

## **RECOUP Consultation Response**

### **Deposit Return System Call For Evidence : June 2015**

Submitted by email for the attention of: [lyndsay.parker@zerowastescotland.org.uk](mailto:lyndsay.parker@zerowastescotland.org.uk)

#### **Introduction**

This document is the RECOUP response to the Zero Waste Scotland call for evidence on the implications of a national deposit return system in Scotland.

RECOUP is a not for profit membership based organisation with member and board representation from across the plastic supply, use and recycling chain. Contributions and views received from RECOUP members on this matter have been considered in drafting the response. This response is compiled by the internal RECOUP team who are not sector or politically driven. The views provided may differ from individual member opinions on specific items. The collective aim is the effective development of UK plastic recycling opportunities in a cost efficient, sustainable and environmentally responsible way.

#### **Achieving Change in Scotland, Showing Leadership**

RECOUP fully support the Scottish ambitions for improving recycling and reducing litter, and believe that the opportunity exists to be a European and global leader in addressing the recycling challenge.

This will need a Scottish solution which will be achieved most effectively by working in a unique partnership with the supply and recycling chain to deliver a range of practical measures to influence positive recycling behaviour change, including both consumer communications and system improvement. RECOUP are therefore official supporters of the PRGS group and fully endorse the PRGS plan which can be developed and implemented immediately.

#### **The Household Plastic Recycling Challenge**

Plastic is popular for so many applications, but it is these wide-ranging applications and unique characteristics that have also created some barriers to finding practical and cost effective recycling solutions. However, using the current approaches Scotland have already achieved a plastic bottle collection rate of over 50%, with specific drink and beverage plastic bottle collection levels even higher, based on both public and confidential material compositional analysis information. One such reference is the plastic milk bottle collection rates which are reported to achieve up to 79% collection levels<sup>1</sup>.

This trend has been well documented, and whilst there is still a need to further increase plastic drinks bottle collections, plastic pots, tubs, trays are the bigger but more challenging opportunity, as are the non drinks plastic bottle fractions, plastic films, and compatible non-packaging plastics.

---

<sup>1</sup> <http://www.britishplastics.co.uk/Environment/milk-bottle-recycling-rates-are-all-white-says-nampak/>

By working in collaboration with the entire supply and recycling chain, many of these challenges can and will be overcome. Plastic has the potential to be a truly sustainable and circular resource, and improved re-use and recycling for all formats of plastic packaging will have a crucial role to play.

Given the current household drinks container recycling levels in Scotland (over 50% for all plastic bottles), the costs of setting up and running a deposit return system simply cannot be justified. Also, the existing schemes and infrastructure would still be needed to collect the significant proportion of the non drinks plastic bottles, pots, tubs and trays for recycling. Realistic performance levels from deposit schemes would be matched much more cost effectively in Scotland by improving, expanding and harmonising existing collection systems across the 32 Scottish local authority areas, and ensuring effective consumer communications are in place.

Quality of material collected is a key consideration and needs to be improved and maintained. Again the consumer communications will help to reduce unrequested items in the recyclables collections. There is already good practice guidance available through RECOUP and the Pledge 4 Plastics initiative.

The strengthening and co-ordinated support of the current kerbside recycling system still has much unrealised potential. The opportunity should be taken to support and use the positions and willingness of existing material sector recycling bodies, including RECOUP for plastics, to deliver recycling aims. A drinks container recycling rate of 80% by 2025 is achievable through this approach. This will also deliver higher overall household recycling levels for formats and materials which are outside the scope of DRS.

The impact of deposits will affect both street cleaning services and recycling systems and will likely increase costs of both. In practical terms, the cost of emptying litter bins and street sweeping will not significantly decrease given the levels of DRS compatible items only representing up to 20% of litter. Plastic and metal drinks containers have a relatively high scrap value compared with other recyclables. Local authorities would therefore lose this value but would still incur similar collection costs (primarily labour and transport) collecting a smaller amount of lower value materials. Valpak information has estimated that the lost revenue to local authorities would be £8.7 million a year, if the DRS achieved an 80% return rate.

