

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

## About you

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

Yes / No

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

**2. What is your name?**

**Councillor EJ Poll**

**3. What is your email address?**

**wastestrategy@lincolnshire.gov.uk**

This is optional, but if you enter your email address then you will be able to return to edit your consultation at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation.

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

Which of the following best describes you?

(Please tick only one option. If multiple categories apply to you please choose the one which best describes you and which you are representing in your response.) (Required)

- Business representative organisation/trade body
- Product designer
- Manufacturer
- Distributor
- Retailer
- Waste Management Company
- **Local Authority**
- Reprocessor
- Community group
- Charity
- Social enterprise
- Independent consultancy
- Academic or researcher
- Individual
- Other

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

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

**Lincolnshire Waste Partnership**

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.

(Optional)

The Lincolnshire Waste Partnership (LWP) brings together the public bodies within Lincolnshire responsible for collection and disposal of waste, including:

- Seven Waste Collection Authorities (WCA's) – Boston Borough Council, City of Lincoln Council, East Lindsey District Council, North Kesteven District Council, South Holland District Council, South Kesteven District Council and West Lindsey District Council; and
- One Waste Disposal Authority (WDA) – Lincolnshire County Council.

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

None

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

## Basic principles for a DRS

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

Yes

No

I neither agree nor disagree

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

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

## Proposed models for a DRS system

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

a. PET bottles

Yes

No

Neither

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.

As many materials as possible which are easily recyclable

b. HDPE bottles

Yes

No

Neither

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.

c. Aluminium cans

Yes

No

Neither

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.

d. Steel cans

Yes

No

Neither

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.

e. Glass bottles

Yes

No

Neither

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.

f. Other (please specify)

As many materials as possible which are easily recyclable

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

a. Cartons e.g. Tetrapack

Yes

No

Neither

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.

Ensures that manufacturers and food and drink producers are required to consider packaging improvements that make them more recyclable. EPR will hopefully also help with that.

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

Yes

No

Neither

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.

Ensures that manufacturers and food and drink producers are required to consider packaging improvements that make them more recyclable. EPR will hopefully also help with that.

**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

No

Neither

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

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

a. Water

Yes

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

b. Soft drinks (excluding juices)

Yes

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

c. Juices (fruit and vegetable)

Yes

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

d. Alcoholic drinks

Yes (some)

Yes (all)

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

e. Milk containing drinks

Yes (some)

Yes (all)

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

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

Yes

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

Whilst these products may be "essential", they should still be in the DRS scope as those who recycle would get their deposit money back anyway!

g. Milk

Yes

No

Neither

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.

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

Whilst these products may be "essential", they should still be in the DRS scope as those who recycle would get their deposit money back anyway!

h. Other (please state which):

Why not make the scope "all drinks bottles and drinks cans"? That would be easier for the public to understand.

### 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)

Yes

No

Neither

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

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

Yes

No

Neither

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

Please briefly state the reasons for your response. Where available, please share evidence to support your view. The government is particularly interested in any.

These may need their own separate DRS rather than being included with bottles etc.

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

Yes

No

I neither agree nor disagree

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

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

Yes

No

I neither agree nor disagree

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

We are slightly confused by the yellow dotted lines on the diagram on page 25. Please explain these further.

## 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 items?
- c. Other (please explain)
- d. 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.

It would appear that the DRS only circulates deposit money, whereas EPR funds collection & processing through other streams. However, if that is not the case, care needs to be taken to avoid double-charging for that collection and processing.

**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.

It would appear that the DRS only circulates deposit money, whereas EPR funds collection & processing through other streams. However, if that is not the case, care needs to be taken to avoid double-charging for that collection and processing.

## Deposit Management Organisation (DMO)

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

Yes

No

I neither agree nor disagree

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.

Pro – DMO have a lot of powers and receive a lot of funding.

Con - DMO would have limited control over this. It should remain a government responsibility as they will set up and enforce the rules of the system.

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

Yes

No

I neither agree nor disagree

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.

Pro – DMO have a lot of powers and receive a lot of funding.

Con - DMO would have limited control over this. It should remain a government responsibility as they will set up and enforce the rules of the system.

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

Yes

No

Neither

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

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

The scheme should be entirely funded by the producers.

**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?**

Yes

No

Neither

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.

This should not end up as an income stream for government.



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

To fund local authority to maintain kerbside collections, treatment and processing infrastructure for those residents that do not participate in DRS.

**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)

Waste trade organisations eg CWM, ESA

Environmental charities/organisations eg KBT/WWF/FoE

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

No Government as they simply set (and update?) the rules.

Producers are key stakeholders.

Umbrella bodies from across the waste industry have expertise which could be invaluable.

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

Yes

No

Neither

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.

They should be involved in the set-up but (as stated above) not in the running of the DMO.

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

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

Yes

No

I neither agree nor disagree

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.

This is dependent on the right make-up of the DMO Board.

It needs to be evidence-based.

- b. Set producer/importer fees

Yes

No

I neither agree nor disagree

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.

This is dependent on the right make-up of the DMO Board.  
It needs to be evidence-based.

- 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

Yes

No

I neither agree nor disagree

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

- d. Set and distribute the handling fees for return points

Yes

No

I neither agree nor disagree

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.

This needs to reflect the true costs, not be arbitrarily set. Does this need shop involvement in the DMO?

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

Yes

No

I neither agree nor disagree

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

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

Yes

No

I neither agree nor disagree

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

g. Own the material returned by consumers

Yes

No

I neither agree nor disagree

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

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

Yes

No

I neither agree nor disagree

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

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

Yes

No

I neither agree nor disagree

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

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

Yes

No

I neither agree nor disagree

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.

