

18. Annex D: Test Run of Business Forms

Annex D.1: Test run of business form methodology details

1. In total three workshops were undertaken. Three or four respondents participated in each workshop. In addition, six telephone interviews were conducted with either one, two or three respondents.
2. Workshops/interviews were undertaken between the 18 November and 2 December 2019.
3. Participants were recruited through the DRS Implementation Advisory Group (IAG) Scheme Administrator working group, the IAG Producer working group and the IAG Retailer working group.
4. Everyone who volunteered and was able to make the workshops was accepted. Where workshop attendance was not possible, telephone interviews were also conducted. The only people who came forward and couldn't be included in the test were those who weren't available for the initial workshops and/or did not respond to the offer of a telephone interview within the feedback collection period. The trade association members of the IAG Scheme Administrator Group put forward representatives to take part, e.g. the Society of Independent Brewers (SIBA), the National Federation of Retail newsagents (NFRN) and the British Soft Drinks Association (BSDA). Mull and Iona Community Trust were also interviewed as they had expressed an interest in becoming a Voluntary Return Point.
5. An incentive of £50 compensated workshop attendees for travel costs and time and encouraged participation.
6. In total, three moderators were involved in the test.
7. Stimulus materials used during the group discussions/depth interviews were DRS business forms.
8. All research projects undertaken comply fully with the requirements of ISO 20252, the GDPR and the MRS Code of Conduct.

Table of participants:

Annex D Table 1. Participants in Test Run of Business Forms

Form(s) tested	Organisation	Number of represent- tatives	Participant involvement in DRS working groups
‘Producer Registration form’ and ‘A Scheme Administrator for Scotland’s Deposit Return Scheme: Application Form and Operational Plan Template’	Coca Cola European partner	1	Member of Scheme Administrator working group.
	C&C Tennent’s	1	Organisation representation in both Scheme Administrator and Producer & Distributor working groups (not participant).
	Dunns Food and Drink	1	Not a member of any working groups.
	Nestle Waters	1	Not a member of any groups at point when provided feedback. Now a member of the Producer & Distributor group.
	Scottish Beer and Pub Association	1	Member of Scheme Administrator and Producer & Distributor working groups.
	AB InBev	1	Member of the Producer & Distributor working group.
	Bestway/ Batleys Wholesale	1	Not a member of any working groups.
	Highland Spring/ Natural Source Water Association	1	Member of Scheme Administrator working group. Organisation representation in the Producer & Distributor working group (not participant).
‘Applicant Form for Return Point Exemption and Voluntary Return Point Approval’	MICT	2	Not members of any working groups.
	NFRN	2	Member of the Scheme Administrator and Retailer working groups (1 participant only).
	Aldi	1	Organisation representation in both Scheme Administrator and Retailer working groups (not participant).
	Scottish Grocer’s Federation	1	Member of Scheme Administrator and Retailer working groups.
	ACS	1	Member of Retailer working group.
	Sainsbury’s	1	Member of Scheme Administrator and Retailer working groups.
	Waitrose	3	Member of Retailer working group (1 participant only). Organisation representation in Scheme Administrator working group (not participants).

Annex D.2: Original Scottish DRS business forms tested
Form 1: 'Producer Registration Form'

**Deposit Return
Scheme Scotland:**
Producer Registration

Please read the guidance document: "Deposit Return Scheme Scotland: Producer Guidance" before filling in this form.

By 1 March every year you must register or be registered with your environmental regulator. You can either join the Scheme Administrator or register yourself. The Scheme Administrator will register you, and assume most of your legal obligations under the Scheme.

If you choose to register yourself, you will be responsible for meeting all of your obligations under the Scheme.

