1. Do you agree that our proposed approach to labelling will be able to accommodate any future changes and innovation?

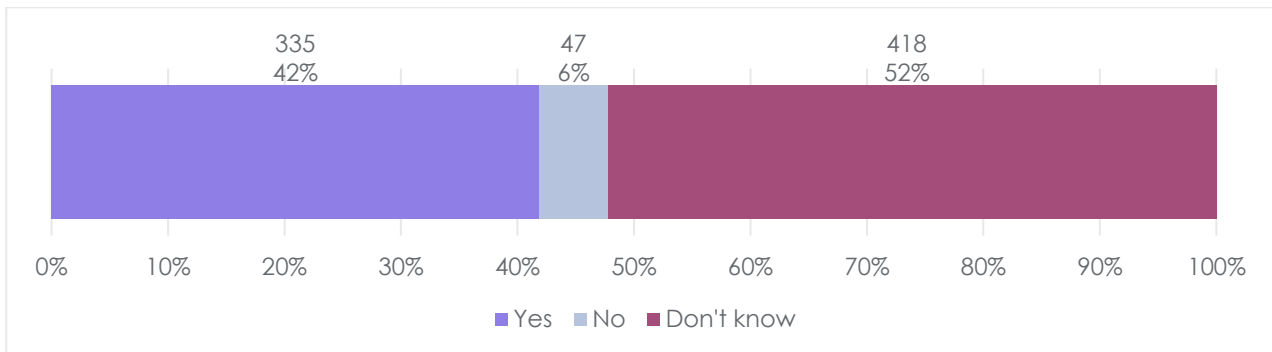


Figure 50: Question 63 (n=800)

### 10.9.2. Are you aware of any upcoming technology in the field of labelling?

This question was answered by 264 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
6 Chapter 6 Labelling (55-63)   63a: Upcoming labelling technology   no/don't know/unsure	6%	2%	29%	0%	5%	16%
6 Chapter 6 Labelling (55-63)   63a: Upcoming labelling technology   suggestion - DMO should advise	1%	0%	1%	2%	13%	3%
6 Chapter 6 Labelling (55-63)   63a: Upcoming labelling technology   yes - general	1%	0%	1%	4%	2%	3%
6 Chapter 6 Labelling (55-63)   63a: Upcoming labelling technology   concern - fast changing technology	1%	0%	4%	4%	2%	3%
6 Chapter 6 Labelling (55-63)   63a: Upcoming labelling technology   suggestion - barcode/ qr code	1%	0%	0%	2%	6%	0%



## Suggestions

Many respondents answering this question say they are unsure or do not know of any upcoming technologies. A few respondents comment that specialist labelling companies or industry experts are best placed to answer this question.

A few respondents make specific suggestions about potential or upcoming technologies which could be used for labelling:

- Digital watermarking technology.
- Blockchain technology, with some commenting this would reduce fraud.
- Radio-frequency identification devices (RFID), although some think this would be open to fraud.
- Smart devices, such as fridges, that record each container entering and being removed.

Some respondents state that the Deposit Management Organisation should manage any technological developments and determine labelling standards.

*“Once the DMO is established, any developments – technological or other – should be managed by them.”*

*User ID 124621, Business representative organisation or trade body*

Some respondents highlight upcoming technologies, such as digital printing, which could potentially help with labelling. Some other respondents make the more general point that technology is always changing. In both cases, some of these respondents comment that the scheme needs to be flexible enough to adopt to different technologies or to use future technical research, with the role of the Deposit Management Organisation specifically highlighted.

*“As much as possible scheme should be future proofed to allow for adoption of proven technology that facilitates targets and objectives of DRS, cost effectively.”*

*User ID 128691, Other*

Some respondents suggest using barcodes/QR codes for labelling, with some arguing that this will help reduce fraud.

## Concerns

A few respondents make more general points about labelling - mandatory labelling could affect UK trading and/or reduce consumer choice and labelling creates litter.

A few respondents express their opposition to the deposit return scheme more broadly, for instance because it will increase costs to consumers.



## 11. Local authorities and local councils

### 11.1. Question 64

**11.1.1. Do you agree that local authorities will be able to separate deposit return scheme containers either themselves or via agreements with material recovery facilities to regain the deposit value?**

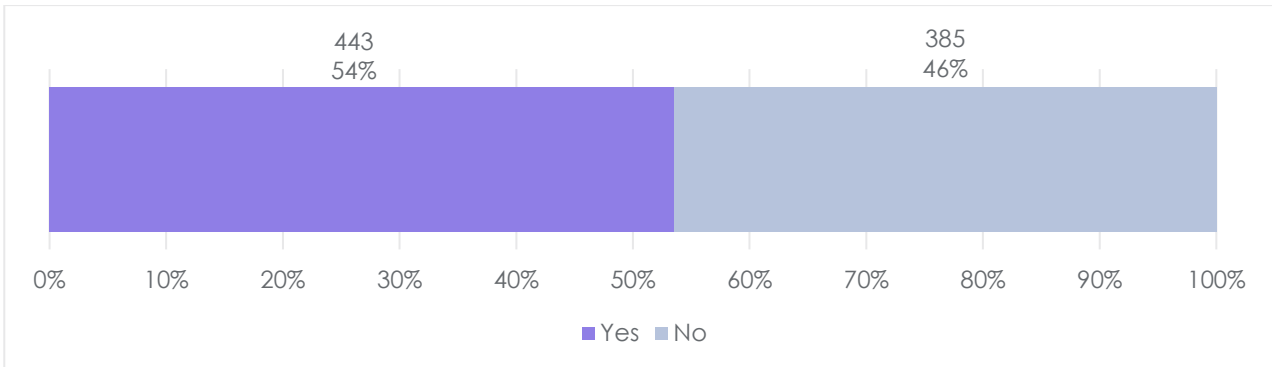


Figure 51: Question 64 (n=828)

### 11.1.2. Please explain your answer.

This question was answered by 521 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
7 Chapter 7 Local Authorities and Local Councils (64-68)   64a: Local authorities separate in-scope containers   Concern   sorting materials	9%	1%	58%	51%	14%	14%
7 Chapter 7 Local Authorities and Local Councils (64-68)   64a: Local authorities separate in-scope containers   Concern   impact on local authority (cost)	6%	1%	44%	12%	5%	11%
7 Chapter 7 Local Authorities and Local Councils (64-68)   64a: Local authorities separate in-scope containers   Concern   oppose on-the-go	4%	0%	24%	7%	16%	11%
7 Chapter 7 Local Authorities and Local Councils (64-68)   64a: Local authorities separate in-scope containers   Concern   contract issues	3%	0%	21%	2%	3%	11%



7 Chapter 7 Local Authorities and Local Councils (64-68)   64a: Local authorities separate in-scope containers   Support   incentives	2%	1%	5%	14%	11%	5%
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## Support

Some respondents agree with the suggestion that local authorities should be able to sort deposit return scheme containers and some say that the deposit return monies will provide sufficient incentive for local authorities to do this.

## Concerns

Many respondents argue that it will be difficult for local authorities to separate deposit return scheme materials, either themselves or via agreements. They say that the practice of mixing collected materials would make it difficult to accurately identify materials and add that containers collected kerbside may be too damaged to correctly identify.

*"it would not be possible to establish in and out of scope containers, for example all PET would be sorted together regardless of the size of the bottle. Likewise, glass would not be distinguished between jars and in and out of scope bottles. If in scope items are required to have the caps on to be eligible for the deposit this is not something a MRF would be able to check for."*

*User ID 124623, Local government*

Many respondents also express concern about the cost to local authorities of implementing this proposal, particularly the cost of the additional technology and infrastructure required to separate in-scope materials.

Some respondents believe that the proposal to divert in-scope materials would impact the viability of contracts which local authorities hold with Materials Recycling Facilities. They say that these facilities would not be able to identify which local authority materials came from and that pre-existing contracts are long-term so changes would take a long time to implement, and research would be required.

Some respondents also feel that local authorities would not be able to reasonably manage the potential administrative challenges of separating the in-scope materials as proposed. They say that they would not have the resources required to implement additional separation methods at Materials Recycling Facilities.

Some respondents say that consumers will have the additional burden of storing and sorting materials at home and may not know how to recycle items if there are several options available.

*"Consideration must be given as to how smaller properties, flats and HMOs will be able to accommodate a separate container for DRS targeted material."*

*User ID 135214, Local government*

A few respondents raise concerns about how local authorities would separate in-scope materials if labels or marking are unclear, whilst a few question the ability of private companies and local authorities to separate in-scope materials without Government



involvement.

Many respondents express concerns about on-the-go deposit return schemes more broadly and say the implementation of such a scheme would make the separation of materials by local authorities harder.

Some respondents argue that local authorities should not be involved in separating deposit return materials, and some respondents say that they do not wish to or feel able to answer this question.

## Suggestions

Some respondents say that a digital deposit return scheme should be used as it would ensure that deposits are redeemed appropriately and would reduce the administrative burden of recycling in-scope materials. They say that use of digital infrastructure within the Extended Producer Responsibility is a sensible example of using technology and should be considered when designing the deposit return scheme.

A few respondents say that local authorities should liaise with the Deposit Management Organisation on a range of issues including the collection of deposit return materials and the management of funds from returned and unredeemed deposits.

A few respondents believe that collections should be aligned with the deposit return schemes across the devolved administrations.

