

Councillor Claudia Webbe
Executive Member for Environment and Transport
Labour Member for Bunhill Ward



Deposit Return Scheme Team
Department for Environment, Food and Rural Affairs
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Dear Madam/Sir,

Deposit Return Scheme consultation

I have pleasure in enclosing my response to the government's Deposit Return Scheme consultation on behalf of Islington Council. We will submit separate responses to the other three related consultations, namely Reforming the Packaging Producer Responsibility System, Introducing a Plastic Tax consultation and Consistency in Household and Business Recycling Collections.

We broadly welcome the proposals set out in these consultations. We support the move towards ensuring that producers of goods bare full responsibility for the environmental and financial impact of those goods including the full cost of collection and disposal.


We support the introduction of a Deposit Return Scheme and we prefer the 'all in' approach rather than on the more limited on the go proposal. We believe it is important to take bold measures to produce a shift in consumer behaviour and to produce the step change in recycling levels that we need. The introduction of a Deposit Return Scheme sends a clear behaviour change message to consumers, giving them an incentive to return and recycle high quality materials.

We believe the scheme compliments the proposed EPR and would encourage the government to be bold and to introduce the two schemes simultaneously.

We also hope that the DRS will promote a knock on behaviour change effect and increase recycling for other materials.

We welcome the consultations as a packaging and support the introduction of all three sets of proposals, which complement and support each other.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Claudia Webbe', with a long horizontal stroke extending to the left.

Councillor Claudia Webbe
Executive Member for Environment and Transport



Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Questions and responses

About you

Q1. Would you like your response to be confidential?

No

Q2. What is your name?

Councillor Claudia Webbe

Q3. What is your email address?

claudia.webbe@islington.gov.uk

Q4. Please provide information about the organisation/business you represent.

Which of the following best describes you?

Local Authority

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

Islington Council

What is the approximate number of staff in your organisation? (If applicable)

~4,000

Q6. Please provide any further information about your organisation or business activities that you think might help us put your answers in context. (Optional)

London Borough of Islington provides services and information to the residents and businesses of Islington. It is a waste collection authority undertaking collection of domestic and commercial recycling and refuse.

As an inner city London Local Authority, the tenth most densely populated borough in the Country, we are uniquely able to provide insight into what measures will help to improve recycling, waste reduction and resource efficiency on behalf of our residents and businesses.

Q6. Does your organisation have any recent experience of a DRS or related policy schemes? If so, can you please briefly explain your experiences?

No



Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Whilst we have reviewed all the consultation questions, we have confined our comments to the elements of the consultation that are relevant to our scope of involvement and expertise.

Q7. 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

Our Approach

Basic principles or a DRS

Q8. Do you agree with the basic principles for a DRS?

Yes

Islington Council believes that a DRS will capture a limited range of good quality materials and potentially increase the amount of recycling, particularly on the go bottles. It should also reduce littering.

DRS will be a strong communications change message for consumers and will have a knock-on effect on the capture rates of other materials not included in the DRS system, by normalising recycling behaviour.

DRS will compliment EPR whilst operating separately from it and we would resist suggestions that DRS should be delayed pending the implementation of EPR and other related consistency proposals.

Proposed models for a DRS system

Materials in scope

Q9. Should the following materials be-in scope of a DRS:

a. PET bottles

Yes

Islington Council considers that PET bottles are widely used and DRS should result in more recycling material of a higher quality and a potential reduction in litter. It is beneficial easier to communicate the scheme to the public if it can accept a wide variety of bottles. From the MRF information we receive for the borough delivered mixed recycling, approximately 9% is PET and HDPE plastics by weight so this would contribute to the recycling targets in the DRS.

b. HDPE bottles

Yes

Islington Council considers that HDPE bottles are widely used and DRS should result in more recycling material of a higher quality and a potential reduction in litter. It is beneficial easier to communicate the scheme to the public if it can accept a wide variety of bottles. From the MRF information we receive for borough delivered mixed dry recycling approx. 9% by weight is HDPE and PET plastics

c. Aluminium cans

Yes

Islington Council considers that aluminium cans are widely used and DRS should result in more recycling material of a higher quality and a potential reduction in litter. Recycling aluminium is very efficient from an energy perspective and the material has a high market value currently at around £750 per tonne. From the MRF information we receive for borough delivered mixed recycling approx. 1% is aluminium.

