

Clive Betts MP,
Chair, HCLG Select Committee
House of Commons
Westminster
SW1P 0AA

5th July 2019

Dear Clive,

cc. Helen Hayes MP, Tahmanjeet Singh Dhesei MP, Bob Blackman MP, Kevin Hollinrake MP, Andrew Lewer MP, Teresa Pearce MP, Mark Prisk MP, Mary Robinson MP, Matt Western MP, Mohammad Yasin MP, Mike Winter - Clerk to the HCLG Select Committee.

Re: Inquiry on the Implications of the Waste Strategy for Local Authorities.

As you know, CPRE has been at the [forefront](#) of campaigns to introduce a deposit return system (DRS). It is an issue on which we have gathered considerable evidence and expertise over many years. Deposit systems, as an approach to waste management, have been proven to cut littering and increase recycling of drinks containers across the world. However, this is not the way in which it is presented in written and oral submissions to the HCLG Select Committee inquiry on the Implications of the Waste Strategy for Local Authorities, which causes us concern.

Unfortunately, we were unable to submit a response to the inquiry during the evidence gathering phase as it coincided with Defra consultations on the proposals of the Resources and Waste Strategy, which we had to prioritise. Nevertheless, we feel it is particularly important that the Committee considers a balanced and evidence-based picture of deposit return and the likely impacts on local authorities when questioning ministers and formulating your recommendations.

The environmental impact of low recycling rates leading to the use of landfill or incineration for disposal, or resulting in the littering of materials, is increasingly well understood. Similarly well understood is the problem of low-quality recycling streams that are not worth reprocessing, leading to waste piling up either in the UK or developing countries, undermining our international reputation on environmental issues. The economic and environmental benefits of tackling such waste and improving recycling streams while promoting resource efficiency cannot be overstated.

While we must be alive to the potential of impacting on council finances, we strongly believe that where a DRS is designed effectively it would not negatively impact local authorities but instead benefit them from cost-savings made elsewhere. This is even more likely to be the case if DRS is introduced in conjunction with other policies in the Waste Strategy aimed at fixing failing household recycling systems. In addition, any costs must be considered in the context of the significant environmental cost of action that is insufficient, ineffective or delayed - already the aim to have a DRS starting in 2023 is woefully unambitious.

From our research to date and reiterating the relevant points from our [response](#) to Defra's consultation on Introducing a Deposit Return Scheme in England, Wales and Northern Ireland, we make the following observations for the consideration of the Committee:

- DRS should be introduced alongside the proposed comprehensive Extended Producer Responsibility system (EPR), where producers and manufacturers are obliged to meet the lifecycle costs of collection and disposal of any materials they place on the market. Such an approach would remove all costs of collection and disposal from local authorities, rendering moot many of arguments about the viability of kerbside collections. It would be for producers to identify the most effective means to capture their products for recycling and so fund those approaches - for some materials this would be kerbside collection, for drinks containers DRS is the most effective form of EPR.

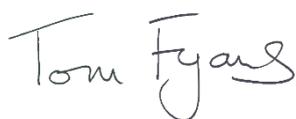
- Research by independent consultants Eunomia in [2017](#) examined the costs of introducing a DRS, particularly for local authorities with high recycling rates who may have most to lose when high-value materials are removed from kerbside collections. The report examined high- and low-performing unitary and combined authorities and found that all eight studied saw savings due to a reduction in residual waste requiring treatment, possible reduced Materials Recovery Facility costs and, by removing high volume items from the waste stream, collection efficiencies could be made and street cleaning costs reduced. A comparison of 27 studies around the world conducted by Reloop in [2018](#) found that, despite being different in scope, location, author and year, 'each study reported significant net cost savings to municipalities'.
- Research conducted by Eunomia for CPRE in [2011](#) found that the overall effect of the introduction of a DRS in the UK is predicted to lead to an increase in the number of jobs available by between 3,000 and 4,300 full-time-employees, depending on whether or not reprocessing jobs are included, as well as resulting in an overall increase in the number of higher-skilled jobs.
- Where DRS has been implemented across the world, the system achieves high collection and recycling rates for drinks containers, often upwards of 95%. This all but eradicates drinks containers from litter surveys.
- By separating out clean, high-value materials such as PET, glass and aluminium, DRS provides a high-quality recycle that enables us to close the loop on a form of packaging which is difficult to eradicate.
- A DRS should incorporate pre-sealed drinks containers of all materials, shapes and sizes. Failing to do so would create perverse incentives for producers to change the sizes of containers or switch packaging materials to those with greater carbon footprints or which cause physical harm to wildlife, simply to avoid participation in the scheme - glass, tetra-pak, HDPE plastic or pouches should all be included in the scheme. Furthermore, to retrofit a deposit system to take materials such as glass can be extremely costly, as was recognised by Scottish government in their announcement on deposit return - a reality which caused them to approve the inclusion of glass within Scotland's system. For more details, see CPRE's [response](#) to question 9 of Defra's consultation on introducing a deposit system.

In summary, an effective DRS, that seeks to drive up recycling rates, reduce littering and create greater opportunities for closed loop recycling must include all pre-sealed drinks containers, with no limits as to size or material, as well as be designed to enable and encourage the use of refillable bottles. It is a simple solution to recycling confusion for consumers and signals that recycling is a desirable behaviour for all consumers through a small financial incentive. **Such an approach by itself would generate jobs and has been consistently shown to provide savings for local authorities.** These savings may be even larger when considered alongside other proposals in the Waste Strategy such as EPR fully funding kerbside collections of material not included in the scope of a DRS.

CPRE urges the Committee to consider the full picture of the Resources and Waste proposals as a comprehensive strategy, alongside the clear evidence of the success of deposit systems that have been introduced elsewhere in the world as you finalise your conclusions on the impacts of the Waste Strategy on local authorities.

We would be happy for you to publish this letter on the Committee website, or consider it as a late submission of written evidence.

Yours sincerely,



Tom Fyans | Deputy Chief Executive