



Lyndsay Parker  
Zero Waste Scotland

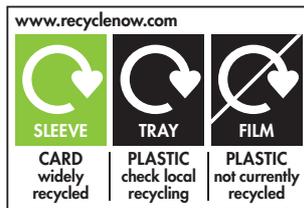
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17 June 2015

Dear Lyndsay Parker,

Please find our response to the Eunomia study on the viability of introducing a deposits system on beverage packaging in Scotland set out below. OPRL Ltd is responding to Question 1 in the consultation: *Are you aware of additional evidence that is relevant to any consideration of the suitability of a deposit return system in Scotland?*

#### ABOUT OPRL



The award-winning On-Pack Recycling Label scheme was launched in March 2009 and is administered by a not-for-profit company, On-Pack Recycling Label Ltd ([www.oprl.org.uk](http://www.oprl.org.uk)). The scheme was originally devised by leading retailers, manufacturers and brand owners, particularly in the groceries sector, working with Government and best practice body WRAP. Today, the scheme is used voluntarily on over 100,000 product lines and by over 150 businesses and charities on products as diverse as food, beauty products, clothing, DIY, electricals, entertainment, furnishings, games, gardening, general merchandising, toys and other household items. It is supported and promoted by Zero Waste Scotland.

Our mission is to make it easy for consumers to recycle correctly, more often.

In a very short time, the label has become the de facto industry standard for communicating the recyclability of packaging in a consistent way, conveying factual information on the ways in which individual packaging materials are currently recovered and reprocessed in local communities across the United Kingdom. OPRL symbols are increasingly recognised by consumers and research conducted for OPRL Ltd by ICM in 2014 confirmed that householders have 62 per cent awareness of the labels and understand the information being conveyed, with almost two-thirds recognising the 'widely recycled' terminology for instance. The scheme has been copied in a number of other countries, including the USA.

The OPRL's objective is to work with all stakeholders to improve household recycling rates in all countries in the United Kingdom. We believe that one key element of success is the provision of a simple, unified labelling and communications system that all parties –

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manufacturers, retailers, local authorities, waste management companies and best practice bodies – can use in a consistent way to help educate consumers about recycling, reduce confusion and encourage the right household behaviours.

## **OUR CONCERNS ABOUT THE EUNOMIA FEASIBILITY STUDY ON DEPOSITS**

The directors of OPRL Ltd have expertise in local government, the waste industry, retail and manufacturing. Like most stakeholders who have been asked to comment on this deposits feasibility study, they are deeply concerned about the flawed conclusions made by Eunomia. In particular, they believe that the true costs for retailers of the imposition of a deposit system in Scotland are significantly understated by Eunomia; the costs and complexities for industry of producing and using packaging only for the Scottish market also requires further investigation, as does its potential for creating additional, unnecessary waste; and the impact on local authorities in Scotland of losing high value materials from their household collections is also under-stated in the study.

However, OPRL Ltd's primary concern is that the Eunomia study does not address the impact that the imposition of a Scottish-only deposit scheme will have on our well-established recycling labelling system nor does it provide any solutions for the unintended consequences this will have.

As we have already outlined in our response, the OPRL system is now used by businesses, local authorities and waste management companies across Scotland, England, Wales and Northern Ireland. It has set a generic standard for communicating the recyclability of packaging materials, thus supporting the household recycling systems that have been established across the United Kingdom. It is widely understood – and used – by consumers with 72 per cent of those recognising it taking the correct action (recycling or putting into the waste stream, depending on availability of recycling services).

The success of the OPRL system is that it provides a simple, unified system across the four UK Nations, targeting and helping consumers identify broad material types and then explaining clearly the relevant actions to be taken in the home.

If a Scottish-only deposit scheme were to be introduced, OPRL Ltd would need to consult our members on the possibility of developing a separate labelling system for Scottish-only packs to take account of the requirement for consumers to return beverage containers (plastic bottles, glass bottles and cans) to their local stores rather than recycling them at home.

OPRL Ltd believes this is unrealistic. We fear such a labelling development would add unnecessary cost and complexity to the waste recovery process and would potentially confuse consumers about recycling and recyclability issues; and it could undo all that a unified on-pack labelling system has achieved since 2009.

Based on our knowledge of our membership, our concern is that businesses supplying products across the four UK nations would be unable to produce packs with Scottish-only information – the costs and supply chain complexities would be prohibitive. Therefore, there would be two clear choices: 'over-sticker' packs with Scottish-only recycling information alongside adding the regulatory deposits label; or remove specific recycling information from all beverage packs and return to a less specific recycling descriptor in order to provide consistency across Scotland, England, Wales and Northern Ireland. Our research shows lack of clarity in labelling reduces consumer action from 72 per cent to 50 per cent, with significant implications for recycling rates in England, Wales and Northern Ireland.

We believe that businesses are more likely to consider the second option on the basis of costs and simplicity. We know that companies supplying packs across EU countries with different recycling systems have already opted not to include the OPRL for that reason. Given that around 80 per cent of UK beverage packaging currently bears the OPRL label, and non-supermarket beverage brands account for 10 per cent of brands using the OPRL, we believe this would negatively impact the viability of our overall scheme to the detriment of consumers and overall recycling rates throughout the UK.

OPRL fully supports the Scottish Government's objectives of increasing recycling and reducing litter. However, we believe that the key to success is continuous improvement of mutually compatible household recycling services across all four UK nations – and the provision of consistent on-pack recycling information plays a critical role in that.

Yours sincerely,

Jane Bevis  
**Chair**  
**On-Pack Recycling Label Ltd**

