



Association of Directors of
Environment, Economy, Planning & Transport

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Dear Consultation Coordinator

Consultation on Implementation of a Deposit Return Scheme for England, Northern Ireland and Wales, Response ID: ANON-HJCY-MEZ2-C

This letter complements ADEPT's submission to the Consultation on Implementation of a Deposit Return Scheme for England, Northern Ireland and Wales, with the ID 'ANON-HJCY-MEZ2-C'.

About ADEPT

The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents Place Directors from county, unitary and metropolitan authorities, along with Directors of Local Enterprise Partnerships and corporate partners drawn from key service sectors. ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK. We deliver the projects that are key to unlocking broader economic success and creating more resilient communities, economies and infrastructure.

ADEPT Waste Group members have welcomed the opportunity to be extensively involved in round table and other forums where many of the issues have been explored with stakeholders.

General Comments

ADEPT has simultaneously submitted a response on Extended Producer Responsibility and strongly supports the implementation of EPR.

However, ADEPT has serious concerns about the implementation of a DRS. We feel it is easier to summarise these in a short letter as the format of the response document – which we have nevertheless submitted completed - does not lend itself to distillation of these key points.

We note that Scotland will implement an all in DRS systems and we understand that many will wish to see a similar system in England, Northern Ireland and Wales.

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However, ADEPT feels that it would be sensible for the Government to wait and review the operation of the DRS in Scotland before deciding on the development of a scheme in other parts of the UK. If such a scheme is to progress, we would urge the full exploration of a potential role, if any, for a digital system. Our thinking is as follows:

Our Specific Concerns

The capture rate of in scope containers is already high in many parts of the UK. ADEPT members include Directors from County-wide Disposal Authorities who can evidence capture rates above 86% for glass, 76% for PET, 71% for steel cans and 74% for aluminium.

The implementation of a DRS will be extremely expensive in relation to the marginal benefit derived from this. EPR provides an opportunity to fund other incentives to increase capture and quality of material and local Government is generally willing to adopt other policies which will reinforce the Polluter Pays Principle with regard to household waste (one of the five Key Environmental Principles set out in the current, separate consultation being undertaken by Defra). These would include a willingness to pilot residual waste charging (so called “pay as you throw” type schemes, which incentivise waste reduction and recycling across the whole municipal waste stream and not just the narrow focus of DRS material. These outcomes would support the response to the climate emergency.

Similarly, we point to the existing infrastructure that is already – or will be under the Government’s plans for consistency (which ADEPT also supports) - in place to collect the a much wider range of recyclable / digestible material from households. We question the carbon impact of superimposing a new scheme which will require provision and emptying / servicing of tens of thousands of reverse vending machines.

We note from the impact Assessment that *“In 2019 Defra consumer research, 74% of survey participants supported a DRS (10% opposed). However, after further consideration, most qualitative participants came to question the idea of a DRS, which they felt asked a lot from consumers with no strong environmental benefit given the existence of kerbside recycling”*. ADEPT strongly endorse this conclusion, arrived at by potential users of the system.

Equity, Amenity and Community Safety

We have concerns around equity. The Impact Assessment notes that both (Defra’s own) survey and qualitative findings demonstrated that older people, those in lower social grades and those without access to a household car may be less able to engage with a DRS for practical and financial reasons. This we feel has not been highlighted enough and is of even greater concern given the more precarious economic situation that many find themselves in as result of the covid pandemic.

We have concerns around the impact on the urban environment, local amenity and community safety as result of locating reverse vending machines. These issues may be particularly evident in urban settings, as local authorities we have overseen the benefits for many communities of moving to kerbside collection and away from bank type return systems which cause noise and can be a magnet for illegal deposit of other waste.

We have concerns around the potential impact of a DRS on litter. The in-scope material only forms a fraction of litter and there is no incentive for those who cause litter to change behaviour in relation to takeaway packaging, coffee cups, cigarette litter and the myriad of other items discarded in this way.

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There is a risk that those who might seek to collect unredeemed DRS material from litter bins could remove and leave other material placed in those bins.

We have concerns that RVMs might be provided under permitted development rights, this risks further degradation of the urban environment and rural locations.

We note that over-the-counter return is an alternative to RVMS but we have concerns around the impact this will place on many SMEs in terms of adding an additional task and non-productive time and cost burden.

Impact of Covid-19 and Ongoing Risks

We note that the Consultation rightly seeks views on how the experience from Covid-19 might impact on a DRS. We question the wisdom of rolling out tens of thousands of more points of contact between people and surfaces through a DRS network. With a flu pandemic still the highest risk identified by Government in its national risk register, and persistence of variants of concern, we cannot assume that the current pandemic is a once in a century or even once in a lifetime occurrence. Existing systems of collection of recyclables have minimum risk in respect of viral transmissibility and we would again argue government should look at EPR to meet the objectives of increased capture and quality.

The Potential of a Digital DRS

Finally, ADEPT's arguments for enhanced use of existing infrastructure draw us to favour, as a least worst option, a requirement to fully explore the potential concept of a fully optimised Digital DRS, either as a significant part of DRS or a central feature of DRS, as a potential solution that addresses many of our concerns, particularly the costly nature of rolling out and servicing RVMs and the impact on small businesses. A fully optimised Digital DRS would be more cost effective and less of an inconvenience to consumers who would now avoid an additional, non-productive task and /or trip to redeem deposits, and if Digital DRS is to play any part or not in DRS that should be established before a DRS is implemented

Our conclusion is that it would be sensible for the Government to delay implementation of a DRS to assess the impact in Scotland, to allow an assessment of re-established consumer and public behaviours as part of the Covid-19 recovery and importantly to allow time to explore the role that a digital DRS could provide and the potential it could have to help ensure the most cost effective and easy to use system for the majority of consumers.

As ever ADEPT remains willing to assist the Government and looks forward to helping through close engagement to deliver the best outcomes from the Resources and Waste Strategy intentions.

Yours sincerely



Chair of ADEPT Waste Group

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