

Redacted

From: Redacted
Sent: 28 January 2019 11:05
To: Redacted
Subject: DRS - announcement Programme for Government - letter - Redacted - 12 September 2017
Attachments: DRS Announcement - Programme for Government.pdf; KSB DRS Sub Group submission 26.04.17.pdf

From: Redacted
Sent: 12 September 2017 14:57
To: Redacted
Subject: Circular Economy - Keep Scotland Beautiful - Deposit Return announcement in Programme for Government 2017-18 - letter - September 2017

Dear Redacted,

On behalf of Redacted, I'd like to thank you for your correspondence to Keep Scotland Beautiful informing us of the Deposit Return announcement in Programme for Government 2017-18.

Please find attached Redacted response, and for your information, a copy of our latest DRS position statement.

Should you have any queries please don't hesitate to get in touch.

Kind Regards,

Redacted

Redacted
Redacted
Keep Scotland Beautiful

t: Redacted
e: Redacted
w: [Redacted](#)



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[KSBScotland](#)



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Redacted
Deputy Director
Environment and Forestry Directorate
Environmental Quality Division
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

7 September 2017

SENT BY EMAIL

Dear Redacted,

DEPOSIT RETURN ANNOUNCEMENT IN PROGRAMME FOR GOVERNMENT 2017-18

On behalf of Keep Scotland Beautiful (KSB), I should like to thank you for your correspondence to my colleague Redacted regarding the above announcement. This is clearly a very important development in Scotland's battle to deal with the significant amount of littered beverage containers that blight our country.

You will hopefully be aware of KSB's work in relation to environmental quality and the significant range of partnerships that we have across Scotland's private, public and voluntary sectors. In relation to the future shape of a DRS for Scotland, we have considerable interest in bringing our unique knowledge and expertise to the future strategic discussions that will undoubtedly take place. I should therefore ask that you note the formal request of my Board that KSB be included, where appropriate, in these conversations. We should like to play our part in ensuring that we get the best DRS system for Scotland.

Given our interest in this matter, I wonder if it would be useful to have a short meeting at your convenience. For information, I have attached a copy of our most recent position statement on DRS.

Thank you in anticipation.

Yours sincerely

Redacted
Redacted

Enc : KSB DRS Position Statement



Keep Scotland
Beautiful

Environment, Climate Change and Land Reform Committee

Deposit Return Scheme Sub-group



Submission by Keep Scotland Beautiful

MAY 2017

Introduction

Keep Scotland Beautiful welcomed the opportunity to meet with the Deposit Return Scheme (DRS) Sub-group recently to offer an informed perspective on the current debate about the possible development and implementation of a DRS for Scotland, particularly in relation to whether such a system will have any impact on litter and littering behaviour.

This submission outlines the key points we covered in our presentation to the Sub-group and the statistics used on the current position with regard to litter in Scotland.



Our current position

Keep Scotland Beautiful has been aware of the potential benefits and issues associated with a DRS for nearly ten years, indeed we invited the DRS industry to participate in the Litter Summit that we organised for Mike Russell and Richard Lochhead in 2007.

We have also spent a significant amount of time and resource on this issue over the last few years and have sought to take a pragmatic approach to the issue of a DRS in Scotland.

For clarity, Keep Scotland Beautiful is not opposed to the design, development and implementation of a DRS for Scotland. Indeed, we believe we would be a valuable key partner in this process, particularly given our perspective on litter.

Introducing a DRS in Scotland will, we believe, lead to a welcome increase in recycling rates and importantly reduce the volume of aluminium and plastic in the litter stream.

However, a DRS will not address fully Scotland's wider litter challenge. There is no evidence to suggest it will lead to a decrease in other regularly littered items such as food on the go packaging, cigarettes, coffee cups, chewing gum, and confectionery wrappers.

We have significant evidence that Scotland's litter problem is bad, and getting worse. Our national surveys have shown a substantial and troubling deterioration in the cleanliness of the environment.

So, although we believe a DRS will play an important role in assisting with the reduction of littering of drinks related items there are many other interventions and solutions that need to be considered alongside it to ensure the impact on litter and littering behaviour is more significant.

Scotland is not alone in facing serious challenges regarding litter - we are a leading member of the Clean Europe Network, a group of environmental NGOs and charities from across the EU with a shared vision of a litter free Europe by 2030.

Involvement in the Network has meant that we have heard a diverse range of views about DRS, from those countries that have a system and those that do not. Our Chief Executive has visited colleagues in Sweden to discuss the interaction between their DRS and litter and has just returned from a similar visit to colleagues in Denmark.

In our view we can only effectively address litter and littering behaviour by putting in place an integrated approach that deploys a significant range of interventions from government, local authorities and the private sector to deliver the difference we all want to see.

That will require a renewed focus on the 2014 National Litter Strategy and the resources provided to deliver it – a DRS could be one of a number of important interventions.

We are concerned that if a DRS is not placed in the context of a broader collective effort to tackle litter and littering behaviour, it will allow industry to adopt a position that by engaging with the design, development and implementation of a DRS it has done its bit, that we will effectively let them off the hook.

We are also concerned that if we do embark on the journey to introduce a DRS, even with a fair wind and the best efforts of all involved, the timescale for design, development and implementation could take a number of years.

What will happen in the interim about litter and littering behaviour? We cannot allow a DRS to be a distraction, or a get-out clause, from the sustained, coordinated and collaborative approach needed to address litter and littering behaviour in Scotland.

We are keen to ensure that a DRS for Scotland delivers the best possible outcome for everyone. We believe that a move towards implementing a DRS is best set in the context of wider societal measures and a move towards a more circular economy. In particular, one which encourages improved producer responsibility for packaging and other waste.

We should not underestimate the hard work and challenges that lie ahead if a DRS is to be implemented in Scotland. It is vital that a system is designed collaboratively to ensure that it works for everyone, and effectively integrates with other elements of the waste management infrastructure.

