**Responding to the Defra consultation on implementation of a Deposit Return Scheme (DRS) for England Wales & Northern Ireland.**

Make sure you have fully read through the AVA step-by-Step Guide, then using the Defra Citizen Space online pages ([Introducing a Deposit Return Scheme in England, Wales and Northern Ireland - Defra - Citizen Space](https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/consultation/)), copy the AVA multiple choice responses (**in red**) and copy & paste detail (**in red**) where required. Don’t worry about typeface or colour – the Defra website will reformat.

**ABOUT YOU**

**Q1.** **What** **is** **your** **name?**

**XXXXXXXXXXX**

**Q2.** **What** **is** **your** **email** **address?**

**xxxxxx@xxxxxxxxx.xx.xx**

**Q3.** **Which** **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)

Academic or researcher

Business representative organisation/trade body

Charity or social enterprise

Community group

Consultancy

Distributer

Exporter

Individual

Local government

Non-governmental organisation

Product designer/ manufacturer/ pack filler

Packaging designer/ manufacturer/ converter

Operator/ Reprocessor

Retailer including online marketplace

Waste management company

Other (please provide details…)

**Q4.** **If** **you** **are** **responding** **on** **behalf** **of** **an** **organisation,** **what** **is** **its** **name?**

**XXXXXXXXXXXXXXXXXXXXXXXX**

**Q5.** **Would** **you** **like** **your** **response** **to** **be** **confidential?**

Yes / **No**

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

**a.) Support**

b.) Neither support nor oppose.

c.) Oppose

d.) Not sure

Please elaborate on your answer if you wish.

**We/I support the introduction of a structured, co-ordinated deposit return scheme for selected drinks containers. But, whatever the structure of the scheme – it should be implemented in the same format across England, Wales, N. Ireland and Scotland to the same timescale.**

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

a.) Yes, a detrimental impact

b.) No, there will be no impact

c.) No significant impact

d.) Some impact but manageable

**e.) Large impact but still manageable**

f.) Large impact and impossible to comply with

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

a) Yes – because of economic impacts

b) Yes – because of social impacts

**c) Yes – because of both economic and social impacts**

d) No

e) Not sure

Please elaborate on your answer if you wish.

**Although supportive of the principle of a DRS and the drive towards a circular economy, it is a concern that there will be a significant impact on the cashflow of Vending Operators, with an immediate increase in cost of items within scope – and up to 6 months before items are sold and the deposit regained.  In the event of variations in timetable for the implementation of schemes and structures across the UK there will be a significant impact on costs and logistics.**

**Vending Operators have suffered significant economic business impact with business reductions averaging 41% and almost 20% reduction in staffing (AVA 2020 Census). Recovery is not expected within the next two years. Accommodating further financial and logistical changes will be challenging. Further enhancing the reason for a well-designed pan-UK implementation of a DRS.**

**Chapter 1: Scope of the Deposit Return Scheme**

**9.** **Do** **you** **agree** **that** **the** **cap** **should** **be** **included** **as** **part** **of** **the** **deposit** **item** **in** **a** **deposit** **return** **scheme** **for:**

a) Plastic bottle caps on plastic bottles – **yes**/no

b) Aluminium bottle caps on glass bottles – **yes**/no

c) Corks in glass bottles – **yes**/no

d) Foil on the top of a can / bottle or used to preserve some drinks – **yes**/no

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

**a.) Yes**

b.) No

Please elaborate on your answer.

**We/I agree with the Automatic Vending Association (AVA) which does not believe a limited, ‘on-the-go’ model will deliver the same environmental outcomes or support the circular economy ambitions of drinks manufacturers. Instead, we support an ‘all-in’ DRS.**

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

**a) Yes**

b) No

Please elaborate on your answer.

**We/I only support an ‘all in’ scope approach. Any differences in scope, fees and financing are likely to result in the fragmentation of the single UK drinks market, and lead to nation-specific labelling. This will create consumer confusion as well as additional costs and complexity for all parts of the drinks supply chain and Vending Operators.**

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

**a) All-in**

b) on-the-go

Please elaborate on your answer.

