

Response ID ANON-JZGE-SNNN-D

Submitted to **Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland**
Submitted on **2019-05-13 18:36:45**

Introduction

1 Would you like your response to be confidential?

No

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

2 What is your name?

Name:

Simon Ellin

3 What is your email address?

Email:

simon.ellin@therecyclingassociation.com

4 Please provide information about the organisation/business you represent

Which of the following best describes you?:

Business representative organisation/trade body

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

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

The Recycling Association

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.

Please answer below:

We are an established and high-profile trade body representing circa 100 members from the Recycling Industry. Our membership is made up of processors and recyclers including merchants, waste management companies, UK & Chinese mill groups and brokers.

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

Please answer below:

No

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

Yes

Background

Our approach

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

Yes

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:

We agree with the basic principles of all in DRS but only FOLLOWING a time period where we have been able to assess the impacts of EPR and consistency of collections. There is evidence to suggest that DRS can be disruptive of a good EPR system and causes confusion over how to recycle - it risks undoing the great work already in place and contained elsewhere in the RWS.

We see DRS as more of an anti littering initiative than a recycling initiative and some funds arising from EPR will be used for anti littering purposes - we should

wait and see the impact of this.

We are receptive to a phased in or an immediate introduction of on the go DRS - this will have a big impact on litter and on capture rates of materials.

9 Should the following materials be in scope of a DRS?

Type of material included - PET bottles:

Yes

Type of material included - HDPE bottles:

Yes

Type of material included - Aluminium cans:

Yes

Type of material included - Steel cans:

Yes

Type of material included - Glass bottles:

Yes

Other (please specify):

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

10 Should the following materials be in scope of a DRS?

Materials in-scope - Cartons e.g. Tetrapacks:

Yes

Materials in-scope - Pouches and sachets e.g. energy gels:

Yes

Other (please specify):

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

Cartons should be collected via DRS if they are not a core material as outlined in the consistency of collections consultation document. They are very difficult to recycle when mixed with other paper and board, but can be recycled if they are collected separately from other board and paper materials.

EPR and modulated fees/deposits should see pouches disappear from the waste stream. If they do not get designed out, they should be introduced into DRS at a later date.

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

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

The waste hierarchy should be at the forefront of the RWS and therefore glass bottles for refills should be provided and promoted above recycling for re-melt.

12 Should the following drinks be in scope of a DRS?

Should drinks be included? - Water:

Yes (all)

Should drinks be included? - Soft drinks (excluding juices):

Yes (all)

Should drinks be included? - Juices (fruit and vegetable):

Yes (all)

Should drinks be included? - Alcoholic drinks:

Yes (some)

Should drinks be included? - Milk containing drinks:

Yes (all)

Should drinks be included? - Plant based drinks (soya, rich almond and oat drinks):

Yes (all)

Should drinks be included? - Milk:

Yes (some)

Other (please state which)::

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

Alcoholic drinks to exclude wines and spirits.

Milk is an essential food item and should be excluded in HDPE bottles but included in Tetrapack

Milk containing drinks - some are essential food items, some are not, so they should be included.

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

Should disposable cups be included? - Disposable cups made from paper with a plastic lining (used for coffee):

Yes

Should disposable cups be included? - Disposable cups made of plastic (used in vending machines):

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view. The Government is particularly interested in any evidence on whether or not it would be practical or cost effective to include disposable cups in the scope of a DRS.:

This is the only effective way to capture these materials because they are an almost exclusively on the go item.

DRS will ensure their capture and in a form where they can easily be recycled eg without the contamination of liquids, tea bags, stirrers etc. The plastic lid should also be within the scope of DRS.

It will be an effective anti-littering move and a good political move.

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

Yes

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 described?

Yes

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

16 Should producers obligated under a DRS be:

Also be obligated under the reformed packaging producer responsibility system for the same packaging items

Other (please explain):

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

Absolutely they should.

DRS is not an effective modulation system and will have a limited impact on product design.

We have got to net DRS recovery off from EPR with the two working together.

DRS drives collection only and does not improve the recyclability of a product - for example, if you collect a PET bottle with a PVC sleeve using DRS, then that sleeve remains a problem to recycle and there is no incentive to remove it from the design. EPR is still needed to work alongside DRS to ensure products are designed for recyclability.

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.:

Clear labelling

With the use of technology eg using a bar coding system or the use of micro chip technology which could also be used to provide capture data and track the life cycle of individual products.

Limit DRS to on the go

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

Yes

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

But only under a DRS system - they should not have responsibility elsewhere.

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

Yes

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

But only under a DRS system

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

Yes

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

The costs of introducing and running an all in DRS are very high and every effort should be made to reduce these costs. Unredeemed deposits must remain in the system.

In Connecticut, unredeemed deposits go to the State and it is seen as a cash cow to the state - there is no incentive to the state/government to then promote greater recovery.

