

# Response ID ANON-JZGE-SNBG-T

Submitted to **Introducing a Deposit Return Scheme (DRS) in England, Wales and Northern Ireland**  
Submitted on 2019-05-13 12:39:46

## Introduction

### 1 Would you like your response to be confidential?

No

If you answered 'Yes' above, please give your reason: :

### 2 What is your name?

**Name:**

Brendan Murray

### 3 What is your email address?

**Email:**

murrayb@belfastcity.gov.uk

### 4 Please provide information about the organisation/business you represent

**Which of the following best describes you?:**

Local Authority

If you answered 'other' above, please provide details:

**What is the name of the organisation/business you represent? (If you are responding on behalf of yourself please write 'Individual'):**

Belfast City Council

**What is the approximate number of staff in your organisation? (if applicable):**

3,000

### 5 Please provide any further information about your organisation or business activities that you think might help us put your answers in context.

**Please answer below:**

Belfast City Council is the largest local authority in Northern Ireland and is a unitary authority, responsible for both waste collection and disposal. The Council is a member of arc21, a regional waste management body in the eastern seaboard of Northern Ireland. The Council has contributed to the arc21 collective response to this consultation. We are supportive of the arc21 responses, however, where appropriate, we have also added additional, sometimes Belfast specific, comments

### 6 Does your organisation have any recent experience of a DRS or related schemes? If so, can you please briefly explain your experiences?

**Please answer below:**

No

### 7 Are you content for the UK government, or in Wales, the Welsh Government, or in Northern Ireland, DAERA to contact you again in relation to this consultation?

Yes

## Background

### Our approach

### 8 Do you agree with the basic principles for a DRS?

Yes

**Please briefly state the reasons for your response. Where there are principles you do not agree with, please outline them here. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"Yes, but the principle of 'full net cost recovery' (FNCR) should also be a key principle so that producers always have the full financial incentive to minimise the

impacts of their products post-use. A DRS established as part of a wider EPR regime ensures clear responsibility for end-of-use management of resources and should have a positive impact on wider public and consumer behaviour. We would also reiterate concern around the timing of its introduction and the reference to await the introduction of the Packaging Responsibility Reform before looking to introduce DRS."

In addition, the DRS should target the reduction of litter and the improvement of local environment as a basic principle.

## 9 Should the following materials be in scope of a DRS?

**Type of material included - PET bottles:**

Yes

**Type of material included - HDPE bottles:**

Yes

**Type of material included - Aluminium cans:**

Yes

**Type of material included - Steel cans:**

Yes

**Type of material included - Glass bottles:**

Yes

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

All materials already widely recyclable.

## 10 Should the following materials be in scope of a DRS?

**Materials in-scope - Cartons e.g. Tetrapacks:**

Yes

**Materials in-scope - Pouches and sachets e.g. energy gels:**

Yes

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Cartons - already widely recyclable and a foreseeable substitutes for the materials in Q9 to which producers might switch if outside the scope.

Pouches & sachets - A foreseeable substitute for the materials in Q9 to which producers might switch if outside the scope.

## 11 If a DRS were to be introduced, should provisions be made so that glass bottles can be re-used for refills, rather than crushed and re-melted into new glass bottles?

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this Question:

" Incentives to refill should not be limited to glass. Waste prevention should be clearly treated as superior to recycling in the architecture of the DRS. In particular for water, schemes to promote water fountains and/or shops willing to top-up people's water bottles with tap water should be supported above recycling."

The Health & Safety implications of the use of glass bottles for refill would have to be considered before adopting such an approach.

## 12 Should the following drinks be in scope of a DRS?

**Should drinks be included? - Water:**

Yes (some)

**Should drinks be included? - Soft drinks (excluding juices):**

Yes (some)

**Should drinks be included? - Juices (fruit and vegetable):**

Yes (some)

**Should drinks be included? - Alcoholic drinks:**

Yes (some)

**Should drinks be included? - Milk containing drinks:**

Yes (some)

**Should drinks be included? - Plant based drinks (soya, rich almond and oat drinks):**

Yes (some)

**Should drinks be included? - Milk:**

Yes (some)

**Other (please state which)::**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"a. Water

Yes - But with incentives and/or encouragement to reuse too, as all such bottles could be re-filled a number of times by the original consumer for his/her own use.

b. Soft drinks (excluding juices)

Yes.

c. Juices (fruit and vegetable)

Yes.

d. Alcoholic drinks

Yes (all) - We can see no rationale for exempting any types of alcoholic drinks.

e. Milk containing drinks

Yes.

f. Plant-based drinks (such as soya, rich almond and oat drinks)

