



Havering
LONDON BOROUGH

Jacki Ager (MCIWM)
Waste and External Contracts Manager

Neighbourhoods

London Borough of Havering
Town Hall
Main Road
Romford
RM1 3BD

DRS@defra.gov.uk

t 01708 433363
e jacki.ager@havering.gov.uk
text relay 18001 01708 433363
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www.havering.gov.uk

Dear Sir / Madam,

**Consultation on introducing a Deposit Return Scheme in
England, Wales and Northern Ireland**

I enclose forthwith The London Borough of Havering's responses to the above consultation from DEFRA.

Yours sincerely,

Jacki Ager
Waste and External Contracts Manager
The London Borough of Havering

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About you

Q1. Would you like your response to be confidential? Yes / No

No

Q2. What is your name?

Jacki Ager, The London Borough of Havering

Q3. What is your email address?

jacki.ager@havering.gov.uk

Q4. Which best describes you? Please provide the name of the organisation/business you represent and an approximate size/number of staff (where applicable).

Local Government - The London Borough of Havering

Q5. Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)

Local authority carrying out street cleansing operations and waste collection from households.

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

No

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

Yes

Materials in Scope

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

Yes, however full nett cost recovery (FNCR) needs to cover all of the associated burdens for example people rummaging through bins to find eligible containers to return, which may increase the escape of other litter such as plastic film. Furthermore, best practice indicates that each DRS location would benefit from a general litter bin, therefore there may be additional cost implications. There are also questions around who would operate and be responsible for maintenance - would there be SLAs for emptying, etc. Ensuring the financial burden rests with the producers should incentivise them to review their material production and create a more sustainable product, whether that is reducing resource use altogether, or transitioning to more sustainable materials. Havering suggests that DRS should act as a complimentary scheme, combined with the wider principle of EPR, and provision of it should be based on overall value for money, particularly given that many of the target materials are likely to already be collected by local authorities at the kerbside.

9. Should the following materials be-in scope of a DRS:

- a. PET bottles**
 - b. HDPE bottles**
 - c. Aluminium cans**
 - d. Steel cans**
 - e. Glass bottles**
 - f. Other**
- a. Yes
 - b. Yes
 - c. Yes

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- d. Yes
- e. Yes
- f. other materials and packaging items such as cartons, which can be substituted for any of the above items. This would discourage producers from switching to alternative types of packaging in order to bypass DRS schemes. Furthermore, it may be prudent to consider other commonly-littered items such as fast food packaging, although there are obviously additional concerns around food residue and the size of the items that may prove limiting.

A to E are widely recycled. Separate collections of glass would be welcomed by the paper industry and may particularly benefit LAs that do not currently collect glass at the kerbside. Colour separation may also be possible and assist with diverting glass away from aggregate. Havering Council currently achieves very high capture rates of glass, despite offering bring bank collections only.

10. Should the following materials be-in scope of a DRS:

a. Cartons e.g. Tetrapack

b. Pouches and sachets, e.g. For energy gels

(Yes/No/Neither/Don't know / not enough information)

Yes. As pointed out in Q9 response, these are items likely to be used as an alternative to target DRS materials in order to bypass DRS, and at present there is poor recycling infrastructure for them. However, a phased introduction may help stimulate the market. These items also often sources of contamination, so the addition of these items to a DRS scheme would be beneficial and reduce confusion amongst consumers. Alternatively, if these were not included within the scope of a DRS scheme they could potentially be captured under a reformed packaging producer responsibility scheme to encourage better product design, and tariffs could be imposed on producers of less recyclable items which could discourage their use and lead to an increase in use of more readily recyclable items instead.

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, where it is viable to do so as this would follow the core principals of the waste hierarchy. However, more understanding is required of the environmental/cost impact of remelt vs washing, and the strength / thickness of bottles required for reuse. Government would also need to consider regional variations in treatments due to proximities to nearest facilities (and whether more infrastructure would be required in either scenario). Colour separation would also need to be considered, as well as standardising some bottles to make depositing / sorting by size easier.

