

Introducing a Deposit Return Scheme (DRS) Consultation

Q1.1 Q1.1. What is your Surname?

[Redacted]

Q2 Q2. What is your e-mail address?

[Redacted]@coop.co.uk

Q3 (ST) Q3. Which best describes you?

Retailer including online marketplace

Q3.a Q3.a Other (please provide details...)

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

The Co-operative Group

Q.5 Q5. Would you like your response to be confidential?

No

UI Unique Identifier:

ANON-HJCY-M6B9-C

DRS in a post-Covid context

6 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 by 2024?

Neither support nor oppose

6.a 6.a Please elaborate on your answer if you wish.

We believe an implementation date that was aligned with Scotland would avoid confusion, reduce the risk of cross border fraud and avoid the necessity for costly artwork changes for Scottish Stock Keeping Units. We suggest that UK and Scottish Governments should work together to implement a DRS across the whole of the UK at the same time, on a mutually agreeable timescale..

7 7. Do you believe the introduction of a Deposit Return Scheme will have an impact on your everyday life?

Not answered

7.a 7.a If you answered yes the scheme would have a detrimental impact, how significant would this impact be?

Not answered

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

No

8.a 8.a Please elaborate on your answer if you wish.

Chapter 1: Scope of the Deposit Return Scheme



Aluminium bottle caps on glass bottles ✕ Plastic bottle caps on plastic bottles ✕

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

No

10.a 10.a Please elaborate on your answer.

We would note that:

- We agree that there would be less confusion with an all-in DRS. However, there will be confusion in any case with some containers for consumers – why, for instance, glass bottles are to be accepted and not glass jam jars, or why beverage cartons are to be excluded?
- A contribution to the UK economy from materials recovery and reprocessing will only be achieved if the issue of export being incentivised over domestic recycling and the lack of UK infrastructure is resolved.
- Returning items to store may result in a higher carbon impact for return trips to store, at least until private vehicles are fully decarbonised.
- There will be a disamenity for customers who walk or use public transport.
- There is a potential disadvantage to customers who are unable to return materials to a store easily, due to disability, age or any other relevant factor.
- If a system that excludes glass is chosen, the EPR and DRS system should be set up to discourage glass use from on-the-go beverages.

The glass industry is clear that they do not want or need glass in a DRS to maintain high recycling rates.

- We would be keen to understand the evidence base for the assertion that household waste does get littered.
- We disagree that an on-the-go deposit return scheme would limit the amount of high-quality material that could be recycled into another bottle because, if EPR is functioning correctly, this material would be captured through household collections. It will still be recycled but through a different route.

11 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.

Yes

11.a 11.a Please elaborate on your answer.

A harmonised system across the UK would make it easier for us to manage cross-border trade. We would otherwise need separate stock keeping units with different labels, stock allocation would be disrupted and there would be potential for cross-border fraud. This is why we urge the UK Government and Devolved Administrations to work towards a harmonised, four nations approach to DRS.

12 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?

All-in

12.a 12.a Please elaborate on your answer.

We need a harmonised system across the UK and as the decision has already been taken to implement an all-in system in Scotland and Wales it would be practical to adopt the same across the whole of the UK.

13 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?

Yes

14 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)?

No

14.a 14.a If no, how would you change the definition of an on-the-go scheme?

No, we do not see the need for glass to be included in an on the go scheme. Handling glass is an ongoing current concern due to the welfare of drivers and colleagues at depot. We are not set up to handle glass today but it does contaminate some store returns. We would need more information as to how glass product would be shipped to make sure it's safe for people to handle it.

15 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?

Difficult to say

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

*Notes on Q15: We agree that the container sizes suggested for soft drinks, wines and spirits are more likely to be consumed out of the home. However for beers and ciders those container sizes are more likely to be consumed in the home. **Notes on Q17: This depends on the type of scheme. An all in scheme should be based on material; an on the go scheme should be based on the product.

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

No



No

19 19. Do you consider there will be any material switching as a result of the proposed scope? Please provide evidence to support your response.

Yes

19.a 19.a Please provide evidence to support your response.

If glass is not included this may encourage producers to switch into glass in order to avoid the deposit *Notes on Q18: Steel cans are not generally used for drinks. The British glass industry has been very clear that they do not want or need glass in a DRS to maintain high recycling rates. So that would mean aluminium cans and PET bottles should be included. If a hybrid scheme where scheme units are still returnable through doorstep collection is proposed, we would like to see any data on what that is likely to do to return rates through stores. Initial outlay for retailers (removing sales area and purchasing / leasing an RVM) will be the same but there will be a lower throughout of deposits returned, which will impact on return on investment, particularly disincentivising smaller stores where the ROI will take longer.

