

Brighton & Hove City Council Response: Deposit Return Scheme (England, NI, Wales) Consultation

The first five questions were about the respondent / responding organisation.

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?

- Support
- Neither support nor oppose
- Oppose
- Not sure

Please elaborate on your answer if you wish.

Our preference is to prioritise EPR and consistency. EPR, Consistency and the incoming Plastics tax will collectively deliver significant and positive changes to the management of waste across the UK.

It may be more prudent to await implementation of EPR and Consistency and to allow for the impact of these to be understood before introducing a DRS, particularly in the context of Covid, its economic impacts and impact on consumer behaviour.

The proposal could be refined in order to represent better value for money for citizens, and be redesigned to minimise confusion for citizens as to where the waste should go.

Should the Government wish to implement a DRS, a UK-wide system should be adopted.

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

- Yes, a detrimental impact
 - No, there will be no impact
- If you answered yes the scheme would have a detrimental impact, how significant would this impact be?
- No significant impact
 - Some impact but manageable
 - Large impact but still manageable
 - 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?

- Yes - because of economic impacts
- Yes - because of social impacts
- Yes - because of both economic and social impacts
- No
- Not sure

Please elaborate on your answer if you wish.

Covid has impacted on public behaviours and practices. These need to be re-established and evaluated as part of the Covid-19 recovery, along with implications of future options around reuse and recycling.

Kerbside recycling services have continued throughout the pandemic whereas the deliverability of a DRS over the past 12 months may have failed and supply chains, dependent on material flows, may have been disrupted.

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:

- Plastic bottle caps on plastic bottles
- Aluminium bottle caps on glass bottles
- Corks in glass bottles
- Foil on the top of a can/ bottle or used to preserve some drinks

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

- Yes
- No

Please elaborate on your answer if you wish.

The system could go further to tackle other forms of litter, and EPR and consistency could deliver good quality materials streams to reprocessors.

Coffee cups are included in EPR as opposed to DRS. As a main goal of DRS is addressing litter this is a material to revisit to ensure the placement of coffee cups is made for the right reasons with the right expectancy.

The implications on kerbside systems have not been fully considered; schemes will have to be designed to comply with EPR and consistency. Without knowing the volume or types of material that will be collected through a DRS – this risks the collections systems not being 'efficient and effective' and impacting EPR payments.

A DRS only concentrates on the collection of material, with a focus on 'collection' and 'return' rates, not recycling rates or a reduction in contamination from kerbside schemes.

DRS will cost a large sum to implement and require a vast collection infrastructure to be designed and constructed (using raw materials and creating a significant energy demand in the running), which delivers a relatively small increase in overall recycling rate.

The potential for drinks waste has not been mentioned. If residents chose to not drink the liquid, and throw it away, as well as the potential for contamination, the carbon impact of wasted drinks has not been accounted for.

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
 No

Please elaborate on your answer if you wish.

There is potential for misalignment, where some opt for all in and some OTG systems, increasing consumer confusion.

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
 On-the-go

Please elaborate on your answer if you wish.

To ensure consistency and clarity for consumers, an all-in scheme is more appropriate to align with Scotland and Wales. Opting for on-the-go for England and N.Ireland may create confusing DRS.

There are concerns about materials being diverted from kerbside streams and the potential impact on income.

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
 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)?

- Yes
 No

If no, how would you change the definition of an On-the-Go scheme?

A partial DRS where some materials are returned to producers and some materials via kerbside schemes is confusing.

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?

- Yes
 No
 Difficult to say

16. Please provide any information on the capability of Reverse Vending Machines to compact glass?

We have no technical knowledge in respect of RVM and unable to answer.

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 there will be any material switching as a result of the proposed scope?

- Yes
 No

Please provide evidence to support your response.

A reason for switching materials might be the relative costs between DRS and EPR.

Chapter 2: Targets

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
 75% in year 1, 80% in year 2, 90% in year 3 and thereafter
 75% in year 1, 85% in year 2, 90% in year 3 and thereafter
 80% in year 1, 85% in year 2, 90% in year 3 and thereafter

These targets are only measuring collection rates and not recycling rates.

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

- 80%
 85%
 90% collection rate should be achieved for all materials

These targets are only measuring collection rates and not recycling rates.

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

- Yes
 No

Please provide evidence to support your response.

There is no evidence to support the same collection targets can be met through the schemes which would vary significantly in operation and how the public would receive them.

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?

- The producer/ importer
 The retailer
 Both the producer/ importer and retailer

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.

Producers, importers and retailers are best placed to report on the implications for them of reporting. An approach based on producer / importer would appear to align the design of a DRS more closely with EPR principles of operation and therefore could facilitate easier incorporation of any DRS within EPR.