It is also crucial that any system minimises overall carbon emissions and does not create new, alternative, negative environmental impacts for example in the collection of materials for recycling.

Keep Scotland Beautiful can play a key role in engaging the hearts and minds of people in communities across Scotland for the system, and bring together the diverse interests involved. We will engage with the Scottish Government, Zero Waste Scotland, our local authorities, industry, our community contacts and other key stakeholders to ensure that any proposed system is designed and implemented effectively.

We have reached out to our colleagues in Association for the Protection of Rural Scotland (APRS) and Have You Got the Bottle (who have helped raise the profile of DRS) to discuss the best way forward. We have also sought to capitalise on our existing relationships with industry to bring them to the table and recognise that they have a key role to play in tackling litter and littering behaviour.

A Scottish DRS will not be the ‘silver bullet’ that solves Scotland’s litter problem. It can, if designed and implemented effectively with the full involvement of all stakeholders, form an important element in a wider strategy to improve Scotland’s environment and in particular, to tackle litter.

Keep Scotland Beautiful would be happy to engage further with the Sub-group if required on this issue or answer any questions arising from other evidence sessions. We would also be willing to provide evidence formally to the Environment, Climate Change and Land Reform Committee (ECCLR) Committee on this matter if that was something the Committee felt would be helpful.

Litter Statistics - May 2017

We have provided below a short overview of the research and evidence that we have gathered over the last few years that support our concerns regarding the potential impact of a DRS on litter and littering behaviour.

This research and evidence illustrates why we have maintained a balanced approach to the issue of DRS to ensure that important questions regarding the ability of any system to make a positive contribution to tackling litter and littering behaviour are not ignored.



LEAMS - 2016/17

The Local Environmental Audit and Management System (LEAMS) is the only national indicator for street cleansing services in Scotland. Each year more than 15,000 sites are assessed for cleanliness in a partnership between Keep Scotland Beautiful and the local authorities.

The following figures are taken from the early information available for the 2016/17 surveys:

Drinks related litter present on **38% of sites** surveyed (increase of 6% from 2015/16).

Drinks related litter present on **70% of roadsides** (principally A roads).

| Litter count survey 2016 (Based on litter counts across four local authority areas) | |
|--|--------------------------|
| Cigarettes | 35% of total count |
| Gum | 49% of total count |
| Drinks containers | 5% of total count |

This shows that if cigarette and gum related litter are discounted (as less visible items) drinks related litter makes up 20% of the total remaining items.

Attitudinal Surveys

Over the last two years, we have commissioned YouGov to undertake research to establish attitudes to litter and littering behaviour to inform our work in this area.

The information below shows the variation in response when asked about the litter items that are most noticeable in each environment.

| In communities | On roadsides |
|--|--|
| Litter noticed the most | Litter noticed the most |
| Cigarettes 58% Drink containers 55% Food and packaging 50% | Drink containers 68% Food and packaging 61% Carrier bags 33% |
| Ways to change behaviour | |
| More bins 59% Education 44% Double fine level 40% DRS 39% | |
| Ways to reduce litter | |
| More bins 57% Education 43% DRS 39% | |

Keep Scotland Beautiful is the charity that campaigns, acts and educates on a range of local, national and global environmental issues to change behaviour and improve the quality of people's lives and the places they care for. We are committed to making Scotland clean, green and more sustainable.



T: 01786 471333 E: info@keepscotlandbeautiful.org

 facebook.com/KSBScotland  [@KSBScotland](https://twitter.com/KSBScotland)

www.keepscotlandbeautiful.org



ISO 14001:2015 Certification No.208826



Roseanna Cunningham MSP
Cabinet Secretary for the Environment, Climate Change and Land Reform
The Scottish Government
St. Andrew's House
Edinburgh
EH1 3DG

31 January 2019

Dear Roseanna,

Deposit and Return Scheme (DRS)

We were grateful for the recent opportunity to meet Scottish Government and Zero Waste Scotland (ZWS) officials for an update regarding the introduction of a DRS in Scotland. As you consider next steps, I thought it would be helpful to highlight some key points arising from that discussion.

We were concerned to hear about the ambitious timescale for implementation suggested by officials, particularly with relatively little information yet available regarding the economic impact of the scheme, the cost to individual businesses or how the scheme will work in practice. To move from the current level of preparation to having the final scheme up and running in just over two years, will make it very difficult for micro and small businesses to adapt and comply. Further, our work with smaller businesses suggests very low awareness about the likely introduction of a DRS.

We would argue that such a change would need a relatively long awareness-raising and preparation period. Ideally this would allow businesses to budget and forward-plan any additional costs. This stage cannot, of course, begin until final details about the scheme, including advice from support bodies on implementation and enforcement, are agreed.

More broadly we have highlighted the benefit of a single UK system, or a scheme which is compatible and does not conflict with schemes elsewhere in the UK. As you are aware the UK government has launched a waste strategy for England, which also commits to the introduction of a deposit and return scheme.

Whilst we're aware of the arguments regarding the economic benefits of a Scotland-only scheme, we do believe it would be practical to consider how the timescale and

design of a Scottish scheme can best integrate with plans elsewhere in the UK, delaying Scottish plans if necessary. This would give businesses more time to prepare and avoid multiple changes for those businesses operating in both Scotland and the rest of the UK.

Thinking about the detail of the scheme itself, we would reiterate our call for an exemption for the smallest businesses in both the retail and hospitality sectors. We have suggested a de-minimis exemption for premises under 200sq ft - as there appears to be consensus that it would be impractical for these firms to participate in the scheme on a mandatory basis. We do not believe that exempting the smallest firms from compulsory participation would fundamentally impact upon consumer behaviour or the success of the scheme. Similarly, while the details about impact for producers, such as labelling or container requirements, are not clear, we would also urge you to consider whether a similar exemption is required for the very smallest producers.

With Scottish business confidence at historically low levels and small retailers and hospitality firms on struggling high streets under pressure from increasing costs, we are understandably concerned about the risks of adding further costs to these firms. We have therefore constructively engaged in the debate about the introduction of a DRS to Scotland, making suggestions about how to minimise cost and disruption for the smallest businesses and the wider economy. I do hope you will be able to fully consider these suggestions.