We believe these should be treated the same as milk bottles. From the resources and waste management perspective, plant-based drink bottles should be in-scope, but this may require other mitigating measures from a public health perspective, particularly when considering those who cannot consume dairy products. If such mitigating measures are considered by Government not to be appropriate, arc21 notes that milk bottles and non-dairy equivalents are sometimes excluded from DRSs in other countries and would consider this acceptable for the UK. If these are not included in the DRS scheme, they should be covered within the EPR to ensure Full Net Cost Recovery (FNCR) of packaging of this material placed on the market.

g. Milk

From the resources and waste management perspective, milk bottles should be in-scope, but this may require other mitigating measures from a public health perspective. If such mitigating measures are considered by Government not to be appropriate, arc21 notes that milk bottles are sometimes excluded from DRSs in other countries and would consider this acceptable for the UK. If these are not included in the DRS scheme, they should be covered within the EPR to ensure FNCR of packaging of this material placed on the market.

h. Other (please state which)

Yes - The principle should be that all drinks containers are in-scope unless explicitly designated as being not in-scope but should be covered within the EPR to ensure FNCR of packaging of this material placed on the market."

**13 Do you think disposable cups should be in scope of a DRS?**

**Should disposable cups be included? - Disposable cups made from paper with a plastic lining (used for coffee):**

Yes

**Should disposable cups be included? - Disposable cups made of plastic (used in vending machines):**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view. The Government is particularly interested in any evidence on whether or not it would be practical or cost effective to include disposable cups in the scope of a DRS.:**

We support the arc21 response to this question:

"a. Disposable cups made from paper with a plastic lining (such as those used for coffee)

Yes – arc21 understands the Government's main objectives to be improved resource management and reduced litter, so it would appear contrary to both of these to exclude such cups.

b. Disposable cups made of plastic (such as those used in vending machines)

Yes – arc21 understands the Government's main objectives to be improved resource management and reduced litter, so it would appear contrary to both of these to exclude such cups."

The total average spend on street cleansing across all of Northern Ireland in 2016/17

was £45,562,532. The introduction of a DRS for disposable cups will be a step in the right direction in tackling litter in society.

#### 14 Do you agree with the proposed material flows as described?

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"The role of councils and our waste handling routes is missing, yet we will be collecting these drinks containers in litter, recycling and residual waste. It is essential that the EPR consultation's commitment to 'full net cost recovery' is implemented fully if councils are not to receive the deposits, unless they act as 'vendor' or as a return point.

2) We suggest potential confusion may be avoided between DRS terminology and EPR/PRN terminology if the term "packer-filler" is used here rather than "producer".

#### 15 Do you agree with the proposed financial flows described?

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"No. - Unredeemed deposits should not be retained by the DMO or their value returned to producers in a way that creates a perverse incentive not to maximise deposit returns, which may well be the most expensive form of producers' compliance. In essence, the flows as set out could be viewed as seen as an obstacle to the aims of DRS and could affect public acceptance because the 'producers' will get their money back to fund the DRS and potentially make a profit.

Additionally, we would like to flag that the council role is missing from Figure 1 (p.25), but that it is not possible to determine how our role should be shown given that we do not know if/how the same drinks containers will be provided for in new EPR policies and structures. The key guiding principle however must be that of 'producer responsibility' such that through 'full net cost recovery' Councils are no longer paying for these wastes."

#### 16 Should producers obligated under a DRS be:

**Other (please explain):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"a. Exempt from obligations under the reformed packaging producer responsibility system for the same packaging items?

No.

b. Also obligated under the reformed packaging producer responsibility system for the same packaging items?

No.

c. Other (please explain)

Yes - We believe any DRS should be fully integrated into a wider EPR scheme.

d. I don't know/I don't have enough information

N/A.

The possibility of creating loopholes and/or double-obligations appears too great in such a multi-faceted new regime, and the best way to avoid this risk would appear to have all such schemes run by a single body."

#### 17 If producers were obligated under both a DRS and a reformed packaging producer responsibility system for the same packaging items, how could we effectively ensure that they would not be unfairly disadvantaged by a 'double charge'?

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"arc21 believes that all such schemes should be run by a single body to minimise both the double-charging risk and the possibility of creating compliance loopholes.

If the two schemes are not run by a single body the DMO will need to be fully linked to the EPR scheme, this could be done through shared representation across both schemes."

#### 18 Do you agree that the DMO should be responsible for meeting high collection targets set by Government?

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"Yes - But there needs to be sufficient feedback loops (targets or financial instruments/measures) to ensure individual producers have every incentive to improve their own environmental performance. The targets should be published on a regular basis and set out responsibilities & accountabilities for meeting such targets."