Drinks in scope

12. Should the following drinks be in-scope of a DRS:

a. Water

b. Soft drinks (excluding juices)

c. Juices (fruit and vegetable)

d. Alcoholic drinks

e. Milk containing drinks (some / all)

f. Plant-based drinks (such as soya, rich almond and oat drinks)

g. Milk

h. Other

a. Water - yes

b. Soft drinks (excluding juices) - yes

c. Juices (fruit and vegetable) - yes

d. Alcoholic drinks - yes

e. Milk containing drinks (some / all) - some

f. Plant-based drinks (such as soya, rich almond and oat drinks) - some

g. Milk - no

h. Other

Including as many drink types as possible will limit confusion to the public, and maximise recycling opportunities. However, there may be an argument to place higher deposits on more sugary / less healthy drinks. As milk is considered an essential item, we agree that customers should not be disadvantaged by a taxation on this item, and suggest that funding for collections / recycling may be covered separately through EPR. As more and more people are switching to dairy alternatives such as soya and almond milk, these should be treated in the same way as essential milk / milk-based drinks. Regarding water specifically, this is the most refillable option and therefore more promotion should be done around reusable water bottles / drinking fountains, such as the One Less campaign / GLA water fountain initiative.

Disposable, single-use cups

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

a. Disposable cups made from paper with a plastic lining (such as those used for coffee)

b. Disposable cups made of plastic (such as those used in vending machines)

a. Yes, because this may help to reduce this type of litter, which is particularly prevalent in high footfall areas. However, it is important to ensure a culture of reuse is established and the use of single-use cups is not driven up by having more recycling outlets for them. This consultation does not appear to acknowledge the role that waste reduction should play, reflecting the waste hierarchy. A similar scheme to the plastic bag charge may be workable, i.e. charging extra to consumers that purchase their drink in a single-use cup, but not necessarily recouping that fully when depositing in a DRS machine, rendering these items less desirable. At the same time, the user of a reusable cup at a coffee outlet may receive a larger discount which acts as a financial incentive. These cups are very common in office environments, so does more responsibility need to be placed on businesses to ensure adequate recycling, or reduction of their use through taxation? What about other non-recyclable / much harder to recycle materials such as foam polystyrene cups? Should there be an outright ban? Even with paper cups, as with cartons, the infrastructure for recycling these items is not fully developed, and some market stimulation is required.

b. yes, otherwise retailers may just switch from one type of cup to another depending on which is more financially viable / less taxable. However again, infrastructure is not developed for this type of item in the same way that general plastic bottles is.

Material and financial flows in a DRS

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

No. The flow is over-simplified as it does not take into account non-retail environments, where a lot of these items are consumed - both offices and homes. The model also does not take into account unsold stock, and does not differentiate between DRS collections, and unreturned items collected through Local Authority collections, where the material may not be captured through a DRS. It also does not acknowledge target items that end up in the residual stream.

15. Do you agree with the proposed financial flows as described above?

No. The flow is over-simplified as it does not take into account non-retail environments, where a lot of these items are consumed - both offices and homes. The model also does not take into account unsold stock, and does not differentiate between DRS collections, and unreturned items collected through Local Authority collections, where the material may not be captured through a DRS. There needs to be a financial flow of unredeemed deposits to demonstrate funding for local authority collections.

Overlap with the packaging producer responsibility system

16. Should producers obligated under a DRS be:

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

b. Also obligated under the reformed packaging producer responsibility system for the same packaging

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items?

c. Other (please explain)

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

a. No

b. No

c. Yes. Some EPR requirements should be universal, e.g. Mandatory labelling. There also needs to be an incentive to drive continuous improvement, on top of ensuring responsibility for recycling / collection costs. Therefore, those producers paying into DRS need to also be incentivised through Extended Producer Responsibility, for example through a credit scheme (perhaps based on market share) to ensure they are not disadvantaged through being charged twice. Alternatively, EPR and DRS could be combined so that the financial flows will be easier to calculate and apply, and which would then avoid the potential for double-charging of producers.

