

MCS response to the Deposit Return Scheme Consultation June 2021

Please note: This document contains the questions we have responded to only.

6. Given the context of the Covid-19 pandemic we are currently experiencing, do you support or oppose our proposals to implement a deposit return scheme for drinks containers in 2024?

Support

Please elaborate on your answer if you wish:

This question combines two aspects. While we support the introduction of a Deposit Return Scheme (DRS), we are strongly opposed to the delay.

The scheme must include drink containers of all materials and sizes. As well as maximising resource capture, DRS provides material which has been separately sorted and therefore is much more likely not to be down-cycled. In the 2019 Defra consultation, it was highlighted that “most commonly, respondents felt that a DRS would incentivise consumers to recycle containers, leading to higher overall recycling rates and an associated reduction in littering and waste production”[1]. Figures calculated for Scotland by Zero Waste Scotland showed that DRS could lead to a 90% reduction in litter for the materials included in the scheme[2] and we do not see why a similar reduction wouldn't be achieved in England, Wales and Northern Ireland.

As the consultation itself states; “We consider that a well-designed deposit return scheme for drinks containers could achieve recycling rates of 90% or higher”, which represents a considerable improvement on current recycling rates. Re-loop analysis has shown that every year, 8 billion cans and bottles are wasted (littered, incinerated or landfilled)[3], so this further delay increases this wastage. In the time of a climate emergency, steps that reduce carbon emissions and move us to a circular economy need to be done expediently and not subject to any further delays.

Marine Conservation Society (MCS) commissioned a YouGov survey in May 2021, which found that 77% and 72% of adults in England and Wales respectively supported the introduction of a DRS. These results similarly reflect the 2017 results where the same question was asked, which found 73% and 71% supported, with opposition significantly dropping (9% to 6% in England, 15% to 8% in Wales). The consultation itself states that “deposit return schemes continue to function well throughout the pandemic”, therefore, it is not clear why Defra needed to phrase this question 6 around the context of the pandemic. Furthermore, we have shown evidence that public support on this issue has not wavered and the already limited opposition has notably dropped.

For over 25 years, MCS has run the Beachwatch citizen science project to collect and record beach litter data. This data provides valuable insight into litter sources and frequently found items. Plastic bottles and their associated caps together with aluminium drinks cans are some of the most visible and consistently found pieces of litter across UK beaches. During the MCS 2020 Great British Beach Clean survey, despite Covid restrictions, our volunteers still found 8,329 drinks litter items including bottles (glass and plastic), lids and cans.

Using year-round beach clean data collected over the last five years, the average drinks litter in England and Wales per 100m is 49.8 (9.2 plastic bottles, 31.2 lids, 6.0 cans and 3.4 glass bottles) and

64.5 (7.0 plastic bottles, 48.2 lids, 5.5 cans, 3.8 glass bottles) respectively. We consider caps an important component of drinks litter, because caps often float due to their shape and material (lids are usually made from high-density polyethylene (HDPE) and polypropylene (PP) rather than PET which tends to sink). The number of lids found therefore gives a potential indication of the number of drink containers being lost to the environment.

In 2020, MCS inland cleans found drinks-related litter (including lids) in 99% of cleans across the UK[4].

The UK Government has committed to maintaining environmental standards equivalent to the EU. In 2020 under the Marine Strategy Framework Directive (MSFD), a threshold value of 20 litter items per 100m was set[5]. This threshold value is considered “by experts from the MSFD Technical Group on Marine Litter to reduce harm from beach litter to a sufficiently precautionary level.”[5]

Using the same methodology as outlined (the threshold value is calculated using a subset of the data with a specific methodology)[5], MCS estimates there were 234 and 183 litter items per 100m in England and Wales respectively calculated over three years (2018-2020). In other words, on English beaches, the litter levels are ten times higher than the threshold value. We urgently need to capture as much high-quality material as possible for recycling. As a key component of a circular economy, reusables should also be prioritised as this is higher up the waste hierarchy.

Question 7 does not allow for unbiased analysis. There is no option for people to express their views on the positive impact that DRS would have on their lives. Hundreds of thousands of people have supported the introduction of a DRS[6]. Support for a DRS remains high, while opposition is notably dropping (as outlined in question 6 and repeated below).