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?

Knowledge of the amount of material placed on the market and processes to record the movement of materials (collections and amounts going to the processor) can allow for calculations.

Chapter 3: Scheme Governance

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

- 3 - 5 years
 5 - 7 years
 7 - 10 years
 10 years +

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

- Yes
 No

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

The DMO will need to support the value chain, which aligns with EPR too. There will need to be a dispute resolution included for LAs as there are likely to be significant impacts. Other areas for consideration to include as part of the wider elements of the scheme are: Reuse, Sustainability, Carbon benefits/reduction, alignment with EPR targets, enforcement and modulated fees and Consistency of Collections, accessibility/mobility impacts for physical return points and RVMs.

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

- Yes
 No

Please list any further issues you believe should be covered by Key Performance Indicators?

- Reuse
- Sustainability
- Carbon benefits of all aspects of the scheme
- Accessibility of the scheme from an age and mobility perspective should be added
- Management of sub-contractors or those selected to service machines
- Littering levels
- Replacement rates of RVMs

28. Do you agree that the 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?

- Yes
 No

Please elaborate on your answer if you wish.

This will give confidence in the scheme

29. Government will need to understand the needs of users to build digital services for deposit return scheme. Would you like your contact details to be added to a user panel for deposit return scheme 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

No

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
 Other

If other, please specify.

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

- Yes
 No

Please explain your answer.

It shouldn't necessarily be an issue for the DMO as is not-for-profit. Any surplus funds from unredeemed deposits would be for the DMO to reinvest into improving the system. DMO would also be held accountable for reaching high collection targets.

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

- Option 1
 Option 2

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?

Are there any unintended consequences of option 2?

Having producer fees set at a certain minimum percentage of net costs could lead to stakeholders trying to drive down the cost of a system to reduce their exposure, but if appropriate performance measures are a feature for a DMO, then that commercial tension may be effective in driving efficient processes and elevating accountability for the DMO.

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

- 25% of net costs
 33% of net costs
 50% of net costs
 Other

Please provide evidence to support your response.

Consideration should be given to a variable figure based on the operational aspects of the DRS over time.

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?

- 10p
 15p
 20p
 Other

If other, please specify.

The issue of fixed versus variable deposits is not resolved. It could be for the DMO to settle.

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

- Yes
 No
- 30p
 40p
 50p
 Other

If other, please specify.

It should be established by the DMO.

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?

There should not be a differentiation between the rate for a single or multipack purchase. A differentiation may leave to inequitable pricing effects, which would allow some parts of society to benefit more greatly from bulk purchases when their financial capacity allows it, whilst others unable to purchase in bulk, or without the same need to, would be disadvantaged.

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 multipacks?

- Yes
 No

Please provide evidence to support your response.

No differentiation should be made between the rate for a single or multipack purchase.

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 (OTG) deposit return scheme?

- Yes
 No

Please provide evidence to support your response.

The location of return points should be based upon a combination of the number of drinks containers sold, the footprint of the store, and the proximity of another return point.

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?

- Yes
 No

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

Delays could be experienced from the outset as a RVM in an outlet is not as convenient as kerbside collections or placing in a litter bin.

Flexibility needs to be provided to account for:

- areas with seasonality and fluctuating populations; Brighton & Hove has a high proportion of visitors to the city as well as accommodating high numbers of overseas summer school students, resulting in an increase in demand.
- Unpredictable usage patterns, aligned to weather, social or sporting events, resulting in logistical issues for the capacity of a RVM to cope with spikes in demand,
- those with home delivery services, mobility issues, lack of access to easy transport, lack of storage space etc.

Where a system has a defined capacity, there may be instances of overload at a return point in totality or just for some materials.

The DMO bidding process will also need to include the needs of vulnerable people as one of the contract criteria.

42. Do you have a preference, based on the 3 options described, 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
- Option 2
- Option 3

Please explain your answer.

A de minimis based approach to obligate qualifying retailers selling in-scope containers to offer a takeback service. However, there will be considerations as part of this for example, waste carriers regulations in the light of couriers using their own vehicles to deliver goods, how will that work?

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

- Yes
- No

Would you propose any additional criteria are included for the calculation of the handling fee?

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

- Close proximity
- Breach of safety

Any further comments you wish to make.

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?

91.8% of businesses in Brighton & Hove are micro, with a further 6.9% classed as small. It is not known what proportion of these are retail based. The proportion of micro businesses is larger than that across the south east.

An all-in DRS may lead to more valid exemptions being sought on safety grounds (larger containers), reducing density of return points available in any area as opposed to OTG.

