

From: (Redacted)
To: [Minister for Green Skills, Circular Economy and Biodiversity](#)
Cc: [Director of Environment & Forestry; Carmichael K \(Katriona\); \(Redacted\)](#)
Subject: [Huyton H \(Harry\)](#)
Ministerial Briefing - DRS - Meeting with Scottish Grocers Federation- 12 October 2022
Date: 11 October 2022 17:12:00
Attachments: [DRS - Meeting with Scottish Grocers Federation- Briefing - 12 October 2022.docx](#)
[Letter to Minister for Circular Economy - 29th September 2022.pdf](#)

PS Minister for Green Skills, Circular Economy, and Biodiversity,

Please find attached the briefing for tomorrow mornings meeting with the Scottish Grocers' Federation (SGF). Also attached separately (Annex C) is a copy of recent correspondence from SGF.

Regards,

(Redacted)

**MINISTERIAL ENGAGEMENT BRIEFING:
LORNA SLATER, MINISTER FOR GREEN SKILLS, CIRCULAR ECONOMY AND
BIODIVERSITY**

Meeting with Scottish Grocers' Federation

What	Meeting with the Scottish Grocers' Federation (SGF) to discuss Scotland's Deposit Return Scheme.
Where	St Andrew's House Room 4W.01
When	12 October 2022 10:00 – 11:00
Key Message(s) and structure	<ul style="list-style-type: none"> • I am strongly committed to introducing DRS on the 16th of August 2023. Scottish Ministers have been clear and consistent that this date will not change. • Implementation is now well underway. I am continually impressed by how business of all types and sizes are stepping forward to prepare for the scheme. • I recognise that your members have concerns over elements of the scheme. I would like reassure you that I am continuing to work with businesses, Circularity Scotland and SEPA to ensure pragmatic solutions are in place. • Now is the time for businesses to push ahead with delivery to ensure they are ready for scheme launch in August next year.
Who	<ul style="list-style-type: none"> • (Redacted)
Why	An opportunity to address the concerns raised by SGF in letter of 29 September, and to demonstrate your continued engagement and commitment to finding pragmatic solutions to their concerns.
Expected Outcome	Attendees feel that their concerns have been listened to, and that the Scottish Government will continue to work with CSL, SEPA and others to find pragmatic solutions.
Supporting officials	<p>(Redacted) , Deposit Return Scheme^(Redacted) Mob: (Redacted)</p> <p>Katriona Carmichael, Deputy Director, Circular Economy Division</p> <p>(Redacted) , Deposit Return Scheme (Redacted)</p>

**MINISTERIAL ENGAGEMENT BRIEFING:
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BIODIVERSITY**

Meeting with Scottish Grocers' Federation

<i>Briefing contents</i>	Annex A – Proposed meeting structure and lines Annex B – Organisation summary and biographies Annex C – SGF correspondence (attached separately)
<i>Media Handling / Social Media</i>	N/A

**MINISTERIAL ENGAGEMENT BRIEFING:
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ANNEX A: Proposed Meeting Structure & Lines

You will chair.

(Redacted)

1. Welcome & opening remarks (14:00 – 14:10)

*Invite representatives from SGF to introduce themselves. (Redacted)
attended a stakeholder meeting you held on 7 September.*

(Redacted)

- I am grateful for you coming here to meet with me today, and for the time and effort you have already put in to engaging on the deposit return scheme, including through the system-wide assurance group. Thank you for your ongoing support.
- You'll know that I, and all Scottish Ministers, remain strongly committed to introducing Scotland's Deposit Return Scheme on 16 August 2023. I am encouraged by the huge amount of work underway across Scotland to prepare for DRS.
- I have appreciated your correspondence setting out the key issues your members are facing. It is important to me that we have problem solving dialogue throughout this crucial period, in response to the types of challenge you raise.
- (Redacted)
- My priority today is to understand your other concerns in more detail. I would like to reassure you that I'm already working on all the issues highlighted to make sure we have pragmatic solutions in place. I want to continue to work with you to achieve this.
- The issues you highlighted were exemptions, price marked pack, cut-over, online takeback, and VAT. I suggest we run through what you feel is needed

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to resolve each of these, but first want to take the opportunity to check if there is anything else you want to cover today.

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BIODIVERSITY
Meeting with Scottish Grocers' Federation**

2. SGF concerns (10.10 – 10.55)

Concern 1 – Retailer handling fee

(Redacted)

Background – SGF believes that the retailer handling fee is insufficient and CSL are refusing to explain or justify this. Members are unable to order RVM's due to the upfront financial cost.