I hope this contribution is helpful and, as always, I am more than happy to discuss any aspect of this in more detail.

Yours sincerely,

Redacted

Redacted, Federation of Small Businesses (FSB)



T: 0300 244 4000
E: scottish.ministers@gov.scot

Redacted
Federation of Small Businesses
(By e-mail)

Our ref: 2019/0004019
21 February 2019

Thank you for your letter of 31 January concerning deposit return and FSB's views on the matter.

It has become clear through this work that there are a number of important issues that need to be considered as we move towards a deposit return scheme for Scotland. This is why I have asked that my officials establish an implementation advisory group to draw on the expertise of retailers and producers in establishing a system that will work for everyone. I understand that your colleagues in FSB will be engaging with this group and I look forward to seeing the outputs of their work.

I am clear that an optimum scheme design is one which strikes the right balance between efficiency from the perspective of businesses such as those you represent and convenience from the perspective of consumers. I will also be watching with interest developments in the other countries in the UK and would be happy to explore how our respective schemes might usefully align in the future should their ambitions match our own.

Yours

Roseanna Cunningham

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Roseanna Cunningham MSP
Cabinet Secretary for the Environment,
Climate Change and Land Reform
The Scottish Government
St Andrews House
EDINBURGH
EH1 3DG

13 March 2017

Dear Roseanna,

Proposal for a deposit and return scheme

As you know the Federation of Small Businesses (FSB) is Scotland's representative body for the smaller business community. We represent firms in every sector and every part of the country, including thousands of retail and hospitality businesses.

With that in mind, you can understand our alarm at renewed calls for a compulsory deposit and return scheme to be imposed on Scottish businesses.

In our view, the case for such a change has not been made – with advocates for the scheme ignoring the practical implications for smaller firms and town centres.

From our perspective, though, there remain three fundamental problems with such proposals:

- Most smaller businesses lack the storage space for large numbers of empty bottles;
- Facilities to return bottles are likely to be located out of town and beside supermarkets, further forcing footfall away from town centres;
- Such a scheme is unlikely to be compatible with Scotland's existing non-domestic waste regime – which recently became considerably more onerous for smaller firms - and may impair further progress; Scotland has just invested significant

sums in some of the best kerbside recycling in the world, making the need for in-store recycling questionable.

We also understand that some concerns have been raised about the feasibility study carried out in 2015, including the lack of consultation with producers, retailers, local authorities or waste management companies; and a lack of analysis of the effects that this scheme could have on consumers.

With Scottish business confidence very low, small retailers under pressure from the cost of a series of regulatory changes in recent years and efforts to inject life into local high streets being undermined by big business and public sector closures, we'd ask you to consider carefully whether this is the right approach for Scotland at this time.

Indeed, as this year's rates revaluation showed, many in the business community would be unable to bear another substantial increase in their operating costs.

As always, we are more than happy to discuss any aspect of this in more detail.

Yours sincerely,

Redacted
Scottish Policy Convener

CC: Paul Wheelhouse, Minister for Business, Innovation and Energy



T: 0300 244 4000
E: scottish.ministers@gov.scot

Redacted

By e-mail

Our ref: 2017/0010408
18 April 2017

Thank you for your letter of 13 March laying out the Federation of Small Business' position on deposit return.

The Scottish Government recognises that a deposit scheme for drinks containers could improve recycling rates and reduce litter. However, we acknowledge that a number of key issues have been raised, such as how deposit return could impact on small stores, how people behave differently where a deposit return is in place and how it might affect the collection system we already have. We have therefore asked Zero Waste Scotland to conduct a thorough review of the issue, including discussing it with stakeholders like the FSB. I understand that a workshop is being held on 10 May to consider the implications for small businesses, and that FSB's participation has been invited. I would encourage FSB to engage with this process to ensure your concerns are discussed.

I hope this reassures you that we are keen to engage fully with stakeholders as part of this work.

Yours

Roseanna Cunningham



Redacted

From: Redacted<Redacted@fsb.org.uk>
Sent: 25 March 2019 11:28
To: Redacted
Cc: Redacted
Subject: RE: Deposit Return Scheme - Implementation Advisory group - 7 May 2019

Hi Redacted,

Hope you're well.

Thanks for sending this over. Unfortunately, I'm away on holiday on the 21 May and it falls on the day of our internal board meeting with members so I don't think we'll be able to send anyone along. I'm happy to meet for a catch up though ahead of or after the meeting.

Best,

Redacted

From: Redacted@gov.scot <Redacted@gov.scot> **On Behalf Of** Redacted@gov.scot

Sent: 19 March 2019 10:16

To: Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk; Redacted@britishsoftdrinks.com; Redacted@fsb.org.uk; Redacted@naturalhydrationcouncil.org.uk; Redacted@swa.org.uk; Redacted@beerandpub.com; Redacted@sgfscot.co.uk; Redacted@sgfscot.co.uk; Redacted@btinternet.com; Redacted@brc.org.uk; Redacted@scottishwholesale.co.uk; Redacted@scottishwholesale.co.uk; Redacted@aol.com; Redacted@ukhospitality.org.uk; Redacted@gov.scot; Redacted@gov.scot; Redacted@gov.scot

Cc: Redacted@swa.org.uk; Redacted@mindthezebra.com; Redacted@naturalhydrationcouncil.org.uk; Redacted@nfrn.org.uk

Subject: Deposit Return Scheme - Implementation Advisory group - 7 May 2019

Dear Colleague,

Firstly, please accept my apologies for the delay in you receiving this email following the DRS Implementation Advisory Group on 26 February. Many thanks for your attendance on the day.

I have now attached the note of that meeting alongside a copy of the presentation delivered by Jill Farrell and me. We will seek comments on the note at the next meeting which we are proposing takes place on **Tuesday 21 May between 11.00am and 2.00pm, again in central Edinburgh**. I appreciate that this is later than initially hoped, for which apologies.