To register as a producer, you'll need the following information:

- The name and address of the legal entity being registered.
- Company Registration number, if applicable
- Where the producer is a partnership, the names of all the partners.
- SIC code for the activities carried out by the producer.
- Contact details of a contact person for the producer.
- The name and Universal Product Code (UPC) for each product placed onto the Scottish Market in the previous calendar year.
- For each UPC:
 - The number of scheme articles placed on the market for retail sale in Scotland in the previous calendar year. This should be broken down by material type (PET plastic; Steel; Aluminium; Glass).
 - The number of scheme articles the producer anticipates it will place on the market for retail sale in Scotland in the calendar year in which the application is being made. This should be broken down by material type (PET plastic; Steel; Aluminium; Glass).
- Your operational plan that demonstrates how you intend to comply with your legal obligations under the scheme.

Once you have completed the form you will need to pay the correct fee using a credit or debit card:

- Large producer (turnover → £2m) TBC.
- Medium producer (turnover ← £2m) TBC.
- Micro producer (← 5000 containers) TBC.

It's quicker to register online. If you can't do this or need help to do this, call us on 03000 996699, or email: sccd@sepa.org.uk

If you want to communicate with us through sign language, the Contact Scotland BSL service will give you access to an online interpreter.

After you apply

You will receive an automatic e-mail confirming that we have received your application. Please check the details you provided are correct.

Within 35 days you will be sent an e-mail confirming your registration as a producer, and a link to your entry on the public register. Keep this safe, as retailers may ask to see it, in order to comply with their own obligations.

Applicant type

Are you registering as:

Brand owner based in the UK

Importer based in the UK

Are you registering as: (required)

Individual/ Sole Trader

Individual/ Sole Trader Trading As _____

Partnership Names of all partners: _____

Partnership Trading As _____

Company/ PLC
Company Registration number: _____

Other Please specify: _____

Are you registering as a:

Large producer (definition TBC)

Medium producer (definition TBC)

Micro producer (definition TBC)

Business Details

Name of the producer	
Address of registered or principal office	
Telephone number	
Address for correspondence (if different from above)	
Telephone number (if different from above)	
UK Standard Industrial Classification (SIC) Code for your business activity:	

Contact Details

Forename	
Surname	
Position	
Email address	
Telephone number	

Number of scheme articles placed on the market for retail sale in Scotland in the previous calendar year

Please see the guidance document for definitions of scheme articles.

Number of scheme articles placed on the market for retail sale in Scotland in the previous calendar year:

SCHEME ARTICLE BREAKDOWN (FOR PREVIOUS CALENDAR YEAR)						
Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode	Other unique ID and data capture markers	No of packs anticipated placing on market	No of containers anticipated placing on market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

NB: All barcodes will be validated on entry

Number of scheme articles you anticipate placing on the market for retail sale in Scotland in this calendar year

Please see the guidance document for definitions of scheme articles.

Number of scheme articles to be placed on the market for retail sale in Scotland in the current calendar year:

FORECASTED SCHEME ARTICLE BREAKDOWN (FOR YEAR THAT THE APPLICATION IS BEING MADE)						
Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode	Other unique ID and data capture markers	No of packs anticipated placing on market	No of containers anticipated placing on market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

NB: All barcodes will be validated on entry

Operational plan

Please include your operational plan. This document should outline how you plan to fulfil your legal obligations under the Scheme. The guidance document contains a sample template for you to use.



Declaration

- I declare that all the information provided in this registration form is accurate and complete.
- I declare that I am authorised to act on behalf of the producer.

Form 2: A Scheme Administrator application form, originally entitled 'A Scheme Administrator for Scotland's Deposit Return Scheme: Application Form and Operational Plan Template'

**A Scheme
Administrator for
Scotland's Deposit
Return Scheme:
Application Form and
Operational Plan Template**

The Deposit and Return Scheme for Scotland Regulations 2020 (“the Regulations”) require any organisation wanting to operate as a Scheme Administrator for Scotland’s Deposit Return Scheme to apply in writing to Scottish Ministers.

A Scheme Administrator is defined in the Regulations as a person that has been approved to submit applications for registration on behalf of producers and to discharge the obligations on behalf of those producers under the Regulations in relation to managing the collection and financial payments associated with returned containers.