**We/I support the implementation of a DRS that covers all sizes of beverage containers up to 3 litres and supported the “all-in model” as presented by the previous Government consultation. We/I do not believe a limited, ‘on-the-go’ model will deliver the same environmental outcomes or support the circular economy ambitions of drinks manufacturers. Governments across the UK should ensure that any DRS introduced is compatible with the system planned for Scotland – and moreover, work towards a single scheme in the future that is efficient, simple and works for consumers, producers and retailers alike.**

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

a) Yes

**b) No**

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

a.) Yes

**b.) No**

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

**We/I do not support the introduction of an “on-the-go” DRS design on the premise that it could focus just on smaller packaging on the assumption that this is more likely to be used by citizens are away from home. Instead, we support an ‘all-in’ DRS.**

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

a) Yes

b) No

**c) Difficult to say**

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

**AVA research shows that reverse vending machines capable of collecting glass are in use in other DRS schemes, and will be available for in use the Scottish DRS. However, past assessment of best practice noted that the inclusion of glass may create issues related to health and safety, retailer considerations, and higher costs. We are aware that Scotland’s DRS and reverse vending machines can accommodate naturally broken glass, whole or crushed bottles.**

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

**Yes** / No

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

Yes / **No**

**19. Do you consider that there will be any material switching as a result of the proposed scope.**

**Yes** / No

**We consider that glass should not be included in the scheme because the current methods of bottle banks and kerbside collection are effective and because introducing glass into those Foodservice environments which provide food is hazardous.**

**Chapter 2: Targets**

**23.Who** **should** **report** **on** **the** **volumes** **of** **deposit** **return** **scheme** **material** **placed** **on** **the** **market** **in** **each** **part** **of** **the** **United** **Kingdom** **(England,** **Wales** **and** **Northern** **Ireland)** **for** **the** **proposed** **deposit** **return** **scheme,** **and** **what** **would** **be** **the** **implications** **of** **these** **obligations?**

a) The producer/importer

b) The retailer

**c) Both the producer/importer and retailer.**

**Clarity is required on the definition of “placed on the market”.**

**Chapter 3 Scheme Governance – No AVA Responses**

**Chapter 4: Financial Flows**

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

* Taxable Turnover
* Drinks containers placed on the market
* **Any other**

If other, please specify.

**Both Taxable Turnover & Drinks containers placed on the market (as with EPR)**

**32.Which** **option** **to** **treatment** **of** **unredeemed** **deposits** **do** **you** **support?**

**Option 1** / Option 2

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

* **Reinvested in the scheme.**
* Environmental causes

**36.What** **should** **be** **the** **minimum** **deposit** **level** **set** **in** **legislation?**

**a.) 10p**

b.) 15p

c.) 20p

d.) Other

**The target deposit for the Scottish DRS is set at 20p, but any initial deposit should be set at a minimum level to reduce cashflow impact on Vending Operators and the consumer. The DMO can review this level as part of their ongoing function. Again – there should be consistency of schemes and timings across the UK.**

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

Yes / **No**

**If** **yes,** **what** **should** **be** **the** **maximum** **deposit** **level** **set** **in** **legislation?**

a.) 30p

b.) 40p

c.) 50p

**d.) Other**

**This is a function of the DMO. The DMO can review this level as part of their ongoing function. Again – there should be consistency of schemes and timings across the UK.**

**Chapter 5: Return Points**

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

Please provide any evidence to further explain your answer.

**No – we/I agree with the exclusion of retail points where the source of in-scope containers is solely through vending machines:**

“*Products sold in scope of the deposit return scheme will also be found in vending machines. The deposit level will need to be added to the purchase price of these products, just as it will be in any other retail environment where an in-scope container is sold, and clearly advertised on the machine (likely via sticker or on screen).*

*However, if a vending machine is situated on a site where there are no other catering / retail facilities selling scheme articles, then there would be no requirement for the vending machine operator to host a return point on the site. Signage may instead be required to inform consumers of the nearest return point to that machine.”*

**46.Do** **you** **think** **obligations** **should** **be** **placed** **on** **retailers** **exempted** **from** **hosting** **a** **return** **point** **to** **display** **specific** **information** **informing** **consumers** **of** **their** **exemption?**

a.) Signage to demonstrate they don’t host a return point;

b.) Signage to signpost consumers to the nearest return point;

**c.) Anything else?**

**Signage to inform to consumers on exemption and how to redeem;**

**Chapter 6: Labelling: No AVA Responses**

**Chapter 7: Local Authorities and local councils: No AVA Responses**

**Chapter 8: Compliance Monitoring and Enforcement: No AVA Responses**

**Chapter 9: Implementation Timeline:**

**75.Do** **you** **have** **any** **comments** **on** **the** **delivery** **timeline** **for** **the** **deposit** **return** **scheme?** **Please** **pose** **any** **views** **on** **implementation** **steps** **missing** **from** **the** **above.**

**There is notable misalignment with the implementation timeframe for the Scottish DRS (currently due to commence in July 2022). A lengthy ‘timing gap’ (and discrepancies between scheme scopes) risks various cross-border issues including fraud. Government must work closely with obligated sectors to assess a pragmatic timeline for implementation and reiterate that Government should work with industry to design a system that will work coherently and efficiently across the UK, facilitated by an industry-backed, independent not-for-profit DMO.**

**Chapter 10: Summary Approach to Impact Statement: No AVA Responses**