

## **Written evidence submitted by the Oxfordshire Resources & Waste Partnership**

Written evidence submitted by the Oxfordshire Resources & Waste Partnership (ORWP), a partnership of the 6 local authorities in Oxfordshire responsible for the collection and disposal of household waste.

### **1. Executive Summary:**

- 1.1 In response to the Government's proposal to implement a Deposit Return Scheme (DRS); ORWP has significant concerns that a DRS targeting drinks containers would greatly undermine existing local authority systems which are established, known and efficient - particularly where residents are engaged.
- 1.2 A DRS should be part of an integrated system of resource and waste management that does not compete with existing recycling services which have proven to be highly successful in delivering significant increases in recycling. Nor should a DRS undermine nor replicate other incoming policy changes such as Extended Producer Responsibility.

### **2. Introduction:**

- 2.1 The Oxfordshire Resources & Waste Partnership is a partnership consisting of the two-tier local authorities in Oxfordshire, who are responsible for both household waste collection and disposal in the County. ORWP consists of Cherwell District Council, Oxford City Council, Oxfordshire County Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council.
- 2.2 ORWP are submitting a response to the Committee in order to ensure that there is local authority representation in regards to the subject of Deposit Return Schemes (DRS) and the considerations the Committee is seeking to make as a result of the evidence it receives. Local Authorities will be significantly affected by the introduction of a DRS as it will directly impact core functions that we provide; those of household waste management and street cleansing.
- 2.3 In a joint response to the 2019 consultation, under the then Oxfordshire Environmental Partnership; Partners indicated while behaviour change and embedding the 'polluter pays' principles are key; a decision on whether or not to implement a DRS should wait until the implications of the Extended Producer Responsibility (EPR) regime are known in full. It is worth noting that this phased approach in relation to EPR and DRS has been adopted in other countries such as France.

The Oxfordshire Resources & Waste Partnership does not support the implementation of a DRS at this time; more detail is provided below.

### **3. Waste types and materials:**

- 3.1 Should a DRS be implemented? Instead of a focus on drinks-type containers, which could be further targeted under the EPR regime as part of packaging, other materials where recycling rates are not as high or which are not currently collected at the kerbside would be more suitable. These could include for example: laminates, takeaway containers and single-use coffee cups for which there is currently limited options for reuse and recycling. Under the EPR regime, material streams such as mattresses, carpets and paint could also be targeted.
- 3.2 Additional materials such as baby/pet food pouches, energy gel packaging, crisp packets, thin plastic films could be considered under an 'All-in' approach should a DRS be implemented. This would support both additional opportunities to collect materials which are not commonly collected at kerbside, for which local authorities struggle to source reprocessing and treatment capacity (particularly in the UK i.e. local) as well as avoiding these materials becoming more widely used in an attempt by producers to avoid the DRS costs and burdens.
- 3.3 In the 2019 DRS consultation document, Government highlighted litter and its associated disamenity as related to drinks containers as part of the reasoning behind introducing a DRS. However, as highlighted in the 2020 Keep Britain Tidy Litter Composition Analysis Summary Report<sup>1</sup> and previously; cigarette butts make up the vast majority of litter items (66%) when examining litter in terms of their numbers (the volume these represent is small at 0.2% of overall volume). Small plastic bottles and non-alcoholic cans make up a far smaller amount (3%) of the litter item count (representing 43% of the total volume). Currently, there exists significant infrastructure at kerbside for plastic bottles and cans, less so for other litter items including fast food packaging and single-use coffee cups. ORWP would suggest that using a DRS to tackle drink container litter is a less effective mechanism than bolstering existing, effective systems such as broader use of the proposed EPR regime.
- 3.4 We have significant concerns that a DRS targeting these kinds of materials would greatly undermine existing local authority systems which are

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<sup>1</sup> [20200330 KBT Litter Composition Report - FINAL.pdf \(keepbritaintidy.org\)](#)

established, known and efficient - particularly where residents are engaged. There is likely to be little net overall gain in the capture of these materials through inclusion in a DRS. Additionally, some of these materials (aluminium cans, glass, etc) are income generating and the removal of these from kerbside systems would likely make recycling more expensive for local authorities as the basket value decreases. A consequential impact of this could be to make EPR more expensive.