Chapter 2: Targets

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

70% in year 1, 80% in year 2, 90% in year 3 and thereafter

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

90% collection rate should be achieved for all materials

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

No

22.a 22.a Please provide any evidence to support your answer

It is axiomatic that reducing the scope of containers collected will impact on the amount of materials being collected.

23 23. Who should report on the volumes of DRS material placed on the market in each nation?

Both the producer/ importer and retailer

23.a 23.a What would be the implications of obligations to report on volumes of deposit return scheme material for producers/ importers and retailers? Please provide evidence to support your answer.

We would suggest c) producer and retailer. The producer will have access to the the weight and material type of the containers, the retailer will have the sales data. A centralised portal managed by the DMO would allow each party to upload their datasets independently against a unique indicator, which would probably be the GS1 barcode.

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

We believe the deposit management organisation should decide this, but we suggest that it should be the same as for EPR, and it could possibly be advantageous to have the same body running both.

Chapter 3: Scheme Governance

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

7 - 10 years

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

Yes

26.a 26.a Please list any further issues you believe should be covered as part of the tender process.

We believe the tender process should cover how the bidder will incentivise domestic recycling over exports to ensure the material stays within the UK economy and is evidenced as being actually recycled.

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

Yes

Effectiveness of building UK recycling capacity / percentage of material recycled in the UK.

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

No

28.a 28.a Please elaborate on your answer

Ownership by government would ensure legal accountability, but in our view it would be preferable for the Scheme Administrator to take on the design, development and ownership of the digital infrastructure required.

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

Yes

Chapter 4: Financial Flows

30.a 30.a If any other please specify

Weight of materials placed on the market

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

Drinks containers placed on the market

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

Yes

31.a 31.a Please explain your answer.

A high level of unredeemed deposits means there is a low level of return, and so the scheme is not achieving its aims of increasing collection of materials for recycling.

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

Option 1

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

None that we have foreseen.

34 34. If a floor is set do you consider that this should be set at:

Other

34.a 34.a Please provide any evidence to support your response.

We believe the answer to this question should be for the DMO to decide

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

Environmental causes

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

20p

36.a 36.a If other please specify

We suggest that the deposit needs to be 20p, the same as is proposed in Scotland. We suggest that Government should set either deposit or performance, but that they can't set both because this would not give the DMO the power to make changes to improve performance. We understand that HMRC intend to levy VAT on the deposit in Scotland. That creates additional complexity and therefore cost in the DRS system, because businesses would be paying VAT as the deposit is applied, and then claiming it back as it is redeemed. We strongly request that VAT is only applied at intervals on unredeemed deposits, and then only to the Deposit Management Organisation.

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



37.a 37.a If yes, then what should be the maximum deposit level set in legislation?

Other

37.b 37.b If other please specify

We suggest that the deposit needs to be 20p, the same as is proposed in Scotland. We suggest that Government should set either deposit or performance, but that they can't set both because this would not give the DMO the power to make changes to improve performance. We understand that HMRC intend to levy VAT on the deposit in Scotland. That creates additional complexity and therefore cost in the DRS system, because businesses would be paying VAT as the deposit is applied, and then claiming it back as it is redeemed. We strongly request that VAT is only applied at intervals on unredeemed deposits, and then only to the Deposit Management Organisation.

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

Multipacks is a complex issue. While an extra 20p on a single can might not make too much difference, an extra £2.40 on a 12 pack will. But we feel that if there is a slightly different solution on multipacks that may distort customer behaviour in an unhelpful way. And it would surely need something different on pack to indicate how much deposit should be returned, thereby adding complexity. Therefore we think there should be no difference between multipack cans and bottles and single sold cans and bottles. If customers regularly buy multipacks at the same time as returning multipacks, after the initial outlay it will be cost neutral. There is evidence from CCE that deposit in multipacks makes little difference.

39 39. Do you agree with our approach to letting the Deposit Management Organisation decide on whether to adopt a fixed or variable deposit level, particularly with regards to drinks containers sold in multipack form?

Yes

39.a 39.a Please provide evidence to support your answer

Yes, we believe the deposit management organisation should manage all issues related to the management of deposits

Chapter 5: Return Points

40 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?

Yes

40.a 40.a Please provide any evidence to further explain your answer.

Yes, in order to create a level playing field all obligated retailers should host a return point.

42 42 . Do you have a preference, based on the 3 options described above, on what the schemes approach to online takeback obligations should be? We welcome views from stakeholders on who this obligation should apply to, including if there should be an exception for smaller retailers or low volume sales.