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?

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

Anything else?

Signage will enable consumers to manage their waste responsibly.

It would be in the exempted retailer's own interests to have signage as it reduces how much time they spend answering customers' questions and provides better customer service (i.e. not requiring customers to queue up for answers).

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
 No

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

- 1 year
 3 years
 5 years or longer

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
 No

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

Please explain your answer.

Where possible, a digital DRS should be incorporated with digitisation of other LA services and waste reporting to allowed for system compatibility.

It may be more prudent to await implementation of EPR and Consistency and to allow for the impact of these to be understood, particularly in terms of improving the quality and quantity of material . Waste collection infrastructure could then be changed to include a mature and robust digital DRS.

If introduced it should ensure that this be introduced at no additional cost to Local Authorities, or additional time for crews, with set up costs provided in advance. This would need to be fully established by the DMO prior to operating the scheme.

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

Please explain your answer.

The potential for fraud is significant, whether by the accumulation of repeated instances of small-scale system abuse or larger scale organised fraud.

The role of digital DRS needs to be fully explored and tested at scale before it can be relied upon. A robust digital DRS system will reduce opportunities for fraud and give confidence in the system.

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?

- Yes
 No

Please explain your answer.

It reasonable to expect that the quality of the overall material in the scope would be lower due to the contamination levels inherent in co-mingled collections. This effect would be counterbalanced by the benefit of having the quantity of material increased. Alternatively, the consistency agenda could be used to ensure collection systems do not impact on quality.

53. If the digital deposit return scheme system can be integrated into the existing waste collection infrastructure would its implementation and running costs be lower?

Please provide evidence to support your response.

Potentially, but there is not enough information available about the nature of the DRS or the format of a digital system to be able to answer this question confidently. Consideration needs to be wider than the relative running costs, and include the implications for implementing a system that undermines the need for existing waste collection infrastructure, paid for by the taxpayer and replacing at additional cost to consumers, with alternative infrastructure.

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
 No

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

The use of permitted development rights would streamline processes and reduce costs for businesses and local authorities. However, the upper limit proposed of 80 square metres may be too high and the exclusion of location types needs to be expanded.

Chapter 6: Labelling

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

- An identification marker that can be read by reverse vending machines and manual handling scanners.
- A mark to identify the product as part of a deposit return scheme.
- The deposit price

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

Effective labelling/bar codes

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
- No

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?

- Yes
- No

Please provide evidence to support your response.

Potentially yes, but we do not have access to data to validate this and the consultation document does not provide enough information either.

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

- Yes
- No

Please explain your answer.

The simplicity of messages and branding is key. All 4 UK nations need to apply the same mandatory labelling system. The DMO should have responsibility for the labelling design.

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

Please explain your answer.

Not sure; further work/consultation should take place with smaller producers to determine what is best

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

- Yes
- No

Please provide evidence to support your response.

18 months is an ambitious timescale, especially given the delays in the publication of the consultation. To make 18 months up to 'late 2024' possible, the pace on bringing in the scheme would need to be accelerated.

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

- Yes
 No
 Don't know

Please explain your answer.

It does not relate to our processes as a collection authority

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

- Yes
 No
 Don't know

There is not enough information about the proposed approach and the terms of engagement of a DMO and its remit to justify a definitive view.

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

Chapter 7: Local authorities and local councils

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?

- Yes
 No

Please explain your answer.

Where a DRS is based on reverse vending, we may be able to separate some DRS containers but not all, due to the way materials are collected and presented. The issues could be significant, as smashed bottles and crushed cans recovered by a MRF or collected separately at the kerbside may make identifying whether a material is in the scope of a DRS impossible, unless those requirements are suspended for material going via this route. Furthermore, for the MRF to separate out materials in scope from similar materials not in scope would be expected to add costs of additional processing.

A failure of a DRS or delayed benefits of a DRS would leave a financial impact on local authorities. Rather than a DRS link to payments to local authorities, it could be that it is EPR that is used to meet all the costs of all packaging materials going via the kerbside route or recycling sites, so that producers pick up the cost one way or the other.

Local authorities should not be left with a funding gap for providing a service they are obligated to where neither DRS, EPR or new burdens funding is available for the new net

costs, which should also reflect losses. The statement from the consultation is worrying: 'Local authorities would only receive funding for packaging covered under the Extended Producer Responsibility regime, excluding deposit return scheme material'.

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
 No

Please explain your answer.

Efforts should be made to avoid any substantive need for such agreements by making sure in-scope DRS materials do not go through the kerbside system.

As stated in the consultation, a kerbside collection is 'a failure of the DRS'.

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?