Applicants completing and submitting this form to Scottish Ministers are, where approved, committing to fulfilling the legal obligations required of a Scheme Administrator under regulation 13 of the Regulations.

This includes:

- Accepting the return of scheme packaging from wholesalers and retailers on behalf of producers for whom they have registered and paying them a deposit for each item accepted.
- Collecting scheme packaging from return point operators, hospitality retailers and distance retailers in accordance with pre-arranged timescales, on behalf of producers for whom they have registered.
- Making payments of deposits and handling fees to return point operators, hospitality retailers and distance retailers in accordance with pre-arranged timetables, on behalf of producers for whom they have registered.
- Meeting collection targets for scheme packaging in relation to scheme packaging of producers for whom they have registered.
- Collecting and keeping information about scheme articles sold by producers for whom they have registered and scheme packaging handled by the scheme administrator.
- Providing that information and any other information requested by Scottish Ministers or SEPA for the purposes of monitoring compliance.
- Providing information to Scottish Ministers or SEPA within 28 days of any material change in circumstances either for the Scheme Administrator or information provided.
- Notifying Scottish Ministers if a decision is taken to stop acting as a Scheme Administrator.

Upon submitting this form, Scottish Ministers have 28 days from receipt to approve or reject the application and will provide notification of the decision within 7 days of this decision.

If the application is rejected, then the reasons will be included in any correspondence and there is further 28-day period during which the applicant can request a review of the decision. The review process is detailed in Part 6 of the Regulations. The review may be carried out in writing or through a hearing if requested by the applicant or the Scottish Ministers.

Where the application is approved, it will take effect from the date of decision until any withdrawal of approval by Scottish Ministers in accordance with the grounds in regulation 17. The business name provided in this application will then be added to the public list of approved Scheme Administrators, maintained by Scottish Ministers, and the Annual Operational Plan published online.

1.0: Contact Information

Scheme Administrator Registration Details	
Organisation name (including any business names)	
Registered or principal office address, postcode and telephone number	
Address for service of notices (if different from above)	
Company/Charity registration number if relevant	
VAT Registration number if relevant	
Contact name	
Job Title	
Telephone number	
Email address	

Print name: _____

Job title: _____

Signed: _____

Date: _____

(applicant)

2.0: Founding Documents

A copy of the founding documents of the Scheme Administrator should be submitted with this application. Where they exist, this should include a copy of articles of association and memorandum of association used to form the constitution of the company. As a minimum this should define the purpose of the Scheme Administrator, any subscribers to the formation of the company or body, any director roles and responsibilities and administrative arrangements.

Where this isn't available at the time of application, then they should be submitted once drafted and submitted to Scottish Ministers as a material change in information since the submission of the original application.

3.0: Producer membership agreement

Scheme Administrators are taking on potential significant liabilities for the Producers that they are acting on behalf of. Specifically, this is in relation to the payment of redeemed deposits and the operation of the necessary infrastructure to meet obligated collection targets.

You must therefore supply with this application a copy of the agreement, covering the rules and procedures that producers on whose behalf the applicant intends to register will be required to adhere to. We suggest that as a minimum this demonstrates:

- A copy of the contract between the parties, which outlines the obligations to be undertaken by both parties.
- How financial risk is to be allocated between the parties .
- How the Scheme Administrator intends to identify that producers have sufficient funds to cover their financial obligations under the scheme.
- How producer fee(s) are to be calculated and charged, including the process and frequency at which such fees will be reviewed.
- Data submission requirements and verification processes including frequency of reporting of containers placed onto market .
- Any requirements to allow the identification of scheme containers and updating or changing packaging specifications.
- Processes for termination of membership and how containers placed onto the market while a member will be handled if membership is terminated.

4.0: Producer Registration

All producers must be registered with SEPA in order for their products (contained in scheme packaging) to be sold by anyone in Scotland. A Scheme Administrator that has been approved following submission of this application may register on behalf of producers.