CSL appointed PwC to conduct an independent analysis of the retailer handling fee. SGF engaged in this process and provided costs data to support the findings.

(Redacted)

Concern 2 - Exemptions

Background – SGF have requested that Scottish Government should provide funding to Biffa to conduct a mapping exercise to support the proximity exemptions process. They also state that retailers are not willing to provide data to competitors to secure an exemption.

(Redacted)

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Meeting with Scottish Grocers' Federation

(Redacted)

Concern 3 – Price marked packs (PMP)

Background – SGF are seeking clarification that the 20p deposit is not included as part of the price marked on the packaging, as well as clarity on point of sale/ labels for PMPs. Their membership firmly believe that the deposit should be clearly pointed out over and above the product selling price.

(Redacted)



(Redacted)

Concern 4 – Cut Over

Background – SGF are seeking clarity over a grace period around cut-over for retained EAN stock and what happens to the stock that retailers will still have.

This type of operational information is the responsibility of CSL, who are responsible for implementing the scheme on behalf of industry.

• (Redacted)



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- **Note that SEPA have confirmed that retailers will still be able to sell existing stock once the scheme is live.**

Concern 5 – online takeback

Background – SGF believe that on-line takeback is proving impossible for members and regulations are not fit for purpose. They want it to be excluded from the scheme. They also have concern that CSL have also failed to publish the online takeback fee.

(Redacted)

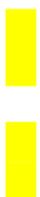


(Redacted)

Concern 6 - VAT

Background – SGF believe there should be no VAT on the 20p deposit and that the Scottish Government should have done more to push back on this.

(Redacted)



**MINISTERIAL ENGAGEMENT BRIEFING:
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Meeting with Scottish Grocers' Federation**

(Redacted)



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BIODIVERSITY**

Meeting with Scottish Grocers' Federation

ANNEX B: BACKGROUND ON SGF AND BIOGRAPHIES OF ATTENDEES

Background on SGF

- The Scottish Grocers' Federation (SGF) is the trade associate for the independent convenience store sector.
- The SGF brings together a range of retailers throughout Scotland, including Scotmid, the Co-operative Group, Clydebank Co-op, SPAR, Londis, Nisa, Costcutter, Day Today's and Keystore.
- The SGF's central aim is to ensure that the Scottish Government and Parliament creates and improves the trading environment to allow for continuing investment, job creation and development by convenience store retailers.
- They have a number of Corporate Members, suppliers to the trade, who actively support them in their role as ambassador for the convenience sector, to the media and both the Scottish and Westminster Governments.

(Redacted)

(Redacted)

(Redacted)

**MINISTERIAL ENGAGEMENT BRIEFING:
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BIODIVERSITY**

Meeting with Scottish Grocers' Federation

(Redacted)

ATTENDEE BIOGRAPHIES

(Redacted)

(Redacted)

(Redacted)

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(Redacted)

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ANNEX C – RECENT SGF CORRESPONDENCE

Attached separately

SGF

Scottish Grocers' Federation

www.scottishshop.org.uk

Promoting Responsible Community Retailing Since 1918
to ensure a sustainable and prosperous convenience industry in Scotland



Lorna Slater MSP
Minister for Green Skills, Circular Economy, and Biodiversity
The Scottish Government
St. Andrew's House
Regent Road
Edinburgh
EH1 3DG

Sent by e-mail

29th September 2022

Dear Minister,

SCOTTISH DEPOSIT RETURN SCHEME

I am writing to seek an urgent meeting with you to discuss the Scottish Grocers' Federation's (SGF) concerns with the Scottish Deposit Return Scheme (DRS) scheduled to go live on 16th August 2023.

Scottish Convenience store sector represents over 5,000 convenience stores in Scotland, which includes all the major symbol groups, co-ops, and convenience multiples in Scotland. In total, convenience stores provide around 49,000 jobs in Scotland. Over the last year, the UK convenience sector contributed over £9.7bn in GVA and over £9bn in taxes.

SGF are representing the largest group of Return Point Operators in Scotland and on the board of Circularity Scotland Limited, as well as being the convenience sector lead for over three years in all DRS discussions. We have written to you on numerous occasions with our concerns and set out some proposed solutions for further discussion, but we have received no response.

It was therefore with great concern and disappointment to learn that you have a range of meetings scheduled with other organisations within our industry where they will have the opportunity to discuss their own concerns with you around DRS. This is simply not good enough and it is unacceptable that SGF is being side-lined in this way.