This would appear to be the same as Q18 – Or is there a difference we're missing?

- Pro – DMO have a lot of powers and receive a lot of funding.
- Con - DMO would have limited control over this. It should remain a government responsibility as they will set up and enforce the rules of the system.

k. Measure and report recycling rates to government

Yes

No

I neither agree nor disagree

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

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

Yes

No

I neither agree nor disagree

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.

This is a critical consideration as the MUST BE sustainable and fully funded national communications campaigns at launch and on-going to maintain and improve participation.

Communications need to address the issue of contamination.

## Producers

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

Yes

No

I neither agree nor disagree

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.

We note the statement in the consultation document that you "would not propose the inclusion of those who manufacture the physical containers". Could this exclusion resolve the issue of double-charging between DRS & EPR?

**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

No

Neither

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

**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

Number of eligible containers sold per annum.

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

## 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

No

I neither agree nor disagree

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.

Could be a substantial up-front cost, but who else would pay it but (indirectly) producers?

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

Yes

No

Neither

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.

If they're meeting the costs, they should have the opportunity to minimise them. However, there needs to be a detailed SLA specifying what they have to provide.

## Operational costs

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

Yes

No

Neither

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

## 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)  
pubs, hotels, cafes – as per Q45

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 (including storage of material)
- electricity to power
- emptying
- requesting maintenance
- additional footfall
- Ability to collect in bulk

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

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

- cabling of electricity supply
- additional footfall – crowding
- emptying machine & carrying material
- Ability to collect in bulk

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

Yes

No

Neither

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

**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)

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

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

**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?**

**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?**

**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?**

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

Yes

No

Neither

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

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

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

Yes

No

Neither

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

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 view on how to measure, but this ties in with our view on other retailers (Q36).

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

Yes

No

Neither

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.

Wherever you're charged a deposit, you should be able to get it back.

**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

No

Neither

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.

These could provide support with return and collection facilities in rural areas

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

## On-trade Sales

should think we should consider.

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



## The deposit

### 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.

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

Yes

No

Neither

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

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

Yes

No

Neither

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

charge the same rate for each bottle, to avoid complexity.

### 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

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

Look for evidence in countries where DRS are already operated to determine what works best.

## 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

No

Neither

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.

**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

No

Neither

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.

## Transparency

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

Please explain your answer, providing evidence where available.

# Monitoring and enforcement

## The DMO

**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

No

Neither

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

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))

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

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

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

**59. Should enforcement focus on:**

- a. A sample of 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

No

Neither

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.

## Fraud

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

**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.

**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.**

**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.**

**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)?**

## **DRS Options – ‘all-in’ and ‘on-the-go’**

### **‘All-in’ option**

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

Yes

No

Neither

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

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

**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

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

## ‘On-the-go’ option

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

Yes

**No**

Neither

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

Packaging manufacturers are likely to adjust packaging volumes to take them under the DRS mandatory scheme volumes.

If limit is to be imposed, on the go should include up to 1 litre

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

Yes

**No**

Neither

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 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

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

Regardless of scope, litter is a key issue to be addressed through a DRS.

## Summary of approach to Impact Assessment

71. Do you agree with our impact assessment?

Yes

No

I neither agree nor disagree

**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

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

Yes

No

Neither

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

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

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

**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**

**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

No

I neither agree nor disagree

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

## Outcomes of what we are hoping to achieve

**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)

Yes

No

Neither

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

b. More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'

Yes

No

Neither

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

c. Higher quality recycling

Yes

No

Neither

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

d. Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials

Yes

No

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

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

Yes

No

I neither agree nor disagree

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.

## Alternative approaches

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

Yes

No

I neither agree nor disagree

Other (please state)

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

Please explain your answer, providing evidence where available.  
epr could meet these

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

Yes

No

I neither agree nor disagree

Other (please state)

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

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?**

DRS, particularly all-in, **could:**

- reduce quality and quantity of recyclables in la stream
- reduce la disposal income and thus increase costs
- reduce overall la recycling performance
- reduce collection quantity and cost
- reduce littering

much depends on how DRS interacts with EPR system

**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).*

DRS, particularly all-in, **could:**

- reduce quality and quantity of recyclables in la stream
- reduce la disposal income and thus increase costs
- reduce overall la recycling performance
- reduce collection quantity and cost
- reduce littering

Much depends on how DRS interacts with EPR system

**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).*

DRS, particularly all-in, **could:**

- reduce quality and quantity of recyclables in la stream
- reduce la disposal income and thus increase costs
- reduce overall la recycling performance
- reduce collection quantity and cost
- reduce littering

Much depends on how DRS interacts with EPR system

Also, changes to composition & quantity of streams entering existing processing facilities



**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).*

- Need to differentiate between drs material drs other material collected on same round.
- If this is expected of la's, that needs to be clarified and fully funded.
- Would la's then be expected to dispose?
- At what point (if any) does the material change from hh waste to commercial or vice versa?
- Depending on how many and how successful they are, we could be looking at additional costs with round rerouting etc.

## Design of drinks containers

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

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

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
- Reprocessors
- Producers
- Local Authorities
- Waste management companies
- Other (please specify)

Environmental charities and University research.

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

## DRS and other waste legislation

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

Agree

Disagree

Neither agree nor disagree

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.

**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.**

## Further comments

In addition to this consultation, we are also carrying out social research with the public and other analytical research to support our evidence base for decision making.

**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?**