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Your ref.:

Our ref.: DrinksDeposits/ARM/2406  
2015

Dear Ms Parker

### **Call for Evidence, Review of Feasibility Study for Deposit Return System for Drinks Containers**

I refer to the recently published call for evidence relating to the proposed deposit return system for drinks containers- glass, plastic, metal and laminated card (e.g. Tetrapak types).

The City of Edinburgh Council does not propose to submit any specific evidence, but does have some comments.

Two of our staff did attend the recent briefing on this subject, and found it very interesting. This also referred to the publication of a feasibility study for the introduction of a Scottish packaging recovery note (SPRN) scheme to (in part) fund anti-littering initiatives and recycling activities.

However it was clear from that event that the issues are less clear cut than may at first appear.

In particular:

- Such systems do operate successfully in other countries but in at least some of these they are operating in an environment which may not have the same extent of kerbside recycling as is in place in Scotland;
- It is not clear to what extent recycling rates would increase compared with the current collections systems as there are wide variations between the collection rates of individual materials even within a single collection scheme;

The/...

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- The targeted items do appear in litter and one would hope that a deposit return system would serve to discourage littering of these items. However it is also the case that these items do not appear in isolation but alongside other items such as wrappers, cigarette ends and gum. The Council will still have to attend to deal with these and therefore it is not clear how much if any financial saving will result from this measure;
- At the workshop there was concern expressed by both the waste management industry and the retailers as to the extent of the evidence gathering in their sectors.
- Within the report on the SPRN there was discussion of local authorities paying to join a packaging recovery assurance scheme, which would then allow the materials they collect to count towards industry targets, and for which they would receive income. The scheme would then also seek to ensure the quality of the materials collected. It is assumed that the cost of doing this would be outweighed by the income from the materials collected. However it is not clear how this assumption is arrived at.

The advice from my officers has been that there are potential benefits from the proposals, but equally there are significant uncertainties.

That being the case, while I would emphasise that the Council certainly does not oppose the proposals, nevertheless I would also express my hope that a full and wide ranging consultation would be carried out prior to any implementation of these proposals.

Yours sincerely



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Acting Head of Environment

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