d. Steel cans

Yes

Islington Council considers that steel cans are widely used and DRS should result in more recycling material of a higher quality and a potential reduction in litter. Steel is easy to recycle but not commonly used for drinks and more so for food items. So is the proposed DRS restrictive about this? These comprise approx. 2% of the borough delivered mixed recycling to the MRF.

e. Glass bottles

Yes

Islington Council considers that glass bottles are widely used and DRS should result in more recycling material of a higher quality and a potential reduction in litter. It will improve the safety of domestic recycling by removing a quantity of glass from street property and bank recycling which should decrease the incidence of breakages on the public highway, residents' property and around bring site. It is beneficial easier to communicate the scheme to the public if it can accept a wide variety of bottles. Glass forms approx. 25% by weight of the mixed recycling delivered by boroughs to the MRF. It will be a significant contributor to meeting the recycling targets in the DRS if these are weight based

Q 10. Should the following materials (also) be-in scope of a DRS:

a. Cartons e.g. Tetrapack

Yes

Islington Council considers that cartons are widely used and DRS should result in more recycling material of a higher quality and a potential reduction in litter, (particularly on the go drinks cartons). Excluding cartons might also incentivise a move from plastic packaging (easy to recycle) to tetrapacs (not so easy to recycle) which would have a detrimental impact on recycling.

b. Pouches and sachets, e.g. for energy gels

No

Islington Council considers that pouches and sachets would be more likely to be contaminated with residual food/ gels for on the go. They are not generally included in DRS schemes in other countries and should be included under a reformed UK packaging producer responsibility system. The recycling market for these items is limited.

Q 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?

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Yes

Islington Council considers that where it can be demonstrated that the process is environmentally beneficial. It would involve some standardisation of bottle types. The scheme should be simple to communicate.

Take back schemes, such as used by the humble milk man (or woman), are the perfect example of a circular economy and the most sustainable use of packaging and should be encouraged and incentivised through either a DRS or the EPR scheme.

We would suggest certain take back schemes such as door step milk delivery and return schemes should be exempt altogether from the DRS, as they already operate effectively.

Drinks in scope

Q 12. Should the following drinks be in-scope of a DRS:

a. Water

Yes

Islington Council considers that while water is still available in plastic bottles it should be included although the wider campaign to get people to use reusable containers and filling points should be continued.

b. Soft drinks (excluding juices)

Yes

Islington Council considers that soft drinks are popular and should be included to contribute to the recycling targets to be met. They are also a common form of littering.

c. Juices (fruit and vegetable)

Yes

Islington Council considers that juices are popular and should be included to contribute to the recycling targets to be met.

d. Alcoholic drinks

Yes

Islington Council considers that the scheme should be as wide as possible for easy communication and good capture rates. It meets the criteria of the DRS and many alcoholic drinks are in aluminium cans of bottles both of which can contribute financially and by weight to the DRS targets.

e. Milk containing drinks

Yes (some)

Islington Council considers that the scheme should be as wide as possible for easy communication and good capture rates. The DRS should be as inclusive as possible to keep costs down so any drink types should be considered for the scheme.

We would support the exemption of containers just containing milk and plant based alternatives.

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

f. Plant-based drinks (such as soya, rich almond and oat drinks)

No.

Islington Council supports the exemption of containers just containing milk and plant based alternatives, where this can be classed the same as milk i.e. essential. This will therefore not discriminate against persons who are unable to drink milk or choose plant based alternatives.

We would add that plant based alternatives to milk general come with lower greenhouse gas emissions and so should at least be treated the same as milk.

g. Milk

No

Islington Council agrees that milk is considered to be an essential and should therefore not be included in the DRS.

We would support the exemption of containers just containing milk and plant based alternatives, where this can be classed the same as milk i.e. essential. This will therefore not discriminate against peoples who are unable to drink milk or choose plant based alternatives.

We would also support the exclusions of milk bottles that are still delivered by the milkman and returned for rebottling.