I would be grateful if you could confirm, by return email, who from your organisation will be available to attend.

I look forward to hearing from you.

Regards

Redacted

Redacted
Circular Economy Unit

Redacted

Phone: Redacted

Mobile: Redacted

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From: Redacted
Sent: 07 March 2019 18:13
To: Redacted
Subject: RE: 20 March 11:00-12:00 DRS and PRN interaction

Hi Redacted,

It looks like the BSDA discussion is now scheduled for the afternoon (2pm start). Is there any flexibility around timings for our meeting?

Best,

Redacted

From: Redacted <Redacted@defra.gov.uk>
Sent: 07 March 2019 16:21
To: Redacted <Redacted@gov.scot>; Redacted <Redacted@gov.scot>
Subject: 20 March 11:00-12:00 DRS and PRN interaction

Hello Redacted,

As you will see I've sent out the calendar invite for 20 March DRS/EPR meeting from 12:00-17:00 However, we've also got an hour 11:00-12:00 in the same location and I wondered if this could be an opportunity to focus on the Scottish DRS and interaction with PRNs (i.e. around exemptions). Let me know what you think – I know you also plan to meet BSDA that day.

Thanks,

Redacted

Redacted | Policy Adviser | Producer Responsibility and Product Regulation | Environmental Quality Directorate | **Department for Environment, Food and Rural Affairs** | Tel: Redacted | Email: Redacted@defra.gov.uk | Address: Redacted

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T: 0300 244 4000
E: scottish.ministers@gov.scot

The Rt Hon Michael Gove
Secretary of State for Environment, Food and
Rural Affairs
Seacole Building
2 Marsham Street
London
SW1P 4DF

7 February 2019

Dear Michael,

Thank you for your letter of 1 February seeking my agreement to proceed with a joint public consultation on reforming the packaging producer responsibility system.

I welcome the work that has been undertaken by our respective officials in recent months to refine the proposals set out in the consultation document and, on that basis, am content to proceed to consultation in the week commencing Monday 18 February.

I note that the consultation will run for an 8 week period. Given these truncated timescales, it will be critically important to ensure every effort is made to engage our partners and the public in the consultation exercise. I understand our officials are already discussing plans in this regard.

Whilst I am content to proceed to consultation at this stage, you will appreciate that I am not yet in a position to set out the Scottish Government's final view on the delivery of packaging reform on a UK-wide basis. Our final position will, of course, be informed by the outcome of the consultation and, in particular, the governance model that is selected.

Further, I am clear that additional work is required alongside the consultation to agree appropriate mechanisms for the management of funding flowing from any UK-wide arrangements, ensuring appropriate recognition of Scottish Ministers' devolved competence for environmental measures and local government funding. I therefore have significant reservations in principle about a UK body distributing funding directly to Scottish local authorities and understand my officials have been in contact with yours to stress the importance of the consultation not closing off alternative options on this front.

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Finally, it will be critical to ensure that any reform of wider packaging producer responsibility takes full account of Scotland's Deposit Return Scheme as a means through which producers can satisfy their producer responsibility obligations. There is already a good level of agreement to the underlying principle that there needs to be a strong fit between these mechanisms. In reaching a final view on the way forward following the consultation, I will need to be satisfied that the option chosen can put this principle effectively into practice.

Given the timescales associated with the introduction of the planned UK Government Environment Bill, it will be important to make early progress with the above outstanding issues.

I look forward to that further engagement.

I am copying this letter to Hannah Blythyn, Deputy Minister for Housing and Local Government, Welsh Government; Dr Denis McMahon, Permanent Secretary Department of Agriculture, Environment and Rural Affairs, Northern Ireland and the Secretary of State for Scotland.

Yours,



ROSEANNA CUNNINGHAM

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From: Redacted <Redacted@zerowastescotland.org.uk>
Sent: 28 March 2019 15:27
To: Redacted@brc.org.uk; Redacted@resourcefutures.co.uk Redacted;
Cc: Redacted ; Redacted; Redacted
Subject: BRC cost to retail report

Dear Redacted, Redacted,

Many thanks for meeting with us on Tuesday to take us through the DRS retail cost report. It was incredibly useful to better understand the components and assumptions in your calculations. We'd be very grateful if you could send us your presentation. I think the main points of clarification we took away from the meeting were as follows:

- What is the assumed split between automated and manual returns? (ZWS figures are 85%/15%)
- What are the assumed storage requirements for returned materials/frequency of collections?
- What differences in cost have been modelled for glass i.e. extra storage, labour, RVM cost, space?
- What are the £ per m2 combining rental/rates/opportunity cost? Generally any figures we've seen add this all into one value, so it would be useful to be able to compare
- Confirm costs and handling fee are Scotland specific to remove any London weighting
- Provide break-down in opportunity cost for glass (to better understand the significant increase seen at large retail)
- Confirm assumptions around RVM sizing, servicing and emptying

We'll share your presentation with colleagues and let you know if we have any further thoughts for your consideration. We appreciate resources may be tight, but any further information would of course be very welcome.

We look forward to hearing from you.

Kind regards,

Redacted | Sector Manager – Deposit Return Scheme | Zero Waste Scotland
Mobile Redacted | **Reception** Redacted
Email: Redacted

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From: Redacted
Sent: 24 March 2019 17:34
To: 'Redacted'
Cc: 'Redacted@zerowastescotland.org.uk';
'Redacted@zerowastescotland.org.uk';
'Redacted@zerowastescotland.org.uk';
'Redacted@zerowastescotland.org.uk'; Redacted; 'Redacted'
Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

Just a quick note to confirm the venue for Tuesday's meeting. Unfortunately we couldn't secure a suitable room in Victoria Quay so the meeting will now be held at:

65-67 Commercial St,
Edinburgh
EH6 6LH

The venue is only a minute or two away from our office so is serviced by the same public transport routes etc.