21 If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?

No

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

As above - they need to stay in the system to offset investment and promote greater recovery.

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

Please explain your answer:

If they are not used to part-fund the cost of DRS, they should be used elsewhere to achieve the objectives of the RWS eg education and communication; anti-littering, etc.

Similar system to the landfill tax community funds.

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

Industry (drinks producers)

Other (please specify):

It will not let me highlight all of the above - we would like to see them ALL represented.

We would also like to see the recycler represented.

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

A glaring omission in the RWS consultations and as demonstrated above is the role of the recycler/processor and the end markets. If you are collecting vast amounts of recyclables under DRS, you must engage with the processor and the end markets - the two systems must work in tandem.

The Recycling Association are ideally placed to fulfil this role.

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

Yes

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

They have to be involved in setting up the DMO body, but the DMO body must be an independent organisation charged with carrying out the role as initially defined by government following these consultations.

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

A DMO should: - Advise Government on setting of the deposit level/s:

Yes

A DMO should: - Set producer import fees:

Yes

A DMO should: - 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

A DMO should: - Set and distribute the handling fees for return points:

Yes

A DMO should: - Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?:

Yes

A DMO should: - Be responsible for maintenance of Reverse Vending Machines (RVMs) and provision of bags/containers to those running manual return points:

Yes

A DMO should: - Own the material returned by consumers:

Yes

A DMO should: - Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts:

Yes

A DMO should: - Fund counting sorting/centres – and manage the contracts for counting/sorting centres:

Yes

A DMO should: - Be legally responsible for meeting the high collection targets set by Government for drinks containers within scope of the DRS.:

Yes

A DMO should: - Measure and report recycling rates to Government:

Yes

A DMO should: - Run communications campaigns to aid consumer understanding of the DRS:

Yes

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

For DRS and other initiatives in the DRS to succeed, every link in the supply chain must be joined together - the DMO is the ideal body to pull all this together.

It will also help to streamline the administration and keep costs down.

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

Yes

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

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

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:

Should a de-minimus be based on: - Number of employees:

Should a de-minimus be based on: - Sales figures:

Should a de-minimus be based on: - Volume/ weight of drinks put on the market:

Should a de-minimus be based on: - None of these:

Yes

If yes, please provide more information (how many employees, what sales figure, what volume/ weight):

Other (please specify):

If a producer is under the VAT threshold, they should not be obligated.

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

Please provide more information:

No

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

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

This matches up with the whole basis of EPR - it would be counter-intuitive and complicated to have two different systems.

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

Yes

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

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

Yes

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

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

Retailers who sell drinks containers in scope, Transport hubs, Leisure centres, Event venues

Other (please specify):

Anywhere with a high footfall - eg parks and beaches with cafes, major streets.

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

The carbon impact of travel to redeem deposits needs to be taken into account for the bigger picture when redeeming deposits. The more choice, the lower the carbon footprint for redeeming deposits and the likely greater success for redeeming deposits per se.

34 What might the impacts be on those hosting:

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

Space and resource to operate

Licensing and permitting

Car parking provision

Health and Safety including storage of dirty material, manual handling, vermin, vehicle movements, broken glass, moving parts within the machinery.

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

Space and resource to operate

Licensing and permitting

Car parking provision

Health and Safety including storage of dirty material, manual handling, vermin, vehicle movements, broken glass

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

Yes

Please provide more information:

As above

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

Yes

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

If they are below the VAT threshold.

37 Should a de-minimis be based on:

Floor size, Sales figures for drinks in scope

Other (please specify):

Storage ability is a key factor

If yes, please provide more information (what floor size, what sales figure, how many employees):

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

38 Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers?

Please provide details.:

Voluntary for businesses below the de minimis to add DRS to drive footfall to their businesses.

Also for a charity/community angle where appropriate.

39 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?

Please explain your answer:

Postage/home delivery reverse logistics

40 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?

Please explain your answer:

Promote provision with community groups for a share of the revenue.

Use local post offices, pubs, shared facilities such as community centres.

Schools, churches etc - for a share of the revenue.

41 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?

Please explain your answer:

No

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

Yes

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

This is imperative to prevent free-riding - back hauling is a very efficient environmental model.

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

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

Please provide more information:

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

Other (please specify):

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

Yes

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

As described above

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

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

As outlined above - may provide increased footfall to their businesses

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

Please provide more information:

No

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

Please provide more information:

Unknown

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.:

Unknown

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

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?

No

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

The environmental impact of the product is the same, irrespective of whether it is sold individually or as a multi-pack

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

Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop off), Digitally (e.g. a digital transfer to a smartphone application), Cash, Return to debit card, Option to donate deposit to charity

Other (please state):

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

Customers should be given choice. We particularly like the charity option - these should be limited to related environmental charities.

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

Yes

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

Hence why it is important recyclers should be represented on the DMO board.

The DMO must demonstrate compliant final recycling/processing.