Marine Conservation Society commissioned a YouGov survey in May 2021 which found that 77% and 72% of adults in England and Wales respectively supported the introduction of a DRS. These results similarly reflect the 2017 results where the same question was asked, which found 73% and 71% supported the introduction of a DRS, with opposition significantly dropping (9% to 6% in England, 15% to 8% in Wales).

Defra’s 2019 consultation demonstrated that there is a clear majority in support of an all-in DRS, with the backing of it by a wide range of stakeholders. The Environmental Audit Committee 2021 inquiry also put further weight behind the need for an all-in deposit system[7], which should be implemented as quickly as possible.

As highlighted in question 9, we don’t think it should be compulsory for the cap to be part of the deposit. However, we would like to see caps captured as part of the DRS process. If the Governments were to legislate for a tethered cap system this would further increase recycling with no additional input from the consumer. Under the EU’s Single Use Plastic Directive, tethered lids are required to be adopted by July 2024. We do not see any reason why Governments in the UK could not implement the same legislation to help tackle litter found on our beaches and would align with their environmental commitments. Over the last five years, MCS volunteers have found on average 29 caps/lids per 100 metres on beaches in the UK.

We would also like to take this opportunity to emphasise our support for the additional points made in the LINK response for this question and subsequent ones.

YouGov information is included throughout our response. Details of the studies used are included below.

2017 study: Total sample size was 2,137 GB adults, of which 1,844 based in England and 106 in Wales. Fieldwork was undertaken between 7th-8th August 2017. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

2018 study: Total sample size was 2,081 GB adults, of which 1,797 based in England and 104 in Wales. Fieldwork was undertaken between 18th - 19th October 2018. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+)

2021 study: Total sample size was 2,076 GB adults, of which 1,794 based in England and 102 in Wales. Fieldwork was undertaken between 25th-26th May 2021. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+)

1. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/826853/drs-consult-sum-resp1.pdf

2. <https://resource.co/article/scottish-drs-could-see-90-cent-reduction-litter>

3. <https://www.cpre.org.uk/about-us/cpre-media/over-8-billion-drinks-bottles-and-cans-wasted-in-2019/>

4. [https://media.mcsuk.org/documents/Source to Sea Education Pack.pdf](https://media.mcsuk.org/documents/Source_to_Sea_Education_Pack.pdf)

5. <https://ec.europa.eu/jrc/en/publication/european-threshold-value-and-assessment-method-macro-litter-coastlines>

6. <https://www.letsrecycle.com/news/latest-news/lobby-groups-press-for-all-in-drs/>

7. <https://committees.parliament.uk/committee/62/environmental-audit-committee/news/155338/deposit-return-scheme-should-be-consistent-across-uk-with-cartons-included-argues-environmental-audit-committee/>

7. Do you believe the introduction of a deposit return scheme will have an impact on your everyday life?

No, there will be no impact

8. Have your views towards implementation of a deposit return scheme been affected following the economic and social impacts of the Covid-19 pandemic?

No

Please elaborate on your answer if you wish:

We would like to note that this question is poorly worded and answers here are open to interpretation and therefore responses could be easily misrepresented. This understanding should be reflected in any interpretation of this question and responses received. Lockdowns have resulted in people becoming increasingly aware of their local environment and therefore the benefits of schemes such as Deposit Return Schemes, with fewer people opposed to such schemes (see answer in question 6).

The introduction of a DRS in Wales, England and NI would also help with the delivery of hundreds of green jobs, reflecting UK Government promises to “build back better” and recommendations made by the Future Generations Commissioner of Wales to create new green jobs and upskilling opportunities[8].

8. <https://www.futuregenerations.wales/wp-content/uploads/2021/05/FGC-A-Fit-for-the-Future-Programme-for-Government.pdf>

Chapter 1: Scope of the Deposit Return Scheme

9. Do you agree that the cap should be included as part of the deposit item in a deposit return scheme?

No, we don't think it should be compulsory for the cap to be part of the deposit. However, we would like to see caps captured as part of the DRS process. If the Governments were to legislate for a tethered cap system this would further increase recycling with no additional input from the consumer.

Under the EU's Single Use Plastic Directive, tethered lids are required to be adopted by July 2024. We do not see any reason why Governments in the UK could not implement the same legislation to help tackle litter found on our beaches and would align with their environmental commitments.