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'?

See Q16

Deposit Management Organisation (DMO)

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

Yes, however these would need to be considered on a regional level, taking into account existing infrastructure, local contracts and housing stock. Capture rates of different materials could be measured, but consideration would need to be given to existing services such as local authority kerbside collections, which may already be capturing a substantial amount of the material.

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

Yes, however these would need to be considered on a regional level, taking into account existing infrastructure, local authority collections, housing stock, etc. (better-off customers with room to recycle at home and an existing robust kerbside collection may have less of an incentive to recycle through DRS). Any local authority targets should then take into account any loss of materials through DRS. Government may also wish to consider targets around availability and functionality of services (e.g. return vending machines) to ensure appropriate coverage. Also consider communications - if EPR is mooted to be a way of funding communications, would this be on a national or regional scale, and should producers bear some of the burden of delivering comms campaigns? Data would also need to be transparent and at a local level in order to determine / offset any impacts on local authority performance.

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

No. Unless FNCR is achieved through EPR, this should be used to fund collections of materials not captured through DRS, which will more often than not end up in the control of the local authority, either through kerbside recycling / residual waste collections, or through street cleansing litter.

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. See Q20

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

See Q20

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

a. Industry (drinks producers)?

b. Government

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

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

e. Other (please specify)

a. Yes

b. Yes

c. Yes

d. Yes

e. Other. Packaging manufacturers as well as drinks producers should be represented to ensure sufficient engagement. Also, local authorities, as the main body responsible for collecting non-redeemed items (and potentially hosting RVMs), as well as possibly waste /resource industry bodies to advise.

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

Set-up - yes, to ensure all requirements are covered.

Running - no, as the government should act as the regulator, to ensure compliance is reported accordingly.

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

a. Advise government on the setting of the deposit level/s

b. Set producer/importer fees

c. 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

d. Set and distribute the handling fees for return points

e. Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?

f. Be responsible for maintenance of reverse vending machines (RVMs) and provision of bags/containers to those running manual return points

g. Own the material returned by consumers

h. Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts

i. Fund counting sorting/centres – and manage the contracts for counting/sorting centres

j. Be legally responsible for meeting the high collection targets set by government for drinks containers within scope of the DRS.

k. Measure and report recycling rates to government

l. Run communications campaigns to aid consumer understanding of the DRS

a. Yes, evidencing how these have been calculated.

b. Yes, evidencing reasons behind this (whether examples from elsewhere, real costs, etc. In consultation with those affected).

c. Yes, providing auditable evidence through a pre-determined plan/template.

d. Yes, evidencing reasons behind this (whether examples from elsewhere, real costs, etc. In consultation with those involved such as counting centres).

e. Yes, but may be opportunities for LAs to integrate with their own collection systems, for example where space is at a premium in dense urban environments.

f. Yes, perhaps through regional or national contracts. Ensure there are performance indicators in place to address coverage, downtime, etc.

g. Neither agree nor disagree. Depends how they are funded - if purely through deposits, or also through material sales. There would still be a duty of care to ensure the material is delivered to registered waste facilities, down the chain.

h. Not sure - if there is a chain within the product journey then maybe it makes sense for the next person in the chain to take ownership, e.g. the counting centres.

i. Not sure - if there is a chain within the product journey then maybe it makes sense for the next person in

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the chain to take ownership, e.g. the MRFs / reprocessors, based on tonnes collected?

j. Yes, as per Q18/19. Furthermore, this data should be made available to local authorities who will plan their waste collection services around capture rates of in-scope DRS material, and whose recycling rates may be impacted by loss of material.

k. Yes, as per Q18/19 - if they are responsible for meeting the targets then they should be responsible for measuring and reporting.

l. Part-funding, but requires a nationally coordinated campaign, e.g. through WRAP, to ensure consistency in messaging, and that Local Authorities are involved given that residents are used to placing many of these containers in their household collections.