Find us on



SGF

Scottish Grocers' Federation

www.sgfcot.co.uk

Scottish Grocers' Federation, Federation House,
222/224 Queensferry Road Edinburgh EH4 2BN

T 0131 343 3300 F 0131 343 6147 E enquiries@sgfcot.co.uk



We have a range of issues which require to be addressed, all of which we have raised before in meetings with officials from Scottish Government, Circularity Scotland Limited and SEPA, some of which include:

- **Retailer Handling Fee** - The retailer handling fee is insufficient and CSL are refusing to explain or justify this – many members are unable to order RVM's due to having to find further financial facilities.
- **Exemptions** – Biffa should do a mapping exercise and the Scottish Government should provide funding for them to do this scoping exercise. Retailers are not willing to provide data to competitors to secure an exemption.
- **Price Marked Packs (PMP)** – clarification that the 20p deposit is not included as part of the price marked on a PMP, as well as clarity on point of sale/ labels for PMPs. Our membership firmly believe that the deposit should be clearly pointed out over and above the product selling price.
- **Cut-over** – clarity over a grace period is required around cut-over for retained EAN stock and what happens to the stock that retailers will still have.
- **On-line take back** – On-Line takeback is proving impossible at present due to the regulations being unfit for purpose. This should be excluded from the scheme. CSL have also failed to publish the online takeback fee.
- **VAT** – There should be no VAT on the deposit the 20p deposit and the Scottish Government should have done more to push back on this.

These are just some of the pressing issues SGF members have with DRS and as the go live date approaches, their and our concerns continue to grow. Despite this, we have been and remain fully committed to working with a range of stakeholders to ensure that Scotland has a world leading scheme.

It is therefore of paramount importance that SGF has a meeting with you to discuss the way forward and to scope out how our concerns can be addressed to enable our members - who will be required to play a critical role in the success of DRS – to approach the 'go live' date with confidence.

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In addition to the above, we would appreciate your attendance at our next SGF National Executive Board Meeting on 30th November.

I look forward to hearing from you.

Yours sincerely

(Redacted)

(Redacted)

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From: (Redacted)
To: (Redacted) [@sgfscot.co.uk](mailto:(Redacted)@sgfscot.co.uk)
Cc: (Redacted) [Carmichael K \(Katriona\)](#)
Subject: Note of meeting between Minister for Green Skills, Circular Economy and Biodiversity
Date: 27 October 2022 13:14:00
Attachments: [Note of meeting between the Minister for Green Skills, Circular Economy and Biodiversity and the Scottish Grocers' Federation - 12 October 2022.docx](#)

Dear (Redacted)

Following the meeting you had with the Minister for Green Skills, Circular Economy and Biodiversity to discuss DRS on 12 October, I am forwarding you a note of the meeting as was agreed.

Kind regards,

(Redacted)

(Redacted) | Deposit Return Scheme Unit | Environmental Quality and Circular Economy Division
| Environment and Forestry Directorate | Scottish Government

Minister for Green Skills, Circular Economy and Biodiversity meeting with the Scottish Grocers' Federation (SGF)

12 October 2022

St Andrew's House

Present

Minister for Green Skills, Circular Economy and Biodiversity (LS)
(Redacted)

Katriona Carmichael, Deputy Director, Circular Economy Division, Scottish Government (KC)

(Redacted)

Harry Huyton, Special Advisor, Scottish Government (HH)

Main discussion points and actions

Retailer Handling fee / Return points

It was noted that LS could not talk in detail on the retailer handling fee due to ongoing legal proceedings.

(Redacted)

Exemptions

SGF had previously raised concerns around legality of exemptions process and requirement for business to share confidential data with competitors. Any proximity exemptions system must be confidential. Despite SGF requests, no partner had come forward to deliver this system.

SGF had asked SG to fund Biffa to carry out a mapping exercise. ^(Redacted) noted that a mapping service would shortly be available. ^(Redacted) noted that SGF had not been involved and that he did not expect this to cover all return points. More information was needed on the usability of the tool, and the effect on data and sought more detail on how the tool would work.

ACTION – Scottish Government to facilitate sharing of information on the mapping tool with SGF.

^(Redacted) raised concerns that SGF's views had not being heard during the ongoing DRS process, citing significant amounts of work being done by meeting attendees and other on DRS. Concerns were raised regarding the quality of minutes of previous meetings with ZWS that had not highlighted SGF concerns.

SGF proposed that “parade solutions” to shared return points had not been fully explored by interested parties, but had the potential to offer an effective approach for small retailers in close proximity.

ACTION – SGF to provide written information on parade proposals, outlining the proposition, progress and blockers.