### 11.2. Question 65

**11.2.1. Do you agree that local authorities will be able to negotiate agreements with material recovery facilities to ensure gate fees reflect the increased deposit values in waste streams or a profit-sharing agreement on returned deposit return scheme containers was put in place?**

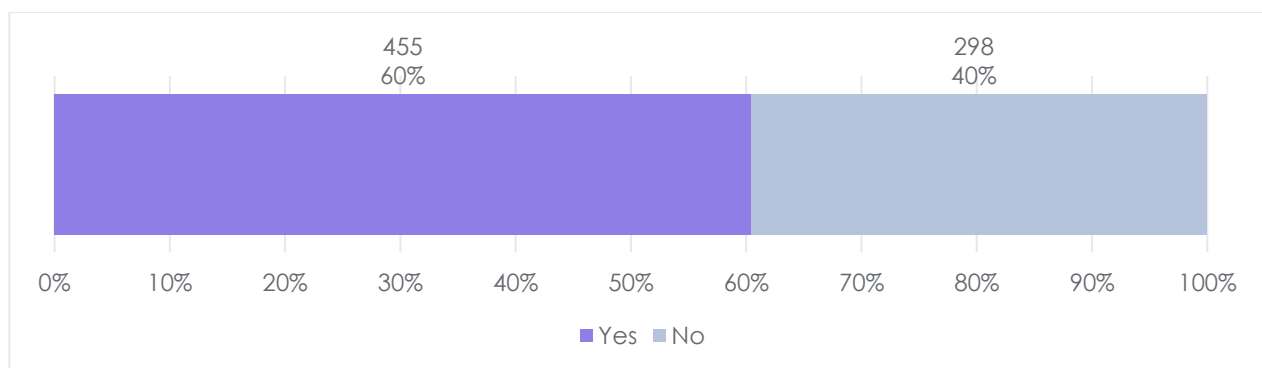


Figure 52: Question 65 (n=753)

### 11.2.2. Please explain your answer.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and



- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
7 Chapter 7 Local Authorities and Local Councils (64-68)   65a: Agreements with material recovery facilities Option 1   Concern   contract issues	7%	1%	51%	32%	5%	8%
7 Chapter 7 Local Authorities and Local Councils (64-68)   65a: Agreements with material recovery facilities Option 1   Concern   sorting materials	6%	1%	37%	37%	8%	22%
7 Chapter 7 Local Authorities and Local Councils (64-68)   65a: Agreements with material recovery facilities Option 1   Suggestion   general/	4%	1%	31%	5%	10%	16%
7 Chapter 7 Local Authorities and Local Councils (64-68)   65a: Agreements with material recovery facilities Option 1   disagree (general)	3%	1%	20%	2%	8%	0%
7 Chapter 7 Local Authorities and Local Councils (64-68)   65a: Agreements with material recovery facilities Option 1   Support   general/	3%	1%	15%	2%	0%	5%

## Support

Some respondents agree or express confidence in local authorities' ability to negotiate gate fees with material recovery facility operators. A few say that this is more likely to be the case because of the potential financial benefit for either or both parties.

## Concerns

Some respondents state their general disagreement with the proposal for local authorities to negotiate gate fee agreements with material recovery facilities operators.

Many raise concerns about the challenges of sorting deposit return scheme materials from other materials either kerbside or at material recovery facilities. They also argue that contractual problems may occur if local authorities negotiate gate fees with material recovery facilities because there are existing contracts in place.

*“Contractual agreements are already in place between local authorities and material recovery facilities. Any agreement may need to be a profit/loss contract as contamination level could de-value the waste stream and mean that a deposit cannot be recovered if the bar code or label cannot be read.”*

*User ID 124616, Packaging designer/ manufacturer/ converter*

Some respondents raise concerns about the cost to local authorities of negotiating gate fees as they may incur additional costs.

A few respondents say that negotiating contracts will place an increased administrative



burden on local authorities, whilst a few say that these contracts should be negotiated nationally or have Government oversight.

A few respondents feel that conflicts of interest could occur if local authorities negotiate agreements with material recovery facility operators.

Some respondents say that more information is needed to enable them to comment on this issue.

## Suggestions

A few respondents suggest that fee agreements should be subject to regular review.

Some respondents comment more broadly on how the deposit return scheme should operate.

### 11.3. Question 66

#### 11.3.1. *In order to minimise the risk of double payments from the Deposit Management Organisation to local authorities, where should data be collected regarding the compositional analysis to prevent the containers being allowed to be redeemed via return points?*

This question was answered by 544 respondents. Their comments are summarised below. The various options are laid out in the consultation document.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
7 Chapter 7 Local Authorities and Local Councils (64-68)   66: Data to prevent containers from being redeemed twice Option 2   Data collection - at/by materials recovery facility (MRF)	5%	1%	28%	16%	10%	8%
7 Chapter 7 Local Authorities and Local Councils (64-68)   66: Data to prevent containers from being redeemed twice Option 2   Suggestion - security / fraud prevention	4%	0%	30%	7%	8%	14%
7 Chapter 7 Local Authorities and Local Councils (64-68)   66: Data to prevent containers from being redeemed twice Option 2   Data collection - at collection/entry point	3%	1%	6%	53%	3%	11%





7 Chapter 7 Local Authorities and Local Councils (64-68)   66: Data to prevent containers from being redeemed twice Option 2   Data collection - at/by local authorities	3%	1%	23%	0%	2%	11%
7 Chapter 7 Local Authorities and Local Councils (64-68)   66: Data to prevent containers from being redeemed twice Option 2   Concern - funding	3%	0%	26%	0%	0%	14%

## Support

Some respondents express general positive comments towards option 2 or say that it seems the most reasonable if material cannot be separated.

## Concerns

Some respondents question how funding would be apportioned under option 2 or say that payment mechanisms for efficient collection require further consultation, whilst some respondents express concern about the complexity of completing a compositional analysis for this option. A few respondents argue that compositional analysis can only identify the overall mix of materials, rather than individual containers, and is therefore not suitable for preventing leakage of individual containers from the system.

A few respondents believe that further modelling and analysis would be needed once the system is in place to be able to ensure that payments are representative of the amount of materials being collected.

Some respondents say that they do not know, do not have enough information, or lack the expertise necessary to be able to answer the question.

## Suggestions

Many respondents say that the data for compositional analysis should be collected at the materials recovery facility because it is the first sorting point and they have the knowledge expertise, as well as the space and resources. However, some feel the data should be collected from the first point of entry into the system, including kerbside where this is the relevant entry point.

*"A compositional analysis should take place at the kerbside at the point of collection in order to capture reliable and accurate data."*

*User ID 128808, Business representative organisation or trade body*

Some respondents say that the data should be collected by local authorities. These respondents say that local authorities work with Government and would be unlikely to abuse the system, or that local authorities already have the capacity to collect and transport kerbside waste. However, some respondents feel that this data should not be collected by local authorities as they already have ongoing financial pressures and existing responsibilities.

Some respondents suggest that data should be collected by the Deposit Management Organisation because they are responsible for eliminating fraud and would have access



to data from the materials recovery facility and reverse vending machines.

A few respondents suggest that a combination of organisations should collect this data, with some saying that local authorities should partner with specialist organisations whilst others feel information should feed into a central database.

Many respondents say that security or fraud measures will be necessary to minimise the risk of double payments from the Deposit Management Organisation to local authorities, whilst some suggest that a digital deposit return scheme could be used to eliminate the risk of double payments.

*"A risk might be perceived around persons (employees or otherwise) seeking to steal material and redeem value. Security processes can be put in place to prevent this and the balance of risk / pay-off is unlikely to make this a significant problem. Additionally payments to LAs at a bulk level will be based on weight received at the reprocessors, so any material removed illegally or otherwise in the process of collection or sorting would not be paid for again."*

*User ID 128837, Other*

A few respondents suggest that existing compositional analysis measures could be adapted, whilst others say that WTS sampling should be explored as a tool to prevent containers being redeemed twice.

A few respondents say that local authorities should have an option to return any deposit return scheme container in bulk once collected at kerbside, whilst a few say that kerbside recycling and deposit return scheme waste streams should be kept separate to prevent containers being redeemed twice.

## 11.4. Question 67

### 11.4.1. How difficult do you think this option would be to administer, given the need to have robust compositional analysis in place? Please explain your answer.

This question was answered by 528 respondents. Their comments are summarised below. The various options are laid out in the consultation document.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
7 Chapter 7 Local Authorities and Local Councils (64-68)   67: How difficult to manage Option	7%	0%	47%	49%	10%	24%



3   Concern - accuracy of measuring/reporting						
7 Chapter 7 Local Authorities and Local Councils (64-68)   67: How difficult to manage Option 3   Oppose - Option 3	4%	1%	31%	5%	13%	8%
7 Chapter 7 Local Authorities and Local Councils (64-68)   67: How difficult to manage Option 3   Difficulty - high / complexity issues	4%	2%	15%	4%	10%	5%
7 Chapter 7 Local Authorities and Local Councils (64-68)   67: How difficult to manage Option 3   don't know/ more evidence needed	3%	2%	5%	5%	11%	5%
7 Chapter 7 Local Authorities and Local Councils (64-68)   67: How difficult to manage Option 3   Suggestion - mass balance	2%	0%	18%	0%	0%	3%

## Support

A few respondents offer general positive comments about option 3 or say that it provides an appropriate incentive for local authorities to return deposit return scheme containers from their waste streams so that the scheme can achieve high return rates.

Where respondents comment on the difficulty of implementation, some say that it would create additional administrative and reporting difficulties but that these would be manageable. They sometimes suggest that option 3 would not be more difficult than the other options proposed.

## Concerns

Many respondents state their opposition to option 3.

Where respondents comment on the difficulty of implementation, many respondents say that it would be difficult to secure accurate data for a compositional analysis, that the technology required would be complex and could go wrong, and that a hybrid option would be difficult to manage.

*“The approach suggested under option 3 appears to be reliant on regular waste compositional analysis (WCA). There is nowhere near sufficient capacity to allow all local authorities to conduct waste compositional analysis on an annual basis.”*

*User ID 124623, Local government*

Furthermore, many argue that there would be risk of misreporting due to a reliance on insufficient compositional analysis data. As a result, they feel that local authorities may benefit unfairly from payments. They add that the additional reporting needed to prevent double payment to producers would be too complex and create an increased workload for local authorities. Some say that the costs associated with option 3 are too high and there is not enough evidence of risk of double payment to take this option forward.



