

Thursday 18th May 2023

Dear Prime Minister,

As charities working to protect the environment across the UK, we warmly welcomed the announcement earlier this year from your colleague, the Secretary of State for Environment, Food and Rural Affairs, that England, Wales and Northern Ireland would adopt a deposit return system for drinks cans and bottles from 1st October 2025.

This measure remains the single most effective policy tool available to reduce litter in our towns and countryside, and is successfully used by hundreds of millions of people across the world every day. The positive difference it will make here will be obvious almost immediately, as it has been elsewhere.

Experience in other countries shows that deposit return may launch with minor teething problems, but, even where that applies, this approach has very quickly proved both popular and effective. For example, a year after the Slovakian system launched, [a poll showed 77% satisfaction](#) with it.

The timescale for the roll-out of deposit return for England, Wales and Northern Ireland is ambitious but feasible, and aligned with roll-out timelines of other recent systems. It will be greatly assisted by the March 2024 launch of the Scottish system, which will benefit the whole of the UK by allowing both retailers and producers to iron out any remaining issues ahead of the later systems, especially with labelling and infrastructure installation.

Businesses have already invested hundreds of millions of pounds in preparedness for the Scottish system, and would be substantially out of pocket if the launch date was changed again. Despite the difficulties the Scottish Government has encountered since their regulations were passed in 2020, the system is now almost ready to launch. People across Scotland can already see reverse vending machines (which will collect returned cans and bottles) as they do their weekly shops, and interest is growing.

The rollout of deposit return in Scotland in March 2024 will require an Internal Market Act exemption which we know is under discussion across Whitehall. Such an exemption will protect the substantial investment industry has already made in Scotland and ensure we start to see the environmental benefits as soon as possible.

Although we believe Scotland launching first will be actively beneficial for England, Wales and Northern Ireland, there remains one key obstacle to a truly UK-wide approach to the litter problem. While Wales and Scotland intend to include glass drinks bottles, as things stand glass is excluded for England and Northern Ireland.

If this remains the case, it would either undermine the long-term interoperability of the various systems, or cost English businesses more, unnecessarily, when glass is subsequently brought in, as happened in Finland in 2011 and elsewhere. Continuing to exclude glass from the English system would give the public a more negative experience, especially those who live near the borders, increase costs for business, sharply reduce environmental benefits, and undermine consistency across the UK. What's more, [75% of those polled](#) backed the inclusion of glass.

We would therefore urge you to intervene and bring forward a straightforward solution to this problem by including glass on the same basis as Scotland and Wales, alongside the Internal Market Act exemption for the Scottish system.

The 2021 Defra [impact assessment](#) showed a positive net present value over ten years of £5,884.5m for a system that includes glass, but just £3,582.3m when glass is excluded. Glass is the most carbon-intensive material used by the drinks industry, and the costs of collection are currently primarily met by local taxpayers.

Another risk associated with not bringing glass into scope for England is that of possible market distortion: drinks producers would be in effect given a direct incentive not to use more efficient materials like aluminium. This would further increase costs to local taxpayers.

In addition, only 73.6% of glass packaging is collected in the UK for recycling, leaving 1.5 billion glass bottles lost to landfill or incineration every year. The average glass recycling rate for EU countries with a DRS is 89%, compared to just 71% for those without. There is no more direct way to elevate glass recycling by such a large margin in just a few years.

Littered and broken glass is also associated with injuries to people, pets, livestock and wildlife, and has been identified as one of the key causes of wildfires. Including glass would also deliver on the welcome commitments made in the 2019 Conservative manifesto.

Deposit return is overwhelmingly popular and effective wherever modern systems like those proposed for the UK are rolled out. Many changes Governments make are difficult to communicate or have indirect effects, but with deposit return, the public will see a marked change in their local environments extremely quickly.

Removing glass bottles as well as cans and plastic from our wild spaces and our urban areas would, we believe, be an extraordinary legacy. An enhanced deposit return system would also fit well with your work on the Global Plastics Treaty, which it will help deliver.

We would be very grateful if you would consider taking a short meeting on the subject to discuss the practicalities of this move. There is a lot of expertise across the NGO sector on this issue, including international contacts, and we would be more than happy to put that at your disposal.

Yours,

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Christina Dixon, Ocean Campaigner Leader, Environmental Investigation Agency

Kim Pratt, Friends of the Earth Scotland

Nina Schrank, Plastics Campaign Lead, Greenpeace UK

Allison Ogden-Newton OBE, CEO, Keep Britain Tidy

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