

# Response ID ANON-JZGE-SN8A-A

Submitted to **Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland**  
Submitted on **2019-05-12 20:29:48**

## Introduction

**1 Would you like your response to be confidential?**

No

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

**2 What is your name?**

**Name:**

Q Durrani

**3 What is your email address?**

**Email:**

qduurrani@eppingforestdc.gov.uk

**4 Please provide information about the organisation/business you represent**

**Which of the following best describes you?:**

Local Authority

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

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

Epping Forest District council

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

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

**Please answer below:**

N/A

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

**Please answer below:**

N/A

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

Yes

## Background

### Our approach

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

Yes

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

Providing all 8 principles followed

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

**Type of material included - PET bottles:**

Yes

**Type of material included - HDPE bottles:**

Yes

**Type of material included - Aluminium cans:**

Yes

**Type of material included - Steel cans:**

Yes

**Type of material included - Glass bottles:**

Yes

**Other (please specify):**

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

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

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

Yes

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

Yes

**Other (please specify):**

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

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

Yes

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

Subject to there being an environmental benefit in doing so

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

**Should drinks be included? - Water:**

Yes (some)

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

Yes (some)

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

Yes (some)

**Should drinks be included? - Alcoholic drinks:**

Yes (all)

**Should drinks be included? - Milk containing drinks:**

Yes (all)

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

Yes (some)

**Should drinks be included? - Milk:**

Yes (some)

**Other (please state which)::**

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

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

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

Yes

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

Yes

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

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

Yes

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

**15 Do you agree with the proposed financial flows described?**

Yes

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

I don't know/further information required e.g. retailer handling fee, DMO operational arrangements, etc. Assuming there is a low level of unredeemed deposits the producer fee will need to be high to fund the DMO, this cost will be passed on to consumers. Volatility of recycling markets will impact on material revenue

**16 Should producers obligated under a DRS be:**

Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items

**Other (please explain):**

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

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

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

N/A

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

Yes

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

Yes, in order to ensure that robust infrastructure is in place to support the scheme.

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

Yes

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

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

No

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

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

No

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

they should be retained to further the objectives of the Resources and Waste Strategy

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

**Please explain your answer:**

To local authorities so they can fund improvements to their waste collection and waste disposal services. If not to a separate charity for environmental projects such as cleaner seas/costal erosion.

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

Industry (drinks producers)

**Other (please specify):**

a. Industry (drinks producers)? Yes

b. Government no

c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)? Yes

d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)? Yes

e. Other (please specify) WRAP/representative of local government yes

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

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

No

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

Government should set the parameters and then leave it to the DMO implement.

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

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

Yes

**A DMO should: - Set producer import fees:**

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

Yes

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

(d) Yes, but the handling fee must cover in full the cost to the retailer

(l) Yes, but campaigns would need to link with those run by LAs and WRAP

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

Yes

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

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

Yes

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

there should be a phased approach to implementation with larger producers joining the scheme first.

**28 Should a de-minimis be based on:**

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

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

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

Yes

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

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

No idea, best answered by producers

**Other (please specify):**

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

**Please provide more information:**

No

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

**Do you agree with this proposal?**

Yes

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

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

Yes

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

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

Yes

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

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

**Other (please specify):**

All, where practicable to do so. - add warehouse distribution centres

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

**34 What might the impacts be on those hosting:**

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

Space, potential fly tipping, maintenance issues, overflowing/full RVMS, frequency of emptying

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

May work in some circumstances and locations

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

Yes

**Please provide more information:**

Additional staffing requirements, storage capacity/impact on retail space, need for regular emptying especially after B/H

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

Yes

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

**37 Should a de-minimis be based on:**

**Other (please specify):**

Retailers best able to answer this question

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

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

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

Please provide details.:

N/A

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

Please explain your answer:

Kerbside collection by local authorities

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

Please explain your answer:

Collection by companies delivering food ordered on line, libraries, council offices.

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

Please explain your answer:

Replace bring banks with RVMs

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

Not Answered

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

Need to consider security, solar operated, space/congestion/queues at HHRCs, site where is there large footfall/popular events

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

Yes

Please provide more information:

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

Other (please specify):

Yes, retailers are best placed to comment on how this should be decided.