#### **4. Scheme Design:**

- 4.1 There are both pros and cons with both an On-The-Go (OTG) and All-in design. While a DRS would provide an additional channel for the public to recycle away from home; overall we believe there are more negatives associated with the regime. Unintended consequences and the interactions with the other proposed changes to waste policy and legislation (Consistency, EPR, plastics tax, waste prevention programme) need to be considered in full.
- 4.2 Other considerations need to include the impacts of the Coronavirus pandemic and the shifts in how the public will both shop and work in the future. There has been a significant increase in online shopping and home delivery, both of which could impact an All-in system. Does the move to continued and greater home working reduce the need for an OTG system? Given the unknowns in how we work and live will shift as we come out of the pandemic; better use of current kerbside systems would seem more prudent and better value for money for the taxpayer.
- 4.3 In regards to an OTG approach for example, we believe that there could be a move by producers to move to non-targeted materials such as glass, laminate pouches, etc to avoid obligations on paying the deposit to consumers. Further unintended consequences as part of this could see increased carbon emissions resulting from the manufacture, transport and recycling of such products – particularly cartons and laminates.
- 4.4 For an All-in approach; if carton, pouches and sachets for example, aren't included in a DRS but are to be captured under EPR how will they be collected as they are not included in the core materials in the consistency framework? It is these harder to recycle items that a DRS should target, rather than materials for which there are effective existing systems in place.
- 4.5 Consideration must also be given to the practicalities of implementing a DRS in small retailers dealing with fast moving consumer goods (FMCG) such as corner shops,

etc. Space in locations such as these to retain returned materials is likely to be difficult to create and manage effectively.

- 4.6 A final consideration must be made on the level of deposit. If it is too high, Local Authorities have significant concerns that 'bin harvesting' i.e. where household recycling bins out on the street awaiting collection may be harvested for targeted material. This is likely to lead to both littering and greatly reduced income from recyclates which is currently used to support other local authority services. Should the deposit be set at too low a level, there is likely to be limited take-up by the public as it wouldn't be perceived as worth the effort. This would greatly undermine the Government's aim to both improve material capture and reduce associated littering. Given the estimates of the likely costs for implementation as provided in the 2019 Consultation<sup>2</sup>, an assessment needs to be made as to value for money a DRS would provide to the taxpayer.

## **5. Interactions with other Resources & Waste Proposals:**

- 5.1 Materials not targeted under DRS, but possibly via EPR and yet not listed under the Consistency proposals create issues with unintended consequence in terms of use to avoid DRS, reduce EPR burden and lack of UK infrastructure (particularly in terms of collection and treatment).
- 5.2 Furthermore, impending changes to the waste industry in the UK from Extended Producer Responsibility, a consistency framework, and the plastic packaging tax (due in 2022) will have far reaching effects – the exact nature of these changes are far from certain. Any assumptions made about the efficacy of a DRS are obscured by the unknown consequences of other waste policy changes.
- 5.3 In the Resources & Waste Strategy, mention was made around changes to metrics and measures, which are currently weight-based but could move to a more carbon-based approach in the future. Would a DRS contribute positively to this shift; when it is accepted that it is likely to only contribute only a small additional amount to the national recycling rate?

## **6. Local Authority Impacts:**

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<sup>2</sup> Page 8 [Introducing a Deposit Return Scheme in England, Wales and Northern Ireland \(defra.gov.uk\)](https://www.defra.gov.uk)

- 6.1 As noted previously, Local Authorities are likely to be significantly negatively impacted by a DRS – irrespective of which system (OTG or All-in) is adopted. These include for example:
- Undermining existing systems at kerbside and household waste recycling centres that are known and effective, particularly where residents are engaged;
  - Reduced capture of material at kerbside;
  - Bin harvesting where core materials are removed from kerbside bins;
  - Little to no impact on littering levels, for which local authorities are also responsible;
  - Possible moves by producers to utilise other materials for which there exists little to no UK reprocessing and recycling capacity.
  - Negative financial impacts on the basket value of goods

We ask the Committee to consider these impacts in relation to the current financial situation local authorities are already working within as well as the interactions with the other proposed changes to waste policy that are due to be introduced (namely EPR and Consistency). As part of this, consideration also needs to be given as to the flow of money within an EPR and DRS linked system. Will local authorities be paid for any DRS-targeted material found in the kerbside bin? If not, what happens to the unclaimed deposits if material does not make it into the new DRS infrastructure and remains in kerbside systems?

## **7. Conclusion:**

- 7.1 The ORWP believes that a phased approach should be adopted where the EPR regime is introduced alongside the incoming Plastics Tax first. Once the impact of this can be seen, an assessment should be made then as to the likely efficacy of a DRS in increasing material capture and reducing litter and contamination, while not adversely affecting sectors such as Local Authorities and small FMCG retailers. If a DRS is implemented, then it must form part of an integrated system of resource and waste management that does not compete with existing recycling services which have proven to be highly successful in delivering significant increases in recycling.

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