A few respondents say that local authorities would not have the resources needed to properly separate materials so this may impact their ability to receive payments, whilst a few question how disputes over payments would be resolved or would impact key relationships.

Some respondents feel that they do not have the experience to respond to this question or say that more research is needed to understand how the proposed options would work.

## Suggestions

Some respondents suggest that a funding formula payment would be an easier option for local authorities, but that there is too much regional variation for funding formula payments to be one-size-fits-all.

A few respondents say that Government would be best placed to monitor deposit return scheme materials collected by local authorities and express concern over conflicts of interest. They say that systems for managing compositional analysis must be established.

Meanwhile, a few respondents say that pilot schemes should be run to gather more evidence before a nationwide rollout, whilst a few say that calculating the mass balance of containers could be a better and cheaper way to assess how many deposit return scheme containers have been captured through kerbside collection.

### 11.5. Question 68

#### 11.5.1. What option do you think best deals with the issue of deposit return scheme containers that continue to end up in local authority waste streams?

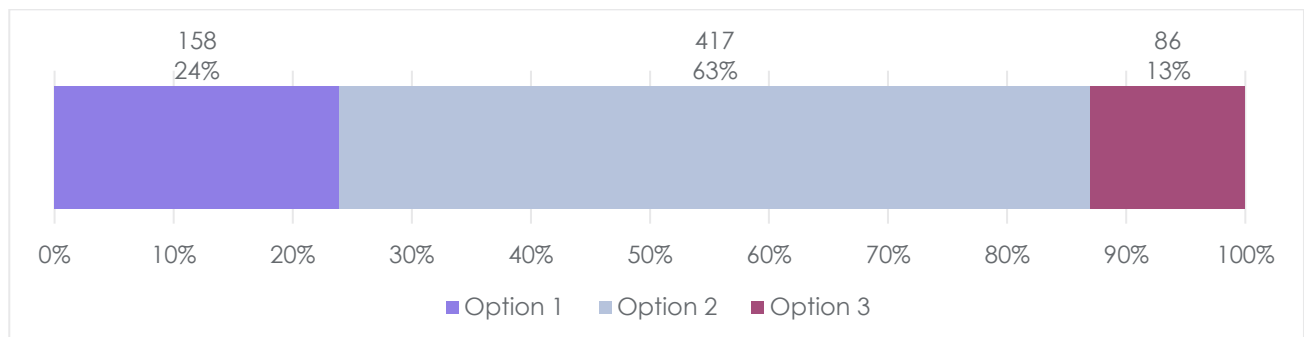


Figure 53: Question 68 (n=661)

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

This question was answered by 454 respondents. Their comments are summarised below. The various options are laid out in the consultation document.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code



applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
7 Chapter 7 Local Authorities and Local Councils (64-68)   68a: Preferred option and why   Reason - financial flows	6%	0%	50%	7%	5%	16%
7 Chapter 7 Local Authorities and Local Councils (64-68)   68a: Preferred option and why   Suggestion - general / other	4%	1%	24%	4%	17%	16%
7 Chapter 7 Local Authorities and Local Councils (64-68)   68a: Preferred option and why   Reason - simplicity	4%	1%	11%	32%	13%	3%
7 Chapter 7 Local Authorities and Local Councils (64-68)   68a: Preferred option and why   Concern - complexity	3%	1%	13%	30%	6%	5%
7 Chapter 7 Local Authorities and Local Councils (64-68)   68a: Preferred option and why   Reason - robustness	2%	1%	14%	5%	5%	14%

## Support

Many respondents say that they support their chosen option because it guarantees appropriate financial flows to cover local authorities for any expenses related to the deposit return scheme. Most of these respondents selected option 2 as their preferred option.

*"I think it makes sense for LPAs to be paid up front for their recycling processes, rather than having to deposit as if they were a private person."*

*User ID 104419, Other*

Many respondents support their chosen option because they feel it is the simplest solution. Most of these respondents selected option 2 as their preferred option but a significant minority selected option 1.

*"The principle of option 2 sounds reasonable, as it provides solutions for those authorities who would be able to separate out DRS materials, but also doesn't penalise authorities who aren't able to separate all DRS materials."*

*User ID 128551, Local government*

Some respondents say that they chose a particular option because it would ensure the robustness and fairness of the scheme. Most of these respondents selected option 2 as their preferred option but a significant minority selected option 3.

Some respondents support an option because they feel it ensures the responsibility for implementing the scheme would fall upon a specific actor, such as the Deposit Management Organisation or local authorities. Most of these respondents selected option 2 as their preferred option.

Some respondents believe that their chosen option aligns with other schemes. Most of



these respondents selected option 2 as their preferred option but a significant minority selected option 1. Those who selected option 1 often suggest that it aligns best with the deposit return scheme which is to be implemented in Scotland.

Some respondents say that they support Defra's preferred option (option 2).

Some respondents state that their support for a particular option is dependent on specific conditions being met. For example, some of these respondents say that they support option 1 but only if an on-the-go scheme is adopted.

A few respondents state that they don't have a preference, do not feel able to answer, or would need more information to provide an informed view.

## **Oppose**

Some respondents specifically oppose option 1 as they feel it leaves local authorities to pay to deal with materials which are in the scope of the deposit return scheme.

Some respondents oppose all the options presented.

Many respondents express concern about the complexity of the impact which a deposit return scheme could have on waste streams currently managed by local authorities. They argue that the scheme may be too complex to warrant local authorities claiming back the deposit for relevant items in their waste streams. Most of these respondents selected option 2 as their preferred option. Relatedly, a few respondents say that the interactions between a deposit return scheme and existing waste schemes currently managed by local authorities will pose difficulties in terms of data collection.

## **Suggestions**

Many respondents offer a range of suggestions about the deposit return scheme, including how local authorities could be funded and deposit return scheme items left in other waste streams.



## 12. Compliance and monitoring enforcement

### 12.1. Question 69

#### 12.1.1. Are there any other producer obligations you believe the Environmental Regulators should be responsible for monitoring and enforcing?

This question was answered by 516 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   69: Regulation of producer obligations   no	9%	3%	51%	7%	21%	11%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   69: Regulation of producer obligations   yes - monitor recycling	2%	1%	0%	42%	3%	11%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   69: Regulation of producer obligations   yes - general	2%	1%	2%	2%	8%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   69: Regulation of producer obligations   yes - appeals and arbitration	2%	0%	12%	0%	2%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   69: Regulation of producer obligations   unsure/don't know	1%	1%	6%	2%	2%	3%

### Suggestions

Many respondents said that there were not any other obligations which the Environmental Regulators should be responsible for monitoring and enforcing, whilst some said that there were not sure, needed more information, or did not feel able to answer the question.

Among those who proposed additional producer obligations which the Environmental Regulators should be responsible for monitoring and enforcing, some said they should monitor the sale, disposal, and recycling of end materials to improve levels of closed loop applications.

Others felt that appeals and arbitrations processes should be introduced to support the



operation of the Deposit Management Organisation. They say this may be necessary to manage potential disputes between the Deposit Management Organisation and the Extended Producer Responsibility or to consider appeals against the Deposit Management Organisation's refusal to grant exemptions. Some also advocate that the Environmental Regulators should have the authority to impose penalties on producers to ensure compliance with their obligations.

Some suggest that producer obligations should also include providing information to consumers or businesses about the deposit return scheme and deposit levels.

A few respondents raise other suggestions, including:

- responsibility for the Environmental Regulator to monitor the packaging used by producers to ensure it is in scope where possible;
- responsibility for the Environmental Regulator to monitor producer use of materials and any attempts to switch to materials which fall outside the scope of the scheme;
- a producer obligation which requires transparency around costs, auditing, and evaluation processes;
- a producer obligation to monitor environmental impact; and
- a producer obligation to provide clear labelling on their products.

## 12.2. Question 70

### 12.2.1. *Are local authorities (through the role Trading Standards and the Primary Authority Scheme) best placed to enforce certain retailer obligations?*

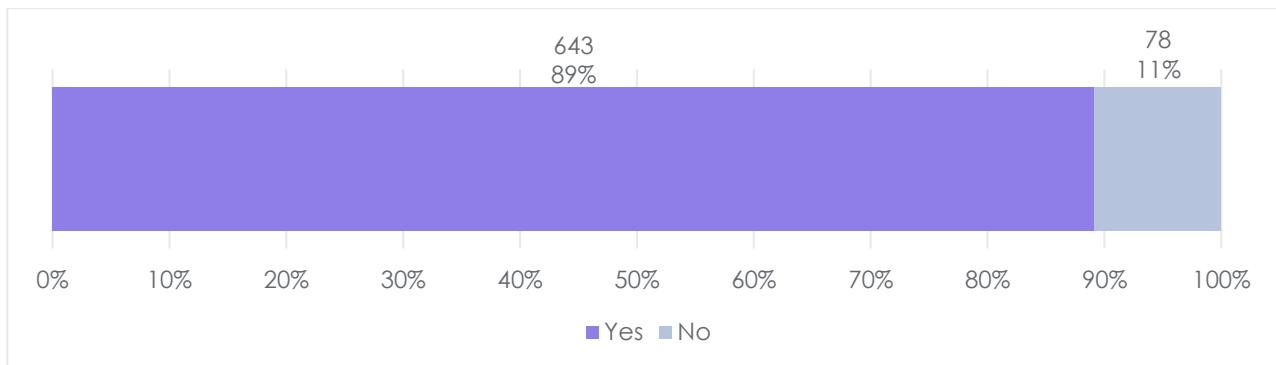


Figure 54: Question 70 (n=721)

### 12.2.2. *Please give any alternative suggestions.*

A few respondents say that the Deposit Management Organisation should themselves, or in partnership with local authorities, add monitoring and enforcement work for the deposit return scheme to the other duties they would carry out with retailers.