^(Redacted) raised concerns that the retailer handling fee would not be cost neutral. There were concerns regarding lack of information from CSL on RVM specifications, space required and uplifts. This lack of information was preventing retailers from being able to determine if an exemption would be needed, or to plan for the scheme.

^(Redacted) raised concerns that there was a lack of financing from banks, including the Scottish National Investment Bank for the purchase of RVMs.

It was SGF’s view that CSL was pushing for a supermarket based model that would deny their members footfall. SGF was clear that its members wished to participate in DRS but were not being adequately engaged or listened to.

Price Marked Packs (PMP)

^(Redacted) provided an update that SEPA and Trading Standards had confirmed that the deposit price did not have to be marked on a PMP. This was welcomed and noted.

Cut-Over

LS acknowledged the need for operational clarity and updated that she was expecting CSL to provide this information in the coming weeks.

^(Redacted) expressed frustration that CSL had been working with supermarkets and not SGF. He cited concerns relating to CSL’s approach to branding on RVMs. It is SGF’s view that this approach goes beyond the powers of scheme administrator.

^(Redacted) asked LS if Scottish Ministers could intervene where CSL is not abiding by the scheme regulations.

LS emphasised that as an industry led scheme, CSL and members should resolve non-legislative issues. ^(Redacted) noted that SGF voting powers did not give it leverage within CSL and there is, therefore, no recourse.

Online takeback

^(Redacted) stated that SGF wishes to see the mandatory obligation removed from the scheme, citing suggestions that small producers will stop selling into Scotland should it go ahead.

LS noted concerns, which were widely held across industry. She was considering options that would lessen the burden of online takeback while maintaining support

for those people who might not otherwise be able to reclaim deposits. She asked for views on what a workable scheme might look like.

^(Redacted) suggested that many retailers would undertake voluntary collections for disabled or vulnerable people. ^(Redacted) suggested a scheme that applied to registered disabled or elderly people would be more workable.

ACTION – Officials to engage with SGF on online takeback.

VAT

All agreed that ideal position would be that VAT should not be applied to deposits.

LS noted her frustration on this issue and that the change in the UK Government had slowed progress. She assured the group that she was urgently seeking a resolution from the Treasury.

Other issues

^(Redacted) asked if SEPA could determine the timing of deposit cash flows to mitigate against retailers with longer payments terms gaining an advantage.

ACTION – Officials to discuss with SEPA.

Summing up

LS thanked SGF for constructive input and noted the concerns set out. ^(Redacted) asked for help to encourage engagement from CSL, SEPA and ZWS with SGF, and also asked for clear feedback from this meeting.

A series of further actions were agreed.

ACTION – SGF to put proposal regarding workable online system in writing.

ACTION – Scottish Government officials to work closely with SGF in coming weeks.

ACTION – Scottish Government to share notes of this meeting with SGF.

ACTION – 6 weekly meetings to be set up between LS and SGF.

(Redacted)

From: Carmichael K (Katriona)
Subject: FW: Note of meeting between Minister for Green Skills, Circular Economy and Biodiversity
Attachments: DRS Issues paper - November 2022.docx

(Redacted)

(Redacted) Divisional Administrator | Circular Economy | Directorate for Environment and Forestry | Scottish Government

Please note, I am currently working from home, Monday – Friday, 08:00 – 16:00

From: Carmichael K (Katriona)
Sent: 13 November 2022 16:12
To: (Redacted)
Subject: FW: Note of meeting between Minister for Green Skills, Circular Economy and Biodiversity

(Redacted) not directly relevant to my email just now, but in case there are useful points to draw from it.

From: (Redacted) @sgfscot.co.uk>
Sent: 02 November 2022 10:35
To: (Redacted) @gov.scot>
cc: (Redacted)

Carmichael K (Katriona)

(Redacted)
Subject: RE: Note of meeting between Minister for Green Skills, Circular Economy and Biodiversity

Dear (Redacted)

Please find enclosed a paper we have prepared in relation to the SGF action points from the minutes of meeting you provided.

If you need anything else please let me know.

Kind regards,

(Redacted)

(Redacted)

Scottish Grocers' Federation
(Redacted)

From: (Redacted)
Sent: 27 October 2022 13:15
To: (Redacted) @sgfscot.co.uk>
cc: (Redacted) [Katriona.Carmichael](mailto:Katriona.Carmichael@sgfscot.co.uk)(Redacted)
Subject: Note of meeting between Minister for Green Skills, Circular Economy and Biodiversity

Dear (Redacted)

Following the meeting you had with the Minister for Green Skills, Circular Economy and Biodiversity to discuss DRS on 12 October, I am forwarding you a note of the meeting as was agreed.