**19 Should the DMO also be responsible for meeting high recycling targets set by government?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

No - Unredeemed deposits should not go back to Government. They should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles.:

"Yes - But there needs to be sufficient feedback loops (targets or financial instruments/measures) to ensure individual producers have every incentive to improve their own environmental performance.

However the ongoing statutory role for councils, both collection & disposal functions needs to be taken into account to prevent unintended consequences of different bodies "chasing target materials" such that the costs to society are not minimised."

It is important that there is a mechanism for the DMO to apportion tonnages collected via a DRS, to Local Authorities in NI who have a statutory obligation to report their recycling and waste statistics through the Waste Data Flow system. The DRS and the efforts of Councils must work in tandem for improved environmental outcomes rather than in competition.

**20 Should unredeemed deposits be used to part-fund the costs of the DRS system?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the views of arc21 and LARAC with regards to this question:

"No - Unredeemed deposits should not go back to the DMO in a way that then subsidises the cost of compliance to the DMO and producers. Rather they should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles."

"Most of the packaging from the unredeemed deposits will have ended up as litter or disposed/recycled through kerbside collections, bring banks or recycling centres, falling to local authorities to deal with. It would therefore be appropriate for the funds from unredeemed deposits to be directed towards local authorities to cover the costs of collecting this material. In accordance with Circular Economy principles, LARAC would also encourage some funding also to be directed towards enhancing local reprocessing facilities."

In addition these unredeemed deposits could be used to fund communications campaigns tackling litter.

**21 If unredeemed deposits are not used to part-fund the costs of the DRS system, do you agree they should be passed to government?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view :**

We support the arc21 response to this question:

"No - Unredeemed deposits should not go back to Government. They should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles."

**22 Do you have alternative suggestions for where unredeemed deposits could be allocated?**

**Please explain your answer:**

We support the arc21 response to this question:

"Yes - Unredeemed deposits should be used as a contribution to ensuring Councils' costs of managing these items, including collection, treatment and disposal, are fully covered under FNCR principles."

**23 If the scheme is managed by the DMO, which of the following bodies should be represented on the management board:**

Industry (drinks producers)

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"a. Industry (drinks producers)?

Yes.

b. Government?

Yes.

c. Trade associations representing those hosting return points (e.g. retailers, small shops, transport hubs)?

Yes.

d. Companies representing those hosting return points (e.g. retailers, small shops, transport hubs)?

Yes.

e. Other (please specify)

Yes - Councils, as we manage a large proportion of these items, and although we expect to manage a declining proportion, we will continue to have an interest from the litter and wider public health points of view.

Northern Ireland's public perception is that it is the councils which have a major and significant role to protect and be accountable for the local environment and amenity, and as such Northern Ireland council representation is key on this DMO."

#### **24 Should there be government involvement in the set-up/running of the DMO body?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Yes – The Government must remain the primary body to ensure the EPR targets are met. The Government may discharge its delivery responsibilities through a DMO and its regulatory responsibilities through the Environment Agencies, but we cannot see how the Government will not be involved in the set-up/running of any DMO.

#### **25 Do you agree with the government's proposals that a DMO would:**

**A DMO should: - Advise Government on setting of the deposit level/s:**

Yes

**A DMO should: - Set producer import fees:**

Yes

**A DMO should: - Be responsible for tracking deposits and financial flow in the DRS – and ensuring those running return points are paid the deposits they refund to consumers:**

Yes

**A DMO should: - Set and distribute the handling fees for return points:**

Yes

**A DMO should: - Be responsible for ensuring that there are appropriate return provisions for drinks containers in place, and that these are accessible?:**

Yes

**A DMO should: - Be responsible for maintenance of Reverse Vending Machines (RVMs) and provision of bags/containers to those running manual return points:**

Yes

**A DMO should: - Own the material returned by consumers:**

Yes

**A DMO should: - Reimburse those transporting returned drinks containers to recyclers/counting/sorting centres – and manage these contracts:**

Yes

**A DMO should: - Fund counting sorting/centres – and manage the contracts for counting/sorting centres:**

Yes

**A DMO should: - Be legally responsible for meeting the high collection targets set by Government for drinks containers within scope of the DRS.:**

Yes

**A DMO should: - Measure and report recycling rates to Government:**

Yes

**A DMO should: - Run communications campaigns to aid consumer understanding of the DRS:**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

#### **26 Do you agree with our proposed definition of a producer?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**27 Should there be a de-minimis which must be crossed for producers and importers of drinks in-scope of a DRS to be obligated to join the scheme?**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**28 Should a de-minimis be based on:**