### 12.2.3. *To what extent will local authorities be able to add monitoring and enforcement work for the deposit return scheme to existing duties they carry out with retailers?*

This question was answered by 431 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or





make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   concern resources - cost	9%	3%	62%	18%	5%	16%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   concern resources - staff	5%	1%	38%	4%	0%	3%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   LA might struggle	4%	1%	33%	7%	2%	3%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   LA will manage	4%	1%	17%	4%	8%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   don't know/unsure	2%	1%	3%	0%	6%	8%

## Support

Some respondents say that local authorities would manage to add monitoring and enforcement work for the deposit return scheme to their existing duties which they carry out with retailers.

## Concerns

Some respondents express concern about local authorities adding monitoring and enforcement work for the deposit return scheme to their existing duties which they carry out with retailers.

Many respondents raise concerns about the cost implications for local authorities and question whether they would have the funds, whilst many also question whether they would have enough staff to carry out these duties. A few respondents suggest difficulties may arise if there were not to be consistency between these new duties and existing duties.

Some respondents say that they do not feel able to answer the question.



## Suggestions

A few respondents say Government should introduce legislation to allow local authorities to make the changes necessary to add monitoring and enforcement work to their existing obligations.

### 12.3. Question 71

#### 12.3.1. *In addition to those in the table, are there any other types of breaches not on this list that you think should be? If so, what are they? These may include offences for participants not listed eg. reprocessors or exporters.*

This question was answered by 487 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   concern resources - cost	7%	3%	24%	12%	14%	11%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   concern resources - staff	2%	0%	11%	9%	5%	8%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   LA might struggle	2%	1%	7%	11%	2%	3%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   LA will manage	1%	0%	0%	30%	0%	3%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   70a: Local authority regulation of retailer obligations   don't know/unsure	1%	0%	9%	0%	0%	5%

## Suggestions

Many respondents say that they are not aware of any further potential breaches of regulation which should be added to the list, whilst some say that they do not know or



need more information.

Additional breaches which are identified by respondents include:

- improper sale of material;
- incorrect labelling of in-scope containers;
- fraud (across all four nations of the UK);
- failure to meet key performance indicators;
- failure by the Deposit Management Organisation to accurately calculate the handling fees of return points;
- failure by the Deposit Management Organisation to undertake due diligence in relation to the waste collector and its treatment of packaging waste;
- provision of inaccurate data to the Deposit Management Organisation;
- failure to meet mandatory reporting requirements in relation to breaches or non-compliance; and
- failure by a retailer to direct customers to the closest available return point.

Some respondents suggest that various organisations should be consulted on this matter, including:

- regulators;
- local authorities;
- those running other schemes; and
- specialists in this field.

Some respondents suggest ongoing monitoring and reviewing of potential breaches of regulation following implementation, whilst a few feel importers, exporters and reproducers should be included in the bodies which could breach regulations.

## Concerns

Some respondents say that some of the given breaches need more detailed definitions, whilst a few argue that 'not setting correct producer fees' should be seen as an accounting issue rather than a breach of regulation.

A few respondents express concerns about material exports and say that recyclate must be exported responsibly, whilst a few raise concerns about the burden this list could place on regulators.

### 12.4. Question 72

#### **12.4.1. Are there any vulnerable points in the system? Please explain your answer.**

This question was answered by 480 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a



percentage of all respondents to the consultation; and

- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   72: Other vulnerable points   ability to enforce	2%	0%	12%	18%	11%	8%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   72: Other vulnerable points   no - general	2%	1%	10%	7%	2%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   72: Other vulnerable points   fraud	2%	0%	6%	11%	16%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   72: Other vulnerable points   unsure/don't know	2%	1%	7%	9%	3%	0%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   72: Other vulnerable points   review/monitor after implementation	2%	1%	11%	0%	0%	11%

## Support

Many respondents say that there are no further vulnerabilities to identify, whilst a few say that the current list of potential breaches is satisfactory.

## Concerns

Some respondents suggest areas of concern which include:

- the potential for fraud;
- hotels, restaurants, and cafes, and how they would be able to engage with a deposit return scheme;
- a lack of consistency across the four nations of the UK;
- the ability of regulators, the Deposit Management Organisation and Government to enforce proposed measures;
- the potential for fly-tipping or littering if return sites are not well managed;
- the security of reverse vending machines;
- provision of inaccurate data; and
- the complexity of the scheme.

Some respondents say that they do not feel able to answer the question or do not have sufficient information.



## Suggestions

Some respondents suggest that once the scheme has been implemented it should be monitored and reviews should be produced to determine necessary adaptations.

A few respondents say that the Deposit Management Organisation should be responsible for identifying breaches, whilst a few say that local authorities or regulators should be consulted on potential vulnerabilities.

### 12.5. Question 73

#### 12.5.1. Do you see a role for the Deposit Management Organisation to seek compliance before escalating to the Regulator?

This question was answered by 529 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   73: DMO to seek compliance   yes - general	8%	3%	33%	14%	24%	30%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   73: DMO to seek compliance   yes - more efficient for regulator	4%	0%	28%	2%	10%	8%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   73: DMO to seek compliance   yes - advisory role/remedial action	3%	1%	5%	37%	5%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   73: DMO to seek compliance   yes - clear guidance/route of escalation	2%	0%	15%	0%	3%	11%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   73: DMO to seek compliance   yes - best placed to communicate/understand	2%	0%	12%	4%	5%	3%

#### The DMO should have a role

Many respondents agree that the Deposit Management Organisation has a role to play in seeking compliance before escalating any issues with the regulator.



*“We would support the use of a resolution mechanism led by the DMO wherever possible.”*

*User ID 135738, Business representative organisation or trade body*

Some respondents believe that the Deposit Management Organisation can encourage compliance by advising or encouraging remedial action amongst participants in the scheme before escalating to the regulator.

Some respondents state that this role can alleviate the administrative burden on the regulator by addressing less significant issues.

*“The DMO is well placed to manage relationships across all parts of the supply chain that relate to its responsibilities. Better for the Regulator to receive a case file it can act upon rather than needing to carry out investigations right from the start.”*

*User ID 124648, Local government*

Some respondents say that the Deposit Management Organisation should have this role because it is best placed to understand the issues and communicate with relevant stakeholders.

A few respondents believe that the Deposit Management Organisation performing this role can prevent unnecessary costs, particularly for retailers.

A few respondents highlight the need for the Deposit Management Organisation to play this role during the implementation period and allowing participants in the scheme to adjust to the new regulations.

While some respondents agree that the Deposit Management Organisation has a role in seeking compliance, they highlight that there must be clear guidance as to when and how issues should be escalated.

A few respondents think that the Deposit Management Organisation should perform this role but are concerned that it would not be able to ensure full compliance or prevent fraud, particularly in reference to organised criminality.

A few respondents suggest that the Deposit Management Organisation's role in compliance is covered by the tender process.

### **The DMO should not have a role**

Some respondents generally disagree that the Deposit Management Organisation should have a role in seeking compliance before escalating with the regulator.

A few respondents argue that if the Deposit Management Organisation had this role, it would make the system too complicated, or add undesired layers of bureaucracy.

A few respondents say that it is possible that the Deposit Management Organisations could have a role in seeking compliance before escalating issues with the regulator.

A few respondents call for any regulations relating to the Deposit Return Scheme to be enforceable.

A few respondents feel unsure or do not know whether the Deposit Management



Organisation should have a role in seeking compliance before escalating any issues with the regulator.

## 12.6. Question 74

### 12.6.1. Do you agree with the position set out regarding enforcement response options?

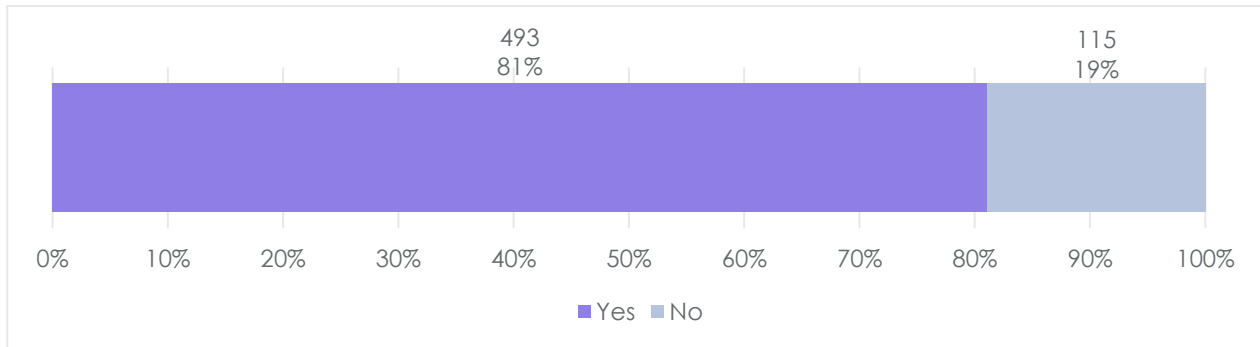


Figure 55: Question 74 (n=608)

### 12.6.2. If not, please expand on your answer.

This question was answered by 608 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   74a: Enforcement response options   more detail on financial consequences	2%	0%	22%	0%	0%	5%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   74a: Enforcement response options   concerns about organised crime	2%	0%	5%	16%	17%	8%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   74a: Enforcement response options   concern - breaches by the DMO	2%	0%	15%	0%	0%	3%
8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   74a: Enforcement response options   support tiered approach	2%	0%	17%	0%	0%	3%



8 Chapter 8 Compliance Monitoring and Enforcement (69-74)   74a: Enforcement response options   support enforcement (general)	1%	1%	8%	9%	0%	0%
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## Support

Some respondents agree with a tiered approach and for resolutions of increasing significance before time-consuming legal approaches.

