

ENVIRONMENT, CLIMATE CHANGE AND LAND REFORM COMMITTEE**DEPOSIT RETURN SCHEME (THE DEPOSIT AND RETURN SCHEME FOR SCOTLAND REGULATIONS 2020)****SUBMISSION FROM Friends of the Earth Scotland, Thorn House, 5 Rose Street, Edinburgh, EH2 2PR**

In most cases we will publish your written submission on the Scottish Parliament's website. What you send us may also be quoted in the Committee's report or in its Committee meetings. These are public meetings that are also broadcast online.

If you wish to request that your submission be published without your name, please contact the Clerks at the following email address: ecclr_inquiries@parliament.scot.

Before making a submission, please read our privacy notice about submitting your views to a Committee [Privacy Notice](#). This tells you about how we process your personal data.

Submissions that are identical or very similar as part of an organised campaign will be treated as one submission for publication and supporting individuals and organisations will be listed alongside the submission.

Please set out your submission below—

1. **Scope (materials)** – the types of container proposed to be covered and excluded and any specific issues.

Friends of the Earth Scotland would like to see the Deposit Return Scheme include as wide a range of materials as possible from the start, including those already agreed such as PET plastic bottles, glass bottles, aluminium and steel drinks cans. Given that glass is the second most common item, after plastic, that causes marine pollution, we believe it's vital that glass is included in the scheme. Glass is already included in DRS schemes in Denmark, Finland and Germany, and by including it in Scotland's scheme, we will benefit from a reduction in CO2 emissions of 50,000 tonnes each year. We would also like to see the scheme expanded to other plastics as well including materials such as HDPE and cartons, as the exclusion of certain materials could inadvertently provide manufacturers with an incentive to switch to those materials, as well as leading to public confusion. It is also important that the scheme is designed in a way which can deal with new products and materials as they come onto the market.

2. **Scope (retailers)** – implications of the scheme applying to all retailers selling single-use drinks containers, including online retailers, and exclusion of businesses such as pubs and restaurant that sell drinks for on-site consumption.

In order to achieve the highest return rate, it is important that all retailers selling single-use drinks containers are included in the scheme and that customers are able to return drinks containers to any shop, not just the location it was purchased from. The inclusion of online retailers in the scheme will make it essential for those who live in remote locations or who have accessibility issues to participate in the scheme.

3. **Costs and operational impacts** – costs anticipated for your business, service or sector and the appropriateness of the proposed financing model (that the scheme will be funded via unredeemed deposits, revenue from the sale of materials and a producer fee).

4. **Environmental impacts** – whether the proposed scheme will have the desired impact on increasing recycling rates and reducing littering, and how that impact can be maximised. What key environmental risks need to be considered and mitigated? Will the scheme incentivise producers to change or modify materials/packaging?

A Deposit Return Scheme which includes a wide range of materials and allows people to return their drinks containers to any shop will increase recycling rates as this makes it easier for the public to understand and provides people with more opportunity to recycle their containers. DRS will improve the quality of material collected for recycling so allowing other locations to accept containers will also be beneficial as well as further increasing recycling rates and reducing litter. DRS will cut emissions by an average of around 160,000 tonnes of CO₂ each year, which is the equivalent of around 4 million tonnes of CO₂ over 25 years. This will be a crucial step towards reducing our climate emissions especially if we are to meet our target of reducing emissions by 75% by 2030. DRS will also help the public understand the concept of a circular economy which is crucial if we are to tackle our more general overconsumption of resources.

5. **Level of deposit** – implications and appropriateness of a charge being a uniform 20p.

Friends of the Earth Scotland believes that a 20p charge is the minimum acceptable starting price and will increase recycling rates through levels of return without placing too much cost on the consumer, especially those on lower incomes. The scheme should also be set up so that the level of the deposit can be varied easily when necessary.

6. **Consumer and social impacts or risks** – accessibility to consumers and what impacts are anticipated on different groups, including those with disabilities, those without private transport, and those living in rural areas.

Drinks containers should be returned in the way that they were purchased. People in remote areas, with disabilities or without public transport, are more likely to use online retailers which is why it is important that these retailers are included in the scheme. Online retailers are already included in the schemes in Germany and Norway.

7. **Local authorities** – implications of the proposed scheme for local authorities, including impacts on kerbside collections.

One of the benefits of the Deposit Return Scheme is that it will reduce drinks container litter from our streets and countryside. If the scheme is designed and implemented efficiently then it has the potential to save local authorities money in reducing the costs associated with dealing with litter and its effects. Since more material, of greater value, will be collected there is an opportunity for local authorities directly or working in partnership with the community recycling sector to be at the forefront of collecting materials in their area. If there is a move away from employment associated with recycling and litter collection due to DRS, we must ensure there is a just transition to new employment opportunities in those communities.

8. **Timing** - implications of the proposed timeframe (a minimum 12-month implementation period from the passing of legislation).

Given that the Scottish Government has declared a climate emergency, it is vital that the Deposit Return Scheme is implemented as soon as possible as delaying it could be detrimental to meeting our 2030 target of reducing emissions by 75%. While a DRS scheme which is the same across the whole of the UK may be logistically easier, the introduction of a Scottish scheme should not be delayed over the uncertain prospect of a UK-wide scheme.

However, any UK scheme which is introduced at a later date should be consistent with the Scottish scheme to make it easier for the public, industry and retailers.

9. **Governance** – how the scheme should be administered, and appropriateness of the proposal for scheme administrator that is industry-led, privately owned and operated on a not-for-profit basis.

Phase1 of the Full Business Case (FBC) does not demonstrate how the preferred option of a privately-owned, not-for-profit option for the scheme administrator will deliver additional social and economic benefits. The FBC states that the private owners of the scheme administrator would be producers and/or retailers, but it is not clear what conditions companies need to meet in order to be selected. It is also unclear how the ownership by the sector will be secured and there is a question over whether it will be through a selected privately-owned proposal or whether the whole sector have ownership of the administrator. The FBC also sets out a case for an option of a joint public and private sector ownership model and this is our preferred option for the scheme administrator because this creates the best balance between public policy objectives and ownership by the sector.

10. **Broader waste policy context** – will the scheme achieve its intended purpose in isolation, or does its success depend on the performance of broader measures? How should the scheme cooperate with any other proposed schemes in the UK?

The delivery of waste policy should contribute to the Scottish Government's Just Transition agenda. The high-value materials that will be recovered through the DRS should not simply be sold to the highest bidder, the creation of this resource stream should be used to create new reprocessing capacity in Scotland to maximise the employment benefits and minimise the transport emissions resulting from the introduction of the scheme.

11. **Any further issues** or views not falling under the above areas.

In the future, the Deposit Return Scheme will need to deal with a range of new materials which may include plastic substitutions like bioplastics and compostable plastics and we would recommend the Scottish Government approaches these with great caution. These types of plastic do little to solve the problem of plastic pollution and are very misleading for customers who may see them as an eco-friendlier option which may encourage manufacturers to see them as the better solution. However, these types of plastic have different types of biodegradability with many only breaking down in industrial conditions which people do not have access to. Their widespread uptake could also have disastrous land-use consequences, particularly for the developing world. Oxo-degradable plastics should not be used at all which is in line with the EU Single-Use Plastics Directive which includes a ban on all products made of Oxo-degradable plastic.