**Should a de-minimis be based on: - Number of employees:**

I don't know/ I don't have enough information

**Should a de-minimis be based on: - Sales figures:**

I don't know/ I don't have enough information

**Should a de-minimis be based on: - Volume/ weight of drinks put on the market:**

I don't know/ I don't have enough information

**Should a de-minimis be based on: - None of these:**

I don't know/ I don't have enough information

**If yes, please provide more information (how many employees, what sales figure, what volume/ weight):**

**Other (please specify):**

**29 If there is a buy back scheme for recycled materials, do you have evidence for how this could be effectively run?**

**Please provide more information:**

No

**30 In line with the principle of full net cost recovery, the government proposes that producers would cover the set up costs of the DMO? Do you agree with this proposal?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

Yes - Full Net Cost Recovery is essential for the scheme to be accepted by Local Authorities and the public.

**31 Should the DMO be responsible for co-ordinating the set-up of the DRS, including buying RVMS and an IT system?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"Yes. – In relation to IT systems for drinks containers in Local Authority Controlled Waste, we would hope that the DMO would supply Councils with timely tonnage data such that we can include it in our submissions to WasteDataFlow in order to fully report on the overall recycling rate in our areas. "

**32 Should producers of drinks within a DRS be responsible for DRS operational costs?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the responses of arc21 and LARAC in this regard:

"Yes – This is an essential part of 'extended producer responsibility' and, as such, the costs cannot fall anywhere else without undermining EPR principles."

"Producers should be responsible for meeting the costs of the wider benefits such as communications campaigns and litter clearance in accordance with meeting full cost recovery. ..The intention of making producers responsible for these costs is that they will be more engaged in behaviour change activities at both national and local levels, as well as complying with the concept of full net cost recovery."

**33 Which of the following should be obligated to host a return point?**

Retailers who sell drinks containers in scope

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

For a DRS to be successful, it has to be as convenient as possible for consumers to return their used drinks containers and receive their deposit back.

Government may wish to consider a class of places which might be permitted (but not obliged) to host a return point. This could include those on the

non-obligated list above along with educational establishments, places of worship, parks, museums, galleries, sports clubs, conference centres, car parks, etc.

#### **34 What might the impacts be on those hosting:**

##### **(a) Reverse vending machines? Where available, please share evidence to support your view.:**

Parties directly affected would better address this but we would presume that space constraints and regulatory permissions may feature in responses.

In addition, if collecting glass there would be health & safety considerations.

Dependent upon the inherent value of the materials or the reward scheme, there may be security issues to consider in order to prevent theft. The units could become the new ATM and be a source of anti-community activity.

The DMO may wish to reflect the redemption process and how this shall be applied. In addition to simple financial credit it may also be appropriate to allow users to convert their pay-back to a virtual currency such as Colu, which is currently being explored by Belfast City Council. See link for further details; [www.colu.com](http://www.colu.com)

##### **(b) Manual return points? Where available, please share evidence to support your view.:**

Parties directly affected would better address this but we would presume that space constraints and regulatory permissions may feature in responses.

In addition, if collecting glass there would be health & safety considerations.

#### **35 Are there any Health and Safety-specific implications that may be associated with hosting return points?**

Yes

##### **Please provide more information:**

If glass is included within the scope of the scheme, there would be health & safety considerations.

With regard to milk containers see Q12.

#### **36 Is there a de minimis level under which businesses who sell drinks in scope should be exempt?:**

I don't know/ I don't have enough information

##### **Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

Parties directly affected would better address this.

#### **37 Should a de-minimis be based on:**

##### **Other (please specify):**

Parties directly affected would better address this.

##### **If yes, please provide more information (what floor size, what sales figure, how many employees):**

##### **Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

#### **38 Do you have alternative suggestions for return provisions that could be used to accept the return of drinks containers?**

##### **Please provide details.:**

Parties directly affected would better address this.

#### **39 For consumers who would have difficulty returning empty drinks containers, what provisions could be put in place so that these consumers are able to return drinks containers and receive their deposit refund?**

##### **Please explain your answer:**

It may be appropriate for home delivery services to offer a take back service.

#### **40 What provisions could be put in place for rural areas where there may be few small retail outlets spread over a wider area, in order to ensure that there are adequate return and collection facilities?**

##### **Please explain your answer:**

The Council supports the LARAC response;

"Obligated producers, through the DMO (although not exclusively) would need to ensure that a suitable return provision is in place in rural areas. A different set of return points compared to urban areas could be considered, such as community halls and building and use of wider community groups to host return points.