Option 1

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

No

41.a 41.a If so, how long or how frequently would such delays be likely to arise for?

There should be service levels built into the contracts with RVM suppliers so breakdowns are repaired within a short period. Online sales could result in delays if online sellers are not obligated to take back materials.

42.a 42.a Please explain your answer.

Option 1 – if the aim is to ensure maximum capture of materials for recycling, then all sellers should be obligated. To not obligate online sellers would provide an unfair competitive advantage to online retailers. As more customers are turning to shop online there will be a large percentage of customers who don't step foot in stores as often (or ever) - this could have an impact on the volume of items returned through the DRS scheme. This will need a culture shift from customers which can't be left to retailers alone. We believe there will need to be a government-led campaign on this and support for colleagues in managing queries/questions/complaints – it would be good if this was a central blueprint that all retailers were issued instead of each retailer doing their own thing which could confuse messaging for customers.

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

Yes

We believe the cost of consumables necessary to operate the deposit return, such as paper and ink used in printing vouchers, or development of smart deposit apps, should also be covered by the handling fee.

44 44. Please tick which exemptions you agree should be included under the scheme:

Breach of safety ✕

44.a 44.a Any further comments you wish to make

We believe there would be a conflict under the close proximity proposals as it would be difficult for the DMO decide fairly which of the 2 retailers in close proximity was to be exempted and which obligated.

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

46 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? If yes, please tick what information retailers should be required to display:

Signage to demonstrate they don't host a return point ✕ Signage to signpost consumers to the nearest return point ✕

46.a 46.a Anything else? Please specify

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

Yes ▼

47.a 47.a Please explain your answer.

We agree with the rationale of not requiring retailers to signpost competitors, however this could cause confusion for customers.

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

5 years or longer ▼

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

Yes ▼

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

A smart phone application would be used to scan a unique code printed on the pack in order to redeem deposits. The container would then be placed in kerbside recycling. The disadvantages could be that the cleanliness benefits of a segregated stream for drinks containers are lost and there is no guarantee that the consumer will place the container in the correct bin after redeeming the deposit. However, excluding co-mingled recycling, and using collection methods that drive higher quality (such as those used in Wales) would mitigate this. *Notes on Q49: We feel that a Digital DRS would have several benefits including protecting kerbside collections, lowering implementation costs, improving citizen convenience, allowing for more flexibility in changing deposit rates, allowing cross-border exchange e.g. between Northern Ireland and the Republic, avoiding the need for multiple labels, allowing easy inclusion of aseptic cartons, coffee cups, milk bottles etc, and allowing extension in future to other container types.

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

A single, interoperational system in all regions of the UK would reduce the risk of cross-border fraud. Other measures may include smart technology such as anti-counterfeiting inks or QR codes. Digital DRS would help with cross-border issues by assigning a specific deposit to a specific container, and only that deposit would be able to be redeemed. This would also work across borders on the island of Ireland.

52 52. Do you think a digital deposit return scheme could ensure the same level of material quality in the returns compared to a tradition return to retail model, given containers may not be returned via a reverse vending machine or manual return point where there is likely to be a greater scrutiny on quality of the container before being accepted?

No ▼

52.a 52.a Please explain your answer.

This would depend on the collection method. We believe kerbside sort would capture similar quality, but co-mingled collection wouldn't. This is why it is important that Local Authorities start to collect quality (clean and sorted) materials for kerbside collections. Co-mingling with food contamination from pots, tubs and trays will reduce quality. There will also be a co-mingling of bottle grade and tray grade polymer.



Yes – the Digital DRS working group impact assessment shows that the cost (both financial and environmental) of allocating and printing unique codes on packaging for collection at kerbside is lower than the cost of installing equipment for consumers to return to store, as long as procedures to ensure a quality kerbside sort, such as those being demonstrated in Wales, are implemented. In addition, we could capture more containers at kerbside using digital – beverage containers and milk bottles.

54 54. Do you support the proposal to introduce a new permitted development right for reverse vending machines, to support the ease of implementation for the scheme?

Yes

54.a 54.a Do you have any amendments or additional parameters you would propose are reflected in the permitted development right?

Alcohol licence variations for DRS machine installation should be made simple and cheap. The proposal that reverse vending machines must not be situated within 15 metres of the curtilage of a building used for residential purposes may be problematic for small retailers which are situated close to residential properties, such as city centres or local convenience stores.

Chapter 6: Labelling

55 55. Do you agree that the following should be part of a mandatory label for deposit return scheme products?

A mark to identify the product as part of a deposit return scheme. ✕

An identification marker that can be read by reverse vending machines and manual handling scanners. ✕

56 56. Are you aware of further measures that can be taken to reduce the incidence and likelihood of fraud in the system?

