

Response: Introducing a Deposit Return Scheme in England, Wales and Northern Ireland



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About the District Councils' Network

The District Councils' Network (DCN) is a cross-party member led network of 183 councils. We are a Special Interest Group of the Local Government Association (LGA), and provide a single voice for district services within the Local Government Association.

District councils in England deliver 86 out of 137 essential local government services to over 22 million people - 40% of the population - and cover 68% of the country by area.

District councils have a proven track record of building better lives and stronger economies in the areas that they serve. Districts protect and enhance quality of life by safeguarding our environment, promoting public health and leisure, whilst creating attractive places to live, raise families and build a stronger economy. By tackling homelessness and promoting wellbeing, district councils ensure no one gets left behind by addressing the complex needs of today whilst attempting to prevent the social problems of tomorrow.

Response from the District Councils' Network

Key Messages

The DCN supports the aim of increasing recycling rates and quality, and the wider ambitions of the Resources and Waste Strategy. Districts are committed to a net zero sustainable future and are leading the way in these efforts. We also appreciate the aims of a Deposit Return Scheme; particularly when focussed on-the-go items.

We wish to first highlight our general concerns in regard to the full waste reforms proposed in these consultations. Chiefly, district members' position that waste collections remain a matter for local determination. Districts know their localities intimately and the challenges and efficiencies that are involved in waste collections within them. Local services have been developed to best deal with local geographies and housing type for reasons that cannot be captured in a mandated methodology, particularly in our highly rural districts. Waste cannot exist as a singular universal service and must be designed around local need.

The DCN also serves to underline district councils' role in championing and supporting our local small and medium-sized businesses. As such we have serious concerns about this scheme being another potential burden on smaller businesses at a time following the Covid-19 pandemic when it's clear that it is support for business that's most needed from government.

In addition, the Covid-19 pandemic has caused marked change in many people's consumer behaviour, and the pandemic has had severe economic impacts for a great many people.

We would therefore suggest that more time should be given to thoroughly consider scheme proposals, and a later implementation might be preferable as a result.

We also have concerns that the technological support needed to analyse waste, and sort DRS from EPR items is not currently in place or consistent across authorities. We would therefore suggest that a longer implementation timeline would be preferable. We would also venture that the need to consider quantities of DRS items in kerbside waste streams would be an indicator that the scheme is potentially superfluous. Given that the EPR scheme and consistency reforms will be increasing the quality of kerbside recycling, and it's clear that DRS will accept kerbside items, there is surely a question as to the value of such a scheme.

This issue may be exacerbated further as a result of the pandemic as many people may not wish to return items to return points in person. We would suggest the benefits of a scheme may be limited to diverting on-the-go items from litter, given that kerbside recycling is an easier and less complex method for both residents and authorities, and that DRS does not serve to minimise waste or push items further up the waste hierarchy. It does though have a potentially valuable impact on litter problems, and this would again suggest that an on-the-go scheme would be preferable.

The DCN's full responses to the consultation questions are below

(As questions 1-4 reflect organisational details only, they are not repeated here)

5. Would you like your response to be confidential?

No

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 or drinks containers in 2024?

Neither support nor oppose

Please elaborate on your answer if you wish.

In theory the DCN support's the implementation of a deposit return scheme for on-the-go containers. However, we also recognise the change in consumer behaviour that has been accelerated by the Covid-19 pandemic, for example the transition of families' weekly shops to online services. There are therefore concerns over the potential impacts of a scheme on small business return points in our districts, particularly in rural locations, if consumers ordering online then bulk return at local shops. There should now be greater emphasis and further consideration on those options outlined below, whereby supermarket online delivery services offer a return system for in-scope containers, and such proposals should certainly be taken forward.

As champions of local economies, district councils are concerned about the implications of proposals for small and medium businesses and the potential burdens the scheme will place on them. These burdens being in terms of both the impacts of businesses operating as return points, and the potential a scheme could have in driving consumers away. The pandemic has been a challenging time for businesses and they need stability and as much government support as possible.

We're also concerned about the potential economic impacts of such a scheme on residents, who will face greater upfront costs for products, despite potentially having deposits returned, with the additional burden of physically returning items. At a time when many people have faced increased hardship because of the pandemic the appropriateness of implementing this scheme should be considered.

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

a.) Yes, a detrimental impact

b.) No, there will be no impact

We would refer you to responses from individual districts and Waste Collection Authorities.

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

c) Yes – because of both economic and social impacts

As stated in the answer to Question 6 the DCN's views towards implementation of a deposit return scheme have changed due to the changing nature of consumer behaviour as a result of the Covid-19 pandemic. We are also concerned about the implications for small and medium businesses as this scheme represents a potential burden on them at a point where they are struggling and need as much government support as possible.

9. Do you agree that the cap should be included as part of the deposit item in a deposit return scheme for:

a) Plastic bottle caps on plastic bottles – yes

b) Aluminium bottle caps on glass bottles – no

c) Corks in glass bottles – no

d) Foil on the top of a can / bottle or used to preserve some drinks – no

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

No

Please elaborate on your answer.

There is an argument that a general con applying to both options is that the scheme does not really contribute to a more circular approach. We already have an effective recycling system via kerbside that is about to be reformed to be even more efficient and effective. The DRS will not push items up the waste hierarchy and could cause further confusion amidst a raft of reforms. In addition, it adds a new collection system, a motivation for consumers to make further trips to shops, and layer of bureaucracy that could potentially have a negative impact in terms of carbon emissions.

Crucially, the last con listed under 'all-in' should also be considered further as the potential for confusion on the part of the consumer is greater with an 'all-in' system, particularly when one considers the consistency reforms also being implemented. Community engagement campaigns on consistency will be further complicated by this, at a time when clarity on what should be put into which waste stream will be key to success. We cannot stress enough the importance of this clarity of message when it comes to engaging residents.

One con that should be elaborated on for the 'all-in' scheme is the effect of removing greater valuable material from kerbside. This will also have a knock-on effect for both collection and disposal authorities when it comes to negotiating contracts and make these more expensive; this is not currently sufficiently recognised within the consultation. This is also particularly worth consideration given the additional costs that will need to be met for collection authorities to meet the requirements of the full resources and waste reforms.

Although there is reference to the fact that consideration will be given to the impact of local authorities dealing with items that enter kerbside waste streams, we would emphasise that any proposals to sort and return items to the Deposit Management Organisation need to be reconsidered. We would stress that the infrastructure required to do this across the country will not be in place by 2024.

One further con to an on-the-go approach is the potential impact to smaller retailers that typically sell on-the-go containers. Such a scheme could push consumers to larger supermarkets to purchase multipack/larger items not subject to deposit. As district councils champion the small businesses within our boundaries, we would be wary of such an impact.

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.

No

Please elaborate on your answer.

It is not foreseen that this would create significant issues, particularly given that the absence or presence of an all-in scheme will primarily affect residents of the given home country, who will naturally become accustomed to the system put in place where they live.

Since the devolution of powers many more affecting differentiations have been witnessed between home countries, as the approaches to the Covid-19 pandemic has demonstrated. This has included previous different approaches to resources and waste, such as the earlier introduction of carrier bag charges in Wales, which did not cause serious friction between countries.

Finally, it is worth remembering that recycling waste collection practices have differed across many authorities within the entire country and this has caused minimal issues for the population.

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?

b) on-the-go

Please elaborate on your answer.

The DCN considers 'on-the-go' as the best option as the rationale for this is clear, primarily the effect it could have in reducing littering of these items and the incentive it provides to recycle. It is also the easier option to implement, at a time when reforms to waste collection will be great and uncertainty will be high. Changes to kerbside sorting alone will require clear and straightforward messaging to be successful.

These proposed changes to kerbside sorting are aimed at making this system more efficient and effective, indeed it already achieves a good recycling rate nationally. We therefore fail to see the merit in expanding a Deposit Return Scheme to 'all in' when we already have a system in place to recycle household drinks containers that is also being overhauled. A Deposit Return Scheme will not create a more circular system and it will not move items up the waste hierarchy; we therefore do not see the benefits of an 'all-in' system as preferable to the current recyclable waste collections in place.

We also have great concerns over the potential impact on waste authorities of an 'all-in' scheme. The scale of the removal of valuable items from kerbside collections is greater, which will not only affect authorities directly but will have knock-on consequences regarding the costs of agreements with contractors. This is perhaps particularly pertinent for collection authorities given the large additional costs and new burdens entailed in the waste reforms that will not be mitigated by savings on the disposal side.

It is also the case that the technological support needed to sort DRS items from waste covered by EPR is not currently in place or consistent across authorities, and this issue will only be amplified by an 'all-in' system.

Finally, a Deposit Return Scheme will have implications for the small businesses within our districts. The impacts on display space in smaller shops, to accommodate return machines, as well as the environmental health implications of returns need to be fully considered, and these issues are exacerbated by an 'all-in' scheme. These businesses need careful and considered support as we begin the recovery from the pandemic, not potential additional burdens. We would again cite changing consumer behaviour as a result of the pandemic, namely the ever-increasing use of online grocery services, the implications of which should be fully considered before taking forward an 'all-in' scheme.

13. Given the impact Covid-19 has had on the economy, on businesses and consumers, and on everyday life, do you believe an on-the-go scheme would be less disruptive to consumers?

Yes

14. 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

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

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

Yes

18. Do you agree with the proposed list of materials to be included in scope?

No

We suggest that glass should be excluded as comingling into DRS return points reduces the quality both of glass and of the other returned materials. It would be preferable to direct these items to glass banks which are already available.

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

Yes / No

We would refer you to responses from individual districts and Waste Collection Authorities.

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

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

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

a) 80%

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

Yes

Please provide any evidence to support your answer

Ultimately the same targets would likely be met given the reforms to collections and the introduction of EPR. The items that would be in-scope as part of an 'all-in' scheme will as likely be collected and recycled as part of an improved kerbside collection service. However, in our opinion 90% is not a realistic or reasonable target in any scenario.

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, and what would be the implications of these obligations?

a) The producer/importer

b) The retailer

c) Both the producer/importer and retailer

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

c) 7 – 10 years

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

Yes

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

The process does not seem to adequately cover issues relevant to Local Authorities as present. This would include:

-outlining preferred methodology and considerations for ensuring payment of costs to Local Authorities for DRS items that are placed into kerbside streams

-consideration of the difficulties and challenges faced by authorities in the sorting of DRS items from waste covered under EPR, as well as specific fraud implications for items entered in kerbside.

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

Yes

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

Again, matters that are relevant to Local Authorities are not covered. Including-

-Assessing the speed and efficiency of payment flows between the Deposit Management Organisation and Local Authorities or the EPR Scheme Administrator.

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

Yes / No

We would refer you to responses from individual districts

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

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

- Drinks containers placed on the market

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

Yes

Please explain your answer.

It is problematic in the sense that it is a clear indication of a failure of the scheme. However if there are a high level of unredeemed deposits then it would be appropriate for Deposit Management Organisation put these funds towards improvements in the system, and this should mitigate problems. This would include the technological support needed to sort DRS from EPR waste as this is not currently in place or consistent across authorities. This would go a long way to ensuring that the two schemes can coexist efficiently together.

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

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?

Unintended consequences could be safeguarded against by ensuring that the efficiency of the scheme and of the Deposit Management Organisation is adequately assessed.

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

- a) 25% of net costs
- b) 33% of net costs
- c) 50% of net costs
- d) Other

We would refer you to responses from individual districts and Waste Collection Authorities.

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

Invested in the scheme/ other environmental causes

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

c.) 20p

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

Yes

If yes, what should be the maximum deposit level set in legislation?

b.) 40p

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?

The best way to ultimately minimise the impact of the scheme on consumers buying multipacks would be to implement an 'on-the-go' only scheme.

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?

We would refer you to responses from individual districts and Waste Collection Authorities.

40. Do you agree that all retailers selling in-scope drinks containers should be obligated to host a return point, whether it is an all-in or on-the-go deposit return scheme?

No

Please provide any evidence to further explain your answer.

The DCN would be wary of introducing a blanket policy on this, particularly given the varied impacts that could be seen at smaller retailers as a result. District councils are champions of their local economies and this will continue to be a period of great uncertainty for smaller retailers given the impacts of Covid-19. There is already pressure on space within smaller shops and requiring them to potentially give up significant display space is an undue pressure on our local businesses.

There are also questions to be answered on how payments will work for retailers and what the processes will be for them to obtain fees. Administrative burdens on smaller retailers should be minimised.

There are further unanswered questions as to the impacts that return points will have on environmental health standards, given the nature of the items that will be returned. Greater clarity on these issues are needed to provide assurances to smaller businesses.

We therefore believe that methods to ensure adequate coverage of return points, without a need to obligate every retailer to host a return point should be thoroughly considered, and that certainly the exemptions considered within this consultation should be implemented. As with many elements of all reforms in the Strategy, the DCN believes that local context should always be considered.

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

There is potential that delays could arise in returning containers. This may particularly be the case in rural locations where return points are limited. This would be exacerbated by changing consumer behaviour with a large portion of the population now relying on online grocery deliveries, which could then see subsequent pressure being placed on return points in rural locations. We therefore suggest that a return service operated by online delivery companies should certainly be investigated further.