Producers

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

Yes, as long as the actual packaging manufacturers are covered through EPR, as per the proposal.

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?

I don't have enough information. Importers have not been included in the material flow, however it seems logical to include them. Given that DRS would still see the packaging returned, it makes sense for all importers / producers to join the scheme. However, this may prove to be an administrative burden depending on the number of importers and producers out there.

28. Should a de minimis be based on:

a. Number of employees

i. If yes, how many employees?

b. Sales figures

ii. If yes, what figure?

c. Volume/weight of drinks put on the market

iii. If yes, what volume/weight?

d. None of these

e. Other

c - volume or weight.

lii. Unsure as do not have enough information, however this would seem like a logical way to do it, as it means that those companies having the most impact on waste volumes / tonnages would be obliged to participate.

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

I do not have evidence.

Set-up costs

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, this would be in line with the "producer pays" principal, and an intrinsic part of the process.

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

Yes. This should be centrally managed to ensure simplicity and consistency, and should allow for adequate flow of data, and access to it by local authorities and possibly other interested parties (e.g. For Freedom of Information requests). It may then take on contracts with regional operators.

Operational costs

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

Yes, this should be the overarching model. However, DRS should operate within a wider EPR scheme in order to reduce complexities and ensure fairness towards producers.

Retailers / return provisions

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

- a. Retailers who sell drinks containers in scope**
- b. Transport hubs**
- c. Leisure centres**
- d. Event venues**
- e. None of these**
- f. Other (please specify)**

- a. Yes
- b. Yes
- c. Yes
- d. Yes
- e. No
- f. Shopping malls that contain food kiosks.

Optional outlets in locations such as public car parks (alongside or replacing recycling banks), educational establishments, large hotels / conference centres, large office buildings / complexes, industrial parks, etc. However, if on public land, SLAs would need to be produced to ensure appropriate responsibility is assigned to the relevant party. A particular concern would be if RVMs were located on high streets / in accessible public areas where they may be subject to vandalism and fly-tipping, as well as contributing to street scene "clutter", which many boroughs are trying to reduce. Therefore, the siting of them needs to give due regard to these issues.

34. What might the impacts be on those hosting:

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

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

a) Similar impacts to recycling sites, and other vending machine points, such as: fly-tipping (of both in- and out-of-scope items), vandalism, maintenance of the unit, overspill / full units.

B) Space, unless there is a way of compacting some items such as cans and plastic bottles. Also the logistics of customers returning the items, and them then being placed in a receptacle which may not be in the same location as the refund point (e.g. refund at till but receptacle at back of store in the case of smaller establishments).

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

Leaks from containers not properly emptied, and associated staining / sticky residue leading to smells, pests etc. Also manual handling issues where retailers may need to move receptacles to present them for collection.

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

Yes.

37. Should a de minimis be based on:

a. Floor size

i. If yes, what floor size?

c. Sales figures for drinks in scope

ii. If yes, what figure?

d. Number of employees

iii. If yes, how many employees?

e. None of these

f. Other (please specify)

a. Yes

i. Unsure of exact size, but perhaps the size of a small corner shop.

c. Yes

ii. Unsure

d. Yes

iii. Unsure

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

This would help to reflect the market share of the products, whilst also considering the practicalities of hosting a vending point for smaller businesses.

39. Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers? Please provide details.

No

40. 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?

Some consideration needs to be taken to ensure sufficient access. It may be worth considering how these residents receive their items in the first place - either through family members or through online shopping. Could online retailers be obliged to take back empty containers, and then refund through reimbursements on the next shopping bill - Ocado already does this with plastic bags. Those who are provided with their shopping through family members may be able to return their items back through that channel. An option may be to reimburse through local authority recycling collections, but this may be complicated to administer.

41. 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?

As above.

42. 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?

No evidence, but these seem like logical places. However, given the likelihood of attracting fly-tipping, the management of these would need to be agreed accordingly.