There is no credible risk of local authorities seeking to benefit from double payments and avoided by measuring material flows. Firstly, at the point of delivery by the local authority to a MRF, and secondly at the export point from the MRF to the reprocessor or return point in to the DRS system.

This can be avoided altogether by not using kerbside collections for in scope materials. There is a need to make sure the DMO and the EPR Scheme Administrator work very closely together to manage any issues arising.

67. How difficult do you think option 3 would be to administer, given the need to have robust compositional analysis in place?

Please explain your answer.

We do not support option 3, which appears to create additional costs and require additional processes to address a risk that is not clearly evidenced as being likely or significant, and is not any credible risk of local authorities seeking to benefit from double payments.

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 1
 Option 2
 Option 3

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

Option 2 is preferred as it presents local authorities with a fairer, more stable and certain position, however it only protects local authorities financially to the extent that any EPR formula is thorough and agile enough to reflect consumer change and habits quickly.

Option 2 also allows the incentive, as stated in the consultation document, to redeem deposits where containers of sufficient quality can be separated, and importantly shifts the onus to producers to improve a DRS if needs be or pay the consequence of any partial failure through EPR.

Chapter 8: Compliance Monitoring and Enforcement

69. Are there any other producer obligations you believe the Environmental Regulators should be responsible for monitoring and enforcing?

Please explain your answer.

Enforcement spot checks.

A general need for enforcement with an ability to ensure all scheme aspects are delivered well.

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

Yes

No

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

The DMO could be enabled to carry out appropriate aspects of the regulatory system (e.g. initial investigations). That could allow Trading Standards and the Regulators to receive a level of intelligence-based information and then decide what to do next.

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. reprocessors or exporters.

Need to be satisfied that existing legislation appropriately covers fraud.

72. Are there any other vulnerable points in the system?

If so, what? Please explain your answer

Ensuring the system as a whole, ensures enforcement issues are acted upon sufficiently well: DMO, regulators, trading standards and government. Tackling the activities of Organised Criminal Gangs

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

Yes / No Please explain your answer

Yes, it should be a key aspect of the DMO role and as such this accountability should encourage a DMO to design, refine and manage a DRS in a way that elevates compliance.

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

- Yes
 No

If no, please explain your answer.

The financial and penal consequences are not clear. As in many instances, the penalties for environmental crimes are not onerous enough to deter criminality.

In addition, the prospect of a significant breach by a DMO is not addressed adequately, beyond saying that a 'discretionary requirement could address this' by using a non-specified 'prescribed formula'.

Chapter 9: Implementation Timeline

75. Do you have any comments on the delivery timeline for deposit return scheme?

The anticipated DRS delivery timeline seems highly ambitious and does not account for the need to reassess community and consumer habits as a part of the Covid-19 recovery, or the time to develop a technological solution and establish a role for it.

It may be more prudent to await implementation of EPR and Consistency and to allow for the impact of these to be understood before introducing a DRS, particularly in the context of Covid, its economic impacts and impact on consumer behaviour.

Specifically, the 18 month period from the appointment of a DMO to a DRS being operational is very ambitious, with the major concern being about the logistics of the roll out of the infrastructure for a reverse vending based DRS.

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?

- 12 months
 14 months
 18 months

Any other (please specify)

It should be longer than 18 months and determined by whether the scheme was on-the-go or all-in.

If other, please specify.

24 months seems more realistic, but the period would be influenced by whether the scheme was on-the-go or all-in, whether it was a reverse vending based or digital based DRS, and when the period was in relation to the roll out of any other DRS in Europe - due to the consideration of competition for the provision of equipment.

Please provide evidence to support your response.

The timeframe should be informed by testing with potential DMO operators and evaluated as part of proposals received from interested parties.

If a digital deposit return scheme solution is to be integrated into existing waste collection infrastructure, then it would require considerable development and lead in time, not just by the DMO, but also by local authorities and contractors.

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?

Differences between the nations on DRS framework/rules will inevitably create longer implementation timescales.

Chapter 10: Summary Approach to Impact Assessment

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

Yes

No

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

The impact assessment is presented in isolation without the context of the effects of the Consistency and EPR agendas which are yet to be determined, in terms of both timing and nature. Ideally these should be subject to a fully integrated impact assessment to help establish the optimal nature and sequencing of change.

The Impact Assessment is also UK wide whereas part of the UK is to implement a DRS which may or may not be the same as any introduced in any other part of the UK and is also expected to be delivered earlier.

Much of the Impact Assessment is a presentation of the current policy landscape, an explanation of the DRS options and the views received to date and does not feature any possible effects of changes to community and consumer behaviours linked to the recovery from Covid-19.