## **Communicating the Recycling Message**

Zero Waste Scotland are aware of plastic supply chain efforts to develop effective plastic recycling communications messages and achieve more consistency in the plastic collection services that consumers receive, from local authorities, waste management companies, brand owners, retailers, central government, and organisations such as RECOUP and ZWS. Pledge 4 Plastics is seen as the way forward to achieve these goals, and a primary opportunity to increase household plastic recycling. The level of intervention can be tailored to budgets, and preliminary results from phase 1 of the programme, whilst not yet published, have been as expected and very encouraging.

Also the frequency of intervention is critical to ensure the messages are received and re-enforced over a number of years in a structured way – something that does not often happen at the moment due to political or funding issues. Part of the success will be, in principle, commitments from all parties to at least 2020.

## Supplementing Household Collection Infrastructure : Recycling on the Go

An effective collection service provision that can recover materials from consumers 'on the go' can be achieved at a fraction of the cost of a DRS infrastructure. Kerbside is still the priority driver to achieve increased collection levels, but the recycling on the go infrastructure has not yet been joined up or developed in a significant way in Scotland. The opportunity exists to significantly expand the current on the go service provision, aligning consumer facing messages and collection of a range of materials both inside and outside the home. This includes locations with high volume footfall and visual coverage such as shopping centres, tourist attractions, schools, colleges / universities, and event facilities such as sports stadiums and conference centres. Music events particularly provides an opportunity to align and communicate positive recycling messages and collect material for recycling from high numbers and diverse ranges of the population.

Recycling on the go service provision development not only provides collection units where provision does not currently exist, but they can be set up in central and accessible locations, such car parks and parks, they provide a recycle for all opportunity.

The use of a reverse vending machine in closed communities and locations has been tested a number of times linked to an incentive with mixed results, but the performance was always related more closely to a bring collection scheme which has since been superceded by kerbside collections as the preferred plastic collection method in many areas due to cost per tonne of material collected and practicality. Any system based on public collection points introduce additional inconvenience and provides a barrier to an inclusive society when compared to doorstep collections, particularly for, those with disabilities, those without access to transport or low income families.

## Delivering a Balanced Review of International DRS Systems

RECOUP are aware of the drivers and policies that have led to the implementation of DRS in some countries. However, it is very apparent that the approach and report completed for ZWS includes information about DRS in selected countries but did not assess countries that have carried out impact assessments of DRS and rejected them including Czech Republic, France, Ireland, Poland, Spain and Switzerland.

Issues raised in countries that are operating a DRS scheme also appear to have been overlooked. These are not new concerns, for example in a 2009 presentation<sup>2</sup>, the Director General of DPG (the German DRS), acknowledged the DRS system encountered a number of issues. Pages 15 and 16 of the presentation makes a number of statements including :

- The DRS costs three times as much as household-based collection in Germany.
- The DRS diminishes the efficiency of household-based collection by requiring both systems to run in parallel for similar types of packaging.
- The DRS has not been suitable as a tool to increase the use of reusable packaging. The quota of reusable packaging for water and soft drinks is falling constantly.
- The DRS does reduce littering caused by drink packaging to some extent, but it does not really help keep public spaces properly clean.