Disposable, single-use cups

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

a. Disposable cups made from paper with a plastic lining (such as those used for coffee)

No

b. Disposable cups made of plastic (such as those used in vending machines)

No

Islington Council would encourage DEFRA to tackle the problem of disposable, difficult to recycle cups (made from paper with a plastic lining) through a point of sale charge ('latte levy'). We would also recommend that these items are included within the EPRS.

Material and financial flows in a DRS

Q 14. Do you agree with the proposed material flows?

No

Islington Council is concerned that Local authorities, and the waste they handle, have been missed off completely, despite the likelihood that a significant proportion of the target materials will continue to be handled by councils through recycling collections, residual waste collections and street cleansing services. It is essential that this element of the material flow is captured, especially as Defra have mentioned that local authorities may be able to redeem deposits, and particularly if Defra chooses to take forward proposals to exclude materials covered by DRS from the EPR regime.

Q 15. Do you agree with the proposed financial flows as described above?



Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

No.

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

Following on from the response to Q14 above, Islington Council believes it needs to be clear where local authorities feature in the financial flows, particularly in relation to recovering their full net costs of dealing with target items that consumers do not return to a deposit station/RVM. If the EPR regime is to apply to these items then this will presumably be dealt with through the formulae outlined in the accompanying consultation (albeit adjusted to take account of the DRS), but if they are to be excluded from the EPR as has been suggested by the Government, there must be an additional element to the financial flows that demonstrates how local authorities could reclaim unredeemed deposits in order to achieve full net cost recovery.

The diagram needs to be updated to make it completely clear that all deposits are paid to the DMO from producers, but only redeemed deposits are paid from the DMO to retailers/return stations. An additional note that acknowledges the presence of unredeemed deposits at the DMO position may help to achieve this.

It would also be useful to include who is responsible / where the handling costs are met, as well as what happens to items that have not been sold / damaged / past their sell by dates. [Overlap with the packaging producer responsibility system](#)

Q 16. Should producers obligated under a DRS be:

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

Islington Council considers that EPR reforms mean that producers must cover the full costs incurred for the collection of material they put on the market, whether this is from kerbside or via DRS. If through the consistency framework the materials mandated for collection through kerbside are also included in the DRS schemes the two collection systems will compliment each other, material being collected through either one scheme or the other.

If a DRS is introduced, producers are not being double charged, they are paying the operating costs of two different collection systems, a DRS and the well-established household collection systems via kerbside, bring banks and HWRCS. This is right and proper under the concept of EPR and full net cost recovery.

This would include materials that are not returned via a DRS and are collected by local authorities through the household waste and recycling infrastructure. The cost of managing these would fall under EPR arrangements. We request that clarification is provided on how collection and disposal costs will be met as identified as an essential requirement for an EPR.

Q 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'?

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

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

As outlined in Q16 Islington Council does not believe producers are being double charged under a system where EPR has been implemented and a DRS introduced. Producers are covering the operating costs of two different collection systems for the products they produce and which under EPR they are responsible for from the entirety of their useful life.

Deposit Management Organisation (DMO)

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

Yes

Islington Council believes they would be in the best position to do so. The DMO has a strategic overview and tools to hand to affect performance against targets so it makes sense that they should be accountable. They should also delegate responsibilities through the supply chain but ultimately take responsibility for the targets.

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

Yes

Islington Council believes that they will be the central body managing the process having strategic overview and tools to hand to affect performance against targets and therefore they should be accountable. Everyone in the chain should be incentivized to achieve targets set by government.

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

No.

Islington Council believes the DRS should function on redeemed deposits only. Most of the packaging from the unredeemed deposits will have ended up as litter or disposed/recycled through kerbside collections, bring banks or recycling centres, falling to local authorities to deal with. It would therefore be appropriate for the funds from unredeemed deposits to be directed towards local authorities to cover the costs of collecting this material. In accordance with Circular Economy principles, I would also encourage some funding also to be directed towards enhancing local reprocessing facilities.

Where it can be evidenced that costs have been borne by Government and/or the DMO as a result of unredeemed deposits (e.g. scheme administration), payment could be made accordingly.

Q 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 see our response to Q 20.

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

Please see our response to Q 20.

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

a. Industry (drinks producers)?



Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

b. Government.

c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)?

d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)?

e. Other (please specify)

Islington Council believes that all of the bodies mentioned above should be included on the management board. It would also be useful to have a representative from one of the consumer groups such as the National Consumer Federation or Which? Local Authorities should also be represented by, for example, LARAC.

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

Yes

Islington Council believes that they can ensure a balanced approach to setting it up but not running it. They will receive reports.

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

a. Advise government on the setting of the deposit level/s

Yes

Islington Council believes they are best placed to do this but the final decision should be made by government. They need to ensure that the deposit costs are not unreasonable as there will be a risk that some stakeholders will not pay it.

b. Set producer/importer fees

I neither agree nor disagree.

c. 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

Islington Council believes they would be best place to manage this to fit in with the other financial aspects of the scheme as long as the administration of the DRS is not too onerous.

d. Set and distribute the handling fees for return points

Yes

Islington Council believes they would be best place to manage this to fit in with the other financial aspects of the scheme.

e. Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?

Yes

f. Be responsible for maintenance of reverse vending machines (RVMs) and provision of bags/containers to those running manual return points

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Yes

g. Own the material returned by consumers

Yes

h. Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts

Yes

i. Fund counting sorting/centres – and manage the contracts for counting/sorting centres

Yes

Islington Council believes the DMO have a strategic overview of the systems and finances so can better manage the counting / sorting centres. They are in a position where they can make adjustments anywhere in the DRS process if required.

j. Be legally responsible for meeting the high collection targets set by government for drinks containers within scope of the DRS.

Yes

k. Measure and report recycling rates to government

Yes

Islington Council believes they have the means to ensure the availability and smooth running of the system. This is a very expensive scheme which according to the modelling could generate significant funds so the scheme should be accountable and performance scrutinised.

l. Run communications campaigns to aid consumer understanding of the DRS

Yes

Islington Council believes this would be a vital part of the system to promote buy in from consumers. Effective communications will be essential in supporting this behaviour change.

Producers

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

Yes

Q 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?

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

Islington Council believes it would depend on what the costs of joining the scheme will be. Is it a flat rate or banded depending on size of company/ products put on the market? Would it be an administrative burden if all producers are included in the scheme.

Q 28. Should a de minimis be based on:

a. Number of employees



Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

i. If yes, how many employees?

b. Sales figures

ii. If yes, what figure?

c. Volume/weight of drinks put on the market iii. If yes, what volume/weight?

d. None of these

e. Other

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

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

Islington Council considers that after drinks container material collected through a DRS is sent to a recycler, our preference would be for this to then be recycled back into drinks containers where possible. Producers who initially put a certain number of tonnes of (for example) PET onto the market may wish to have the first rights to 'buy back' the same amount of recycled PET for use in their own drinks containers. Alternatively, to give smaller producers an opportunity to use recycled materials in their containers, this could be allocated on a percentage based on the materials they put on the market in the first place

Set-up costs

Q 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

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

Yes

Islington Council believes they are best placed to do this to ensure consistency of systems and provision RVMs and to keep the administration and costs down as much as possible.

Operational costs

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

Yes

In line with the principles of full net recovery, Islington Council believes the producers should cover all aspects of the DRS including operational costs unless there is already a provider fulfilling the same function.

Retailers / return provisions

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

a. Retailers who sell drinks containers in scope

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

b. Transport hubs

c. Leisure centres

d. Event venues

f. Other (please specify)

Islington Council agrees that all the suggestions above should be obligated to host a return point. It makes sense to locate these facilities where there is high footfall but this will be dependent on local circumstances - space, collection requirements.

Retailers offering home delivery should make arrangements for collection of DRS material.

Q 34. What might the impacts be on those hosting:

(a) Reverse vending machines?

Islington Council considers that there may be space constraints for the organisations hosting the RVMs. There could be issues if the equipment breaks down or if the collections are not frequent enough or delayed. There is potential for fly tips where RVMs are locating in public areas.

(b) Manual return points?

Islington Council considers that there may be space constraints restricting where manual return points could be located.

It may result in adjusted opening hours, additional labour and additional space required.

Items may be fly tipped outside a premises if the public have taken the items to the site but it is closed (e.g. they are not in a position to take the items home because they are going on elsewhere and therefore it would not be practical to carry the bottles onwards).

