

Written evidence submitted by Keep Britain Tidy

In respect of the Deposit Return Scheme (DRS) to be proposed for England, Keep Britain Tidy is a signatory to the evidence submitted by Wildlife LINK. We have also provided some additional commentary below on specific questions.

- **The types of waste to be collected under the scheme**

1. We contend that drinks containers of all sizes and materials must be collected.

2. In 2019, Keep Britain Tidy undertook a composition analysis survey for Defra of litter on the ground and in street waste bins¹. Overall, this demonstrated that 75% of items littered by volume were drinks containers. The table below, which is taken from the report, also demonstrates that these drinks containers are not uniform in nature but comprise small and large plastic bottles, aluminium cans and glass bottles.

Table 15: Litter types by volume (top 15 by total volume only)

Item type	Count	% of dropped litter volume
Non-alcoholic small plastic bottle	1,049	24.4%
Non-alcoholic can	1,188	18.6%
Smoking litter not stubs	1,511	12.4%
Coffee cups	285	7.8%
Alcoholic can	417	6.8%
Fast food drink container (not coffee)	307	5.0%
Non-alcoholic large plastic bottle	71	4.4%
Other general litter	11,652	3.3%
Cold drink containers (not bottle)	98	3.0%
Small alcoholic glass bottles	146	2.4%
Newspaper	50	2.3%
Sandwich packaging	67	1.8%
Fast food inner	613	1.3%
Large alcoholic glass bottles	32	0.9%
Snack pack	264	0.7%

3. The report also demonstrates the prevalence of coffee cups and other fast food drinks containers. These containers are made of paper with single- or double-walled polyethylene lining for water-proofing. These materials aren't widely collected for recycling at the kerbside, although many retailers now provide in-house collection and recycling services. There may be scope to include these containers at a later date, after the DRS scheme has been implemented. This would be subject to decisions on whether, these types of composite packaging products are part of a circular economy in

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<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&ProjectID=20212&FromSearch=Y&Publisher=1&SearchText=eq0121&SortString=ProjectCode&SortOrder=Asc&Paging=10#Description>

future. In the interim, they should be subject to Extended Producer Responsibility, with producer fees that recognise they are materials that cannot as yet be closed loop recycled.

4. Also within the same report, the contents of litter bins is recorded by waste item and again it is apparent that drinks containers dominate, including large and small plastic and glass bottles and aluminium cans. Of course, in reality empty containers comprise mainly 'air' and take up a lot of void space within a litter bin, increasing the frequency with which they must be emptied. An all-in Deposit Return Scheme for plastic, aluminium and glass containers of all sizes would free up this void space, allowing local authorities to review their bin stock, with potentially fewer bins needed and less frequent collection rounds, allowing cost savings or redeployment of resources to other critical front-line services.

5. The comments above relating to other drinks containers such as coffee cups and fast food beverages apply equally here. Their inclusion in a DRS would substantially reduce the volume of waste in street litter bins at any one time.

Table 18: Top 15 binned waste items by volume

Item	Count	% of binned waste volume
Drinks: Plastic bottles – small, non-alcoholic	2,193	20%
Coffee cup	1,515	17%
Drinks: Cans – non-alcoholic	1,944	12%
Sandwich packaging	694	8%
Drinks: Cans – alcoholic	1,075	7%
Newspaper	316	6%
Drinks: Plastic bottle – large, non-alcoholic	204	5%
Fast food drink container (not coffee)	671	4%
Drinks: Other cold drink containers (not bottle)	346	4%
Fast food – inner packaging	3,873	3%
Magazines	167	3%
Drinks: Glass bottles – small, alcoholic	413	3%
Smoking litter (not stubs)	773	3%
Drinks: Glass bottles – large, alcoholic	184	2%
Snack pack	1,846	2%

- **The materials to be included in the scheme's scope**

6. We contend that the scheme must include all materials commonly used for drinks containers: PET plastic, HDPE plastic, aluminium, steel and glass. Other composite packaging materials such as coffee/soft drinks cups, pouches and sachets could be considered at a later date, subject to a review of their continuing use within a circular economy.

- **Scheme design ('all-in', 'on-the-go' or other models) and the level and scale of deposit charges**

7. We contend that the scheme must be an 'all-in' scheme. It is clear from our litter composition report above, that both small and large drinks containers are littered and feature as waste in street bins.