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

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

Data covering the entire supply chain is key to continuous improvement.

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

Please explain your answer, providing evidence where available:

Unknown

Monitoring and Enforcement

56 Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?

Yes

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

Please explain your answer:

They are the regulator and therefore best placed..

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))

Annually

Other (please specify):

Annually which matches most other related systems of reporting eg targets, producer responsibility

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

Annually

Other (please specify):

As above

59 Should enforcement focus on:

A sample of producers

Other (please specify):

Risk based and to keep costs as low as possible

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

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.:

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

Please state :

Potentially all redemption points.

62 Which labelling/markings on drinks containers in scope would best protect against fraud? Please select all that apply:

Existing product barcode (containing DRS information when scanned)

Other (please specify):

Technology should be embraced in all aspects of DRS.

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.:

Unknown

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. :

Unknown

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)?

Please explain your answer:

Unknown

DRS Options - 'all-in' and 'on-the-go'

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

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

These sized containers lend themselves very well to re-use and therefore should be excluded.

An opportunity to promote the waste hierarchy

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

Other (please specify):

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

3 litres brings into scope certain products eg plastic bottles for beer and cider. Above 3 litres is rare.

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

Yes

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

In our experience, it is 750 ml or below that are missed in current collection systems and are the receptacles that form most of the drinks container litter.

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

No

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:

Some retailers/producers may try to sell more containers in multi-packs to avoid compliance. Loopholes should be removed wherever possible.

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

On-the-go

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

We remain receptive to all in DRS once the impact of EPR and consistency has been assessed and if EPR and consistency isn't meeting targets, including quality.

We feel there is little point in investing in systems to improve the design, labelling, collection and processing of materials and then cherry picking the easiest to collect materials in a different collection system -it is a duplication in cost and is potentially a huge waste of money and resource to duplicate collection systems.

In existing DRS models, such as Germany, which was introduced after kerbsides were established, DRS was a disruptive influence on kerbside collections. Alternative research eg the Institute of Economic Affairs has highlighted the vast expense of an all in DRS - a cost which should be avoided if possible.

We are however receptive to an initial on the go DRS system which should pull material into the recycling system which may still be missed under EPR and consistency. It should also have a significant effect on littering and will help to promote anti-littering practices. It will also provide data and best practice for the implementation of all in DRS if introduced at a later date

Summary of approach to Impact Assessment

71 Do you agree with our impact assessment?

No

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

Because it does not take into account the impact of EPR and consistency on net social benefit.

72 Do you think more data is needed?

Yes

If yes, please state where:

The data should be re-run after a period to assess hard data emanating from EPR and consistency.

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

As above

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

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

If yes, please provide further information:

74 Do you have further comments on our impact assessment?

Please be specific.:

No

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:

The potential of EPR and consistency and the use of revenues for education and communication, including anti littering could achieve these objectives. We need to give them time to assess their impact before introducing all in DRS.

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

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

Absolutely. This will provide valuable experience and data if all in DRS is eventually adopted. It will immediately impact on targets and will "buy time" to assess the impact of EPR and consistency.

Outcomes of what we are hoping to achieve

77 Do you think a DRS would help us to achieve these outcomes?

Do you think a DRS will help achieve these outcomes? - Reduction in litter and litter disamenity (include expected % decrease where possible):

Yes

Do you think a DRS will help achieve these outcomes? - More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go':

Yes

Do you think a DRS will help achieve these outcomes? - Higher quality recycling:

Yes

Do you think a DRS will help achieve these outcomes? - Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials:

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

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

Certainly the evidence points towards a reduction in litter through on the go DRS.

Certainly too, DRS will result in improved quality of recyclates compared with current practices. However, evidence also points towards improved quality through EPR and consistency.

There is no link we know of between lack of investment in UK re- processing infrastructure with the quality of recyclates. Factors such as costs of power and labour allied to overseas competition and a cumbersome planning system are bigger factors. It is more likely that the effects of EPR and the plastics tax will be far bigger factors attracting investment.

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

No

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

As previously described

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

Yes

Other (please state):

EPR, consistency and the plastics tax

Please explain your answer, providing evidence where available. :

As previously described

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

Yes

Other (please state):

Please explain your answer, providing evidence where available. :

As previously described.

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?

Please provide more information:

N/A

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.:

N/A

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:

N/A

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:

N/A

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

Varying producer feed 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

Other (please specify):

EPR is a far better way of achieving this because it affects all forms of packaging. We need a consistency of approach here.

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

As above

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

Government, Reprocessers, Producers, Local Authorities, Waste Management companies

Other (please specify):

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

All the supply chain has data pertaining to this - every link must be taken into account.

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

Agree

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

All legislation will need to be reviewed to ensure there is a smooth and complementary pathway to the success of a joined up system approach.

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.:

Depending on Brexit, the Eu Circular economy framework will need to be considered.

Further comments

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?

Please specify.: