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By email to: DRS@defra.gov.uk

Dear Sir/Madam

Ref: Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

North London Waste Authority (NLWA) is pleased to have the opportunity to respond to the Government's consultation on introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland.

NLWA is the joint waste disposal authority for north London established by the Waste Regulation and Disposal (Authorities) Order 1985. As a joint waste disposal authority NLWA is responsible for the disposal of waste collected from over two million households and local businesses by seven north London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. NLWA manages the residual waste from all seven boroughs, recyclable and compostable waste from six boroughs and all the north London reuse and recycling centres except in one borough. NLWA also delivers extensive behaviour-change campaigns in the fields of waste prevention and recycling.

Although we have some concerns about the robustness of the commercial data and the dis-amenity calculations included within the consultation information, in principle we support the introduction of a DRS. It makes environmental and economic sense based on the evidence provided to capture resources in this way and provide a direct incentive to stakeholders to maximise the quality and quantity of recycling collected. Deposit return schemes work well elsewhere across the world and would provide a valuable new impetus to recycling here. An 'all-in' scheme shows the most benefits and would provide most consistency for users so is our preferred approach.

The response is submitted by the North London Waste Authority. The seven collection authorities in the NLWA area – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest will also be submitting responses to the consultation. Individual borough views may vary from the points made in the NLWA response here.

If you have any questions about our response then please do not hesitate to contact me via the

officer email below.

Yours faithfully

Cllr. Clyde Loakes
Chair, North London Waste Authority

Consultation on introducing a Deposit Return Scheme in England, Wales and Northern Ireland

About you

1. **Would you like your response to be confidential?**

No

2. **What is your name?** Cllr Clyde Loakes

3. **What is your email address?** Please email Barbara.Herridge@nlwa.gov.uk

4. **Please provide information about the organisation/business you represent.**

Type of organisation - **Local Government**

Name – **North London Waste Authority (NLWA)**

Approximate number of staff in your organisation? **We serve over 2 million north London residents with a team of 28**

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

NLWA is the joint waste disposal authority for north London established by the Waste Regulation and Disposal (Authorities) Order 1985. As a joint waste disposal authority NLWA is responsible for the disposal of waste collected from households and local businesses by seven north London boroughs – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest, the 'constituent boroughs'. NLWA manages the residual waste from all seven boroughs, recyclable and compostable waste from six boroughs and all the north London reuse and recycling centres except in one borough. NLWA also delivers extensive behaviour-change campaigns in the fields of waste prevention and recycling.

Whilst we have reviewed all the consultation questions, we have confined our comments to the elements of the consultation that are relevant to a waste disposal authority in the capital.

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

Not directly although an NLWA officer is on the Board of ACR+ (Association of Cities and Regions for Sustainable Resource Management) which has recently commissioned a piece of research into DRS schemes across Europe. The report is available at: <http://www.acrplus.org/en/news/news-from-our-members/1596-reloop-global-overview-of-deposit-return-systems-2018>

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

Basic principles for a DRS

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

Yes

It makes environmental and economic sense based on the evidence provided to capture resources in this way and provide a direct incentive to stakeholders to maximise the quality and quantity of recycling collected.

Proposed models for a DRS system

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

- a. PET bottles

Yes

Many drinks containers are made of PET and it has a value in the commodities market. 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

There is a value for this material and it is widely used for drinks containers. 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

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

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

Glass is easily recyclable and widely available. 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.

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

- a. Cartons e.g.

Tetrapack

No

Cartons do not currently have a value and are notoriously difficult to recycle due to their multi material composition. However, they are widely used and so could be considered for the DRS at a later stage.

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

No

The recycling market for these items is limited at best if they exist at all.

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?

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

The details of this are unclear as there are a number of potential changes that would need to be made to facilitate this such as redesigning the bottles and having washing facilities. Would separation into different colours be required as was previously the case and what are the additional financial and environmental impacts of making these changes?

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

a. Water **Yes**

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**

Soft drinks are provided in the target containers for a DRS and will contribute to the recycling targets to be met.

c. Juices (fruit and vegetable) **Yes**

Soft drinks are provided in the target containers for a DRS and will contribute to the recycling targets to be met.

d. Alcoholic drinks **Yes (all)**

It meets the criteria of the DRS and many alcoholic drinks are in aluminium cans or bottles both of which can contribute financially and by weight to the DRS targets.

e. Milk containing drinks **Yes (all)**

The DRS should be as inclusive as possible to keep costs down so any drink types should be considered for the scheme.

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

The DRS should be as inclusive as possible to keep costs down so any drink types should be considered for the scheme.

g. Milk Yes

For consistency and as a drink milk should be included in the DRS but not for milk bottles that are still delivered by the milkman and returned for rebottling. As an incentive of true recycling perhaps they can also be rewarded indirectly?

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

It would be good to include disposable cups but practically it is difficult as they are made from so many different materials and often contaminate other recyclables. Recycling 'on the go' bins are regularly contaminated by the contents of disposable cups. It is a product that could be considered at a later date.

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

Yes

The material flows in the diagram are as expected.

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

I neither agree nor disagree

In principle this looks reasonable. It would be useful to have more information about the handling costs and, who would pay for these? What about the financial flows for unsold / past sell by date of products wastage and deposit reimbursements?

Overlap with the packaging producer responsibility system

16. Should producers obligated under a DRS be:

a. Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items?

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

c. Other (please explain)

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

Yes

It would make sense for it to be one scheme or the other but not both as this could cause confusion and possible duplication.

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.

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

Deposit Management Organisation (DMO)

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

Yes

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.

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

Yes

The DMO has the strategic overview and tools to hand to affect performance against targets so makes sense that they should be accountable. Everyone in the chain should be incentivised to achieve targets.

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

Yes

Agree this should be the case if there is a deficit in the system.

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

Deposits could be used to increase awareness or make the scheme more accessible where there is poor coverage. If the money were to go to Government it should be put towards supporting the local authorities.

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

As above.

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)?
- 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)

All of the bodies mentioned above should be included on the management board. We also consider that it is important to have representation on the DMO from the Local Government Association (LGA). It would also be useful to have a representative from one of the consumer groups such as the National Consumer Federation or Which? as well as further Local Authority representation such as from LARAC.

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

Yes

As the DRS is an initiative proposed by the Government, they should ensure that the scheme is set up as intended but not necessarily the running of it.

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

Agree with this proposal but 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

It would make sense for the DMO to set this as they will have an overview of the whole scheme although the mechanics of this are not clear.

- 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

Agree with this approach as long as the administration of the DRS is not too onerous.

- d. Set and distribute the handling fees for return points **Yes**

The DMO will have an overview of the whole system so are in the best position to manage the fees relating to all aspects of the system.

- 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

Yes

Agree that the DMO should be responsible for return provisions but there may be areas and circumstances where this is not possible especially in rural and densely populated urban areas.

- g. Own the material returned by consumers **Yes**

Based on the design of the proposed DRS, this seems a necessary measure for the scheme to work as the costs are transferred around the system.

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

Yes

We generally agree but we should look at existing transportation/collection infrastructure to optimise these rather than relying on a new resource. Use of supermarket delivery vans, UPS, reverse logistics etc., as long as material quality is not compromised.

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

Yes

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

The DMO should have overall responsibility but depending on how the scheme is set up it may be appropriate to delegate this to some of the other members of the scheme.

- k. Measure and report recycling rates to government

Yes

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

The scheme will not work unless there is buy in from consumers and effective communications will be essential in supporting this behaviour change.

Producers

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

Yes

This definition makes sense in the context of the EPR consultation.

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

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.

28. Should a de minimis be based on:

- a. Number of employees

- 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

It is proposed that initially this could be in line with the plastic bag tax and apply to organisations of more than 250FT employees.

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

After drinks container materials collected through a DRS are 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.

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

Agree with this and would also request whether the DRS could contribute to the local authorities implementing the mandated kerbside collections?

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

Yes

It makes sense for the DMO to coordinate the infrastructure implementation to keep the administration and costs down as much as possible.

Operational costs

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

Yes

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

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

- a. Retailers who sell drinks containers in scope
- b. Transport hubs
- c. Leisure centres

- d. Event venues
- e. None of these
- f. Other (please specify)

Agree 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

34. What might the impacts be on those hosting:

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

The machines used seem large so 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 flytips.

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

There may be storage issues for smaller businesses like corner shops and problems if any failures with the collection service.

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

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.

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

For smaller businesses hosting a take back scheme may be an unreasonable burden depending their available storage space, staffing levels and location.

37. Should a de minimis be based on:

- a. Floor size
 - i. If yes, what floor size?
- c. Sales figures for drinks in scope
 - ii. If yes, what figure?
- d. Number of employees
 - iii. If yes, how many employees?
- e. None of these
- f. **Other (please specify)**

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

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?

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

The possibility of using 'on street' bring sites could be considered as they are often in convenient locations.

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?

This could be covered by the local authority kerbside services where assisted collections are usually provided. Additional financial contributions towards this would need to be factored in.

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?

Consideration should be given to locating RVMs at local community hubs such as village halls and pubs if appropriate. Also consider use of the existing local authority collection services. Possible financial contributions towards this may be necessary.

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?

All local authority household waste recycling centres (HWRCs) or reuse and recycling centres as they are termed in north London, and town centres should accommodate DRS infrastructure. However there would need to be further evaluation as there may be planning and other practical considerations, particularly in busy town centres and for example if a power supply is needed.

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

Yes

If on line retailers are not included it may create a loophole and cause other retailers to sell more through that outlet. Online supermarket shopping is popular and increasing so it makes sense to include it in the DRS so the scheme is more equitable.

44. 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

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

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

Yes

These types of businesses usually have frequent delivery and return systems in place so would make sense to be included in the DRS.

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

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.

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

We are unclear if retailers or organisers of sporting events such as large running events like will be obligated under the DRS and will therefore need to provide return points. Similarly, venues such as sports centres or railway stations which have vending machines for obligated drinks containers.

On-trade Sales

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

We agree with the example provided that businesses pay the deposit and then they decide locally what the redemption method will be as long as it is not too much of a burden.

The deposit

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

It should be high enough to affect behaviour change and cover the costs of the scheme. Given that glass bottle deposit schemes in 1970 were 10p a bottle, then (based on inflation) they should be at least 30p.

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

Yes

This appears to be the most straight forward approach although there might need to be some flexibility if target materials are not meeting the required recycling rate

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

No

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

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 to donate deposit to charity
- f. Other (please state)
- g. None of the above

All the above options should be considered. Because of peoples' differing circumstances there should be flexibility in the way people can redeem the deposits.

Sending material on for recycling and data recording

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

Yes

This will be necessary for assessing performance against targets and for managing the income from the materials.

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

For many reasons 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

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

Is there already something similar for the packaging producer compliance scheme that could be adapted or used for this purpose? It would be better to use a proven system if such a thing already exists.

Auditing whichever system is implemented would help provide confidence and transparency in the scheme.

Monitoring and enforcement

The DMO

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

The Environment Agency are already the inspection / enforcement agency for most waste and recycling activities so it would make sense for them to fulfil this role.

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

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.

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

Bi-annually

Ideally bi-annually but this could be very resource intensive so annually is probably more realistic unless only a certain percentage of the producers is audited at any one time.

59. Should enforcement focus on:

- a. A sample of producers?**
- b. All producers?

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.

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

Yes

Or the environment agencies if they end up not being the regulatory bodies.

Fraud

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

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.

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

Please select all that apply:

- a. Deposit value amount**
- b. Marking indicating inclusion in DRS**
- c. Existing product barcode (containing DRS information when scanned)**
- d. Other (please specify)
- e. None of the above

Barcodes seem an established method of categorising items but not sure how fool proof they would be for this purpose. It would be beneficial to include the deposit value so there is no ambiguity about the redemption cost.

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.

This technology is not used much in the UK so not aware of how it currently works but it should be robust and as tamper proof as possible and in or within close proximity of retail outlets. Evidence of transactions from deposit point to handling plants and reprocessors and income should all be recorded and provided to the DMO.

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.

If bar codes are used, scan all items on receipt at the drop off points and ensure they have the correct DRS labelling to demonstrate they are part of the scheme.

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)?

Unsure

DRS Options – ‘all-in’ and ‘on-the-go’

‘All-in’ option

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

We generally agree with all size drinks containers being in the DRS but for the items mentioned above there are already generally take-back schemes in place and they would also have to be handled manually as they would not fit in the reverse vending machines. These are also items that are unlikely to be littered.

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

> **4 Litres**

> 5 Litres

Other

There should be no maximum size cut-off

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

‘On-the-go’ option

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

No

It is true that the majority of drinks containers are 750 ml although 1,000 ml containers are sometimes used so should also be included.

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

No

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

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?

All-in

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 nervousness about the level of investment.

Summary of approach to Impact Assessment

71. Do you agree with our impact assessment?

Yes

Generally, we agree with the impact assessment, but 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.

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

Yes

As mentioned previously there are gaps in the commercial data but we are not sure if there is any way to cover this, because data gaps are a wider issue not just confined to this impact assessment. It would be useful to see the overview of how the 4 current consultation and how they interlink especially between the DRS, EPR and collection consistency.

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

Unsure

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

None

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

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

This approach was considered but thought to be too complicated so prefer the 'all in option' from the outset.

Outcomes of what we are hoping to achieve

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

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

People will have more options to recycle and directly benefit from taking back their drink containers.

- c. Higher quality recycling

Yes

Items will be cleaner recycled this way although not sure if liquids in drinks containers can be detected by the RVMs and if 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.

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

Yes

If it performs as the impact assessment suggests.

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

Other (please state)

There are other more punitive systems such as compulsory recycling and incentive schemes such as local Green points which if introduced may achieve similar results if considered as an option.

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

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

Alternative options would need to be explored with the same impact assessments which have been undertaken for this consultation.

Statutory local authority recycling targets in Wales

We are not proposing to answer the following questions 81-84 which are applicable to Wales.

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?

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).

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).

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

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

- a. Varying producer fees that reflect the environmental cost of the products that producers are placing on the market
- b. An additional producer fee for producers using unnecessary and/or difficult to recycle packaging
- c. Other (please specify)**
- d. None of the above

Possibly 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 alu cans.

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

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

This should be the responsibility of all stakeholders in the DRS

DRS and other waste legislation

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

Agree

With new initiatives like this where there isn't a precedent it is necessary to review existing legislation to ensure that existing relevant legislation is updated to reflect any changes and to ensure there are no conflicts with other legislation which affects this scheme.

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.

There is possibly planning legislation that will need to be included in this review.

Further comments

In addition to this consultation, we are also carrying out social research with the public and other analytical research to support our evidence base for decision making.

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. However, please note: This response is submitted by the North London Waste Authority. The seven collection authorities in the NLWA area – Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest will also be submitting responses to the consultation. Individual borough views may vary from the points made in the NLWA response here.