Kind regards,

(Redacted)

(Redacted) | Deposit Return Scheme Unit | Environmental Quality and Circular Economy Division | Environment and Forestry Directorate | Scottish Government

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SCOTTISH DEPOSIT RETURN SCHEME

Overview

Scottish Grocers' Federation (SGF) has been and remains fully committed to a fit for purpose, world leading, deposit return scheme (DRS).

It is essential however that DRS remains cost neutral to Return Point Operators and does not leave them with an additional cost burden or put them out of business.

We welcomed the recent meeting (12/10/22) with the Minister for Green Skills, Circular Economy and Biodiversity and the offer for the Minister to meet with SGF every six weeks. It is also encouraging that there will be the opportunity for Scottish Government officials to work closely with SGF in the coming weeks.

Actions from 12th October meeting

ACTION: SGF to provide written information on parade proposals, outlining the proposition, progress, and blockers

Proposition:

We would recommend a “planning permission to allow blanket cover for these RVM machines to operate on shopping parades, by the Head of Planning at the SG”.

The proposition of utilising DRS community return points on shopping parades could present a more effective and efficient mechanism for certain groups of retailers and businesses situated in such locations.

If in-scope businesses on these parades such as convenience stores, chip shops and other takeaway outlets agreed to utilise an RVM located on their shopping parade this would remove the need for each business to provide a manual takeback system or an RVM. This would also reduce the number of return points that Biffa would be required to pick-up from and so reduce the demands on workforce, vehicles, and environmental impact.

Such a solution would allow this specific group of convenience retailers to still play a key role in DRS while protecting their customer footfall and therefore avoiding a supermarket solution that could decimate our industry and jeopardise the viability of small retailers.

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For this approach to work however the Scottish Government would need to commit providing resources for this and for Biffa to pay for and implant the required RVMs. In such a scenario, retailers should still receive a proportion of the retailer handing fee.

Progress

Having the opportunity to meet the Minister every six weeks is a key step forward as will be the opportunity to work closely with Scottish Government officials in the coming weeks to develop any proposals.

Blockers

SGF have met with Biffa on several occasions and have held discussions with SEPA, ZWS and local authorities over the last 18 months about a community return point solution but to date we have had no support from them for such a move.

We are keen however to enter further dialogue with CSL and the Scottish Government to scope out a way forward.

For a community return point solution to work in practice this would also require the Scottish Government's Chief Planner to overrule any of the 32 Local Authorities who may seek to block such a solution. This would require the necessary planning permission to be granted.

ACTION: SGF to put proposal regarding workable online system in writing

Proposition:

It should only be mandatory for the larger retailers, who have significant turnover and capital. Large food stores mean a food store containing retail space of more than 25,000 square feet. Or with turnover of more than £1 billion a year.

This would stop smaller manufacturers locating outside Scotland, e.g., small craft beer companies, who would have ordinarily relocated and stopped selling in Scotland.

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Rather than an online takeback system being a legal obligation on retailers, a better solution would be for convenience retailers to offer a voluntary collection service for the registered disabled, vulnerable and older people.

Progress

If as the Minister suggested at our last meeting on 12th October, that the regulations could be opened up in a targeted way with regard to online takeback solutions that would be a positive step forward. One which we would be happy to engage in.

Blockers

Voluntary system

This would require the removal of the mandatory requirement for those who sell in-scope products via online sales which would then allow that convenience stores and smaller retailers to participate on a voluntary basis and offer free or discounted collections.

Current online takeback proposition

SGF take the view that a DRS online takeback system – as presently outlined - will be impossible to do on a cost neutral basis for the customer and will potentially lead to 100% increase in upfront delivery charges impacting many who are housebound.

On-line takeback is complex with no clear process for returning in-scope material from customer houses to for example stores or regional centres who will accept returns.

There is also a material risk to investment for the convenience sector and other businesses in that there could be a scenario where a company such as Amazon or a retail giant could come in and offer kerbside collections. In such a situation, the RVMs which retailers would have purchased or leased, would not be required leaving retailers financially disadvantaged or in danger of going out of business.

Other factors are that to date no online takeback fee has been published, there is also no credible third party solution and there are massive development costs for systems which need to be considered.

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Other issues for consideration

ACTION: We would ask that the Minister for Green Skills, Circular Economy and Biodiversity provides clarity in relation to the points made by SGF (Redacted)

(Redacted)

(Redacted)

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(Redacted)

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(Redacted)

November 2022

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