Completing the tables below will provide the necessary information required under the Regulations to allow SEPA to progress registration. A table should be completed for each producer on whose behalf the Scheme Administrator is acting.

In relation to producers operating as producers before [1 April 2020], a first application for producer registration should be submitted by [1 May 2020]. It will be possible to submit applications from [1 January 2020].

Once registered, a producer will continue to be registered unless their registration is cancelled by SEPA in accordance with regulation 9. However, a further application for registration in relation to a registered producer should be submitted to SEPA annually, before 1 March.

If the timescales above do not apply to a producer because they become a producer after [1 May 2020], an application for registration is refused, or their registration has been cancelled, an application for registration should be submitted to SEPA within 28 days of:

- that producer becoming a producer,
- that producer receiving notification that a previous application has been refused, or
- that producer receiving notification that a previous registration has been cancelled.

Where this application is approved, producer details included will be passed onto SEPA for registration i.e. there is no need to submit these separately again. SEPA will contact the named individual for the Scheme Administrator to discuss payment of the regulation fee for each producer.

When registering producer details in future years, the forms below can be submitted direct to SEPA. There is no need to notify Scottish Ministers of the registering of producers, or where a Scheme Administrator stops acting on behalf of a producer, unless it has a substantial impact on the Operational Plan e.g. a major producer is added or removed requiring changes to key infrastructure or financial arrangements.

In year 1, the number of articles placed onto the Scottish market in the previous calendar year should be estimated including providing a range where required. It is recognised that until the scheme is operational that imperfect data exists to use for reporting this detail.

A Scheme Administrator must collect and keep information for producers they have registered for a minimum of four years from the date on which the information is collected. This information must include:

- Number of articles [each producer] place[s] onto the market.
- The primary material from which the packaging used for those articles is made.
- The number of items of scheme packaging returned directly to the producer or Scheme Administrator from wholesalers or retailers.
- The number of items of scheme packaging collected by the producer from return points, hospitality retailers and distance retailers.

SEPA are required, under the regulations, to publish and maintain a list of registered producers. The purpose of this list is to allow retailers to ensure that they are only purchasing containers for sale that fulfil the requirements of these regulations. The additional details being captured will provide the necessary granularity to be certain down to the individual SKU that it is registered as a scheme article and can be sold in Scotland.

Producer Registration Details

Organisation name	
Address, postcode and telephone number of registered or principal office	
Telephone number	
Address for service of notices (if different from above)	
Company registration number (as kept by Companies House)	
Names of all partners (where the Producer is a partnership)	
UK Standard Industrial Classification (SIC 2007) Code for relevant activities	
Total No of scheme articles first placed onto the market for retail sale in Scotland in previous calendar year	
Total No of scheme articles forecast for the year that the application is being made (providing breakdown in table below)	
Contact name	
Job Title	
Telephone number	
Email address	

Print name: _____

Job title: _____

Signed: _____

Date: _____

(applicant)

FORECASTED SCHEME ARTICLE BREAKDOWN (FOR YEAR THAT THE APPLICATION IS BEING MADE)

Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode	Other unique ID and data capture markers	No of packs anticipated placing on market	No of containers anticipated placing on market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

5.0: Annual Operational Plan

A Scheme Administrator must fulfil a number of obligations on behalf of all the Producers that it is acting on behalf of. Specifically, these include:

- Accepting the return of scheme packaging from wholesalers and retailers – this obligation only extends to scheme packaging sold in Scotland by a producer registered through the Scheme Administrator to the wholesaler or retailer returning it.
- Paying a deposit to the retailer or wholesaler for each item of packaging returned as above.
- Collecting scheme packaging from return point operators, hospitality retailers and distance retailers in accordance.
- Setting out the timescales within which these collections will be made and operating within them.
- Making payments of deposits and handling fees to return point operators, hospitality retailers and distance retailers .
- Setting out the timescales within which these payments will be made and operating within them.
- Meeting collection targets for collection of scheme packaging.