Look forward to seeing you on Tuesday.

Kind regards

Redacted

Redacted

Circular Economy Unit

Environmental Quality and Circular Economy Division, Directorate for Environment and Forestry, Scottish Government

Redacted

Phone: Redacted

Mobile: Redacted

From: Redacted <Redacted@brc.org.uk>
Sent: 12 March 2019 09:28
To: Redacted <Redacted@gov.scot>
Cc: Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk;
Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk; Redacted
<Redacted@gov.scot>; Redacted <Redacted@resourcefutures.co.uk>
Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

CC'ing in Redacted – the morning of the 26th is fine – can I suggest 10:00.

Thanks

Redacted

From: Redacted@gov.scot <Redacted@gov.scot>

Sent: 10 March 2019 20:16

To: Redacted <Redacted@brc.org.uk>

Cc: Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk;
Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk; Redacted@gov.scot

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

Let's aim for the morning of the 26th. I'll book a room at Victoria Quay and secure representation from ZWS who have been leading on the modelling.

Thanks and speak soon.

Redacted

From: Redacted <Redacted@brc.org.uk>

Sent: 07 March 2019 15:35

To: Redacted <Redacted@gov.scot>

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

That was good for me, but not our consultants – they can do: 14, 15, 20, 25 of Mar, and morning of the 26th. Any of those work?

Redacted

From: Redacted@gov.scot <Redacted@gov.scot>

Sent: 07 March 2019 12:47

To: Redacted <Redacted@brc.org.uk>

Cc: Redacted <Redacted@brc.org.uk>; Redacted@zerowastescotland.org.uk;
Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk; Redacted@gov.scot

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

How would the morning of Friday 22 March suit?

Thanks

Redacted

From: Redacted <Redacted@brc.org.uk>

Sent: 06 March 2019 16:17

To: Redacted <Redacted@gov.scot>

Cc: Redacted <Redacted@brc.org.uk>; Redacted@zerowastescotland.org.uk;
Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk; Redacted
<Redacted@gov.scot>

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

From a practical perspective that might be a bit tight for getting people north – how is the following week. I'll then put the dates across to our guys (but we are keen to get them up to Scotland as well)

Redacted

From: Redacted@gov.scot <Redacted@gov.scot>

Sent: 06 March 2019 10:05

To: Redacted <Redacted@brc.org.uk>

Cc: Peter Andrews <Redacted@brc.org.uk>; Redacted@zerowastescotland.org.uk;
Redacted@zerowastescotland.org.uk; Redacted@zerowastescotland.org.uk; Redacted@gov.scot

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

Thanks for coming back to me on this. I'm afraid neither Monday or Friday next week will work for us. Could a session on Tuesday between 11.30am and 1.30pm be accommodated? Would your consultants be happy to travel if we were to cover costs?

Thanks again.

Redacted

Redacted

Circular Economy Unit

Environmental Quality and Circular Economy Division, Directorate for Environment and Forestry, Scottish Government

Redacted

Phone: Redacted

Mobile: Redacted

From: Redacted

Sent: 20 February 2019 16:49

To: 'Redacted' <Redacted@brc.org.uk>; 'Redacted' <Redacted@brc.org.uk>

Cc: Redacted <Redacted@gov.scot>; Redacted <Redacted@gov.scot>; 'Redacted' <Redacted@gov.scot>; Redacted <Redacted@gov.scot>; 'Redacted' <Redacted@zerowastescotland.org.uk>; 'Redacted@zerowastescotland.org.uk' <Redacted@zerowastescotland.org.uk>

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted/Redacted,

I hope all is well at your end.

Following our previous exchange, we've now had the opportunity consider how we might best use the time with Resource Futures to better understand the key assumptions which have driven the figures contained in their "implications for retailers" analysis. Key areas of interest are as follows:

1. It would be useful to understand the numbers in a Scottish context, how they have been arrived at and the scope of the scheme modelled, which will help us relate it to the scheme design under consideration in Scotland.

2. A presentation of the cost calculation for the different sizes of retail outlet. In particular, we suspect assumptions around return point footprint and valuing space may be key sensitivities – any insight into this, in terms of figures by return location, or even overall share of costs, would be helpful.
3. Also relevant to the above point, how the opportunity cost has been calculated and applied.
4. What differences in cost have been modelled for glass.
5. How online retail costs have been calculated.

We think a face-to-face session is probably going to be more productive but appreciate that this carries financial implications. I wonder whether Resource Futures would be happy to participate in such a session on the basis that we cover the additional expenses incurred as a result of travel etc.?

In terms of timing, we think a session in the week beginning 11 March could work but would very much welcome your views.

Thanks and look forward to hearing from you.

Redacted

Redacted

Circular Economy Unit

Environmental Quality and Circular Economy Division, Directorate for Environment and Forestry, Scottish Government

Redacted

Phone: Redacted

Mobile: Redacted

From: Redacted <Redacted@brc.org.uk>

Sent: 01 February 2019 14:08

To: Redacted <Redacted@gov.scot>

Cc: Redacted <Redacted@gov.scot>; Redacted <Redacted@brc.org.uk>; Redacted <Redacted@gov.scot>; Redacted <Redacted@gov.scot>; Redacted <Redacted@gov.scot>; Redacted <Redacted@gov.scot>

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

Apologies for the delay in coming back to you on this. We're keen to advance the discussion with you and ZWS. We've spoken with our consultants and what would make our life much easier would be if we could set up a Skype/Virtual meeting with them from London (which would save us a days cost for shipping them north). Would that be possible? If so I imagine we could set something up relatively quickly.

Secondly, would we be able to understand some of the specifics you'd like to discuss so they can appropriately prepare. We're keen to be as transparent and detailed as possible so you can understand the assumptions which have driven the top line figures, and want to ensure they're as prepared as possible. Is that something you're able to help with?

Can you please keep my colleague Redacted (who is actually managing that relationship) cc'd in please?