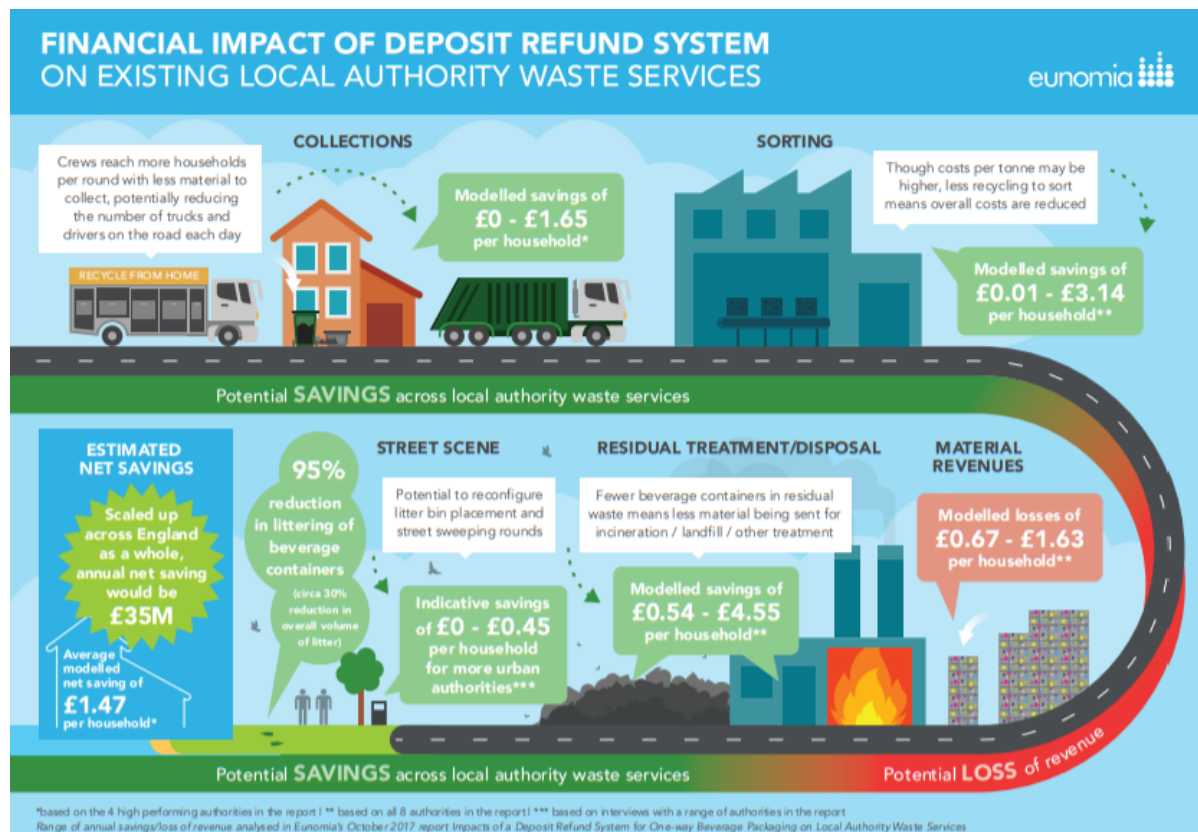
- **The impact of any scheme on local authority kerbside collections and on local authority revenue streams dependent on the value chain of recyclables**

8. We are aware that concerns have been raised by some actors within the waste sector about the impact of removing plastic, aluminium and glass containers from the existing kerbside collection system. This is because these materials can have a resale value on the secondary material market and hence provide some income towards the costs of running the collection service. Removing these materials would, as things stand, increase the costs of providing the collection service to a local authority.

9. However, a report commissioned from Eunomia by a consortium led by Keep Britain Tidy², demonstrated that this analysis was too simplistic. In fact, analysis of savings and costs throughout the whole of the collection and processing chain revealed that local authorities in England could save around £35 million as a result of not having to collect drinks containers diverted to a DRS (see infographic below taken from the Eunomia report). Furthermore, this figure did not include savings arising within local authority streetscene and cleansing teams, as a result of dealing with substantially fewer littered and binned drink containers.

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https://www.keepbritaintidy.org/sites/default/files/resources/KBT_Research_Report_Deposit_Refund_System_2017.pdf



10. However, introducing a DRS at the same moment as an Extended Producer Responsibility scheme for packaging nullifies these concerns altogether. With EPR expected to require that producers cover 100% of the net costs of providing a kerbside collection service for their packaging, the loss of any materials, such as drinks containers, becomes irrelevant, as local authorities will be financed to collect whatever packaging is deemed in scope under EPR.

11. Furthermore, the removal of drink containers from the kerbside collection system presents opportunities for collection of additional valuable materials such as textiles and small electrical goods or offers potential to review collection round frequencies and vehicle requirements, with potential to make cost savings in service provision.

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