A few respondents express a general positive comments towards the principle of enforcement, whilst a few would support the inclusion of criminal prosecutions in the enforcement options.

## Concerns

Some respondents feel that there is not enough detail about tackling organised crime, whilst a few raise concerns about the funding and resources available for enforcement.

A few respondents express concern that breaches by the Deposit Management Organisation are not adequately addressed in the proposed enforcement options, whilst a few respondents call for more details on the financial penalties or suggest that these are insufficient.

A few respondents say that the scheme is too complex, and this may impact how effectively it works.

## Suggestions

A few respondents say that this question should be answered by experts.





## 13. Implementation timeline

### 13.1. Question 75

#### 13.1.1. Do you have any comments on the delivery timeline for the deposit return scheme? Please pose any views on implementation steps missing from the above?

This question was answered by 1936 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
9 Chapter 9 Implementation Timeline (75-77)   75: Delivery timeline   Concern   campaign	33%	42%	2%	0%	3%	0%
9 Chapter 9 Implementation Timeline (75-77)   75: Delivery timeline   Concern   interaction with EPR implementation	11%	2%	60%	46%	44%	32%
9 Chapter 9 Implementation Timeline (75-77)   75: Delivery timeline   Concern   campaign (bulk)	11%	14%	0%	0%	2%	0%
9 Chapter 9 Implementation Timeline (75-77)   75: Delivery timeline   Concern   no delays/as soon as possible	11%	14%	0%	0%	2%	0%
9 Chapter 9 Implementation Timeline (75-77)   75: Delivery timeline   Support   longer timeline	8%	1%	41%	58%	25%	24%

### Support

Many respondents, including a number who based their responses on a campaign template response, would support a speedy implementation of the scheme. The main points these respondents raise are: (1) Over 8 billion bottles and cans are wasted every year in the UK so there is no justification for delaying the start of the deposit return system again. (2) Following the pandemic and the subsequent increase in litter, it is needed even more urgently than before. (3) A deposit return system is a core part of a green and fair recovery from the pandemic. (4) The Conservative Party manifesto committed to the implementation of the scheme.



Some respondents call for no delays in the implementation of the scheme and state that it is as needed as soon as possible. Some of these respondents argue that there is no justification for delaying implementation and that delay will lead to increases in waste and litter.

*“There can be no justification for delaying the start of the scheme. It is an urgent problem that must be addressed as soon as possible.”*

*User ID 111801, Individual*

However, some respondents express general positive comments towards the proposed implementation timeline for the deposit return scheme, for instance commenting that the timeline is reasonable or achievable.

## Concerns

Some respondents argue that the proposed delivery timeline is too long, and a quicker rollout of the scheme is needed, with some commenting that implementation in 2024 would be too late. In a similar vein, some respondents state that the scheme should be put in place immediately, with some of these respondents saying that Government should get started with implementation or that the scheme is needed now.

A few respondents express concern that delaying the implementation of the scheme might affect Government credibility in the UK and internationally.

Some respondents argue that the timeline for the implementation of the scheme needs to be extended or propose later start dates, saying that it is unrealistic or too fast.

*“Depending on the decisions taken, particularly around labelling and retailer obligations 24 months may not be sufficient from when the full design and entail of the scheme is announced. It may take longer than forecast to have a DMO in place. Furthermore, the timeline needs to consider Covid-19 and continued disruption to society and business.”*

*User ID 112323, Retailer including online marketplace*

A few respondents say that they are unsure or do not know how to respond to the question.

## Suggestions

Some respondents state that there should be alignment and consistency with the Extended Producer Responsibility scheme during the implementation of the scheme. Some of these respondents propose that start dates for both schemes should be coordinated or that the implementation of a deposit return scheme should be deferred until the outcomes of the Extended Producer Responsibility and Consistency in Recycling policies are known.

*“It is vital that industry has clarity on requirements for reporting targets and how the transition from PRNs to EPR to a DRS will work for containers in scope of a DRS. It is vital industry, local authorities and consumers have clear information, clear timelines, and not overtly penalised where errors in compliance are made as a result of confusion arising from concurrent timescales.”*

*User ID 129116, Operator/ Reprocessor*



Some respondents suggest that the implementation of the scheme should be aligned with Scotland and other UK nations, for instance arguing that an aligned scheme across devolved administrations will reduce the risks of cross-border fraud, confusion and would be less expensive. Some of these respondents comment that devolved governments should work with industry to design a coherent and efficient scheme across the UK.

*“The misalignment in timescales for DRS across the United Kingdoms’ four nations will almost certainly incur issues and consumer confusion, which risk undermining the success of all schemes. These risks will only be compounded by misalignment in core scheme rules such as deposit levels and labelling.”*

*User ID 129093, Business representative organisation or trade body*

Some respondents suggest that trials or pilot schemes should be rolled out before scaling the scheme up to a national level, for example to allow for digital trials to be completed to design a scheme that is fit-for-purpose across the UK.

A few respondents state that urgent action is needed to support the implementation of a digital deposit return scheme solution in the UK, with some highlighting the advantages of a digital scheme and saying it would be a missed opportunity if it is not implemented.

A few respondents express positive comments towards an all-in deposit return scheme.

## 13.2. Question 76

### 13.2.1. How long does the Deposit Management Organisation need from appointment to the scheme going live, taking into account the time required to set up the necessary infrastructure?

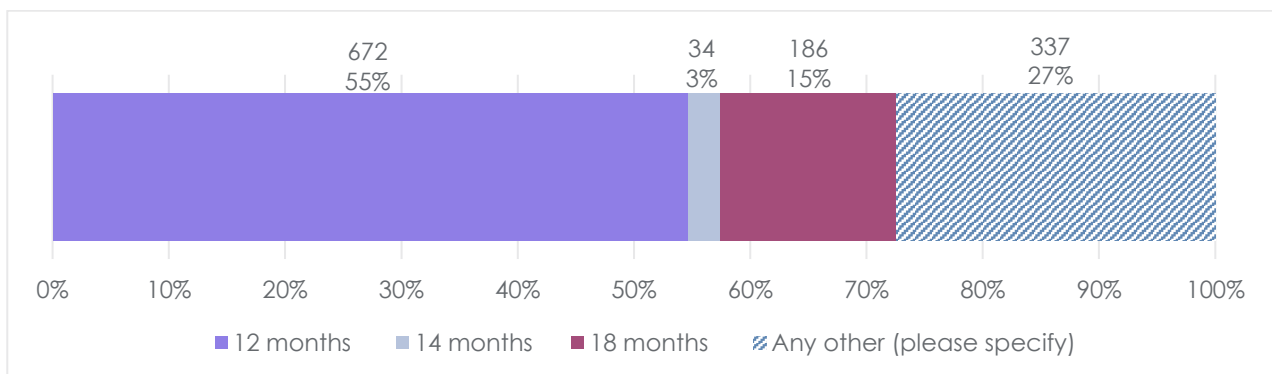


Figure 56: Question 76 (n=1229)

### 13.2.2. Please provide evidence to support your answer.

This question was answered by 452 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code



applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
9 Chapter 9 Implementation Timeline (75-77)   76b: Time form appointment to live   24 months - support	6%	0%	33%	30%	29%	19%
9 Chapter 9 Implementation Timeline (75-77)   76b: Time form appointment to live   difficult to know - timeframe	5%	1%	41%	4%	3%	3%
9 Chapter 9 Implementation Timeline (75-77)   76b: Time form appointment to live   Suggestion - alternative timeline / approach	5%	2%	23%	11%	19%	14%
9 Chapter 9 Implementation Timeline (75-77)   76b: Time form appointment to live   Agree - sooner the better	5%	6%	0%	0%	2%	0%
9 Chapter 9 Implementation Timeline (75-77)   76b: Time form appointment to live   18 months - support	3%	1%	6%	30%	6%	8%

## Timescales

Many respondents offer timescales which they believe would be acceptable ranging from a few months to more than two years. Many of these respondents say they would support a 24 month timescale, some would support an 18 month timescale and some would support a 12 month timescale from appointment of the Deposit Management Organisation to the scheme going live. Some also support a timescale of between 18 months and 24 months.

Many argue simply that the sooner the scheme can be taken live the better. However, some respondents say they favour careful implementation whilst others feel there is a need to be realistic about timescales.

## Concerns

Many respondents say that it is difficult to know what the timeframe should be for the scheme going live, with some suggesting that there are too many unknown factors.

A few respondents say that Government has already delayed the implementation of a deposit return scheme for too long, whilst a few state their opposition to the deposit return scheme as a whole.

## Suggestions

Some say the Deposit Management Organisation should follow existing deposit return schemes from other countries to learn from them, whilst some say that the implementation should be delayed until the Extended Producer Responsibility has been implemented.

Meanwhile, some say that the Deposit Management Organisation should consult with contractors or operators to design a system which works coherently across the UK.



### 13.3. Question 77

#### 13.3.1. Depending on the final decision taken on the scope of the scheme in England and Northern Ireland – all-in or on-the-go – what, if any, impact does this have on the proposed implementation period?

This question was answered by 602 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
9 Chapter 9 Implementation Timeline (75-77)   77: Impact of scope on timeline   All-in takes longer / on-the-go quicker	7%	1%	49%	14%	10%	27%
9 Chapter 9 Implementation Timeline (75-77)   77: Impact of scope on timeline   No impact expected	4%	4%	2%	32%	3%	8%
9 Chapter 9 Implementation Timeline (75-77)   77: Impact of scope on timeline   Impact - other comment	4%	1%	18%	16%	16%	5%
9 Chapter 9 Implementation Timeline (75-77)   77: Impact of scope on timeline   Unsure / don't know	2%	1%	7%	2%	10%	0%
9 Chapter 9 Implementation Timeline (75-77)   77: Impact of scope on timeline   Support - all-in	2%	2%	0%	2%	8%	0%

#### Comparing all-in and on-the-go

Many respondents think that an on-the-go deposit return scheme would be quicker or easier to implement than an all-in scheme. Some of these respondents refer to potential difficulties with developing appropriate scheme infrastructure.