Collection targets for producers are detailed in schedule 3 of the Regulations and relate to a percentage of the total number of scheme articles made available by that producer for retail sale in Scotland in any one year.

Where the targets apply to the Scheme Administrator, they relate to a percentage of the collective number of scheme articles placed on the market by all producers registered through that Scheme Administrator during the same year. The targets are:

- 1 January 2022 - 31 December 2022: 70% of total number of containers.
- 1 January 2023 – 31 December 2023: 80% of total number of containers.
- 1 January 2024 – 31 December 2024 (and each subsequent calendar year): 90% of total number of containers (with each packaging material type achieving a minimum 85% collection rate).

In relation to the obligations above, a “reasonable handling fee” for return point operators and distance retailers should take account of the following

- Costs of purchase, lease, maintenance or upkeep of any infrastructure, including any vehicles, used exclusively for collection and storage of scheme articles.
- Costs of materials used for collection and storage of scheme articles.
- Rental value of floor space used exclusively for collection and storage of scheme articles.
- Staff time dedicated to the collection and storage of scheme articles.
- For hospitality premises that do not operate a return point, a reasonable handling fee should take account of the cost of materials used for collection and storage of scheme articles.

This Operational Plan should set out how, as a Scheme Administrator, you will fulfil these obligations on behalf of producers you have registered. Therefore, the detail contained should take account of the size and number of producers that are covered by this plan and, by extension, the scale of the responsibility being adopted.

An Operational Plan must provide sufficient detail to demonstrate to Scottish Ministers that the proposals for discharging the obligations are realistic. The application should also demonstrate that, if approved, the entity applying has sufficient resources, knowledge and detailed proposals that it is likely to be able to subsist for a period of at least five years.

5.0: Annual Operational Plan

A Scheme Administrator must inform the Scottish Ministers and SEPA in writing of any material change in the information provided in the application. This includes any significant changes to the operational plan. In that event we will request an updated operational plan. A Scheme Administrator may include an updated operational plan when notifying the Scottish Ministers of a material change if it considers it helpful.

As a guide, you should notify the Scottish Ministers where there are changes in your:

- Number of producers that you are acting on behalf of, that increases or decreases the number of containers by 10% or more of a specific material.
- Where producer estimates of scheme articles placed on the market change significantly from those provided at the time of registration.
- Data verification, infrastructure or delivery approach to achieving targets.

Once approved, a Scheme Administrator must comply with its obligations under the Regulations. The Scottish Environment Protection Agency (SEPA) will monitor compliance with this throughout the year. If you fail to comply with the obligations placed on the Scheme Administrator then Scottish Ministers may withdraw your approval meaning you can no longer operate as a Scheme Administrator.

The Full Business Case for Scotland's Deposit Return Scheme identified a number of additional environmental, economic and social benefits that could be realised through the implementation of a Deposit Return Scheme.

Any Scheme Administrator could play a significant role in delivering some of these benefits. A section is included in this template offering applicants the opportunity to identify what, if any, of these benefits their proposed operational plan will support, either directly or working with others. This section will NOT be part of the approval process, as there are no obligations to deliver these under the Regulations.

Organisation name	
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OPERATIONAL PLAN

Scheme Articles placed onto market by represented Producers (for year that the application is being made)

Total number of Scheme Articles, where the primary material is PET	
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Total number of Scheme Articles, where the primary material is Glass	
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Total number of Scheme Articles, where the primary material is Aluminium	
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Total number of Scheme Articles, where the primary material is Steel	
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SECTION 1: DATA VERIFICATION

You must demonstrate how you will verify the accuracy of information both from producers on containers placed onto the market and also for containers collected from return points.

