

The Scottish Deposit Return System: What should it cover?



Have You Got The Bottle?

The Scottish Government are expected to announce their final decision on the design of Scotland's deposit return system early in 2019. Which materials should an ambitious, world-leading system include? The main arguments from from parts of the drinks and retail industries seeking to be exempted or to limit their costs are around glass, larger plastic bottles, HDPE (the plastic used for milk bottles, amongst other things), and TetraPak cartons. We support an inclusive system that covers all materials used for drinks containers, including glass, metal and plastic.

Those two plants currently employ an estimated 800 people, so a reliable supply of colour-separated glass will provide increased job security. Currently only one other plant in Scotland is able to separate mixed post-consumer glass, limiting the amount that can be recycled. Therefore, the existing demand for colour-separated glass is one additional advantage of including it in a deposit return system. Overall, the more inclusive a system Scotland introduces, the greater the circular economy opportunities that would be associated with it.

The Scottish Government's position

Holyrood held a debate on 7th February 2018 at which Cabinet Secretary Roseanna Cunningham MSP said: *I reiterate the commitment that we do not want the scheme to be just about plastic bottles; we want to make it about cans and glass, too. We want to be as ambitious as we can be.*

First Deposit Return petition, 2006

Calls for an inclusive system date back to the first Parliamentary consideration of deposits. In 2006 a petition was submitted on behalf of Woodlands Primary School in Cumbernauld, calling on the Scottish Parliament to urge the Scottish Executive to take greater action to protect the public, domestic and non-domestic birds and animals from the dangers of broken glass, to promote the use of plastic bottles as an alternative to glass and to introduce a refundable deposit scheme aimed at reducing the levels of broken glass in public places. The pupils' dogs had suffered cut paws from broken glass, and they wanted "safe grass, not broken glass!".

Economic opportunities

Scotland could be the focus for new and significant investment in aluminium and PET plastic recycling facilities to take advantage of the large volumes of food grade recycled materials provided by a deposit system, especially if Scotland introduces deposit return before England or Wales. However, Scotland already has two glass bottle plants (OI in Alloa and Ardagh in Irvine) which rely on being supplied with colour-separated glass.

Litter evidence

The Marine Conservation Society launched their #wildbottlesighting project in September 2016 to support the call for an inclusive deposit return system. More than 6,000 reports of drinks bottles and cans littered all over Scotland's rural, urban and coastal landscapes were reported by members of the public, including almost 3,000 plastic bottles, over 2,000 metal cans and over 1,000 glass bottles. In 2018 their Great British Beach Clean found an average of 16 drinks containers on every 100m of surveyed beach (see table below for more detail on this).

1	 Plastic/polystyrene (0–50 cm)	182.6/100m	↔
2	 Glass	45.6/100m	↑
3	 Cigarette stubs	35.8/100m	↑
4	 Packets (crisp, sweet, lolly, sandwich)	35.6/100m	↓
5	 String/cord (thickness 0–1 cm)	26.8/100m	↑

Surfers Against Sewage's Autumn Beach Clean 2018 found a total of 39,572 drinks containers were collected by volunteers, including 27,696 plastic bottles, 8,672 cans, 2,688 glass and 516 other containers (including TetraPaks and cartons).

Encouraging the use of sustainable materials

An inclusive deposit return system, covering all materials and all sizes up to the limit of return technology, reduces the risk that manufacturers will arbitrarily change container sizes to exclude those cans or bottles. Countries such as Germany experienced market distortions as a result of some materials and products being exempt from the system. It would be unfortunate if Scotland's system causes producers to switch to less sustainable materials if those materials are not included.

Creating new glass is extremely CO₂ intense, for example, and TetraPaks are expensive and difficult to recycle (although they are included in New South Wales since their system began in 2017, as well as many Canadian deposit systems), increasing costs for local authorities if they are left to be collected via household or street bin collections. Legislation must be broad enough to cover new packaging, too.

An inclusive system that varies producer fees makes producers responsible for the full cost of recovery of the materials they use, and mitigates against distortion of the market. It also encourages the use of materials that are easier to recycle for use as food grade containers, and in particular easier to recycle indefinitely (for example, in the Norwegian system, producers of cans pay no fee to participate, given return rates and material values). Furthermore, the system should allow the later inclusion of refillables (most likely glass, but possibly also plastic). Those producer fees should be varied to take account of the whole product life-cycle, including recoverable value, proportion of recycled material used in manufacture, cost of litter and cost of recovery.

Under recent commitments in the UK Government's Resources and Waste Strategy for England, producers will be liable for the full costs of packaging recovery. To exclude certain materials at this stage will potentially create a lot of additional work later when producers realise that being included in the deposit return system is the most cost-effective way to fulfil their responsibilities under Extended Producer Responsibility. In particular the dairy industry will need to assess whether it would in fact be cheaper for them to participate in Scotland's deposit system.



Dangers of littered glass

The evidence below comes from both terrestrial and marine based litter surveys and consistently shows that glass is commonly littered. This is the material that poses the biggest immediate danger to humans, pets and wildlife.

Spokes: We are very happy to support the APRS campaign for bottle deposits, which have been found to reduce broken glass on roads and paths in other countries.

British Horse Society Scotland: The British Horse Society is passionate about making every horse and rider as safe as possible while out enjoying Scotland's roads and countryside. Deposit return systems in other countries reduce litter and we want one in Scotland that helps to make the out-of-doors safer and maintains its beauty.

Williams Bros. Brewing Co.: We would absolutely love to see a deposit return system introduced into Scotland and the rest of the UK on glass, metal and plastic containers. The mechanics would be fairly simple to organise, the reward in terms of the environment on many levels would be tremendous. What's not to like?

The range of materials covered elsewhere

	PET	Aluminum	Glass	Other materials
Estonia	✓	✓	✓	Other plastics
Germany	✓	✓	✓	Other plastics, refillables
Lithuania	✓	✓	✓	All plastic
Norway	✓	✓	✗	Other plastics
Sweden	✓	✓	✗	

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