Full net cost means exactly that and so there are some areas that will be more cost effective to set up with return points than others. Higher costs should not be an excuse for providing a less than appropriate or adequate system in rural areas. If an appropriate system is not provided then return rates will drop and littering rates will increase, leaving producers to pick up the cost via EPR which for litter is likely to be more expensive than getting clean material back through a DRS."

In addition, it may be appropriate for home delivery services to offer a take back service."



**41 Do you have evidence that would help inform us about whether there is potential for siting RVMs outdoors e.g. in parks, at existing outdoor recycling centres, on highstreets?**

**Please explain your answer:**

The Council broadly supports LARACs response on this question:

"Local authorities that have provided on street recycling facilities will be able to provide evidence as to how well they are used. Generally, the public do not engage well with recycling on the go when there is no financial penalty not to. The potential for misuse, vandalism and theft would also be high and would need careful assessment and mitigation. A significant number of local authorities have removed bring banks due to high contamination levels and misuse.

The siting and design of any RVM that does not have an element of "help" or "administration" associated with their immediate use will need careful consideration and it could be that pilots are needed to establish the full consequences of such machines."

In addition, Belfast City Council has experienced significant contamination levels in its "on-the-go" recycling containers. There may be merit in locating the RVMs in supervised facilities.

**42 Should online retailers selling drinks in in-scope containers be obligated to pick up and refund DRS material?**

Yes

**Please briefly state the reasons for your response. Where possible, please provide supporting information.:**

We support the arc21 response to this question:

"Yes. – Otherwise the DRS would be a failure in the public's view and cause more confusion, effectively setting up a two-tier system from the start. It would also support accessibility to the DRS for those who may struggle to get to normal shops, and will likely improve the customer-service offering of these online retailers.

However, this should probably only apply to those using the distribution format most commonly associated with the "home delivery" model of online grocery shopping, i.e. staff make a delivery at a pre-allocated time when the resident is at home, using a trolley and crates that they then return empty to their bespoke truck. For drinks that are sold online but distributed through postal services, the provision of a take-back scheme would not be practicable. The containers would therefore have to be able to be returned via RVMs and other manual return centres."

**43 Should there be a de-minimis under which online retailers would not be obligated to pick up and refund DRS material?**

No

**Please provide more information:**

Belfast City Council does not have sufficient information to advise on this.

**44 If yes, should a de-minimis for online retailers be based on:**

**Other (please specify):**

Belfast City Council does not have sufficient information to advise on this.

**45 Should certain businesses which sell drinks in in-scope drinks containers host return points, e.g. pubs, hotels, cafes? Please provide details.**

Yes

**Please briefly state the reasons for your response. Where possible, please provide supporting information:**

Yes - Such businesses can either manage on site (as many already do for glass) or they should be contributing to a system aimed at reducing the impact on the environment of the products which they sell.

**46 Should there be an opportunity for retailers that don't stock drinks / those who may not be obligated to provide a return point to 'opt-in'?**

Yes

**Please briefly state the reasons for your response. Where possible, please provide supporting information. :**

Yes - The primary aim of the scheme is to maximise the capture rate of such packaging and an opt-in system assists in this regard.

**47 Do you have any further views, comments or evidence in relation to retailers not already covered above?**

**Please provide more information:**

No

**48 How should a DRS account for 'on-trade' sites such as bars and restaurants?**

**Please provide more information:**

Drinks purchased in pubs, cafés etc. will be consumed on the premises and therefore it is unlikely that DRS will be required for such sites.

**49 What do you consider to be the optimum deposit level to incentivise return of drinks containers?**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the views of arc21 and LARAC regarding this question:

"The value needs to be sufficiently high that it can drive behaviour change, without having a significant adverse impact on the commercial viability of the product or disproportionately impact any social group."

"The level of the deposit should be set by the DMO, so that it can be varied in the light of experience. However, it is essential that any additional costs falling to Councils from bin-raiding by people seeking to claim the deposits from other people's discarded drinks containers (from litter bins or recycling bins left out for collection) should be included in the calculation of FNCR so that producers do indeed pay the full cost of managing their wastes. Consideration may also be given to include costs of damage to bins, litter from scavenging, street cleaning."

**50 Should the deposit level be a flat rate across all drinks containers covered by the DRS?**

Not Answered

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

See Q49

**51 Should there be an alternative deposit level for drinks containers in a multipack, rather than each container carrying the same deposit?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

No. – Multi-packs are often used by families etc. for packed lunches, and as such should be included in all types of DRS and at the same deposit level.

