

Summary of LARAC response to main areas of DRS Consultation 17.05.19

Question	LARAC Response
13b Disposable cups	Advocate cups falling within EPR and strong measures brought in to push action on cup recycling further and quicker than voluntary actions have.
Q16 Producer Obligations	If a DRS is introduced, producers are not being double charged, they are paying the operating costs of two different collection systems under the umbrella of EPR. One would be a DRS and the other the well-established household collection systems via kerbside, bring-banks and HWRCs. Given that DRS is just one form of EPR it is natural that the obligation under EPR covers any aspects of a DRS.
Q20 Unredeemed Deposits	The DRS should function on redeemed deposits only. Most of the packaging from the unredeemed deposits will have ended up as litter or disposed/recycled through kerbside collections, bring banks, recycling centres or in the residual waste, falling to local authorities to deal with. It would therefore be appropriate for the funds from unredeemed deposits to be directed towards local authorities to cover the costs of collecting, reprocessing and disposing of this material.
Q23 DMO	There needs to be an element of ownership by the producers as well as some element of public ownership or oversight in the ownership model. This would be best placed at the local government level given the links to wider EPR objectives and local government long standing involvement in recycling collections and communications campaigns and general engagement with the public in this area.
Q33 Return Points	Any DRS system will need a comprehensive collection infrastructure to be successful, with readily accessible locations. This will mean retailers being the main part of this collection solution supported by other services. It would not be appropriate to mandate all these locations as it should be assessed on a local basis and the geographical spread/location of these service industries and opening times to provide a comprehensive distribution.
Q50 Deposit Flat Rate	The scheme needs to be as simple as possible for householders to understand. A single price will allow for a consistent message with less chance of ambiguity and minimise administration. The fees that producers pay to cover the costs of the scheme could then be set in a way which promotes better

	product design rather than using the deposit level to do that. The deposit level must bring about the behaviour change in individuals.
Q70 All In or On The Go	Neither system is supported and instead implementation of DRS should be deferred to allow EPR and Consistency policies to be put in place and show results and also allow more research into the full impacts and implications of a DRS being layered on top of existing and planned collections.
Q77 Outcomes of DRS on quality	Diverting a proportion of the 'higher quality' recycling from kerbside collections into a DRS could leave the kerbside recycling lower quality than currently. This could then depress prices for that tonnage, which will be far greater than the DRS tonnage, and so make overall compliance more costly to producers.