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

The DCN's preference would be Option 2.

As stated elsewhere we feel that that pandemic has caused a marked change in consumer behaviour and has resulted in more consumers opting for regular online grocery deliveries. It therefore makes sense for such services run by supermarkets to offer a takeback service given the logistics already in place to make deliveries. This would also limit pressure on return points, particularly in rural areas which would otherwise have to potentially cope with the bulk of returns from these online purchases. Option 2 would ensure this without unduly burdening smaller retailers and restaurants who should be exempt. Not only is the impact of their transactions smaller than that of larger retailers and therefore returns could be absorbed locally, but the complexities of takeaways and other businesses offering a takeback service is not feasible and likely not environmentally friendly.

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

Yes

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

These exemptions are eminently sensible and should be confirmed. They would aid in providing assurances to the concerns raised in our answer to Question 39.

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?

We would refer you to responses from individual districts and Waste Collection Authorities.

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?

Yes

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

a.) Signage to demonstrate they don't host a return point;

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

Please explain your answer.

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

c.) 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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

52. Do you think a digital deposit return scheme could ensure the same level of material quality in the returns compared to a traditional 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

We would refer you to responses from individual districts and Waste Collection Authorities.

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 answer.

We would refer you to responses from individual districts and Waste Collection Authorities.

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?

No

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

We do not believe that there should not be a new permitted development right on principle, given that they remove power from districts to shape their local areas, and do not take local context into account.

However, if a permitted development right is inevitable the we would suggest sensible parameters would include:

- Exclusion of conservation areas
- The potential negative impact on the setting of listed buildings
- Ensuring disability access surrounding placement.
- A condition requiring redundant machines to be removed if no longer of use.

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

Yes

a) an identification marker that can be read by reverse vending machines and manual handling scanners.

b) a mark to identify the product as part of a deposit return scheme.

c) 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?

We would refer you to responses from individual districts and Waste Collection Authorities.

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

Yes

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

No

62. Will your processes change as a result of mandatory labelling? Yes/ No/ Don't know. Please explain your answer.

We would refer you to responses from individual districts and Waste Collection Authorities.

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

Don't know

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

No

Please explain your answer

This would not be possible by the time of scheme implementation in 2024 as we are aware that the technological support needed to sort DRS from EPR waste is not currently in place or consistent across authorities. It is highly unlikely that this could be resolved within the necessary timeframe.

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?

We would refer you to responses from individual districts and Waste Collection Authorities.

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?

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would suggest that this option would be very difficult to administer given the need to have robust compositional analysis in place. Many authorities do not undertake such analysis, and many have not done so for some time. To expect all authorities to provide the analysis needed, in time for the 2024 implementation of the scheme, and alongside the other huge changes to working and infrastructure resulting from related reforms, is not feasible.

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?

b. Option 2

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

This Option would be the least complex and difficult to administer than the other two options. However, we would note that all are complex and place a huge burden on authorities regarding compositional analysis. We are aware that many districts within our membership share these concerns and have doubts on whether the issues of sorting DRS and EPR can easily be solved. This again raises the question of the value of introducing two schemes that are essentially achieving the same thing, the increased recycling of these items.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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.

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

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

We would refer you to responses from individual districts and Waste Collection Authorities.

74. Do you agree with the position set out regarding enforcement response options? If not, please expand your answer.

75. Do you have any comments on the delivery timeline for the deposit return scheme? Please pose any views on implementation steps missing from the above?

The DCN's primary comment on the timeline is that it does not allow enough time for the development of the technological support needed for Local Authorities to sort waste, and the data analysis needed to claim payment for the items that are put into kerbside waste streams. This will be an area of great concern given that it has the potential to create more disturbance and uncertainty around systems that will already be greatly reformed due to the proposals in the other design consultations taking place. We therefore believe that this should be highlighted within the delivery timeline.

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? Please provide evidence to support your answer.

c.) 18 months

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?

Implementation of an 'on-the-go' scheme would not completely solve the concerns that we have over the implementation timeline but it would likely greatly lessen the impact on Local Authorities in regard to the amount of waste that would need to be sorted and analysed as part of the DRS and therefore would be more feasible to implement.

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

No

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

As stated throughout this submission we have concerns over the feasibility and timeline of implementation of all the reforms taken together within the three recent service design consultations. We therefore would appreciate an assessment that focused on the interplay between these reforms further, rather than one considering DRS individually.