---

<sup>2</sup> [http://www.kvvm.hu/cimg/documents/Bernd\\_Ulrich\\_Siebergerger\\_The\\_experience\\_of\\_the\\_German\\_deposit\\_system.pdf](http://www.kvvm.hu/cimg/documents/Bernd_Ulrich_Siebergerger_The_experience_of_the_German_deposit_system.pdf)

Through international contacts, RECOUP are also aware of the Cadaqués example provided at the recent DRS seminar. It was not highlighted that this system had a number of fundamental flaws, with information from the respected Spanish organisation Eco-embes<sup>3</sup> confirming that;

- The amount collected during the test is estimated to have been 2.3 tons. An extrapolation of the 2.3 tons collected over 76 days shows that the DRS would have collected 11 tons in one year out of the 2,961 tons produced annually in Cadaqués, or 0.37% of the total. A good portion of this packaging is currently collected through the recycling system now in place, meaning that any potential marginal improvement offered by the DRS would be even less.
- Even assuming a year-round return rate like the one Retorna claims to have attained for the last weeks in June (by which time the DRS had been implemented a while), a total of 13.1 tons would have been collected, or 0.44% of the total waste generated in Cadaqués.
- Of the 122 establishments where drinks are served in the pilot area, only 10 took part. The way the test was conducted is not representative of how it would work if a DRS were actually implemented.
- There was an apparently high level of acceptance of the system by the residents and businesses of Cadaqués, but it was not made clear that the establishments received the necessary infrastructure, such as machines and other materials for free, and the points of sale also had their municipal waste management fee paid for.
- For many stores, Retorna collected the containers on demand and in many cases anticipated the collection request. In a real situation, businesses would have to store the containers until the specified pick-up date.
- Retorna handled the maintenance of the machines during the test, which would not happen if a DRS were actually implemented. The bulking centre was located in Cadaqués. In an actual implementation, the distances that the containers would have to be transported would not be 2 km as in the test in Cadaqués.
- Only 71,216 containers were labelled for the test, but 81,183 were collected. This indicates that during the process of returning containers to the store, containers not identified as being in the DRS were accepted, altering the result.
- A total of 70,983 DRS containers were placed in the usual household recyclables collection container during the test period. If 105,901 containers were sold, 67% of them were being collected via the yellow container, making it impossible for Retorna to have collected the claimed 76% of them via the DRS test.

## **Other Key Considerations Based on the ZWS DRS Report**

- The report provides no evidence for its assumption that a 10p deposit would produce an 85% return rate and a 20p deposit a 95% return rate. Many of the published reports suggest a lower performance level, and often do not consider overall plastic packaging recycling levels as part of reviews.

---

<sup>3</sup> Ecoembalajes España, S.A. (Ecoembes) is a Spanish non-profit public limited company whose corporate objects include the design and organization of an Integrated Management System (SIG) for the selective collection and recovery of packaging waste for subsequent treatment, recycling and upgrading. Its stakeholders include all the agents that play a role in the lifecycle of packaging: companies that manufacture packaged goods, companies that sell them, consumers, public administration, waste management facilities, recyclers, public media and NGOs.

- A deposit return system will be limited to those containers within the system, which goes against the perceived need to provide simplicity and transparency to consumers, and the need to increase recycling levels for all consumer plastic packaging.
- The report puts a high value on people's willingness to pay for reduced littering but no value on the costs, wasted time and inconvenience that people would face.
- Using the report's assumptions, the DRS infrastructure would mean an investment of over £86 million for the 2,700 machines the report says would be needed.
- Consumer studies have confirmed that there is already a high level of confusion regarding plastic recycling. Introducing a deposit system will extend that confusion further rather than help to simplify recycling messages. Data is available for Scotland through Pledge 4 Plastics consumer insight work looking at the barriers to plastics recycling in the UK.
- The report did not include a cost-benefit analysis, nor did it consult any retailers, local authorities or waste management companies. Therefore key concerns have not been accounted for, and were not given sufficient coverage or consideration at the ZWS deposit seminar despite these issues being raised directly by a retailer and local authority at that event.
- The conclusions of the report are therefore of limited value, have not been verified, and is not robust enough to inform policy decisions.

---

RECOUP (RECYCLING OF USED PLASTICS LTD), 1 METRO CENTRE, WELBECK WAY, WOODSTON, PETERBOROUGH, PE2 7UH  
T : 01733 390021 E : enquiry@recoup.org W : www.recoup.org