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

Yes, and it would support those that may otherwise have accessibility problems. Online grocery retailers would be the prime way of capturing this material, and many already take back plastic bags and provide a nominal reimbursement to customers. For general postal purchases, this would not be practical, and that is where RVMs and in-person venders would be more practical.

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

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

- a. Sales figures for drinks in scope
- b. Number of employees
- c. None of these
- d. Other (please specify)

No, if carrying out the deliveries directly (i.e. Not through postal services)

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

Yes, and there is a big opportunity here to capture a large amount of material. As well as the catering sector, consider educational establishments, places of worship and one-off events where mobile RVMs could be utilised. Many events such as festivals already have return vending for items like paper or plastic cups, so it would make sense to formalise this approach.

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, particularly where visitors may need to dispose of items on the premises. This would maximise capture, and potential provide the groundwork for any extension of DRS into other materials or packaging types.

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

No further comment.

On-trade Sales

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

Most of these types of premises will already be separating some of their containers, such as glass bottles. Therefore, logistically this may be one of the least complex scenarios. The deposit could automatically be taken off of the bill (so a nett cost for the customer), on the assumption that the vast majority of the containers are not going to be taken from the premises.

The deposit

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

This may be dependent upon the size and material of the container. These should be covered by EPR, if DRS is only to be used as a system to complement the overarching EPR scheme. However, if certain DRS materials were exempt from EPR then the nett costs involved in dealing with these items would need to be fully considered - from a collection / recovery side, but also secondary costs such as street cleansing (clearing fly-tips next to RVMs and spillages from raided litter bins), congestion charges for collection vehicles, communications etc. Consideration should also be made around whether behaviour such as bin raiding would be encouraged by a certain deposit price threshold which makes an item more desirable.

20p would be a good level to make DRS worthwhile for consumers, with a differential that is dependent on the material type and size of container. Regarding material type, the price differential could be based on the impact of creating new containers from virgin materials.

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

No, as per Q49 response, this may vary both on the container type and size, as well as associated costs of collection etc.

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

No, as often there will be no differentiation from a customer perspective once returning the item.

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

a. Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop-off points)

b. Digitally (for example a digital transfer to a smartphone application)

c. Cash

d. Return to debit card

e. Option to donate deposit to charity

f. Other (please state)

g. None of the above

a. Yes

b. Yes

c. No as this may encourage break-ins / vandalism of RVMs. There should be widespread availability of useful vouchers (perhaps money off the next shop) so as not to disadvantage customers without regular access to bank accounts.

d. Yes, but as in (c) there should be alternative options such as vouchers.

e. Yes

f. There should be a mechanism for local authorities to redeem deposits from containers collected through street cleansing and residual waste collections, i.e. deposits that will remain unredeemed as the customer has chosen not to redeem them by disposing of them outside of a DRS. Along with donations to charities, there may be opportunities for charities to partake in redeeming points directly, or through hosting an RVM in larger premises.

g. No

Sending material on for recycling and data recording

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

Yes, just as local authorities have to report on the destination of their collected waste through Q100.

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, but this may need to be in conjunction with other reporting systems such as WasteDataFlow to ensure as thorough capture of materials flow as possible.

Transparency

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

A standard and clear formula for calculation and publication of audited data where figures can be worked back using the standardised formula. A robust flow of tonnage to back this up, similar to WasteDataFlow but more easily accessible to the public / more user-friendly.

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?

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

Yes

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))

- a. Annually
- b. Bi-annually
- Other (please specify)

Other. Regarding material flows and recycling rates, currently most councils submit quarterly waste tonnage figures to WasteDataFlow. It would be prudent to keep any reporting from DMOs to the same frequency, in order for local authorities to incorporate tonnage figures from DRS into their own reporting. The systems need to either be aligned, or combined. Financial monitoring could also be tied into this, in order to ensure regular monitoring of constant cashflows, with an annual audit. The setting of the deposit level could be carried out annual or bi-annually, as this is more of a high-level issue.