**52 How do you think deposits should be redeemed? Please tick all that apply.**

Voucher (for deposit value, printed by the reverse vending machine or by the retail assistant at manual drop off), Digitally (e.g. a digital transfer to a smartphone application), Return to debit card, Option to donate deposit to charity

**Other (please state):**

Councils should be able to redeem drinks containers found in its street cleansing wastes and its recycling and residual waste collections.

In the past charities collected items such as milk bottle tops for fund-raising. We therefore suggest that the redemption regime should not prevent registered charities or other organised groups (e.g. schools) from collecting drinks containers and redeeming the deposits.

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Cash - holding cash within a RVM may encourage theft and vandalism.

Digitally - The DMO may wish to reflect the redemption process and how this shall be applied. In addition to simple financial credit it may also be appropriate to allow users to convert their pay-back to a virtual currency such as Colu, which is currently being explored by Belfast City Council. See link for further details; [www.colu.com](http://www.colu.com)

**53 Should the DMO be responsible for ensuring that there is evidence that drinks containers have been recycled?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

Yes - The DMO will be a player within the waste management sector and as such should be required to comply with Duty of Care Regulations which include waste transfer notes and evidence of end destination.

**54 In addition to reporting on collection rates, should the DMO also be obliged to report on recycling rates of in-scope drinks containers?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**55 How do you think transparent financial flows in a DRS could be achieved most effectively?**

**Please explain your answer, providing evidence where available:**

We support the arc21 response to this question:

"Regular publication of data /evidence setting out internal costs and payments to listed parties in line with public bodies."

**Monitoring and Enforcement**

**56 Would Environment Agencies in England, Wales and Northern Ireland be best placed to monitor/enforce a DRS covering England, Wales and Northern Ireland?**

Yes

**If no, why and is there another body that would be better suited to perform this function?:**

**Please explain your answer:**

**57 How frequently should the DMO be monitored? (This monitoring would look at, i.e., financial accounts, material flows, proof of recycling rates, setting of deposit level (if done by the DMO))**

Not Answered

**Other (please specify):**

We support the arc21 response to this question:

"Assuming the Government will want Councils to include DRS data from their areas in WasteDataFlow (WDF) returns, arc21 believes the DMO should be monitored quarterly (at least for tonnages), with data published in good time for Councils to be able to include the performance in WDF."

**58 How often should producers be checked for compliance with the DRS (if compliance is obligated)?**

Not Answered

**Other (please specify):**

Monitoring needs to be appropriate and proportionate to the activity. The regulator must be able to check for compliance at any time outside of routine checks.

**59 Should enforcement focus on:**

All producers

**Other (please specify):**

**60 Should any penalties (fines) on the DMO or producers/importers be set by the regulator appointed to monitor the DMO?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

The regulator would be best placed to consider what penalty levels are appropriate and these may reflect the size of operation.

**61 Are there any points in the system which you think would be particularly susceptible to fraud?**

**Please state :**

Belfast City Council would not have sufficient information to enable a meaningful response.

**62 Which labelling/markings on drinks containers in scope would best protect against fraud? Please select all that apply:**

Deposit value amount, Marking indicating inclusion in DRS, Existing product barcode (containing DRS information when scanned)

**Other (please specify):**

**Please explain your answer. We are particularly interested in evidence of effective fraud prevention in existing DRS systems. :**

**63 How could return via Reverse Vending Machines (RVMs) best be protected against fraud?**

**We are particularly interested in any evidence you may have to support suggestions.:**

Belfast City Council would not have sufficient information to enable a meaningful response.

**64 How could the process of manual returns best be protected against fraud?**

**We are particularly interested in any evidence you may have to support suggestions. :**

Belfast City Council would not have sufficient information to enable a meaningful response.

**65 How could a DRS best protect against fraud across Devolved Administrations in the event of similar schemes with common underlying principles (but not one uniform scheme)?**

**Please explain your answer:**

Belfast City Council would not have sufficient information to enable a meaningful response.

**DRS Options - 'all-in' and 'on-the-go'**

**66 Should drinks containers over a certain size, for example beer kegs and containers used for water coolers, be excluded from an all-in DRS?**

I don't know/ I don't have enough information

**Please state the reasons for your response. Where available, please share evidence to support your view:**

Excluding such containers from a DRS would appear reasonable so long as they are captured under other EPR provisions. Any such exclusions should be set in a statutory instrument so that they can be amended in light of experience.

**67 If drinks containers over a certain size were excluded from an all-in DRS, what should the maximum cut-off size be?**

Not Answered

**Other (please specify):**

**Please state the reasons for your response. Where available, please share evidence to support your view:**

Belfast City Council would not have sufficient information to enable a meaningful response.

