



*Glass is one of the most sustainable materials on earth - it is 100% recyclable and can be re-melted endlessly without ever reducing its quality. In 2019, glass achieved an impressive collection rate of 77%, but the glass industry wants to go further with a target to achieve a collection rate of 90% by 2030. This ambition is best achieved by excluding glass from a Deposit Return Scheme (DRS), instead recycling glass through a world-leading system of Extended Producer Responsibility (EPR), consistent collections and campaigns to promote a better culture of recycling.*

## Why glass should be excluded from a DRS

The glass industry has long-called for all glass packaging to be collected through improved, consistent kerbside collections within EPR. Whilst we are not opposed to a DRS as a mechanism to increase the recovery of certain types of packaging, it is not the right solution for glass. There is substantial evidence which shows that including glass bottles in a DRS leads to adverse consequences including:

**Keeping glass packaging at our doorsteps is better for our environment** - research by the consulting team at Reconomy Group company, Valpak has shown **including glass in the planned DRS will produce millions of tonnes more carbon and collect less glass** than an improved kerbside scheme.



**It will perversely increase plastic consumption, rather than reduce it** - in countries like Germany and Croatia there has been **a significant uptake in larger, plastic containers** due to the smaller upfront cost of the deposit where glass is included in the DRS.



**It splits glass packaging recycling into two waste streams to the detriment of both** - glass jars, condiment bottles and other glass packaging would still remain part of future household collections, **representing circa 30 per cent of all glass packaging**. When a DRS was announced in Scotland which included glass, **Dumfries and Galloway Council immediately set out its intention to stop collecting all glass from the kerbside**.



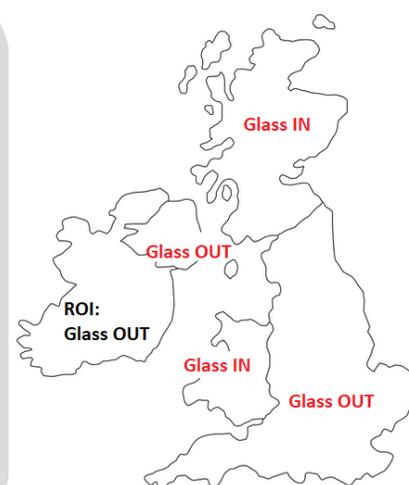
**The public do not want it** - a recent YouGov survey has shown that **over 70% of people are already satisfied with the current collection system for glass packaging and nearly half want to recycle their glass packaging through kerbside collections at their doorstep**.



## State of play

The glass industry welcomed the decision by UK and Northern Irish governments to keep glass out of a DRS. It is the right decision for our environment, consumers and businesses alike, and can be delivered quickly. However, both Scottish and Welsh Government have outlined their intention to include glass in a scheme, creating serious concerns about the interoperability between the schemes:

- **England and Northern Ireland** will exclude glass from DRS, as will the Republic of Ireland.
- **Wales** opted to include glass in its DRS, with a view to exploring digital solutions.
- **Scotland** is pressing ahead with a DRS including glass, intending to go operational in late 2023.



## Multiple schemes will hit hard consumers and businesses

*The prospect of having multiple, diverging schemes across the UK will force many drink businesses to make tough decisions, especially smaller businesses in Wales and Scotland. The regulatory divergence in the scope of materials between schemes in Scotland and Wales and England, Northern Ireland and Ireland raises myriad challenges, and is of serious concern.*

- **It will increase the cost and complexity for businesses, forcing them to take tough decisions and stymieing growth** - glass bottles included in a DRS would likely be required to carry a specific label and/or demarcation, which would require a separate Stock Keeping Unit (SKU) for bottles being sold in England and Northern Ireland to those in Scotland and Wales. This would **increase production complexity and cost, and could lead to producers withdrawing products** from uneconomic markets – or **switching to plastic packaging** – hitting hard both businesses and consumers alike with higher costs and less choice. 
- **It will lead to greater confusion over what can be recycled properly, and where, for consumers** - for residents in close proximity to either border, and indeed those travelling between countries, divergence **risks creating more, not less, confusion about how to recycle properly**, to the detriment of both kerbside collections and a DRS. 
- **It will increase the risk of fraud** - **having multiple schemes with different materials in scope increases the risk of fraud**, as has been witnessed in other schemes around the world. 

### But there is a better alternative.....

The UK already has an impressive glass collection rate of 77%, collected at the kerbside. Keeping glass bottles out of all schemes in the UK, and instead collecting and recycling all glass packaging through improved, consistent collections within a world-leading system of EPR would remove major interoperability issues, including:

- ✓ **Alleviating issues caused by divergence, creating a level-playing field for producers of all sizes to sell on all markets without additional cost or complexity**
- ✓ **Expediting the implementation and effectiveness of deposit return schemes across the UK**
- ✓ **Reducing the impact on consumers; reducing cost, increasing choice and making it as easy and understandable as possible to recycle your glass packaging, wherever you are in the UK**

***In conclusion.....***we all know more needs to be done to increase recycling, tackle litter, and move toward creating a circular economy for all packaging formats. To this end, it is vital that we use the opportunity now to get recycling right for generations to come. For glass, this means keeping the collection of food and beverage packaging in a single waste stream through improved, consistent kerbside collections within EPR, not in a damaging DRS.

Given the complexity of adding glass to a DRS, particularly given the issues of divergence, and the impact this will have on businesses and consumers, **we are calling on Scottish and Welsh governments to think again** on its inclusion within their schemes. Not only would this help overcome very real issues around interoperability but also expedite the implementation date of a DRS.