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

- a. Annually
- b. Bi-annually
- Other (please specify)

b. At least bi-annually. This could potentially be made less onerous by a robust reporting and evidencing regime by producers.

59. Should enforcement focus on:

- a. A sample of producers?
- b. All producers?
- b. All producers

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

Yes

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

Any point along the system where either money or materials change hands. This may be particularly problematic with small venders who are not necessarily using barcode scanning technology to track stock. RVMs may be subject to attempted fraudulent usage, and will need to be monitored accordingly.

62. Which labelling/markings on drinks containers in scope would best protect against fraud?

Please select all that apply:

- a. Deposit value amount
- b. Marking indicating inclusion in DRS
- c. Existing product barcode (containing DRS information when scanned)
- d. Other (please specify)
- e. None of the above

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

- a. Yes
- b. Yes
- c. Yes
- d. Local authority collections through kerbside recycling / residual waste collections and street cleansing activities mean that barcode scanning, for example, would not be practicable. Therefore, there would still need to be a method or formula of measuring, or at least estimating, the amount of target DRS materials within these waste streams.
- e. No

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.

Regular maintenance and updates. There may be some lessons learned available from localities that are already utilising this technology.

64. How could the process of manual returns best be protected against fraud? We are particularly interested in any evidence you may have to support suggestions.

This would be the most problematic method, but perhaps a formula could be created to estimate the amount of material expected to be captured through different retail types / sizes. Any appearing to perform drastically differently could be subject to further investigation.

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)?

Regular sharing of best practice and lessons learned in order to regularly update the system.

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?

It would seem practical to exclude them due to their size, as long as they were included under the EPR regime to ensure full nett cost recovery for collection and treatment is achieved.

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

> 3 Litres

> 4 Litres

> 5 Litres

Other

There should be no maximum size cut-off

Other. 2-3L would seem like a maximum reasonable size to handle by a vendor and / or RVM.

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

Yes. Some water containers in particular may be larger, but these are the exception rather than the rule, and many consumers already use reusable containers to hold larger amounts of water.

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

No, as items from multi-packs are often used "on-the-go", for example in packed lunches. As highlighted in Q51, consumers are unlikely to make a distinction between single containers and multi-pack containers of the same size / type.

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

All-in

On-the-go

Neither

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

All-in. A comprehensive scheme with a variety of options will ensure as much material capture as possible, in as many different container sizes as possible. This would also reduce confusion for consumers. If, for example, on-the-go was the only option, producers may look to place larger containers on the market to bypass DRS. All-in, if managed effectively, would potentially allow for full net cost recovery for local authorities who collect the items through both kerbside collections and street cleansing operations. Provided that DRS is fully integrated into a wider EPR system, local authorities currently receiving income from recycle should not be impacted by loss of revenue as full net costs will be covered by producers.

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71. Do you agree with our impact assessment?

No. Costs do not include Local Authority kerbside collection and street cleansing costs. The IA states that funding would be covered by material revenue and Producer Fees, however markets remain volatile and therefore would Producer Fees be amended to make up for any shortfall? Non-monetised benefits are vague and assumptions are not especially sound. For example, there may be increased flows of customers in some instances, but this will depend on how dense the coverage of RVMs and take back points is. Less dense coverage may lead to greater footfall at some locations, whereas a more dense spread would mean a saturated market with little change in customer footfall. The rationale behind litter disamenity is sound; however whilst DRS will cover some key litter items, non-target materials such as paper cups and films will still likely be prevalent. Furthermore, raiding of litter bins for target materials, and fly-tipping of non-target materials around RVMs in the public realm, may incur extra work in clearance, and therefore cost.

72. Do you think more data is needed? If yes, please state where.

Yes. In order to estimate full net cost recovery, Local Authority operations (collections, disposal, street cleansing operations) need to be taken into account, along with communications and potentially enforcement. Best/worst case scenarios on market values also need to be factored in; currently it appears that an average cost has been worked out based on 2018 market values, and whilst it has been acknowledged that these are likely to fluctuate, no alternative scenario has been given, other than an overall High / Low / Average scenario for nett costs/gains of the different options. This is over-simplified, given the different types of collections and profit shares / income that some local authorities receive, whilst others pay considerable gate fees.