**68 Do you agree with our definition of 'on-the-go' as less than 750mls in size?**

Yes

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

**69 Do you agree with our definition of 'on-the-go' as excluding multipack containers?**

No

**Please briefly state the reasons for your response, including in which cases multipack containers should not be excluded from our definition of 'on-the-go'. Where available, please share evidence to support your view:**

No - multi-packs may be used by families etc. for packed lunches or picnics etc. and as such should not be excluded from a DRS.

**70 Based on the information, and where relevant with reference to the associated costs and benefits outlined in our impact assessment (summarised in this consultation) which is your preferred DRS option?**

Not Answered

**Please state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 and LARAC response to this question:

"We have no definitive preference in terms of either option. However, on balance we feel there is merit in considering an incremental model of implementation. This may be in terms of pilot schemes and/or introducing 'on the go' initially followed by a period of evaluation to which unless it is unfavourable moving to an 'all-in' scheme."

"LARAC believes that DRS should be considered as a second phase after EPR reforms and should only be implemented if measures through EPR do not achieve the desired recycling levels."

## **Summary of approach to Impact Assessment**

**71 Do you agree with our impact assessment?**

No

**Please briefly state the reasons for your response. Where available, please share evidence to support your view:**

We support the arc21 response to this question:

"No. – The funding model is a key piece of data and the current assumptions are vague and where they are stated to "un-monetised" they have never the less been given large social value in the model. In addition there may be differences in the supply chain arrangements and cost base in Northern Ireland which may impact on the assessment."

**72 Do you think more data is needed?**

Yes

**If yes, please state where:**

We support the LARAC response to this question:

"LARAC would urge the estimated return rate to be reassessed. If comparisons with other countries are to be made, it should be only against those countries which offer similar recycling opportunities for the proposed DRS materials. If no direct comparisons can be made further trials should be completed to provide assurance the required capture rate can be achieved to ensure the scheme does not operate at a loss."

In addition, there may be differences in the supply chain arrangements and cost base in Northern Ireland which may impact on the assessment.

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

**73 Are there other costs and benefits which we have not covered in our impact assessment?**

No

If yes, please provide further information:

**74 Do you have further comments on our impact assessment?**

Please be specific.:

No

**75 The dual objectives of a DRS are to reduce litter and increase recycling. Do you wish to suggest an alternative model that would be more effective at achieving these objectives?**

If so please briefly describe it, making reference to any available evidence:

The Council believes that it may be appropriate to defer the introduction of a DRS in order to assess if other, more economical EPR measures are sufficient to achieve the objectives of the scheme i.e. increased recycling and reduced litter.

This is particularly the case given the economic costs of introducing such a system.

**76 A potential option for introducing a DRS could be to start with the 'on-the-go' model, and then expand/phase roll-out to 'all-in'. Do you think this would be an effective way to introduce a DRS?**

Not Answered

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

As stated in Q75 it would be preferable to defer the introduction of a DRS until the impacts of an EPR scheme can be fully measured. Should the objectives of the EPR not deliver on increased recycling and reduced litter and a decision is taken to introduce DRS it would seem sensible to have a graduated approach i.e. on-the-go first and assess the impact before consideration is given to introducing an "all-in" scheme.

## Outcomes of what we are hoping to achieve

**77 Do you think a DRS would help us to achieve these outcomes?**

**Do you think a DRS will help achieve these outcomes? - Reduction in litter and litter disamenity (include expected % decrease where possible):**

I don't know/ I don't have enough information

**Do you think a DRS will help achieve these outcomes? - More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go':**

Yes

**Do you think a DRS will help achieve these outcomes? - Higher quality recycling:**

Yes

**Do you think a DRS will help achieve these outcomes? - Greater domestic reprocessing capacity through providing a stable and high-quality supply of recyclable waste materials:**

I don't know/ I don't have enough information

Please briefly state the reasons for your response. Where possible, please share evidence to support your view:

WE support the arc21 response to this question:

a. Reduction in litter and litter disamenity (include expected % decrease where possible)

We don't know, but it is essential that any additional costs/impacts falling to Councils from the disamenity of bin-raiding by people seeking to claim the deposits from other people's discarded drinks containers (from litter bins or recycling bins left out for collection) should be included in the calculation of 'full net cost recovery' (FNCR) so that producers do indeed pay the full cost of managing their wastes.

In calculating FNCR for Councils, producers should be required to make a reasonable contribution to street cleansing costs, perhaps by reference to the volume of their wastes in litter bins.

b. More recycling of drinks containers in scope of a DRS, especially those disposed of 'on-the-go'

Yes in the absence of tangible evidence to the contrary

c. Higher quality recycling

Yes in the absence of tangible evidence to the contrary.

d. Greater domestic reprocessing capacity through providing a stable and high- quality supply of recyclable waste materials

It is not clear what "domestic reprocessing capacity" covers. i.e. UK, devolved administrations or includes the Island of Ireland but in principle, yes in the absence

of tangible evidence to the contrary.