*“In terms of the sheer scale and number of return points and RVMs required, as well as a need to ensure that the scheme is set up to work efficiently for consumers on day 1, it seems reasonable to assume that more time will be needed to implement an 'all-in' DRS compared to 'on the go'.”*

*User ID 129021, Charity or social enterprise*

Conversely, a few respondents think that an all-in deposit return scheme would take less



time to implement than an on-the-go scheme. In their view an all-in scheme would be quicker and easier to implement, saying for instance that the multipack aspect of an on-the-go scheme would take longer.

Some respondents make comments about how the final decision between an on-the-go and an all-in deposit return scheme could impact on implementation timescales. For example, respondents mention the time needed to ensure scheme infrastructure and operational contracts are in place. A few respondents make similar comments with a focus on the potential differences in scheme implementation between devolved nations, saying that a common approach would be beneficial for a swifter implementation.

Some respondents believe the final decision to implement an on-the-go or an all-in deposit return scheme would not have a significant impact on implementation timescales.

*"The differences in scope should not impact the achievability of the proposed timeline as many of the different tasks should be able to be achieved concurrently."*

*User ID 26457, Individual*

Some respondents express positive comments towards the implementation of an all-in deposit return scheme, whilst a few object specifically to the implementation of an on-the-go deposit return scheme.

Some respondents state that they do not know whether the final decision to implement an on-the-go or an all-in deposit return scheme would affect implementation timescales.

### **General comments and suggestions**

A few respondents express positive comments towards the principle of implementing a deposit return scheme as soon as possible. For example, they say it should be implemented immediately or they oppose any delays.

A few respondents voice their opposition to the implementation of any deposit return scheme.

Some respondents make suggestions as to how to implement a deposit return scheme. For example, they suggest what type of infrastructure would be required, the use of trials, or the level of deposits needed to incentivise people to return containers.



## 14. Summary of approach to Impact Assessment

### 14.1. Question 78

#### 14.1.1. Do you agree with the analysis presented in our Impact Assessment?

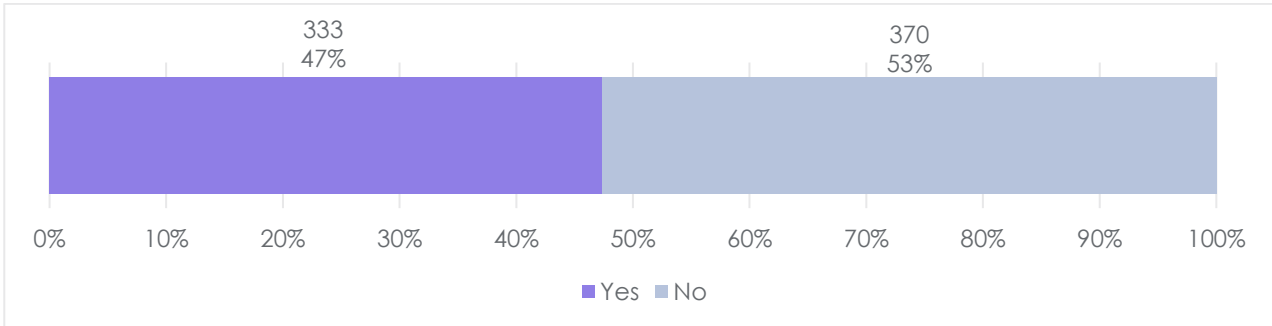


Figure 57: Question 78 (n=703)

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

This question was answered by 536 respondents. Their comments are summarised below.

The table below lists the codes most commonly applied to all responses to the open question. These include comments that express positive comments, express concerns or make suggestions about the proposals.

The table shows:

- All respondents – the respondents who had the corresponding code applied as a percentage of all respondents to the consultation; and
- Group 1/2/3/4/5 – the respondents in that group who had the corresponding code applied as a percentage of all respondents in that group.

	All respondents	Group 1	Group 2	Group 3	Group 4	Group 5
9.1 Chapter 10 Summary Approach to IA   78: Impact assessment   Concern about impact assessment   challenge figures / assumptions	10%	1%	56%	54%	19%	16%
9.1 Chapter 10 Summary Approach to IA   78: Impact assessment   Concern about impact assessment   incomplete / information missing	8%	1%	63%	18%	17%	24%
9.1 Chapter 10 Summary Approach to IA   78: Impact assessment   Disagree with impact assessment - general	2%	0%	9%	2%	5%	14%
9.1 Chapter 10 Summary Approach to IA   78: Impact assessment   Other comments   support all-in	2%	2%	1%	4%	6%	3%
9.1 Chapter 10 Summary Approach to IA   78: Impact assessment   Other comments   comment about recycling / waste / litter	2%	0%	12%	11%	0%	5%



## General comments on the Impact Assessment

A few respondents say they agree with the analysis provided by Defra in its Impact Assessment, whilst a few more say that they agree conditionally, provided that, for example, the economic Impact Assessment and modelling framework used have been tested by experts.

Some respondents state that they disagree, in part or wholly, with Defra's Impact Assessment.

### Specific concerns

Many respondents question the accuracy and reliability of calculations in Defra's Impact Assessment or challenge the scope or content of the analysis. For example, respondents question the anticipated costs to business, whether the underlying principles used in the risk assessment are adequate, and whether the calculations of the potential benefits of a deposit return scheme are accurate.

*"We would question whether the disamenity figures within the Impact Assessment are correct and note that lost sales have not been taken into account."*

*User ID 129094, Product designer/ manufacturer/ pack filler*

Many respondents also express concern about the lack of information provided in Defra's Impact Assessment. For example, respondents say the assessment of cost implications for small businesses is incomplete. Others argue that the Impact Assessment should consider the implications on existing schemes, such as kerbside recycling, or the potential impact of digital scheme solutions.

*"Other factors not captured within the impact assessment include: substitution of material (increase in plastic use and less glass used should be assessed and longitudinal assessment for micro-plastics), reduced access to the UK market and reduced entrants, reduction in UK wine or spirit trade (due to different labelling requirements and cost of proposals to obligated industry), reduction in clear flint glass quality recyclate, increase in vehicular emissions due to DRS, increased social inequality, increased consumer costs and increased consumer time 'non-monetised'."*

*User ID 112323, Retailer including online marketplace*

Some respondents raise specific concerns about the cost projections in Defra's Impact Assessment, including concerns about how the scheme would be funded and how it would impact financially on retailers and industry.

Some respondents believe the Impact Assessment underestimates the benefits of an on-the-go scheme, for example through discounting multipacks.

Some respondents raise specific concerns about Defra's Impact Assessment regarding waste, recycling and/or litter. For example, respondents express concern about the proposed disamenity value for litter or the inclusion of glass recycling within the scheme.





A few respondents question whether a comprehensive equalities Impact Assessment has been completed as part of Defra's final Impact Assessment. Meanwhile, a few respondents express concern about impacts relating to the level and allocation of deposits, whilst others raise concerns about the potential for fraud. For example, respondents think there would be potential for fraud at the Irish border due to the operation of different schemes on either side.

A few respondents identify other possible general implications of implementing a deposit return scheme. For example, respondents comment on potential consumer behaviour change and/or product switching by manufacturers.

A few respondents state that they are unable to make a judgement as to whether they agree with the contents of Defra's Impact Assessment, saying for example that it is too specialist, too long and/or too complicated for them to consider.

### **Other comments**

Some respondents express general concern about the scope of the proposed deposit return scheme. They question why certain types and sizes of product would be included in or excluded from scheme.

A few respondents suggest that the proposed scheme could be extended to, for example, include further materials or to embrace digital solutions.

Meanwhile, a few respondents request that after a period of implementation a review is undertaken to assess the effectiveness and impacts of the scheme.

Some respondents express positive comments towards an all-in deposit return scheme, with some arguing that an on-the-go scheme would be unsustainable.

A few respondents express general positive comments towards the introduction of a deposit return scheme, whilst others call for the implementation of the deposit return scheme as soon as possible. However, a few respondents express general opposition to the introduction of a deposit return scheme.



## Appendix A: List of participating organisations

The following organisations responded to the consultation. This list only includes those which answered 'no' to the consultation question 'Would you like your response to be confidential?'.