Thanks

Redacted

From: Redacted@gov.scot <Redacted@gov.scot>

Sent: 29 January 2019 19:08

To: Redacted <Redacted@brc.org.uk>

Cc: Redacted@gov.scot; Redacted <Redacted@brc.org.uk>; Redacted@gov.scot;

Redacted@gov.scot; Redacted@gov.scot; Redacted@gov.scot

Subject: RE: SRC follow up to DRS Meeting

Hi Redacted,

I have recently joined Redacted's team to support delivery of the DRS in Scotland. I look forward to working with you and colleagues at SRC as we progress the programme.

This is just a short note to ask whether there is any update on the below email exchange and, in particular, whether SRC is keen to participate in a session with Zero Waste Scotland and SG analytical colleagues to further explore costs to the retail sector.

Happy to discuss next steps over the phone if easier.

Thanks and look forward to hearing from you.

Redacted

Redacted

Circular Economy Unit

Environmental Quality and Circular Economy Division, Directorate for Environment and Forestry, Scottish Government

Redacted

Phone: Redacted

Mobile: Redacted

From: Redacted <Redacted@brc.org.uk>

Sent: 18 January 2019 17:03

To: Redacted <Redacted@gov.scot>

Cc: Redacted <Redacted@gov.scot>; Redacted <Redacted@brc.org.uk>; Redacted <Redacted@gov.scot>;

Redacted <Redacted@gov.scot>; Redacted

<Redacted@gov.scot>; Redacted <Redacted@gov.scot>

Subject: RE: SRC follow up to DRS Meeting

Thanks for the note Redacted, We'll discuss this over the weekend and come back to you at the start of next week. I think in principle we'd be keen to do this, but we'll need to sort out some logistics first before we can be more definite.

Have a good weekend

Redacted

From: Redacted@gov.scot <Redacted@gov.scot>

Sent: 18 January 2019 16:16

To: Redacted <Redacted@brc.org.uk>

Cc: Redacted@gov.scot; Redacted <Redacted@brc.org.uk>; Redacted@gov.scot; Redacted@gov.scot;

Redacted@gov.scot; Redacted@gov.scot

Subject: RE: SRC follow up to DRS Meeting

Redacted

Thanks very much for sending this. Sorry for the delay in responding.

I've shared with our economist who may come back with some questions. Following that it might be helpful to set up a workshop in the second ½ of February to discuss where there are differences between the various estimates of these costs and what might be driving them? I'd envisage something which brought together your experts, ZWS and our economists to see if we can reach a shared understanding of the costs to the retail sector.

Given calendars it might be worth booking that meeting in now and we can always cancel if we reach agree by e-mail. Redacted can co-ordinate a time and location if you can give an indication of when the key people would be available from your side. Would that suit?

I also wanted to check whether you would be comfortable with me sharing this work with Deloitte who are currently carrying out some financial modelling work for us?

Thanks

Redacted

From: Redacted <Redacted@brc.org.uk>
Sent: 21 December 2018 11:06
To: Redacted <Redacted@gov.scot>
Cc: Redacted <Redacted@gov.scot>; Redacted <Redacted@brc.org.uk>
Subject: RE: SRC follow up to DRS Meeting

Redacted, really good to catch up on Wednesday, and I appreciate the clear discussion.

As promised, please find attached the final report on our research into DRS costs. I've cc'd my colleague Redacted (who leads on this issue for the BRC) who is much closer to the research than I, so feel free to point any questions to us. Hopefully the assumptions are clear.

I'm off from today until the 7th of January, but we'd certainly welcome a discussion in the New Year, and I would imagine Members would be keen to engage as well.

Have a good Christmas

Redacted

From: Redacted
Sent: 06 December 2018 08:11
To: 'Redacted@gov.scot' <Redacted@gov.scot>
Cc: 'Redacted@gov.scot' <Redacted@gov.scot>
Subject: SRC follow up to DRS Meeting

Dear Redacted,

Thanks for taking the time to meet with me last month. BRC colleagues and I have taken the headline points from that meeting and discussed them with Members, both individually, and collectively. We're also able to share some of the findings from research commissioned by us over the summer from Resource Futures – who have modelled some of the costs of a DRS for the UK, and Scotland. I'm happy to meet up before Christmas to discuss this in more detail, but I thought I'd share our main reflections now.

- 1.) **Scotland only Scheme:** As anticipated, Members were very concerned at the practical implications of Scotland de facto going alone on a DRS. Labelling is obviously a significant concern, but the segregation of lines required has very significant impacts on warehousing space, staff time, and product range. A number of Members suggested the costs would make a number of product ranges unviable in Scotland – with the extra costs far outweighing any profits. Consequently some ranges would continue, some would be removed, and other materials might also be considered. It's worth noting these issues become even more severe the wider the scope of the scheme. Members are attempting to estimate the

costs for those lines which would be retained – their best estimate is it would add 50% to the existing DRS costs.