The bottles may not be washed out and could cause a health hazard if not collected quickly.

Will shop staff be able to refuse to take dirty or chipped, damaged containers? A health and safety project looking at overstocking in small retail businesses produced a clear finding that small businesses struggle to organise stock rooms in such as fashion as to maintain safe storage, keep floors clear for cleaning, remove slip and trip hazards etc. A far more likely scenario was that shelving units would be stocked too high resulting in poor working at height and manual handling practices or floors were cluttered causing a trip hazard. There are also some implications for manual handling but there are also implications with taking delivery of full drinks containers in the first place so this is unlikely to be an additional burden just another aspect that would need to be risk assessed.

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

Islington Council considers that there may be restricted space for storage of RVM or returned materials.

Dirty materials with residue which could attract insects, bacteria and odours.

There may be some manual handling concerns for the manual take back schemes. RVMs would need to be in relatively secure areas so the risk of vandalism is reduced. May be necessary to do risk assessments for proposed take back points. The health and safety implications have been outlined in the answer for 34b.

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

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

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

Islington Council believes that smaller businesses hosting a take back scheme may be an unreasonable burden depending their available storage space, staffing levels and location. See health and safety answer for 34b.

Q 37. Should a de minimis be based on:

a. Floor size

This should be commented on by the retail sector but from a health and safety perspective floor size should be a consideration.

Q 38. Please briefly state the reasons for your response.

Islington Council believes it may be unreasonable for a business with limited space to accommodate returned bottles. This could have a reduction in earning potential with a reduction in shop display space and store room capacity.

Alternatively, rather than floor size of the whole premises, instead the size of available floor space or daily / weekly customer numbers could be considered for an idea of footfall and whether or not it is suitable for a drop off point?

Q 39. Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers? Please provide details.

Islington Council suggests that the possibility of using 'on street' RVMs could be considered as they are often in convenient locations.

Q 40. 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?

Islington Council suggests that supermarket delivery services should be able to take back returned containers and receive their deposit refund. Local hot spot areas such as post offices, transport hubs, schools could have RVMs. These could be serviced by the local authority collection services subject to additional financial support.

Q 41. 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?

Islington Council suggests locating RVMs at local community hubs such as village halls, public spaces or pubs if appropriate.

Use of the existing local authority collection services.

Online delivery service to take back DRS items.

Q 42. 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?

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Islington Council suggests that this could be possible but would need more evaluation as it may have planning and cost implications and is difficult in some environments especially if a power supply is needed.

It is commonplace for recycling bring sites to be located in public areas.

Q 43. Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?

Yes

Islington Council believes that the trend for more online shopping is likely to increase with more and more people doing most, if not all of their shopping online. It is right that these suppliers participate in the DRS scheme, offering a convenient takeback scheme for in-scope items.

There should be some mechanism to facilitate the return of the bottles, particularly useful in rural areas which depend on deliveries.

Q 44. Should there be a de minimis under which online retailers would not be obligated to pick up and refund DRS material?

Yes but we have no evidence to support what this should be based on.

Islington Council believes this could work for the larger retailers such as the supermarkets but it is not clear if this is practical for the smaller retailers.

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

Yes

Islington Council believes it would increase the tonnage and be convenient for customers. These types of businesses usually have frequent delivery and return systems in place so would make sense to be included in the DRS. Small businesses may struggle to find a safe way to store on site. The majority of S & M sized catering businesses struggle for storage and preparation space in the borough. The over stocking project referred to in 34 also included licensed catering premises.

Q 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

Islington Council suggests that if they can demonstrate that there is a high enough footfall, suitable location and that it would be cost efficient for them to be part of the DRS they should be considered and particularly in areas where return points are sparse.

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

Islington Council is unclear if retailers or organisers of sporting events such as large running events will be obligated under the DRS and will therefore need to provide return points.

On-trade Sales

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

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Islington Council believes that the Norway system seems appropriate enabling costs to be reduced whereby businesses receive a small 'handling fee' for drink containers returned through the system. Businesses pay the deposit, redeeming this when they return the empty drink containers. On occasions where customers remove drinks from the premises, premises can decide to charge and return the deposit to customers if empty bottles are returned.