Over the last five years, MCS volunteers have found on average 29 caps/lids per 100 metres on beaches in the UK.

10. Do you believe we have identified the correct pros and cons for the all-in and on-the-go schemes described above?

No

Please elaborate on your answer if you wish:

The implementation of Extended Producer Responsibility means that removing material for a DRS is a moot point and that DRS is important in collecting high grade/valuable materials for recycling.

A well-designed DRS system would ensure anyone has the means to access and use it - and this would be a requirement regardless of whether it included all sizes. Therefore the size should be irrelevant for inclusive access.

Analyses of sociograde data (ABC1 & C2DE) from an MCS-commissioned YouGov survey in May 2021 shows support across adults in England for the inclusion of all sizes; 74% and 70% for ABC1 and C2DE grades respectively, compared to only 3% (in both sociogrades) for 750ml or less containers. An all-in DRS is strongly and evidently preferred across both the sociogrades.

11. Do you foresee any issues if the final scope of a deposit return scheme in England and Northern Ireland does not match the all-in decision taken in Wales? E.g. an On-the-Go scheme in England and an all-in scheme in Wales.

Yes

Please elaborate on your answer if you wish:

There are a number of risks if the scope is inconsistent - firstly, it would cause confusion for consumers, particularly those who live, work and travel regularly across the devolved nations.

There is also increased likelihood of fraud as cited by producers such as Coca Cola[9] and the British Plastics Federation[10].

Finally, there is increased cost for producers who have highlighted their desire for consistency across the UK[11].

9. <https://committees.parliament.uk/oralevidence/1981/html/>

10. <https://committees.parliament.uk/oralevidence/1895/html/>

11. <https://committees.parliament.uk/committee/62/environmental-audit-committee/news/152940/minister-quizzed-on-how-a-deposit-return-scheme-can-be-rolled-out/>

12. Having read the rationale for either an all-in or On-the-Go scheme, which do you consider to be the best option for our deposit return scheme?

All-in

Please elaborate on your answer if you wish:

There is strong public support for an all-in system and this has remained consistently high. A survey conducted by YouGov for MCS in 2018 showed overwhelming support for a DRS that included all sizes of drinks containers. 72% of respondents in England supported all sizes, while only 4% supported a DRS for 750ml or less.

This survey was then repeated in May 2021 and it reconfirmed this level of support with 72% of respondents in England supporting all sizes, while only 3% support a DRS for 750ml or less.

Beyond the extremely high public support evidenced by the above data, there are a number of other reasons for an all-in system, which includes:

Drinks containers of all sizes are littered. For example, Strandliners who do beach cleans at Fairlight Cove, Sussex found 376 bottles less than 750ml and 679 greater than 750ml during their September 2020 beach clean[12]. Data collected in May 2021 showed reduced numbers of bottles in all sizes but litter in both sizes were still prevalent (81 bottles less than 750ml, 146 more than 750ml)[12].

Higher economic benefits will be achieved by an in-all DRS. The impact assessment completed by Defra specifically for this consultation outlines the economics of the two systems, resulting in a net economic benefit of £5.8 billion for all-in compared to £0.28 billion for an on-the-go system.

An 'all-in' system brings numerous environmental benefits - such as the capture of 23 billion containers compared to only 7.4 billion by an on-the-go system as stated by Defra in this consultation. Higher capture rates would not only reduce the associated clean-up costs for local authorities and land owners, but would also assist in reducing the carbon footprint associated with requiring new, virgin materials (whereby, recycled material from captured containers is used instead). These drink

containers provide a higher quality sorted material, which is a particularly sought after recyclate. As stated by the Welsh Government in the consultation document; “the deposit return scheme is required to push these recycling rates even higher, tackle littering and improve the quality of collected recyclate.”

Consumers want an easy-to-follow system. With the potential for drinks containers to be made just beyond the scope of an on-the-go DRS e.g. 751ml, this will make it very confusing for consumers and further reduce the amount returned.

Regarding question 13, the proposed date of 2024 means that any impacts of the pandemic will be considerably less relevant if at all.

12. <https://strandliners.org/bottle-deposit-return-scheme/>

13. Given the impact Covid-19 has had on the economy, on businesses and consumers, and on everyday life, do you believe an On-the-Go scheme would be less disruptive to consumers?