- 2.) **Costs of the scheme to Retail:** Our research (which I'll share in full when we next meet) indicates that our 'targeted' DRS approach (AI and PET) would cost retailers around £60-£70 million per annum (on the assumption Capital Expenditure is annualised over seven years). This research was predicated on UK-wide compatibility – so the Scottish scheme would potentially be significantly higher (and less effective) without the savings inherent in scale.
- 3.) **Glass:** Our Members are very concerned at proposals to include glass. On an economic level, including glass will increase the costs of the scheme from around £60 million to around £120 million per year. Those costs are particularly acute in small format stores, and for online retailers. For small format stores many will have to either lose significant store or warehouse space for storing glass. For on-the-go food retailers, many don't sell glass products and therefore don't have waste streams or systems in place – which would be a significant burden. We remain unpersuaded that over a seven year period the additional £400 million cost of including glass will be offset by the public policy benefits.
- 4.) **Timetable:** Members felt the aim of an operational scheme within two years was optimistic. To bring a scheme in that time, which was different from the rest of the UK, and wide in scope, is unlikely to be realistic. This is a very complicated system; and it's never been implemented before within such an integrated market as the UK to complement an existing household recycling scheme. Those factors are worth considering when contemplating other precedents on implementation, either in Europe or on other Scottish public policy.
- 5.) **RVMs:** There are concerns setting too wide a scope will de facto create a monopoly for one RVM manufacturer who would then have an opportunity to maximise profit – especially within the proposed timetable.
- 6.) **Handling Fees:** Our research found break even handling fees for small shops would be around 5-10p per container (depending on whether glass is included). They'd be likely to be around 1-3.5p for larger stores. We'd also note online systems would be likely to require much higher fees – but there are no relevant international comparisons to assist there. Please note these fees depend on UK-compatibility, as explained elsewhere a Scotland-only scheme would likely require higher fees.
- 7.) **Retail Industry:** Members from different sectors within retail are concerned the practical issues germane to their operations may not be fully recognised. There are enormous differences between how hospitality, food-to-go, high street, convenience, online, and grocery retailers operate. Two points arose from this:
 - a. Firstly, Members are happy to organise store visits for Ministers, or officials, to understand the practical issues related to implementing a DRS in their store. The SRC is happy to set up the initial contacts for this.
 - b. Members reflected on the creation of an advisory group. They are comfortable with the SRC sitting on that group. However, they are concerned that considering the impact of DRS on retail operations is so significant, and that retail operations are so diverse, that there should be a number of retail voices around that meeting table. This is particularly relevant if the Government considers this group to be the start of a process to develop an industry-led management company. SRC Members have been clear retailers should have a majority voice on such a body as the operational effects, and handling fees, are essential to the successful running of the scheme. Without control of the DRS it's hard to see how retailers can mitigate the very significant liabilities inherent in the scheme.
- 8.) **Online:** A number of Members wanted to understand in more detail how the scheme would engage with online retail. It was made clear that whilst some grocery retailers might choose to opt in (as they have both delivery fleets and optimised systems) there would have to be exemptions for retailers who don't control their logistical operations. Those who use, for example courier companies, or indeed businesses which act as collaborative platforms, could not realistically comply with returns (although the products would have to carry the deposit).

Apologies for the length of response, but this is an issue our Members are deeply vested in, and we're keen the Scottish Government understands the practical implications of their decisions before coming to a final decision. Happy to discuss this in person, or by phone, in the coming days if that's convenient.

Kind regards

Redacted

Redacted

Head of Policy and External Affairs
Scottish Retail Consortium

Redacted
Redacted



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Dh’fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh’fhaodadh nach eil beachdan anns a’ phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

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190530 DA meeting minutes

Redacted

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Redacted

Scottish Government update

- Ministerial statement on DRS scheme design since last meeting.
- Aim still for implementation 2021. Minister recognises timescale is ambitious.
- Remains open to working with DAs. Needs to be degree of complementarity on scheme design for that to work in practice.
- Overall positive response but industry concerns around glass, impact on retailers, and alignment with UK.
- Broad political support for core features, even inclusion of glass. Expect debate on details rather than fundamental principles.
- Unredeemed deposits to be reinvested in scheme to drive up future performance. Removes industry incentive to have more unredeemed deposits. Looking to modulate producer fee by material.
- Set up implementation working group. Industry getting engaged on implementation. Mix of lobbying on some issues and keenness to get involved in other areas.
- Super-affirmative process for secondary legislation in Scotland. Pre-legislative stage where it sits for 90 days and can be scrutinised in way primary can be. Anticipating lobbying will continue through that process. Aim to get legislation into pre-laying process late July.

Redacted

- Redacted

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Redacted

From: Redacted <Redacted@defra.gov.uk>
Sent: 20 February 2019 16:43
To: Redacted; Redacted@gov.wales; Redacted@gov.wales; Redacted@gov.wales; Redacted@daera-ni.gsi.gov.uk; Redacted; Redacted
Redacted
Cc: RE: In confidence - DRS consultation analysis
Subject:

Thanks very much for sharing this with us.

Redacted

Redacted

Tel: Redacted | Mob: Redacted

From: Redacted@gov.scot [mailto:Redacted@gov.scot]
Sent: 20 February 2019 14:35
To: Redacted@gov.wales; Redacted@gov.wales; Redacted@gov.wales; Redacted@daera-ni.gsi.gov.uk; Redacted <Redacted@daera-ni.gsi.gov.uk>; Redacted <Redacted@defra.gov.uk>; Redacted <Redacted@defra.gov.uk>
Cc: Redacted@gov.scot
Subject: In confidence - DRS consultation analysis

Colleagues,

Just wanted to let you know, in confidence, that we're going to publish our analysis of the DRS consultation tomorrow. I attach a draft of the analysis for your edification and enjoyment – I would be grateful if this didn't go any further.

Happy to talk through any of this (though out of the office next couple of days).

Regards,
Redacted

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Redacted

From: Redacted
Sent: 28 May 2019 12:15
To: Redacted; Redacted@zerowastescotland.org.uk
Cc: Redacted; Redacted; Redacted
Subject: RE: DRS Enquiries

Hi Redacted,

Thanks for your note. Hope all is well at your end.

On your question regarding return points, the policy intention is that only those shops who sell single-use drinks containers will be required to accept returns.

Redacted – I suspect you are better placed to advise on the membership and operation of the various working groups. Would you be happy to liaise with Redacted directly on this?

I hope this is helpful. Of course, happy to discuss further as required.

With best wishes,

Redacted

Redacted

Circular Economy Unit

Environmental Quality and Circular Economy Division, Directorate for Environment and Forestry, Scottish Government

Redacted

Phone: Redacted

Mobile: Redacted

From: Redacted <Redacted@brc.org.uk>

Sent: 23 May 2019 16:59

To: Redacted <Redacted@gov.scot>; Redacted <Redacted@gov.scot>

Subject: DRS Enquiries

Hi Redacted/Redacted,

As you might expect we're starting to get a few Member enquiries around the scheme (something which will increase no doubt). Where possible I can normally answer, but there are two relatively specific ones which are hopefully simple to answer:

- 1.) Is your intention for businesses to provide members to the IAG working groups – or should it all be through the trade associations. If the former, do you have a sense of what you might like for the retail group (i.e. different business models) so I can help find the right people?
- 2.) One member who operate a small food to go offering wanted clarity on whether retail locations (shops) which were part of the business, but didn't sell drinks containers would be obliged to take back containers

(i.e. at a community pharmacy which doesn't sell drinks or indeed any food)? I'd have assumed not (or it's a question for the System Administrator) but wanted to check.