<b>Alliance for Beverage Cartons and the Environment (ACE UK)</b>
<b>360 Environmental Ltd</b>
<b>38 Degrees</b>
<b>AB InBev</b>
<b>Adur District Council</b>
<b>Alliance for Beverage Cartons and the Environment (ACE UK)</b>
<b>ALLIANCE WINE CO LTD</b>
<b>Allied Glass Containers</b>
<b>Alupro</b>
<b>Ambleside Action For A Future</b>
<b>Ardagh Group</b>
<b>Asda</b>
<b>Associated Beverage Services Limited</b>
<b>Association for the Protection of Rural Scotland</b>
<b>Association of Directors of Environment, Economy, Planning and Transportation (ADEPT)</b>
<b>Association of London Cleansing Officers (ALCO)</b>
<b>Automatic Vending Association</b>
<b>Axite Ltd</b>
<b>Babergh District Council</b>
<b>Bannagh Community Project</b>
<b>Barnsley Metropolitan Borough Council</b>
<b>Basildon Borough Council</b>



<b>Basingstoke and Deane Borough Council</b>
<b>BCP Council</b>
<b>Beatson Clark Ltd</b>
<b>Belfast City Council</b>
<b>Belvoir Farm Drinks Ltd</b>
<b>Benders Paper Cups</b>
<b>Bentley Parish Council</b>
<b>Bericap UK Ltd</b>
<b>Bettavend Ltd</b>
<b>Billericay Litter Pickers</b>
<b>Birmingham Friends of the Earth</b>
<b>Bishops Stortford Climate Group</b>
<b>Bolton Council</b>
<b>Boots UK</b>
<b>Boston Borough Council</b>
<b>BPIF Cartons</b>
<b>Brighton and Hove City Council</b>
<b>Bristol City Council</b>
<b>British Beer and Pub Association (BBPA)</b>
<b>British Glass</b>
<b>British Retail Consortium</b>
<b>British Soft Drinks Association (BSDA)</b>
<b>Britvic plc</b>
<b>Broadland District Council</b>
<b>Bromley Friends of the Earth</b>



<b>Bromsgrove District Council</b>
<b>Bryson Recycling</b>
<b>Buckinghamshire Council</b>
<b>Bunzl Catering &amp; Hospitality</b>
<b>Caerphilly County Borough Council</b>
<b>Cafe Connections Limited</b>
<b>Cafe Connections Ltd</b>
<b>Cafepoint LLP</b>
<b>Cambridgeshire County Council</b>
<b>Cambridgeshire County Council - RECAP Waste Management Partnership</b>
<b>Camden Council</b>
<b>Camden Friends of the Earth</b>
<b>Can Makers Committee</b>
<b>Canned Food UK</b>
<b>Canterbury City Council</b>
<b>Cardiff Council</b>
<b>Carlisle City Council</b>
<b>Castle Point Borough Council</b>
<b>Celebration Packaging Ltd</b>
<b>Central Bedfordshire Council</b>
<b>CGAN</b>
<b>Charlestown Chums litter picking group</b>
<b>Charnwood Borough Council</b>
<b>Charpak Ltd</b>
<b>Chelmsford City Council</b>



<b>Cherwell District Council</b>
<b>Cheshire East Council</b>
<b>Chesterfield Litter-Picking Group</b>
<b>Chichester District Council (CDC)</b>
<b>Ciner Glass Ltd.</b>
<b>Circularity Solutions Limited</b>
<b>City of London Corporation</b>
<b>City of Wakefield Council</b>
<b>City of Wolverhampton Council</b>
<b>City of York Council</b>
<b>Climate Action Frodsham, part of the Transition Network</b>
<b>Coca-Cola Europacific Partners</b>
<b>Coinadrink Ltd</b>
<b>Community of Christ Clay Cross</b>
<b>Compliance Link</b>
<b>Comply Direct Ltd</b>
<b>Confederation of Paper Industries</b>
<b>Constellium (NYSE: CSTM)</b>
<b>Cornwall Council</b>
<b>CPRE Kent</b>
<b>CPRE Lancashire, Liverpool City Region and Greater Manchester</b>
<b>CPRE Northumberland</b>
<b>CPRE Sussex</b>
<b>CPRE</b>
<b>Crediton Dairy Ltd</b>



<b>Crooks fish bars LTD</b>
<b>Crown Holdings UK Ltd</b>
<b>Crown Packaging Manufacturing UK Ltd</b>
<b>Crown Packaging Manufacturing UK Ltd (Botcherby)</b>
<b>Crown Packaging Manufacturing UK Ltd (Braunstone)</b>
<b>Crown Packaging Manufacturing UK Ltd (Crown Technology)</b>
<b>CTPA</b>
<b>Cumbria County Council</b>
<b>Cumbria Strategic Waste Partnership</b>
<b>D G Payne Ltd t/as Vending Enterprises</b>
<b>Dacorum Borough Council (DBC)</b>
<b>Dairy UK</b>
<b>Danone UK and Ireland</b>
<b>Daventry Litter Wombles</b>
<b>Decorum Vending Ltd</b>
<b>Derbyshire County Council</b>
<b>Derbyshire Dales District Council</b>
<b>Devon Authorities Strategic Waste Committee</b>
<b>Devon County Council (DCC)</b>
<b>Diageo Great Britain</b>
<b>Diageo Northern Ireland</b>
<b>District Councils' Network (DCN)</b>
<b>Divest Brent</b>
<b>Doncaster Council</b>
<b>Dorset Council</b>



<b>Drumbeat School and ASD Service</b>
<b>DWF Law</b>
<b>East Devon District Council (EDDC)</b>
<b>East Hertfordshire Council and North Hertfordshire District Council</b>
<b>East Herts Council and North Hertfordshire District Council</b>
<b>East Lindsey District Council</b>
<b>East London Waste Authority</b>
<b>East Suffolk Council (ESC)</b>
<b>East Sussex County Council ESCC</b>
<b>East Sussex Joint Waste Partnership</b>
<b>Eco Chi</b>
<b>Ecosurety</b>
<b>ecoVeritas</b>
<b>Edingley Old Schoolroom Association</b>
<b>Emballator UK Ltd</b>
<b>Emmi UK</b>
<b>Encirc</b>
<b>Enfield Climate Action Forum</b>
<b>Envases Liverpool Limited</b>
<b>Envipco UK Ltd</b>
<b>Environment Agency</b>
<b>Environmental Services Association</b>
<b>Enviroo</b>
<b>Epsom &amp; Ewell Borough Council</b>
<b>Equanimator Ltd</b>



<b>Erdington Litter Busters</b>
<b>Essex County Council</b>
<b>Exeter City Council</b>
<b>Fareham Borough Council</b>
<b>FCC Environment</b>
<b>Fenland District Council</b>
<b>Food and Drink Federation</b>
<b>Foodservice Packaging Association</b>
<b>Freelance</b>
<b>Friends of Chorlton Meadows</b>
<b>Friends of Hollingbury &amp; Burstead Woods</b>
<b>Friends of Marie Louise Gardens</b>
<b>Friends of North Thames Estuary - Thames21 Badged Group</b>
<b>Friends of Surrey Square Park</b>
<b>Friends of the Fallowfield Loop (Manchester)</b>
<b>Friends of the Lake District</b>
<b>Friern Barnet School</b>
<b>Frith Resource Management</b>
<b>Gloucestershire Resources and Waste Partnership</b>
<b>Gravesham Borough Council</b>
<b>Great Yarmouth Borough Council</b>
<b>Greater Manchester Combined Authority</b>
<b>Green Alliance</b>
<b>Greener &amp; Cleaner UK</b>
<b>Greening Tetbury Climate Action Group</b>





<b>Greenpeace UK</b>
<b>Greenpeace, University of Oxford</b>
<b>Greenredeem Ltd</b>
<b>Grundon Waste Management</b>
<b>GS1 UK</b>
<b>Guildford Borough Council</b>
<b>Gwynver Car Park</b>
<b>H Weston &amp; Sons Ltd</b>
<b>Hampshire County Council</b>
<b>Handsworth Helping Hands</b>
<b>Hanover Action</b>
<b>Harborough District Council</b>
<b>Harlow District Council</b>
<b>Hart District Council</b>
<b>HCC Student recycling group</b>
<b>Heineken UK</b>
<b>Herefordshire Council</b>
<b>Hertfordshire County Council (HCC)</b>
<b>Hertfordshire Waste Partnership (HWP)</b>
<b>Herts. WithOut Waste ('HertsWOW')</b>
<b>Hertsmere Borough Council</b>
<b>Hinckley and Bosworth Borough Council</b>
<b>Hitchin Forum</b>
<b>Hoole Hardware &amp; DIY</b>
<b>Horsforth Civic Society</b>



<b>Hotel Chocolat</b>
<b>Hull City Council</b>
<b>Huntingdonshire District Council</b>
<b>Hythe Environmental Community Group</b>
<b>Iceland Foods Ltd</b>
<b>Ide PC Climate and Environment Emergency Working Group</b>
<b>Industry Council for Packaging and the Environment - INCPEN</b>
<b>Inglehurst Foods Ltd</b>
<b>innocent drinks</b>
<b>IOM3 - Institute of Materials, Minerals and Mining</b>
<b>Ipswich Borough Council</b>
<b>Islington Council</b>
<b>Jigsaw</b>
<b>Joint Waste Solutions</b>
<b>Joss Bay Surf School</b>
<b>Keen Ltd</b>
<b>Keep Northern Ireland Beautiful</b>
<b>Kent County Council</b>
<b>Kent Resource Partnership</b>
<b>Kirklees Council</b>
<b>Kwan Yick (UK) Ltd</b>
<b>LARAC (The Local Authority Recycling Advisory Committee)</b>
<b>Leaf Group</b>
<b>Leicester City Council</b>
<b>Leppitt Associates</b>



<b>Lewisham Council</b>
<b>Liberal Democrats</b>
<b>Lincolnshire County Council</b>
<b>Lincolnshire Waste Partnership</b>
<b>Lisburn &amp; Castlereagh City Council</b>
<b>Litter Action Group for Ealing Residents (LAGER Can)</b>
<b>Litter and Recycling Group Elmbridge (LARGE)</b>
<b>Litter Free Bramham - community litter picking group</b>
<b>Little Melton Parish Council</b>
<b>Local Authority</b>
<b>Local Government - Solihull Metropolitan Borough Council</b>
<b>Local Government Association (LGA)</b>
<b>London Borough of Barnet</b>
<b>London Borough of Bromley</b>
<b>London Borough of Hackney</b>
<b>London Borough of Harrow Council</b>
<b>London Borough of Hillingdon</b>
<b>London Borough of Hounslow</b>
<b>London Borough of Sutton</b>
<b>London Borough of Tower Hamlets</b>
<b>London Borough of Waltham Forest</b>
<b>London Environment Director's Network (LEDNet) / London Councils' Transport and Environment Committee (TEC)</b>
<b>Macpac Ltd</b>
<b>Maldon District Council</b>
<b>Malvern Hills District Council</b>