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

See Q71 and Q72

74. Do you have further comments on our impact assessment? Please be specific.

No further comment.

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

With the funding of communications through EPR, more national visibility, either through WRAP, Local Authorities or producers themselves may help to increase recycling rates and reduce litter. Consumers may be encouraged to think more about the waste they reduce, and as such produce a cleaner recycling stream at home. Plastic litter in particular is currently weighing heavily on the public psyche, but maintaining momentum may be an issue. The more ingrained a new scheme becomes in day-to-day routines, the less people will consider their wider impacts.

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

No. This would fail to maximise capture rates, as well as engage with the widest possible group of consumers and producers. In order to have the greatest impact on the population - both in material capture and buy-in - a complete overhaul is necessary.

77. Do you think a DRS would help us to achieve these outcomes? Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

- a. Reduction in litter and litter disamenity (include expected % decrease where possible)
- b. More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'
- c. Higher quality recycling
- d. Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials

- a. Don't know - whilst it may reduce littering of target DRS materials, it may also lead to increased fly-tipping around RVMs in the public realm, and increased litter around litter bins where they are raided for target DRS materials. In a best case scenario, there may be no nett benefit overall.
- b. Yes, and there may be added benefits, e.g. a more conscientious public may look to recycle more items than previously, and also prevent waste in some circumstances, such as reusable cups and bottles.
- c. Yes, not just with target DRS materials, but possibly other materials collected at kerbside / bring banks as the public become more conscientious.
- d. I don't have enough information - whilst this would be an ideal scenario, considerable investment would be required, and an end market (e.g. for plastic pellets), potentially for exports. There is naturally uncertainty around this, particularly with Brexit.

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

Yes, in order to achieve public buy-in and adequate separation of clean material. However, this just forms part of a larger system of waste management, including kerbside collections of waste, and business waste recycling.

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

I don't have enough information, however it is likely that a broad range of approaches are necessary to achieve the desired outcomes, hence why EPR is necessary, as well as more consistency in recycling collections.

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

I don't have enough information, however it is likely that a broad range of approaches are necessary to achieve the desired outcomes, hence why EPR is necessary, as well as more consistency in recycling collections.

Statutory local authority recycling targets in Wales

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?

N/A

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

N/A

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

N/A

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

N/A

Design of drinks containers

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

- a. Varying producer fees that reflect the environmental cost of the products that producers are placing on the market
- b. An additional producer fee for producers using unnecessary and/or difficult to recycle packaging
- c. Other (please specify)
- d. None of the above

- a. Yes
- b. Yes
- c. Where packaging is a necessity, perhaps an additional rebate for the most environmentally-friendly packaging, at least for the first few (5?) years to encourage switch overs.

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

- a. Government**
- b. Reprocessors**
- c. Producers**
- d. Local Authorities**
- e. Waste management companies**
- f. Other (please specify)**

- a. Yes
- b. Yes
- c. Yes
- d. Yes
- e. Yes

f. Yes - environmental consultants or other independent experts able to undertake appropriate lifecycle analyses. Also organisations such as Keep Britain Tidy, who regularly assess the impact of issues such as litter, as has been noted within the IA for this consultation.

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

Agree. Environmental permitting will need to be reviewed, particularly around waste volumes at sites, as well as potentially Duty of Care documentation - whether for example it needs to highlight where material has been delivered to a DRS outlet. Where reverse haul operates, it may be prudent to offer an incentive for companies to purchase the appropriate waste transfer licenses, given that this may come as an additional burden. Where manual reverse vending takes place in smaller retail outlets, updated environmental health guidance (including Food Standards) may need to be issued. Given the aim of reducing litter, it may be prudent to investigate EPR opportunities for other litter types such as smoking-related and chewing gum litter.

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.

See Q87

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?

No further comment.