No doubt more to follow

Redacted

Redacted

Head of Policy and External Affairs
Scottish Retail Consortium

Redacted
Redacted@brc.org.uk



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Redacted

From: Redacted
Sent: 27 February 2019 10:02
To: Redacted
Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Hi Redacted,

1pm sounds good!

Best,

Redacted

From: Redacted
Sent: 27 February 2019 10:00
To: Redacted
Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Hi Redacted,

Nice to meet you as well!

I've got a meeting this morning but will try to catch you around 1pm if that is ok?

Best wishes

Redacted

Redacted

From: Redacted
Sent: 27 February 2019 09:46
To: Redacted
Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Hi Redacted,

Lovely to meet you yesterday!

I've just went to give you a ring there and realised I don't have your number, I'm at my desk for most of today so if you wouldn't mind giving me a ring on 07595284292 that would be great.

Best,

Redacted

From: Redacted

Sent: 20 February 2019 14:28

To: Redacted

Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Great, look forward to catching up then.

Best wishes.

Redacted

From: Redacted

Sent: 20 February 2019 10:02

To: Redacted

Cc: Redacted

Redacted

Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Hi Redacted,

No problem! Thanks for confirming.

That sounds great, happy to catch up next week around the meeting.

Best wishes,

Redacted

From: Redacted

Sent: 20 February 2019 09:51

To: Redacted

Cc: [Redacted](#)

Subject: Re: Deposit Return Scheme for Scotland - Implementation Advisory Group

Hi Redacted

Please accept my apologies for the delay in coming back to you. To confirm, we would be happy to engage FSB in the work of the IAG as you describe. Perhaps we could have a conversation in the margins of next week's meeting regarding how best to support your participation?

Kind regards

Redacted

Sent from my BlackBerry 10 smartphone.

From: Redacted
Sent: Wednesday, 20 February 2019 09:37
To: Redacted
Cc: Redacted
Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Dear Redacted,

Thank you for your E-mail.

Please note that I no longer work for the Environmental Quality and Circular Economy Division, as I moved to my new role within the Scottish Commission on Social Security.

I forwarded your original E-mail dated 11th February 2019 to Redacted who said he would contact you in due course.

I hope that this is satisfactory.

If you, however, require any further assistance, please do not hesitate to contact me at your earliest convenience.

Thank you for your co-operation.

Kind regards,

Redacted

Redacted

 [Redacted](#)

From: Redacted
Sent: 20 February 2019 09:26
To: Redacted
Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Hi Redacted,

I hope you're well.

I was just wanting to follow up on the below. Would it be possible for FSB to interact with the DRS Implantation Advisory Group in the manner proposed below?

Best wishes,

Redacted

From: Redacted

Sent: 11 February 2019 09:54

To: Redacted

Subject: RE: Deposit Return Scheme for Scotland - Implementation Advisory Group

Dear Redacted,

Sorry for the delay in getting back to you.

We are keen to participate in this group because, as you are aware, certain aspects of DRS, such as labelling and logistics, are critical to our members. However, there are some technical matters, such as ICT, where FSB is probably not best-placed to contribute. You also mentioned that the group would require a fairly significant time commitment as the intention was to meet regularly.

Given that a proportion of the discussion is likely to be less relevant to FSB and the frequency of meetings, I don't think I would be able to meet this resource commitment. However, we are keen to be able to receive up to date communications about the development of DRS and contribute the small business perspective where this is useful (for both us and Scottish Government). On that basis, might it be acceptable for FSB to receive papers and/or contribute in writing? We might also be able to attend particular meetings where our attendance would be particularly useful.

I'm sorry to complicate matters but might this compromise be acceptable?

Happy to discuss further.

Best wishes,

Redacted

Redacted

Policy and Public Affairs Assistant, Scotland

Federation of Small Businesses

T Redacted

M Redacted

Redacted

Redacted

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Registered in England No: 1263540 VAT No: 997342763.

From: [Redacted](#)

Sent: 21 January 2019 15:17

To: [Redacted](#)

Cc: [Redacted](#) **Subject:** Deposit Return Scheme for Scotland - Implementation Advisory Group

Importance: High

Dear Redacted,

Please find hereto attached a letter issued on behalf of Redacted, inviting your participation in the Implementation Advisory Group for Scotland’s Deposit Return Scheme.

I trust this is helpful.

Thank you for your co-operation.

Kind regards,

Redacted

[Redacted](#)



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Redacted

From: Redacted
Sent: 25 April 2019 17:22
To: Redacted
Subject: FW: John McNally quote 'co-designing DRS with Defra'

Hello Redacted,

At this week's Plastics Recycling [debate](#) in the House of Commons John McNally SNP spoke about a joined-up approach to DRS, as below. I don't know if you're aware of this but was wondering if you happen to know what the background to it might be? When he says co-designing I presume he refers to our joint working, rather than indicating an increased desire to match up the schemes more closely.

"Scotland was the first part of the UK to commit to introducing a deposit return scheme for drinks containers. The Scottish Government are open to co-designing the scheme with the Department for Environment, Food and Rural Affairs, being mindful that nothing happens in isolation. I believe the UK Environment Secretary, the Minister and the devolved Administrations met at a summit on this matter, and the principles—as far as I know—were agreed in July."

Thanks,

Redacted

Redacted | Policy Adviser | Producer Responsibility and Product Regulation | Environmental Quality Directorate | **Redacted** | Tel: Redacted |
Email: [Redacted](#) | Address: Redacted

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