No

14. Do you agree with our proposed definition of an On-the-Go scheme (restricting the drinks containers in-scope to less than 750ml in size and excluding multipack containers)?

No

If no, how would you change the definition of an On-the-Go scheme?

Drinks containers of different sizes are consumed in a variety of locations. The size of drinks container carried as “on-the-go” or used at home by a consumer is determined by consumer choice and behaviour. As evidenced in question 12, a variety of different sized containers are found littered on UK beaches. Consequently, a DRS system cannot afford to exclude any sizes and should adopt an all-in approach.

15 Do you agree that the size of containers suggested to be included under an On-the-Go scheme are more commonly consumed out of the home than in it?

No

16. Please provide any information on the capability of Reverse Vending Machines to compact glass? Please provide information on RVMs to compact glass:

Glass should be included within a DRS. Support for the inclusion of glass in a DRS is high; 75% of people in England and 75% in Wales support its inclusion (YouGov survey commissioned by MCS in May 2021). This support for the inclusion of glass is consistent with the similarly high recorded support when the same survey question was asked in 2018; 75% and 74% supported the inclusion of glass in England and Wales respectively.

MCS volunteers regularly find glass on UK beaches. During MCS’s all-year Beachwatch surveys, an average of 33.5 ‘glass other’ items (which are typically but not exclusive glass pieces) were found. Glass fragments are a danger to both wildlife and people. By including glass in a DRS, this danger would be reduced.

Glass can be infinitely recycled. It is therefore imperative it is fully captured within a DRS system in order to reduce our carbon footprint and achieve our national commitments to moving to a circular economy.

17. Do you agree that the scope of a deposit return scheme should be based on container material rather than product?

Yes

18. Do you agree with the proposed list of materials to be included in scope?

Yes

19. Do you consider there will be any material switching as a result of the proposed scope?

Yes

Please provide evidence to support your response:

Any material used for drinks containers which is not included within a Deposit Return Scheme could result in material switching. It is important as a minimum that glass, aluminium and plastic are included. The adult public in England and Wales support the inclusion of glass, aluminum, plastic and drinks cartons made of more than one material type. YouGov surveys conducted for MCS in 2018 and repeated in May 2021 revealed overwhelming support for a Deposit Return Scheme which included a wide range of drink container materials. When asked what respondents think should be included in the scheme in May 2021, those surveyed in England said plastic bottles (77%), glass bottles (75%), aluminum cans (67%) and drinks cartons made of more than one material type (57%). In Wales, the figures demonstrated a similar support for including these materials - plastic bottles (76%), glass bottles (75%), aluminum cans (63%) and cartons of more than one material type (58%).

This evident public support is why MCS is calling for the system to include all materials commonly used for drinks containers, including as a minimum; plastic (PET and HDPE), aluminium, steel, and glass. Inclusion of all of these materials will help eliminate the potential shift to using and purchasing a drinks container that is not covered by the scheme, simply to avoid the deposit. Beverage containers of mixed material including pouches/sachets should also be included to reduce the likelihood of them being littered. If a material used cannot be recycled however, then they need to be phased out. We consider drink pouches as a form of single use sachet and therefore don't align with a circular economy approach.

Single use sachets and other applications which are multilayer, multimaterial should be banned. Alan Jope, CEO of Unilever when asked during the launch of the "Breaking the Plastic Wave report" (July 2020)[13] about multilayer single use plastic sachets stated "we have to get rid of them" saying they have "no real value" for mechanical recycling [14]. This material is not fit for a circular economy.

13. https://www.systemiq.earth/wp-content/uploads/2020/07/BreakingThePlasticWave_MainReport.pdf

14. <https://www.youtube.com/watch?v=tNtkgRkenIk> [1 hour 21-22 minutes into panel]

Chapter 2: Targets

20. Which of the following approaches do you consider should be taken to phase in a 90% collection target over 3 years?

80% in year 1, 85% in year 2, 90% in year 3 and thereafter

21. What collection rate do you consider should be achieved as a minimum for all materials after 3 years?

90% collection rate should be achieved for all materials

22. Is it reasonable to assume that the same collection targets could be met with an on-the-go (OTG) scheme as those proposed for an all-in scheme for in-scope materials?