Integrated barcodes can be used to hide a sophisticated code within container artwork, thereby reducing space needed on pack. QR codes can be printed on containers using inkjet technology at point of filling. GS1UK are the leaders in this field and hold 90% of existing barcode information. Other DRS systems such as Germany use anti-counterfeiting inks which are detectable by RVMs and distributed under licence by the DMO. Near field communication technology for packaging is a growing area that may have fraud reduction benefits (although costs are likely to make this unfeasible at present).

57 57. Do you agree with our proposals to introduce mandatory labelling, considering the above risk with regards to containers placed on the market in Scotland?

Yes

58 58. Do you consider the risk of incorrectly labelled products entering the markets of England, Wales or Northern Ireland via Scotland to be a significant risk? Please provide any evidence to support your answer.

Yes

58.a 58.a Please provide any evidence to support your answer.

We would encourage governments in all regions to work together to enable a consistent labelling requirement across the United Kingdom.

59 59. Do you consider leaving any labelling requirements to industry to be a better option than legislating for mandatory labelling requirements?

No

59.a 59.a Please explain your answer.

We would encourage governments in all regions to work together to enable a consistent labelling requirement across the United Kingdom.

60 60. Are you aware of any other solutions for smaller producers who may not currently label their products? Please explain your answer.

No. We are not aware of any products that are currently sold unlabelled as that would contradict the Food Information Regulation.

61 61. We believe 18 months is a sufficient period of time for necessary labelling changes to be made. Do you agree?

No

61.a 61.a Can you provide any evidence to support your answer?

2 years is the established period of churn for OPRL changes to take effect. We would advocate for consistency with that.

62 62. Will your processes change as a result of mandatory labelling?

Yes

62.a 62.a Please explain your answer.



counterfeiting inks is mandated then this will be more complex.

63 63. Do you agree that our proposed approach to labelling will be able to accommodate any future changes and innovation?

Don't know

▼

63.a 63.a Are you aware of any upcoming technology in the field of labelling?

Integrated barcodes can be used to hide a sophisticated code within container artwork, thereby reducing space needed on pack. QR codes can be printed on containers using inkjet technology at point of filling. GS1UK are the leaders in this field and hold 90% of existing barcode information. Other DRS systems such as Germany use anti-counterfeiting inks which are detectable by RVMs and distributed under licence by the DMO. Near field communication technology for packaging is a growing area that may have fraud reduction benefits (although costs are likely to make this unfeasible at present).

Chapter 7: Local Authorities

64 64. Do you agree that local authorities will be able to separate deposit return scheme containers either themselves or via agreements with material recovery facilities to regain the deposit value?

No

▼

64.a 64.a Please explain your answer

We don't believe current NIR technology would be able to tell the difference between an in-scope PET bottle for beverages and a PET washing up liquid bottle, for example. For this to work it would have to be a manual pick.

65 65. Do you agree that local authorities will be able to negotiate agreements with material recovery facilities to ensure gate fees reflect the increased deposit values in waste streams or a profit sharing agreement on returned deposit return scheme containers was put in place?

Yes

▼

65.a 65.a Please explain your answer.

66 66. In order to minimise the risk of double payments from the Deposit Management Organisation to local authorities, where should data be collected regarding the compositional analysis to prevent the containers then being allowed to be redeemed via return points?

Collection of data at the point of shredding / crushing would mean the deposit cannot be redeemed twice.

67 67. How difficult do you think this option would be to administer, given the need to have robust compositional analysis in place? Please explain your answer.

We understand that compositional analysis would be possible in terms of material types, however what may be more difficult to administer is the redemption of deposits from kerbside collections.

68 68. What option do you think best deals with the issue of deposit return scheme containers that continue to end up in local authority waste streams?

Option 2

▼

68.a 68.a Please briefly state the reasons for your response. Where available, please share evidence to support your view.

Option 2, where the Deposit Management Organisation makes payments for deposit return scheme containers appearing in all local authority waste streams seems the most logical option of those presented.

Chapter 8: Compliance Monitoring and Enforcement

69 69. Are there any other producer obligations you believe the Environmental Regulators should be responsible for monitoring and enforcing? We believe the Environmental Regulators should also ensure that the RVM authentication method for RVMs is functional and works at the point of redemption.

70 70. Are local authorities (through the role Trading Standards and the Primary Authority Scheme) best placed to enforce certain retailer obligations?

Yes

▼

70.a 70.a To what extent will local authorities be able to add monitoring and enforcement work for the deposit return scheme to existing duties they carry out with retailers?