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

No

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

unless in scope containers taken off premises

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

Yes

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

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

Please provide more information:

N/A

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

Please provide more information:

Businesses to pay the deposit which is redeemed when they return empty bottles

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

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

Deposit needs to be proportionate to the value of the item, needs to be sufficiently high to incentivise use of DRS

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

No

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

should be proportionate to value of the material

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

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

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

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

**Other (please state):**

All, whatever incentivises people to use the scheme.

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

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

Yes

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

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

Yes

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

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

**Please explain you answer, providing evidence where available:**

On line viewable account

## **Monitoring and Enforcement**

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

No

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

**Please explain your answer:**

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

Not Answered

**Other (please specify):**

Risk based

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

Not Answered

**Other (please specify):**

risk based

**59 Should enforcement focus on:**

Not Answered

**Other (please specify):**

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

Not Answered

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

No government to legislate and set fine levels

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

**Please state :**

Yes, manual return points, RVMs – security/accessibility, possibility of double counting

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

**Other (please specify):**

manual return points, RVMs – security/accessibility, possibility of double counting

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

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

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

Non cash payments (phone or card) only so there is some traceability, although may not pass discrimination tests.

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

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

Look at approaches adopted elsewhere.

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

**Please explain your answer:**

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

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

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

Not Answered

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

I don't know/I don't have enough information. It will depend on the scheme which is introduced.

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

Not Answered

**Other (please specify):**

Other, it will depend on the scheme

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

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

Yes

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

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

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

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

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

Not Answered



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

Neither. Do not favour DRS as bureaucratic and expensive to operate and enforce. From a local authority point of view LAs will be left to collect all the hard to recycle/expensive to recycle materials. Concerns regarding environmental and transport issues given the large number of potential collection points. Too much overlap with extended producer responsibilities and the other consultations that are currently underway. The effectiveness of other initiatives such as standardised LA collections and extended producer responsibility should be assessed first before introduction of DRS is considered. It is doubtful that a DRS will reduce litter as those littering unlikely to go to the trouble of returning containers, and also additional litter could be produced if people start sorting through neighbours recycling boxes to remove containers which are in scope of the scheme so that they can claim the deposit.

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

**71 Do you agree with our impact assessment?**

Yes

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

**72 Do you think more data is needed?**

Yes

**If yes, please state where:**

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

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

Not Answered

**If yes, please provide further information:**

more info required

**74 Do you have further comments on our impact assessment?**

**Please be specific.:**

No

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

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

More funding to local authorities for more frequent litter clearance/more enforcement, provision of more litter bins and recycling banks. Also more funding for communications targeted at "recycling on the go".

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

Yes

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

Yes, scheme should be piloted first and then phased in if the pilot proves successful.

## **Outcomes of what we are hoping to achieve**

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

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

No

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

Yes

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

Yes

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

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

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

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

No

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

No, need to have regard to the other consultations which will potentially deliver greater benefits without the bureaucracy involved in implementing DRS scheme.

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

Yes

**Other (please state):**

enhanced LA collections/communications, extended producer responsibility, plastic tax

**Please explain your answer, providing evidence where available. :**

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

Yes

**Other (please state):**

enhanced LA collections/communications, extended producer responsibility, plastic tax

**Please explain your answer, providing evidence where available. :**

### **Further detailed questions**

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

**Please provide more information:**

Loss of income from material sales/LAs would need to be compensated, impact on MRF contracts, removal of material presented kerbside for collection to redeem deposit on in scope materials, potential increase in littering. Productivity – the number of properties that can be serviced per day rather than the tonnage collected is often the limiting factor. It should not be assumed that collections costs will reduce proportionately to reduction in amount of material collected.

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

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

Nothing specific identified as this stage

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

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

Need further information but potentially environmental costs associated with transportation, impact on kerbside collections.

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

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

None identified, further info required.

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

**Other (please specify):**

a and b

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

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

Government, Reprocessers, Producers

**Other (please specify):**

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

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

Agree

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

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

**Please specify.:**

None identified at this time.

### **Further comments**

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

**Please specify.:**

The law on unintended consequences. Producers may start using alternative packaging material to be exempt from RDS requirements