Please provide evidence to support your response:

Collection rates would be different but not if the targets are percentage rates. However, an all-in system would be much easier for consumers to understand and therefore targets would be easier to achieve.

23. Who should report on the volumes of deposit return scheme material placed on the market in each part of the United Kingdom (England, Wales and Northern Ireland) for the proposed deposit return scheme?

The producer/ importer

What would be the implications of obligations to report on volumes of deposit return scheme material for producers/ importers and retailers? Please provide evidence to support your answer:

It is important to report the volumes of packaging being placed on the market and enable a transparent system of reporting.

Chapter 3: Scheme Governance

25. What length of contract do you think would be most appropriate for the successful bidder to operate as the Deposit Management Organisation?

7 - 10 years

26. Do you agree that the above issues should be covered by the tender process?

Yes

27. Do you agree that the issues identified should be monitored as Key Performance Indicators?

Yes

Please list any further issues you believe should be covered by Key Performance Indicators:

It is imperative that the process of establishing infrastructure aligns with the UK and Welsh Government's commitments to carbon emission reduction targets; 78% by 2035 for the UK[15] and

89% by 2040 for Wales[16]. The Deposit Management Organisation should adopt KPIs that reflect these targets and outline how they will contribute to emission reductions e.g. alternative renewable energy sources, use of electric vehicles.

15. <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

16. <https://gov.wales/climate-change-targets-and-carbon-budgets>

28. Do you agree that the Government should design, develop and own the digital infrastructure required to register, and receive evidence on containers placed on the market on behalf of the Deposit Management Organisation and regulators?

Yes

Chapter 4: Financial Flows

30. What is an appropriate measure of small producers for the purposes of determining the payment of registration fees?

Drinks containers placed on the market

31. Is a high level of unredeemed deposits funding the scheme problematic?

Yes

Please explain your answer:

The aim of the scheme is to capture as many drinks containers as possible and higher return rates would increase the efficiency of the system. It is thereby important that high levels of unredeemed deposits results in a penalty and that the system actively looks to minimise unredeemed deposits.

32. Which option to treatment of unredeemed deposits do you support?

Option 1

35. Do you agree that any excess funds should be reinvested in the scheme or spent on other environmental causes?

Reinvested in the scheme

36. What should be the minimum deposit level set in legislation?

20p

37. Do you agree that there should be a maximum deposit level set in legislation?

No

38. Recognising the potentially significant deposit costs consumers could pay on a multipack purchase, how best can we minimise the impact of the scheme on consumers buying multipacks? How do you think the deposit return system will impact on the sale of drinks containers sold in

multipacks and how best can we minimise the impact of the scheme on consumers buying multipack?

Consumers need to be clear that this is a deposit and their money will be returned to them upon the return of each container. Clear labelling on shelving and packaging would assist with this. Having drinks containers within multipacks with a different deposit to those sold singularly would be confusing to the consumer.

There is the additional concern that if multipacks have a reduced deposit, then it could lead to companies selling two drinks together to form a 'multi-pack' and thereby having reduced deposits while increasing the amount of single use packaging used to keep the drinks together.

39. Do you agree with our approach to letting the Deposit Management Organisation decide on whether to adopt a fixed or variable deposit level, particularly with regards to multipacks?

Yes

Please provide evidence to support your response:

The government should set a minimum deposit level of 20p. Despite not objecting to the Deposit Management Organisation deciding on a variable deposit, there are a number of concerns that would need to be addressed. Costs to the system and consumer confusion are likely to increase if differences occur between the devolved nations. A fixed deposit of 20p has already been set in Scotland.

Chapter 5: Return Points

40. Do you agree that all retailers selling in-scope drinks containers should be obligated to host a return point, whether it is an all-in or on-the-go (OTG) deposit return scheme?

Yes

Please provide evidence to support your response:

The system needs to be as accessible and convenient as possible for consumers to return their drinks containers. The potential situation where people are unable to return and redeem deposits through lack of access to return points should be avoided.

41. Given the proposed extensive distribution and availability of return points for consumers to return bottles to, do you think customers would be likely to experience delays / inconveniences in returning drinks containers?

No

42. Do you have a preference, based on the 3 options described, on what the schemes approach to online takeback obligations should be?

