

Written evidence submitted by the Foodservice Packaging Association

The Foodservice Packaging Association represents the producers, distributors and end users of packaging used to serve food and drink away from the home and for home delivery of meals. This includes all packaging used by takeaways, restaurants, caterers, meal delivery, venues, transport and events. It includes front of house (customer facing) and back of house (food and drink preparation). Criteria for usage includes hygiene and safety as well as convenience. Currently the sector is experiencing a collapse in business as a result of the pandemic with the exception of NHS purchasing and to a lesser extent the growth in home delivery. Our members use most materials and the

The types of waste to be collected under the scheme

Beverage containers including bottles and beverage cartons, pouches, and sachets but excluding paper cups. If the latter were to be included then the degree of fraud would be very high as it would be possible to purchase cups in bulk and then redeem deposits.

Reverse vending machines will require further development to accept pouches and sachets but inclusion will help to ensure no single packaging format is able to benefit because it is excluded. It is also important to investigate the use of Digital DRS systems.

In common with DRS in other countries milk and plant based-based drinks should be excluded from DRS as they will contaminate and pose a hygiene risk. The majority of milk consumption is, of course, in homes and in commercial kitchens.

Containers made from bioplastics will need to be handled separately from non-bioplastic containers to avoid contaminating recycling and decreasing recycle quality.

The collection and recycling of beverage containers used in homes have very high recycling rates. We believe there is no benefit to be achieved by asking householders to take used containers back to stores and RVMs when they have excellent kerbside waste collections which account for the current high recycling rate. DRS should therefore be solely based on consumption outside the home where up to 25% of containers are not collected. Out of home

represents the greatest opportunity to increase recycling and reduce drink container litter.

The use of life cycle assessments for each container type should be used before making final decisions for DRS inclusion on any format.

The materials to be included in the scheme's scope

If any materials are excluded then an impact assessment must be conducted to ensure the excluded material doesn't benefit as a result. This should also take account of potential increases in carbon by encouraging switching from one material to another

Plastic and metal containers as well as beverage cartons should be included.

We are concerned the inclusion of glass will mean glass containers being taken back to stores and RVMs with the possibility of breakages even before they reach them. Many takeaways and coffee shops do not sell drink in glass containers for safety reasons and would not wish to have glass items taken into their premises.

Containers made from bio based plastics should be included but the system needs to ensure they are separately identified.

Shopkeepers should have the right to refuse alcohol containers on religious grounds.

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

Quite simply DRS should be based solely on-the-go. As on-the-go collection and recycling rates are significantly lower than kerbside, this is where the biggest leap in recycling rates is to be gained with the added potential to reduce litter.

There is a lack of much needed on the go recycling infrastructure in the UK. which also encourages litter. Containers placed in litter bins are often contaminated reducing their ability to be recycled.

We support the use of a variable deposit rate to avoid switching from single serve sizes to much larger containers which has been shown to occur if the rate is identical irrespective of size.

In the event. of DRS being 'all in' then at 20p a 24 pack of canned drinks means an additional outlay of £4.80. For many in the population even though

deposits are returned money today is much more important than money tomorrow. Given on-the-go is in primarily smaller size single serve containers then the argument for an on-the-go scheme is strengthened and avoids the potential for multi-packs used in the home becoming out of the range of those on lower incomes.

The obligations on retailers at all levels (including online only retailers) to participate in the scheme

Exclusions to the obligation to take back used containers and return deposits should include restaurants and portals delivering meals to homes and vending machines.

Restaurants delivering meals to homes mostly deliver to an individual home once every three months on average. Making a journey specially to collect a container would most likely lead to restaurants not delivering drinks – a major revenue loss.

Many vending machines are in isolated places with no facility to return deposits.

Online retailers will require a waste carriers license to take back waste and carrying used containers and ready to eat food will breach hygiene regulations.

The effect on scheme design of recent changes in patterns of retail activity

The most significant change has been a shift to online delivery with on-the-go consumption a fraction of sales pre-pandemic. Home delivery is very likely to remain high post-pandemic.

We believe the proportion of foodservice packaging in homes has never been higher. However much can be disposed of at kerbside.

This suggests an 'all in' the development of DRS is essential.

The impact of any scheme on existing reuse and recycling and reuse systems

The development of reuse systems is unlikely to be impacted by DRS. Hygiene and safety are critical in their development hence reuse systems are to be encouraged rather than the public bringing in their own used containers to retailers.

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

Losing their most valuable materials (metal and plastic) will inevitably have an adverse impact on Local Authorities. We believe this strengthens the case for an on-the-go only DRS

The potential relationship between deposit return schemes and other packaging waste initiatives promoted under the Resource and Waste Strategy, such as the packaging producer responsibility system and consistency in kerbside collections of dry recyclables.

We believe Extended Producer Responsibility should be implemented ahead of DRS. A well modulated and managed EPR system will achieve most of the goals of DRS.

How the use of deposit return schemes is likely to affect the UK's progress towards meeting the targets set in the Resource and Waste Strategy.

The net increase in overall recycling rates for plastic packaging has been estimated to be between 2-3%.

The scope for interoperability between any schemes in England, Wales and Northern Ireland to be established under Schedule 8 to the Environment Bill and the scheme to be established in Scotland under the Deposit and Return Scheme for Scotland Regulations 2020.

A single Great Britain wide scheme rather than a separate scheme for Scotland is needed to ensure the public have a greater understanding of the scheme and to prevent fraud. The latter will arise if the deposit rate in Scotland is different to that of England and Wales and different packaging formats are in scope.

The factors which have contributed to the successful implementation of deposit return schemes in other jurisdictions.

Successful use of DRS in other countries is often mentioned but such comparisons fail to take into account the UK's well advanced kerbside collection which is collecting many of the items in scope anyway.

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