

## Department for Environment, Food and Rural Affairs

### Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland

#### Background to CIWEM

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent commentary on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

CIWEM welcomes the opportunity to respond to DEFRA on its consultation on introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland. This response has been compiled with the assistance of members from our Waste Management Specialist Panel.

#### Response to consultation questions

We welcome the opportunity to respond to this consultation, but we do not have detailed answers to the questions posed. Here follows an overview of the views of our members on the proposals.

We suggested that a national Deposit Return Scheme (DRS) for single use plastic bottles would be a sensible and achievable place for the Government to start with increased Extended Producer Responsibility measures, and we welcome to Government's commitment to introducing one.

The most important feature of any DRS is that it must be easy for consumers to use and return containers. This would mean that an ability to return to different locations other than where purchased would be appropriate.

A DRS would:

- Reduce litter
- Increase recycling rates
- Instigate behaviour change
- Reduce use of virgin materials

We support the all-in proposal, which would not place any restrictions on the size of drinks containers in the scope of the DRS, and therefore capture the largest amount of materials. The government needs to display greater commitment and ambition in relation to climate change and wider environmental management and an all in approach would align with this.

Cartons, pouches and sachets should not be included in the DRS, and instead should be accounted for under the EPR scheme for plastic packaging. The all-in proposal does risk removing valuable material from kerbside collections, however the on the go proposal which limits the DRS scheme for 750ml would be a confusing system for consumers and missing out on large quantities of material collections. Material recycled through a DRS scheme is likely to be high quality, and less likely to be contaminated as through a kerbside collection.

The first-choice solution for glass recycling should be refill/re-use, instead of being crushed and re-melted into new glass bottles. This is less energy intensive, and higher up the waste hierarchy.

We would advocate that the Government should introduce as ambitious a scheme as possible from the beginning, as it would be more difficult to extend later on and an ambitious scheme would increase recycling rates quickly and instigate behaviour change at a rapid rate.

The DRS must be co-developed with the EPR for plastic packaging proposal to avoid unintended implications and duplications on either scheme.

We support the introduction of a not-for-profit Deposit Management Organisation to be responsible for and facilitate the DRS, including meeting targets for in-scope DRS materials. Its leadership should be representative of producers, retailers and consumers. The DMO must be transparent and regulated as it will handle significant flows of money, and should therefore be monitored by an appropriately resourced and independent regulatory body.