

ENVIRONMENT, CLIMATE CHANGE AND LAND REFORM COMMITTEE

DEPOSIT RETURN SCHEME (THE DEPOSIT AND RETURN SCHEME FOR SCOTLAND REGULATIONS 2020)

SUBMISSION FROM the Resource Management Association Scotland (RMAS).
The trade association for micro, small and medium sized resource management companies operating in Scotland.

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.

Glass should be excluded from the DRS and we are supportive of the key messages evidenced and issued by British Glass, specifically:

- Recycling DRS for glass will disrupt glass recycling and not achieve a circular economy in Scotland.
- Including glass in the DRS will mean a dramatic increase in costs and inconvenience for consumers.
- Including glass in the Scottish DRS is economically inefficient
- Logistics issues, mechanisms and costs associated with 'soft drop' requirements for the collection of intact glass beverage containers are disproportionate.

RMAS believe that the DRS should be introduced as part of overall EPR reform and should not be introduced in advance of this wider reform, or solely in a Scottish context, but should be part of a UK wide integrated and strategic approach to packaging reform.

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.

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).

The RMAS have specific concerns of the cost/benefit and net carbon impacts of establishing a competing system to the well-established recycling collection and reprocessing infrastructure which has seen significant investment over many years. The impact of the diversion of DRS 'in-scope materials' away from the established collection and reprocessing systems and the resultant impacts on collection configurations, contracts, reprocessing capacity, gate fees, end-markets, the net carbon impacts, job redeployments etc. have not been modelled and/or communicated effectively to the Resource Management Sector. Conflating DRS and mandatory kerbside collections risks both systems under-performing. Cost benefit and proposed carbon reductions remain a significant concern.

The RMAS would like the opportunities to use the existing Resource Management collection and reprocessing infrastructure optimised across Scotland.

Will the RV machines be manufactured in Scotland?

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?

The RMAS believe that similar or better outcomes could be achieved through implementing the reformed EPR for packaging proposals, the Household Recycling Charter to support collection consistency and the move to dual stream collections maximising plastics recovery, coupled with further measures detailed within the National Litter Strategy – 'Towards a Litter Free Scotland: A Strategic Approach to Higher Quality Local Environments. In combination, these should maximise the desired impacts on increasing recycling rates and reducing litter. The revised EPR will provide sustainable funding sources for targeted communications, improved

enforcement activities, improvements in recycling services and infrastructure, and effectively embed environmental impact considerations at the packaging design stage.

Once EPR is implemented DRS could be used to address any gaps in material capture such as 'on the go' packaging or other material that may be more challenging to collect at kerbside, such as textiles and batteries. Concerns remain on the destination of DRS collected material for counting and delivery to material recycling infrastructure. Current proposals appear centralised with the potential to lead to higher carbon impacts than currently proposed. This would also distribute employment opportunities from a DRS scheme. A decentralised counting centre model should be considered.

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

RMAS believe a single deposit of 20p is much easier for consumers to understand, the producer to implement and for the overall ease of scheme operation.

The cumulative impact of this level of impact on lower income households needs to be assessed fully.

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.

The RMAS believe that further evidence is required from other countries where DRS has been introduced where a robust and extensive kerbside collection system already existed. Effective modelling of the implications of the DRS scheme as proposed is essential for the resource management sector to fully prepare for any changes in public participation or reductions in volumes collected in existing recycling systems.

7. Local authorities – implications of the proposed scheme for local authorities, including impacts on kerbside collections. The RMAS consulted with the Waste Managers Network on the response to this question.

The RMAS wish to see the opportunities to use the existing collection and reprocessing infrastructure optimised across Scotland. This needs to be considered in the short and longer terms, it would appear that the opportunities to use existing collection and waste transfer infrastructure are limited (perhaps associated with rural or more difficult to access locations, the administrative requirement and need for materials to be collected intact in some cases), not fully understood, and ultimately the decision of the scheme administrator.

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

The RMAS believe that this is a challenging timeframe to set up the Scheme, develop the infrastructure collection and return mechanisms, and mitigate and manage the impacts on the existing infrastructure,

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.

The RMAS agree that it is appropriate that the scheme administrator is industry-led, privately owned and operated on a not-for-profit basis. However, we believe there should have been consideration given to the Scheme Administrator having representation from the Resource Management Sector, and there should have been more direct and on-going engagement with the Sector to identify and maximise the use of existing Resource Management collection and reprocessing infrastructure across Scotland. Clear outcomes in terms of benefits to the Scottish economy should form part of any Scheme Administrator design.

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 RMAS believe that the DRS should be introduced as part of overall EPR reform and should not be introduced in advance of this wider reform, or solely in a Scottish context, but should be part of a UK wide integrated and strategic approach to packaging reform.

The RMAS believe that introducing a DRS in isolation will create a competing framework for packaging materials with the potential to significantly increase both the cost, complexity and carbon impacts of achieving the desired outcomes.

Once EPR is implemented DRS could be used to address any gaps in material capture such as 'on the go' packaging or other material that may be more challenging to collect at kerbside, such as textiles, batteries and energy efficient lamps.

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

The RMAS believe that the carbon impacts of the existing and proposed new collection and processing options associated with the introduction of DRS should be fully assessed and that the net carbon impacts of the implemented scheme should be subject to on-going monitoring and reporting.