

Additional Written evidence from British Glass

British Glass: Response to EAC 'Next steps for deposit return schemes' evidence sessions

I am writing to thank you for providing British Glass with the opportunity to present evidence to your Committee, and to offer some evidence and clarity on some of the comments made by other witnesses who, being in the first session, we were unable to respond to. We stand by all the figures and data we used during the evidence session and in our written evidence – this evidence is fully referenced and can be accounted for.

We must express our disappointment that glass has been included within the scope of materials to be included in an intended Deposit Return Scheme, as per the consultation. We champion the ambition to recycle more glass, but a DRS is not the magic bullet it is sometimes suggested to be. The inclusion of glass will lead to a number of unintended consequences including material switching (most commonly increasing plastic bottle usage), creating more carbon emissions, and the impact a DRS will have on the recycling of other glass packaging that will remain at the kerbside.

Our ambition

British Glass shares the same ambition as every other witness the Committee invited to give evidence, which is to increase recycling rates and to create better environmental outcomes. Making new glass from recycled glass reduces CO₂ emissions and energy use, saving 580kg of carbon dioxide emissions with every tonne of glass re-melted. That's why we are working with companies at every point in the life cycle of glass products to increase recycling.

An absolute priority for the glass sector is to maximise the quantity and quality of recycled glass (cullet). Demand by glass manufacturers for good quality cullet is always high: the industry and its wider supply chain rely upon a consistent supply of good quality, economically sourced, post-consumer glass to maximise the recycled content of new glass bottles and jars. Producing glass packaging from cullet is more cost effective for manufacturers than using raw materials, as such high collection and recycling rates are both economically and resource efficient for the glass industry.

Glass is a low value material compared to plastic and cans and the industry is deeply concerned that rather than increasing quantity and quality, including glass in a DRS will be costly, increase carbon emissions, incentivise and increase the consumption of PET (at the expense of glass) and crucially reduce the quality and quantity of recycled glass. As set out in our evidence.

Collections vs recycling rates

In the session directly after my appearance there was some confusion over the collection rate figures presented, which were mistaken for recycling figures by ReLoop's Samantha Harding. The reason we spoke about collection rates, as oppose to recycling rates, is because the DRS proposed by DEFRA is only offering a collection target, not a recycling target. This is an important point and reflects the fact that DRS is only a collection system (like kerbside or bottle banks) unlike EPR which is an overarching producer responsibility system with recycling targets (essential for glass) and a producer fee to incentivise recyclability which will fund and invest in the entire recycling infrastructure – from collection and consumer communications to infrastructure (such as sorting facilities and on-street recycling bins) and litter costs.

We want to maximise the recycling of glass, and indeed glass is the only material currently collected with a target for closed loop recycling (the PRN system for glass includes a remelt target to ensure at least 72% of glass recycled is remelted back into bottles and jars, rather than aggregates). That is why we are clear glass must remain within a system of EPR, rather than in a DRS – which could lead to material being 'recycled' as aggregate rather than for remelt.

Remelt targets

DEFRA is currently only considering a collection target for materials in scope of a DRS. In our view, if glass is in scope of DRS then a remelt target will be essential to guarantee closed loop recycling for remelt back into bottles and jars – without it, the scheme administrator will have no incentive to ensure the closed loop recycling of glass, therefore the quality and quantity of glass available for closed loop recycling will be significantly impacted and lead to material ending as aggregate. This is a fundamental concern for the glass industry, which would accentuate the UK's cullet imbalance. The DRS administrator will not be able to dictate how the glass collected is recycled and there is a risk that it will go to the lower cost option of aggregates. The other materials within the scope of a DRS do not have this issue as there is no alternative markets for the collected materials.

It is worth pointing out that during the second evidence session, the Minister on a number of occasions spoke of the proposed DRS seeking to achieve a 90% recycling target, this is not the case – the proposed DRS is seeking a 90% collection target.

International examples of Deposit Return Schemes

In response to your question to the Minister on the best example of an international DRS scheme, the Minister was quick to point to the Norway model - stating that their DRS collects 97% of plastic drinks containers. British Glass agrees with the Minister that the Norway model is an example of best practice and pointed to this in our written and oral evidence.

It must be emphasised that the Norway DRS does not include glass. Norway achieves one of the highest glass recycling rates in Europe (89.4% in 2016) using EPR, bottle banks and bins closer to home. This model operates alongside a DRS for cans and plastic, which, as alluded to by the Minister, captures an impressive 97% of plastic bottles.

I would be more than happy to provide any further information to the Committee which may help to further inform your report. I thank you once again for providing much-needed scrutiny to the introduction of a DRS, which will shape the UK's recycling landscape for a generation.

Yours sincerely,

Dr Nick Kirk
Technical Director, British Glass

March 2021