<b>Manchester City Council</b>
<b>Manchester Friends of the Earth</b>
<b>Marine Conservation Society</b>
<b>Marks &amp; Spencer plc</b>
<b>Medway Council</b>
<b>Merseyside Recycling and Waste Authority (MRWA) responding on behalf of Merseyside and Halton Waste Partnership (MHWP).</b>
<b>Metal Packaging Manufacturers Association</b>
<b>Mid – Suffolk DC</b>
<b>Mid Devon District Council</b>
<b>Milbank Ventures</b>
<b>MKD32</b>
<b>Mole Valley District Council</b>
<b>Molson Coors Beverage Company</b>
<b>Moneyneena &amp; District Development Initiative</b>
<b>Montagu Group</b>
<b>Moreton Action on Plastic</b>
<b>Mutual Aider who supports CPRE</b>
<b>NACM Cider Makers Ltd</b>
<b>National Association of Waste Disposal Officers (NAWDO)</b>
<b>National Trust</b>
<b>Natural Source Waters Association</b>
<b>Neath Port Talbot CVS</b>
<b>NERA, a residents' association representing 365 flats in London NW3</b>
<b>Nestle UK&amp;I</b>
<b>New Ash Green Village Association</b>



<b>New Forest District Council NDFC</b>
<b>New Southgate Millennium Green</b>
<b>Newcastle City Council</b>
<b>Newcastle-under-Lyme Borough council</b>
<b>Newport City Council</b>
<b>NFFF</b>
<b>NFRN</b>
<b>Nichols PLC</b>
<b>Nipak</b>
<b>NIVO Ltd</b>
<b>Nom Wholefoods</b>
<b>Norfolk County Council</b>
<b>Norfolk Waste Partnership</b>
<b>North Kesteven District Council</b>
<b>North London Waste Authority (NLWA)</b>
<b>North Northamptonshire Council</b>
<b>North West Leicestershire District Council</b>
<b>North West Vending</b>
<b>North Yorkshire County Council</b>
<b>Northern Ireland Environment Link</b>
<b>Northern Ireland Local Government Association (NILGA)</b>
<b>Northumberland County Council</b>
<b>Nottingham Open Spaces Forum</b>
<b>Nottinghamshire County Council</b>
<b>Novelis UK Ltd.</b>



<b>NSPCC</b>
<b>Ocado Retail</b>
<b>ODS</b>
<b>O-I Glass Limited i</b>
<b>Old Hatfield Residents Association (OHRA)</b>
<b>O'Neills Nisa Extra</b>
<b>OPRL Ltd</b>
<b>Options Management Ltd</b>
<b>oshea graphic design</b>
<b>OxClean</b>
<b>Oxford Friends of the Earth</b>
<b>Oxfordshire County Council</b>
<b>Oxfordshire Resources &amp; Waste Partnership ORWP</b>
<b>Oxshott Litter Pickers (Oxshott Surrey)</b>
<b>Paperpak Ltd</b>
<b>Park Langley Litter Pickers</b>
<b>Paul G Meins</b>
<b>Pendle Council</b>
<b>Pernod Ricard</b>
<b>'Pick Up For Pendle' Litter Picking Group</b>
<b>PLACE</b>
<b>Planet Purbeck CIC</b>
<b>Plastic Free Chesterfield</b>
<b>Plastic Free Congleton</b>
<b>Plastic Free Faversham. Oare Parish Council</b>



<b>Plastic Free Silsden</b>
<b>Plastic-Free Hackney CIC</b>
<b>Plymouth City Council</b>
<b>Polytag</b>
<b>Portsmouth City Council</b>
<b>Presteigne Plastic Project (Powys)</b>
<b>Princes Limited</b>
<b>Project Integra</b>
<b>Pupils 2 Parliament</b>
<b>re3 (Bracknell Forest/Reading/Wokingham)</b>
<b>RECOUP</b>
<b>Recycle NI</b>
<b>Recycle Wales</b>
<b>Recycle-pak Ltd</b>
<b>Recyclever</b>
<b>Redditch Borough Council</b>
<b>Refreshment Systems Ltd</b>
<b>Regen Waste Limited</b>
<b>Reigate &amp; Banstead Borough Council</b>
<b>ReLondon (previously the London Waste and Recycling Board)</b>
<b>Reloop</b>
<b>Refford Civic Society</b>
<b>Richmond-Upon-Thames Borough Council (LBRuT)</b>
<b>RLM Packaging Ltd</b>
<b>Roberts Metal Packaging Ltd.</b>



<b>Robinson plc</b>
<b>Rother District Council</b>
<b>Royal Borough of Greenwich</b>
<b>Royal Borough of Windsor and Maidenhead</b>
<b>Rubbish Friends Norton Lindsey and Rubbish Friends Warwick District</b>
<b>Rushmoor Borough Council</b>
<b>Ryedale District Council</b>
<b>Sacks Consulting</b>
<b>Sainsbury's</b>
<b>Saltash Environmental Action</b>
<b>Scotch Whisky Association</b>
<b>SDLP Belfast City Council</b>
<b>Selby District Council</b>
<b>Select Catering Solutions Ltd</b>
<b>Selecta UK Limited</b>
<b>Shropshire Council</b>
<b>SIG Combibloc Ltd.</b>
<b>Smart Comply Ltd</b>
<b>Somerset Waste Partnership</b>
<b>South Cambs / Cambridge City Council</b>
<b>South Derbyshire District Council</b>
<b>south devon vending ltd</b>
<b>South Hams District Council</b>
<b>South Holland District Council</b>
<b>South Lakeland District Council</b>





<b>South Norfolk Council</b>
<b>South Oxfordshire District Council</b>
<b>South Staffordshire Council</b>
<b>South Tyne and Wear Waste Management Partnership (consisting Gateshead Council, South Tyneside Council, Sunderland City Council)</b>
<b>Speira</b>
<b>Spencers Wood Village Hall</b>
<b>St Neots Museum</b>
<b>Stafford Borough Council</b>
<b>Staffordshire Waste Partnership (representing all 10 local authorities in Staffordshire)</b>
<b>Steady State Manchester</b>
<b>Stevenage Borough Council</b>
<b>Stevenage Wombles</b>
<b>Stoke Climsland Climate Change Action Group</b>
<b>Stop Portland Waste Incinerator</b>
<b>Strandliners CIC</b>
<b>Strefford Litter Pickers</b>
<b>Suffolk County Council</b>
<b>Suffolk Waste Partnership (SWP)</b>
<b>Surfers Against Sewage</b>
<b>Surrey County Council</b>
<b>Surrey Environment Partnership</b>
<b>Sustainable Cottenham</b>
<b>Sustainable Henfield 2030</b>
<b>Sustainers</b>
<b>Swale Borough Council</b>



<b>SWS Compak</b>
<b>Synergy Compliance Ltd.</b>
<b>Tandom Metallurgical Group Ltd</b>
<b>Teignbridge District Council</b>
<b>Tenby Connects</b>
<b>Test Valley Borough Council</b>
<b>Thames Distillers Ltd</b>
<b>The Canal &amp; River Trust</b>
<b>The Co-operative Group</b>
<b>The Highland Spring Group</b>
<b>The London Borough of Havering</b>
<b>THE PACKAGING FEDERATION</b>
<b>The Scarab Trust</b>
<b>The Society of Independent Brewers (SIBA)</b>
<b>The Upton Group</b>
<b>The Wine and Spirit Trade Association</b>
<b>The Wine Society</b>
<b>Three Rivers District Council. (TRDC)</b>
<b>Tinmasters Ltd</b>
<b>Todmorden Riverside Improvement Group</b>
<b>Tonbridge &amp; Malling Borough Council</b>
<b>Torbay Council</b>
<b>Torfaen County Borough Council</b>
<b>Townswomen's Guilds</b>
<b>Transition Town Bridport</b>



<b>Transition Truro</b>
<b>TRESA CiC</b>
<b>Trivium Packaging UK Ltd</b>
<b>UKH</b>
<b>Unicorn Grocery</b>
<b>University of Cambridge</b>
<b>University of Newcastle upon Tyne</b>
<b>University of Oxford</b>
<b>University of Roehampton</b>
<b>University of the West of England</b>
<b>Unpackaged Innovation Ltd</b>
<b>Vale of White Horse District Council (VOWH)</b>
<b>Valpak</b>
<b>Vending Solutions Ltd &amp; therudefoodvendingco Ltd</b>
<b>Vendmaster Ltd</b>
<b>Veolia</b>
<b>Viridor Limited</b>
<b>Wandsworth Borough Council</b>
<b>Warwickshire Waste Partnership</b>
<b>Wastepack EA</b>
<b>Wastepack NI</b>
<b>Wastepack SEPA</b>
<b>Welwyn Hatfield Council</b>
<b>West Devon Borough Council</b>
<b>West London Waste Authority</b>



<b>West Oxfordshire District Council</b>
<b>West Suffolk Council (WSC)</b>
<b>West Sussex County Council</b>
<b>West Sussex County Council/West Sussex Waste Partnership</b>
<b>West Sussex Waste Partnership</b>
<b>West Yorkshire Vending Solutions Ltd</b>
<b>Western Riverside Waste Authority</b>
<b>Westminster BIDs</b>
<b>Wigan Council</b>
<b>Wildlife and Countryside Link and Wales Environment Link</b>
<b>Wiltshire Council</b>
<b>Winterbourne Environmental Group</b>
<b>Wm Say &amp; Co Ltd</b>
<b>Woking Borough Council</b>
<b>Worcester City Council</b>
<b>Worcestershire County Council</b>
<b>Word to Dialogue Limited</b>
<b>WRAG (Welwyn Rubbish Action Group)</b>
<b>WRAP (the Waste &amp; Resources Action Programme)</b>
<b>Wychavon District Council</b>
<b>Wyre Council</b>
<b>Wyre Forest DC</b>

**TRAVERSE**

