



Packaging and Films Association

Formerly

The Packaging and Industrial Films Association

The Flexible Packaging Association

Ref: BT/ZWS deposits

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Zero Waste Scotland

Packaging and Films Association (PAFA) Response to Consultation on Deposit Return Scheme

Background of our Association and its Members.

PAFA represents UK producers and International companies having operations in the UK as well as companies in the UK acting for overseas manufacturers. Some of its members are also reprocessors.

PAFA is a trade association and represents packaging companies who have a combined worldwide turnover of several billion sterling. Many of the products supplied by its members are supplied to packer fillers, who then sell the product onto retailers although some are supplied directly to retailers.

The consultation

The report the 'Review of Feasibility Study' highlights in section 2.2 that a number of areas require further investigation and PAFA would concur with this especially in relation to the impact on local councils of the economics of maintaining kerbside collection after removing the more valuable revenue stream associated with beverage containers. In addition there seem to be unsubstantiated claims related to the impact on litter of introducing a deposit scheme and an assumption that beverage litter is greater than actually recorded by surveys conducted by KBT.

Consultation Response

Although PAFA supports ZWS aims to increase recycling and reduce litter it believes this proposal will do neither and at the same time will have damaging unintended consequences.

Impact of Proposal on recycling levels for beverage containers and on existing collection schemes.

The plastics industry and its trade bodies which includes PAFA has just launched an initiative to increase the recycling of all plastics across the entire UK called PIRAP of which ZWS has been an important contributor.

Beverage containers have high recycling values and there is a well-established market for these products and the challenge we face at present is to engage consumers at home to recycle more packaging of all types and use the existing kerbside collection systems for all packaging and extend those collections to include forms of recyclable packaging. To single

out a product i.e. beverage containers and divert that will add complexity, confuse consumers, undermine existing kerbside collection systems and will prove more costly overall to execute.

Deposit system trials have been operated by individual companies such as AG Barr and Body shop and in the 1990s broader trials were carried out across the UK. The experience and learnings from these schemes and trials does provide evidence that would support the introduction of a deposit scheme in Scotland.

Furthermore the level of deposit proposed will not yield the level of returns set out as one only needs to look at the experience of schemes elsewhere e.g. AG Barr to name just one. To achieve the return rates proposed is likely to need a deposit level many times that proposed.

So in conclusion we would urge ZWS to engage with councils, waste management companies and retailers and brands to examine

1. The impact that the proposal will have on the economics of existing kerbside collection schemes. We believe that the impacts will be significant and will be twofold i.e. removing the revenue stream from kerbside will undermine the existing kerbside schemes for all packaging and the cost of operating the collection of beverage containers is likely to be significantly more than at present through the existing kerbside schemes (in Germany the costs per container were reported to have risen threefold).
2. To examine the learnings from operating deposit schemes and trails of the same in the UK and apply those to the proposal in order to ensure the assumptions made on return rate and recycling rate are correct and not overstated. For example AG Barr only achieves 54% with a higher deposit level.

Impact of proposal on litter

Beverage containers only form a small part of litter 4.3% according to KBT and KSB reports.

Those organisations that operate in the field of litter **do not** believe that a deposit scheme will have any impact on littering nor is there any evidence where these schemes operate that it does.

If ZWS wants to tackle litter then one has to look across the whole spectrum not just focus on one component of litter. Most organisations including both trade bodies and many NGOs believe, as we do, that the right approach to tackling litter is through education and behavioural change combined with correct provision for the collection of litter accompanied by appropriate policies, enforcement and fines.

Conclusion

PAFA recommends that based on the information available there is no case for a deposit system to be introduced in Scotland and that if it were introduced the result would be an increase in costs for consumers for no net benefit in litter or overall recycling performance and at the same time we would maintain that it would also risk undermining existing proposed initiatives and collection systems.

We would instead recommend that **ZWS** engage with those stakeholders and experts involved in retailing of beverage products, those involved in collection of used beverage containers, waste management companies and recyclers and explore alternatives that are less costly, are compatible with existing collection schemes and will not undermine the same and that will indeed drive up recycling levels. **PAFA** also understands that an alternative has been proposed by many of the groups mentioned above and under the banner of **PRGS**.

Quite separately we would urge **ZWS** to develop with all stakeholders not just those involved in beverage products a comprehensive litter strategy for Scotland



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