The deposit

Q 49. What do you consider to be the optimum deposit level to incentivise return of drinks containers?

Islington Council suggests that 15p – 20p would seem appropriate. It would make the return of the bottles worthwhile but 35p could be too much for people on low income and 6p not worth the effort.

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

Yes

Islington Council believes it would make the scheme simple to communicate to the public and retailers and simpler logistically to operate. There might need to be some flexibility if target materials are not meeting the required recycling rate.

Q 51. Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?

No

Islington Council believes that to place the same deposit on multipack drinks containers would incentives purchasing fewer bottles. If there were an alternative deposit level for multi packs this could lead to abuse of the system if they are split and sold individually.

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

- a. Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop-off points)**
- b. Digitally (for example a digital transfer to a smartphone application)**
- c. Cash**
- d. Return to debit card**
- e. Option donate deposit to charity yes (but not obligatory for all return points)**
- f. Other (please state)**

Islington Council believes that all the above options should be considered. People have differing circumstances so flexibility will be necessary e.g not everyone has a smartphone, children may be asked to take the bottles back so would require cash rather than a debit card. Smaller return points may find the option of donating to charity impractical.

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Sending materials on for recycling and data recording

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

Yes

Islington Council believes that they are best placed to follow the process through the cycle. This will be necessary for assessing performance against targets and for managing the income from the materials.

Q 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

Islington Council believes that the main driver for DRS is to ensure that the material is to divert from disposal and create a circular economy therefore they should be obliged to report on recycling rates of in-scope drinks containers. It makes sense to capture this data as it will impact local authority performance data, MRF operations, end markets and performance of the DRS.

Transparency

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

No comment.

Monitoring and enforcement

The DMO

Q 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

They already have related experience in this respect.

Q 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))

b. Bi-annually

Islington Council believes that bi-annually is a reasonable time scale to measure performance and identify trends. At the start of the DRS it may be worth increasing the frequency to quarterly until it has bedded in and there is confidence that the scheme is working.

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

b. Bi-annually

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Islington Council believes that Bi-annually is a reasonable time scale to measure performance and identify trends. At the start of the DRS it may be worth increasing the frequency to quarterly until it has bedded in and there is confidence that the scheme is working.

Q 59. Should enforcement focus on:

a. A sample of producers?

Islington Council believes that a sample is probably the most efficient way of using the resources available and attention could be focused on specific producers depending on their performance or other factors as appropriate.

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

Yes

Islington Council suggests that the environment agency might set penalties, if it is not the regulatory body.

Fraud

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

Islington Council suggests that where there are manual take back systems there may be a risk of fraud as items may not be accurately recorded. Also with the labelling system there could be forgeries with fake labels.

Q 62. Which labelling/markings on drinks containers in scope would best protect against fraud?

Please select all that apply:

Islington Council suggests the following:

Deposit value amount

Marking indicating inclusion in DRS

Existing product barcode (containing DRS information when scanned)

Barcodes seem an established method of categorising items and could be used to securely identify the item as in-scope or not.

It would be beneficial to include the deposit value so there is no ambiguity about the redemption cost, although if there is a widely known, uniform deposit value, this may not be necessary.

Q 63. How could return via reverse vending machines (RVMs) best be protected against fraud?

Islington Council suggests that a bar code reader could identify the item and identify if it is in-scope or not.

Q. 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.

No comment.

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Q 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)?

Not applicable.

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

'All-in' option

Q 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

Islington Council believes that they would be suitable to be part of the manual return point scheme but is there another mechanism of returning them via the company that delivers the original product to the customer e.g. brewery, water cooler supplier? They would probably not fit in a RVM. They are items that would be unlikely to be littered.

Q 67. If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?

Islington Council suggests this would depend on the RVM technology being used and what could practically be accommodated.

Containers larger than 3 litres are not very common, unlikely to be littered and may be a problem for the reverse vending machines and smaller return points.

'On-the-go' option

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

No

Containers of 750ml should be included (wine bottles, for example) as well as larger bottles up to 1 litre, which are often consumed on the go.

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

No

Islington Council believes multipacks should not be excluded. These are often purchased for consumption in outdoor social gatherings and routinely littered.