**78 Do you think a DRS, as set out in this consultation, is necessary in helping us achieve the outcomes outlined above?**

I don't know/ I don't have enough information

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

As stated previously the Council believes that consideration of a DRS should be deferred until the impacts of EPR reforms are fully known. At that point the need for a DRS would be more obvious.

**79 Do you think the outcomes of what we are hoping to achieve could be reached through an alternative approach?**

I don't know/ I don't have enough information

**Other (please state):**

**Please explain your answer, providing evidence where available. :**

As stated previously the Council believes that consideration of a DRS should be deferred until the impacts of EPR reforms are fully known. At that point the need for a DRS would be more obvious.

**80 Do you think an alternative approach would be a better way of achieving the outcomes?**

I don't know/ I don't have enough information

**Other (please state):**

**Please explain your answer, providing evidence where available. :**

**Further detailed questions**

**81 Are there particular local authority considerations that should be taken into account when considering whether to implement either an "all-in" or "on-the-go" model?**

**Please provide more information:**

We believe efforts should be focused on EPR reforms and that these should be implemented with a view to recover full net costs for Councils. Overall UK performance on packaging recycling can then be assessed and the need for DRS reviewed in light of this performance. Taking this staged approach not only appears sensible but also manageable for all the organisations involved.

At that stage should a DRS scheme be adopted it would be sensible to introduce an "on-the-go" scheme initially with the ability to expand to "all-in" should the need arise.

**82 Are there specific considerations associated with your local authority that DRS policy makers should consider?**

**Specific examples and any cost estimates, where applicable, would add value to this response.:**

Considerations for Local Authorities;

- \* Reduction in recycled tonnages/recycling rate - a DRS scheme should apportion tonnages back to Local Authorities in a timely manner for reporting in Waste Data Flow
- \* Potential changes to gate fees due to changes in the waste composition
- \* Potential reduced income from targeted materials e.g aluminium
- \* Reduced landfill disposal charges if littering is successfully tackled
- \* Impact on glass bring banks should glass be within scope

**83 What benefits and/or disadvantages can a DRS provide to your local authority?**

**Specific examples and any cost estimates, where applicable, would add value to this response:**

As outlined in the primary benefits of the scheme.

**84 Are there any specific considerations associated with local authorities that collect waste from designated DRS return points that we should consider?**

**Specific examples and any cost estimates, where applicable, would add value to this response:**

Belfast City Council does not have sufficient information to provide a meaningful response.

**85 How should a DRS drive better design of packaging? Please select all that apply:**

Varying producer fees that reflect the environmental cost of the products that producers are placing on the market, An additional producer fee for producers using unnecessary and/ or difficult to recycle

**Other (please specify):**

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**86 Who should be involved in informing and advising on the environmental cost of products? Select all that apply**

Government, Reprocessers, Producers, Local Authorities, Waste Management companies

**Other (please specify):**

Environmental consultants, academia, in order that rigorous and independent life-cycle assessments and cost-benefit analyses can be undertaken on the information provided.

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

**87 Do you agree or disagree with our assessment of other waste legislation that may need to be reviewed and amended?**

Not Answered

**Please briefly state the reasons for your response. Where available, please share evidence to support your view.:**

We support the arc21 response to this question:

"It may be necessary to review legislation as it would apply to retail outlets in order to ensure that they do not need to be permitted as waste transfer stations, and to understand what hygiene implications there may be, particularly in smaller shops where it may be difficult to keep returned used containers fully separate from new stock.

Clearly the Government will be looking at how it ensures imported products are managed and subjected to the same obligations as drinks containers filled in the UK. arc21 is not aware of what specific measures will be needed in this regard.

Given the Government's stated objective to reduce litter, arc21 suggests that the Government may also want to look into targeted EPR schemes for smoking-related litter and used chewing gum, as both are significant sources of litter/disamenity."

**88 Do you have evidence to suggest that we might need to revise any other waste-related regulations as part of introducing a DRS?**

**Please specify.:**

No

**Further comments**

**89 Is there anything else we should be considering related to drinks container recycling and litter reduction which has not been covered by other questions?**

**Please specify.:**

We support the arc21 response to this question:

"Government should satisfy itself that proper consideration is given to the situation in Northern Ireland with particular reference to the relationship with the Republic Of Ireland, given the locality, supply chain arrangements and other influencing aspects such as Brexit implications"