Option 1

Please explain your answer:

This provides the easiest system for consumers to engage in. With the rise of online sales, this is an important way in which consumers are able to return empties, and ensures accessibility and fairness for those who purchase online and who may be unable to return in store.

43. Do you agree with the proposed criteria for the calculation of the handling fee?

Yes

44. Please tick which exemptions you agree should be included under the scheme:

Close proximity

Breach of safety

Any further comments you wish to make:

Businesses that do not sell alcohol for religious reasons should be exempt from accepting empty alcohol drinks containers.

46. Do you think obligations should be placed on retailers exempted from hosting a return point to display specific information informing consumers of their exemption?

Signage to signpost consumers to the nearest return point

47. Do you agree with our rationale for not requiring retailers exempted on the basis of a breach of safety not to be required to signpost to another retailer?

Yes

48. How long do you think exemptions should be granted for until a review date is required to ensure the exemption is still required?

1 year

50. How could a digital deposit return scheme solution be integrated into existing waste collection infrastructure?

Please explain your answer:

Digital deposits are currently unproven technology and we think it will be up to the Deposit Management Organisation to determine whether to include this technology. However, it is crucial that a digital system does not delay or stall any implementation of a DRS – particularly as the implementation of a DRS has already been significantly delayed.

52. Do you think a digital deposit return scheme could ensure the same level of material quality in the returns compared to a tradition return to retail model, given containers may not be returned via a reverse vending machine or manual return point where there is likely to be a greater scrutiny on quality of the container before being accepted?

No

Please explain your answer:

A digital deposit is likely to increase the probability of it being co-mingled in kerbside collection and thereby decrease the material's quality. This in turn would decrease the probability of the material being recycled into food grade containers and increase the likelihood of downcycling.

53. If the digital deposit return scheme system can be integrated into the existing waste collection infrastructure would its implementation and running costs be lower?

Please provide evidence to support your response:

This is for the system operator to decide.

Chapter 6: Labelling

55. Do you agree that the following should be part of a mandatory label for deposit return scheme products?

An identification marker that can be read by reverse vending machines and manual handling scanners.

A mark to identify the product as part of a deposit return scheme.

57. Do you agree with our proposals to introduce mandatory labelling, considering the above risk with regards to containers placed on the market in Scotland?

Yes

59. Do you consider leaving any labelling requirements to industry to be a better option than legislating for mandatory labelling requirements?

No

Please explain your answer:

It is useful for clear and consistent labelling to ensure that containers are marked to show they are included in a Deposit Return scheme.

61. We believe 18 months is a sufficient period of time for necessary labelling changes to be made. Do you agree?

Yes

Please provide evidence to support your response:

The Scottish system is already well underway. It is important that producers know as soon as possible and make systems as compatible as possible so that this is factored into labelling changes in Scotland.

63. Do you agree that our proposed approach to labelling will be able to accommodate any future changes and innovation?

Yes

Chapter 9: Implementation Timeline

75. Do you have any comments on the delivery timeline for deposit return scheme? Please pose any views on implementation steps missing from the above:

The potential delay of the scheme until 2024 means that the environmental (including carbon) benefits of a DRS are not going to be obtained for another 3 years.

76. How long does the Deposit Management Organisation need from appointment to the scheme going live, taking into account the time required to set up the necessary infrastructure?

12 months

77. Depending on the final decision taken on the scope of the scheme in England and Northern Ireland – all-in or on-the-go – what, if any, impact does this have on the proposed implementation period? Depending on the final decision taken on the scope of the scheme in England and Northern Ireland – all-in or on-the-go – what, if any, impact does this have on the proposed implementation period?

We do not want to see any further delays in the schemes being implemented and would like to see implementation before 2024. Scottish Government have already committed to implement a DRS by July 2022 and we see no reason why this cannot be achieved across the UK. The implementation of an on-the-go only system is likely to result in greater complexity. Furthermore, additional differences between schemes is likely to add unnecessary burden during implementation of the scheme.

Therefore, we urge that all-in systems are implemented consistently across all UK nations by July 2022.

Chapter 10: Summary Approach to Impact Assessment

78. Do you agree with the analysis presented in our Impact Assessment?

Yes

Please briefly state the reasons for your response. Where available, please share evidence to support your view:

We trust the Government's technical expertise in calculating the net benefits of a DRS, which conclusively demonstrates the higher economic benefits of an all-in system.