Multi packs are split into individual parts when consumed and disposed of so they should form part of the DRS.

Q 70. Based on the information above, and where relevant with reference to the associated costs and benefits outlined in our [impact assessment](#) (summarised below), which is your preferred DRS option?

Islington Council supports the 'All-in' approach.

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

This would send a far clearer and stronger behaviour change message to consumers and result in far greater quantities of good quality material being collected for recycling.

The all-in scheme shows the most benefits although there are some concerns about the robustness of the commercial data and the dis-amenity calculations based on the attitudes of the public rather than hard facts. Given the scales of the costs involved there is some concern about the level of investment.

Impact Assessment

Outcome

Q 71. Do you agree with our impact assessment?

Yes

Islington Council believes it appears to be logical however we have some concerns about the gaps in the commercial data and the calculations of the dis-amenity of litter savings in particular. We are concerned that the dis-amenity figure may be an over-estimate - it is based on the attitudes of the people approached in the survey.

Q 72. Do you think more data is needed? If yes, please state where.

Yes

Islington Council suggests that, as mentioned previously there are gaps in the commercial data but not sure if there is any way to cover this as it's a wider issue not just for this impact assessment. It would be useful to see the overview of how the current consultations interlink especially between the DRS, EPR and collection consistency.

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

Unsure

Q 74. Do you have further comments on our impact assessment? Please be specific.

None

Q 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

No

Q 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?

No

Islington Council supports an all in roll out should be implement from the start. Manufacturers may decide to produce 751ml bottles or slightly more to avoid the deposit.

Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Various collection points will not be able to cope with the all in method so it is prudent to roll out to locations that can cope with everything from the outset rather than disrupt the system after a few years.

It will also be easier to communicate the scheme if it is all in. It will ensure that the maximum amount of material can be recovered.

Outcomes of what we are hoping to achieve

If introduced, we anticipate that a DRS will help us to achieve the following outcomes:

- **Reduction in litter and litter disamenity**
- **More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'**
- **Higher quality recycling**
- **Greater domestic reprocessing capacity through providing a stable and high quality supply of recyclable waste materials**

Q 77. Do you think a DRS would help us to achieve these outcomes? Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

a. Reduction in litter and litter disamenity (include expected % decrease where possible)

Yes

Islington Council believes that based on the evidence in the Eunomia Impact on Local Authority report 2017 there should be cost savings from litter reduction if a DRS is introduced.

b. More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'

Yes

Islington Council believes that people will have more options to recycle and directly benefit from taking back their drink containers.

c. Higher quality recycling

Yes

Islington Council believes that items for recycling will be cleaner this way although we are not sure if liquids in drinks containers can be detected by the RVMs and whether they will cause problems if they are accepted by the machine.

d. Greater domestic reprocessing capacity through providing a stable and high- quality supply of recyclable waste materials

Yes

This makes sense in principle.

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

Yes



Islington's response to the Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

Alternative approaches

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

Alternative schemes such as incentives schemes have been extensively researched by DEFRA and others and found not to have sustained success or be financially sustainable. The package of measures proposed in the DRS, PRS and consistency consultations are our preferred way forward.

How will we know when we've been successful?

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

No.

Statutory local authority recycling targets in Wales

We have not answered questions 81-84 which are applicable to Wales.

Q 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?

Not applicable.

Q 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).

Not applicable.

Q 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).

Not applicable.

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).

Design of drinks containers

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

Varying producer fees that reflect the environmental cost of the products that producers are placing on the market

Yes

An additional producer fee for producers using unnecessary and/or difficult to recycle packaging

Yes

Islington Council suggests you could include a RAG status on the labelling as to how 'recyclable' a product is based on value and ease such as red for cartons, green for aluminium cans.

Q 86. Who should be involved in informing and advising on the environmental cost of products?

Select all that apply

- a. Government** yes
- b. Reprocessors** yes
- c. Producers** yes
- d. Local Authorities** yes
- e. Waste management companies** yes
- f. Other (please specify)**

Advice should be obtained from all parties to be able to arrive at the final environmental cost.

[DRS and other waste legislation](#)

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

Agree

Q 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.

No.

Q 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?

We have no additional comments.