We believe another option would be to give enforcement powers to the DMO



71 71. In addition to those in the table, are there any other types of breaches not on this list that you think should be? If so, what are they? These may include offences for participants not listed e.g. reproprocessors or exporters.

no.

72 72. Are there any vulnerable points in the system? Please explain your answer?

Vulnerabilities in the system as proposed from our perspective are:

- We require further clarification on the 'retailer requirement to sell in-scope containers'. Does this mean that if a retailer chooses not to sell drinks in containers or only sells containers that are not in scope of DRS they will be in breach of regulations?
- There is also clarification required on the point about 'not disposing of material in the required way' – our understanding is that the DMO will dispose of the materials as, once deposits are redeemed, they will be the owner of the materials, not the retailer.
- We have some concerns over the logistics of collected materials being returned to the DMO. Will the DMO organise collection from store, or will materials have to be returned to a retailer's depot first?
- We suggest that maintaining segregation at the collection point is important to help keep costs down. Manual collection points might result in a higher risk for mixed recycling.
- We need to understand if there could be a requirement to sort, present, weigh and / or count at the depot returns site.
- Collecting returns in smaller amounts increases handling cost. We suggest the DMO thinks about how it would be possible to collect full or nearly full containers of material to recycle.
- Some thought needs to be given to traceability when moving material from the depot recycling centre; we would be very supportive of a digital element in this space too, avoiding the need to introduce more paper ideally.
- Operating capacity is a concern for depot returns. We would need to model some scenarios based on different levels of returns.
- Knowing what we need to do with it at the depot recycling centre is essential when considering capacity
- Knowing how the recycled material is expected to be presented to a recognised recycling business is important.
- The ability to return multiple streams to recycling companies on one trailer / vehicle will reduce transport costs and improve material flow
- There should be a benchmark when considering all of the retailers handling fees (if also moving recycled material to bulk collection points).
- We would need to factor time in for colleague consultation – especially our driver population, as well as time to integrate new ways of working, communication and driver training, ways of working and layout at the depot returns centre.
- In terms of supply chain, our initial view is that 3500 products and over 300 suppliers could be impacted. We would need to carefully manage the flow of old and new product to maintain availability without impacting on holding space at depots.
- Any interruption to supply could impact alternative similar products as demand could switch.
- Looking at the Scottish thinking, it sounds as though there could be a 10 – 12 week period where producer charges are applied which might help smooth the transition for old to new product
- Seasonality could be a factor in terms of the switchover in relation to peak production / demand period.
- A situation where different barcodes might be required in specific countries within the UK creates huge complexity. It is worth bearing in mind much of what is produced in Scotland is sold elsewhere.
- Moving products between our depots in Newhouse (Scotland) and Birtley (NE England) would be problematic if different schemes in England and Scotland exist. Currently all our Scottish stores are serviced by Newhouse, but there may be future situations to supply some stores from Birtley or possibly Lea Green (NW England) – for instance if we needed to support Newhouse capacity for a period of time.

73 73. Do you see a role for the Deposit Management Organisation to seek compliance before escalating to the Regulator?

We foresee an introductory period where stakeholders are getting used to the system where it would not be appropriate to escalate directly to the Regulators.

74 74. Do you agree with the position set out regarding enforcement response options?

Yes

74.a 74.a If not, please expand your answer.

Chapter 9: Implementation Timeline

75 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?

An implementation date that was consistent with Scotland would remove the risk of cross-border fraud and remove the need for additional stock keeping units and segregated logistics for Scotland. We would encourage the governments of the devolved nations to work together to agree a common implementation period.

76 76. How long does the Deposit Management Organisation need from appointment to the scheme going live, taking into account the time required to set up the necessary infrastructure?

Any other (please specify)

76.a 76.a Any other (please specify)

2 years

76.b 76.b Please provide evidence to support your answer.

Retailers will need to accrue funds, source and install Reverse Vending Machines and apply labelling and authentication methods to labels. 2 years is a minimum time requirement needed to achieve this.

77 77. Depending on the final decision taken on the scope of the scheme in England and Northern Ireland – all-in or on-the-go – what, if any, impact does this have on the proposed implementation period?



Chapter 10: Summary of approach to Impact Assessment

78 78. Do you agree with the analysis presented in our Impact Assessment?

Not answered

▼

78.a 78.a Please briefly state the reasons for your response. Where available, please share evidence to support your view

We don't have enough evidence to support or refute.

ES Email Subject

FI File Upload

Select files...

Drop files here to upload

RT Response Type

Online / CSV

▼

NF Non-fitting

DS Date Submitted

44350.45043

