

Deposit Return System Call for Evidence: Britvic Soft Drinks Response

Britvic Soft Drinks welcomes the opportunity to respond to Zero Waste Scotland's call for evidence on the suitability of a deposit return system in Scotland.

Britvic Soft Drinks is one of the leading soft drinks companies in Europe, with manufacturing operations in Great Britain, Ireland and France. We have an enviable portfolio of leading brands, including Robinsons, Fruit Shoot and Tango and have been in partnership with PepsiCo since 1987, bottling and distributing their brands in Great Britain and Ireland.

We are an active member of the Packaging Recycling Group Scotland (PRGS) and strongly believe that a DRS will undermine existing efforts in Scotland to increase recycling and tackle litter. We fully support the PRGS unprecedented alternative proposal to tackle litter and to achieve a beverage container recycling rate of 80% by 2025, exceeding government targets. For more information, and to read its proposals visit www.prgs.org.uk.

Deposit Return System

We recognise that in some small scale scenarios, such as festivals, deposit return systems can be an effective way of reducing litter and improving recycling rates. However, we do not believe such a system is the solution for Scotland and would instead:

- **Undermine kerbside collections, diverting valuable material away from Local Authority waste collections**
 - Effective kerbside collection schemes are considered by many to be the best environmental option in addressing the recycling and recovery of packaging. They focus on a range of materials rather than just certain containers, therefore achieving greater economies of scale.
- **Be inconvenient and confusing for the majority of consumers**
 - Many consumers, particularly those with access to a kerbside collection, would view this as a step backwards, requiring them to queue up to reclaim a deposit on every item of recyclable drinks packaging. There is also potential for confusion with regards to what packaging is within scope, particularly with the scope suggested by Eunomia in their report.
- **Only target a small proportion of litter**
 - Keep Scotland Beautiful has recently conducted a survey on the composition of litter in Scotland. The results show that a piecemeal approach to the issue focusing on just a selection of items will not solve the litter problem. Deposits on drinks containers (cans, bottles and cartons) for example would target only 4.3% of litter. That would leave 95.7% unaffected.
- **Disproportionately increase costs to consumers, manufacturers and retailers**
 - Calculations indicate that the average cost of a soft drinks would go up from 65p to almost £1 (with only 20p of that increase refunded to the consumer). The remainder would be from additional costs passed on to the consumer - including higher production and handling costs and provisions to discourage fraud.

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Eunomia Report

Whilst we welcome the research into the feasibility of a deposit scheme in Scotland, we strongly question the soundness of the conclusions made within '*A Scottish Deposit Return System*' report produced by Eunomia and do not believe it should be used to inform policy.

- The report did not include a cost-benefit analysis, nor did it consult any retailers, local authorities or waste management companies.
- It did consult Reverse Vending Machine, RVM, manufacturer TOMRA which lobbies worldwide for DRS.
- The report includes information about DRS in selected countries but did not assess countries that have carried out impact assessments of DRS and rejected them – Czech Republic, France, Ireland, Poland, Spain and Switzerland.
- It failed to consider A.G. Barr's returnable bottle scheme that still operates today. Current return rate is 54% with a 30p refundable deposit. In contrast and with no supporting evidence, the report predicts return rates of 85-95% with a 10p-20p deposit.

We firmly believe that a Deposit Return System is not the solution to increasing recycling rates and reducing litter. The Government should instead focus on improving the existing kerbside system and work with industry to influence and change consumer behaviour.

As a responsible business, we are constantly striving to reduce our environmental impacts and packaging is an important pillar of our sustainable business strategy. As a Courtauld 3 signatory we consider the materials we use, their use and ultimate disposal and are committed to minimising the impacts wherever possible. We promote recycling to our consumers through the on-pack recycling logo and support behaviour change campaigns such as WRAPs recycle week.