Applications should include all relevant information but as a minimum it should include the following:

- The format of information requested from Producers that you will be acting on behalf of.
- A monitoring plan, to demonstrate how information from producers you are acting on behalf of will be checked for accuracy. This should include methodology to be adopted, checks carried out both at the beginning and during the year and frequency of monitoring.
- Contractual arrangements to allow additional checks to undertaken if errors are suspected in the submitted information.
- The systems and processes are in place to complete checks and submit a robust data set to SEPA ahead of the deadline for the relevant year.
- How changes to producer data will be captured and reported to SEPA in a timely manner.
- How will retailers know how to identify scheme articles from producers that you are acting on behalf of.
- How will you verify that containers collected by return points are scheme packaging.
- How would you manage both non-scheme packaging or scheme packaging belonging to another Scheme Administrator that was returned?
- How will information from return points be analysed, to identify fraud and misreporting of data.
- How will information on scheme packaging returned will be reconciled with material collected, to confirm collection of this packaging and evidence performance against regulated targets.
- Systems and processes in place to prevent data being corrupted or changed when in possession of the organisation.

SECTION 2: INFRASTRUCTURE AND LOGISTICS

You must demonstrate how the infrastructure and logistics is either in place or will be secured to deliver the proposed approach to servicing return points and verifying delivery against required targets.

Applications should include all relevant information but as a minimum it should include the following:

- How are retailers, hospitality premises and voluntary return points being advised to collect and present scheme packaging for collection?
- What are arrangements for customer service and complaint management from retailers, hospitality premises and voluntary return points?
- How are you identifying return points and ensuring that they have access to the required infrastructure and information ahead of collections commencing?
- How are you going to service the number of return points where producer packaging is likely to be returned to?
- How frequently will you collect packaging from different types of retail and hospitality premises and how has this frequency been established?
- How are you going to service ad hoc collection arrangements or where additional resources are required to complete collections?
- Reimbursing the deposit in full for scheme packaging returned by retailers or wholesalers.
- What infrastructure will be used to identify and verify that containers returned belong to producers that you are acting on behalf of?
- How are you ensuring this infrastructure is appropriately sized and can provide either redundancy or if additional capacity is required?
- How are you ensuring legal compliance with all required regulations and standards for delivery of necessary infrastructure and logistics?
- How will packaging collected be recycled, including the length of contract and security of this end destination?

SECTION 3: DELIVERING COLLECTION TARGETS

You must demonstrate how you intend to achieve the specified collection targets for the calendar year that this operating plan is being submitted for.

Applications should include all relevant information but as a minimum it should include the following:

- A communications plan to detail how the scheme will be promoted and the channels to be used.
- How will this communications plan be delivered and resources and expertise to be deployed.
- Key messages to be used to engage key audiences in how to participate and the benefits of participating.
- How will awareness of corporate branding be increased, and positive associations constructed, to build awareness of activities.
- Materials and collateral to be developed for producers and retailers to use in communicating their involvement.
- What information will be provided to the public to ensure that they understand the scheme and allow them to engage with your organisation.
- How will partnership activity be leveraged in communication and engagement activities to maximise impact.
- How will you identify geographical areas or demographic groups that are not performing and target these to enhance performance?
- Intention to operate, or work with others, to establish voluntary return points where there are significantly more containers returned than sold.
- How will target performance be monitored and remediation plans developed if there is slippage against the target in year.

SECTION 4: FINANCING

You must demonstrate how the financing is in place or will be secured to deliver the proposed approach for those producers that you are acting on behalf of and to deliver against required targets.

Applications should include all relevant information but as a minimum it should include the following:

- A breakdown of costs and revenue streams in the format of a P&L account and Summary Balance Sheet for a 5-year period.
- How will increased costs or reduced revenues will be compensated for to ensure sufficient financing is available?
- What is being proposed as a retail handling fee and how has this been calculated?
- Specify the proposed time limit for payment of refunded deposits and handling fee to retailers.
- Demonstrate that there are no liquidity issues caused by payment terms and conditions for income and expenditure e.g. any observatory period required for financial auditors to define deposits as unredeemed.
- Engagement of a financial auditor to verify that financial statements are stated in line with international accounting standards.
- Evidence of insurance and sufficient indemnity cover.
- Description of corporate governance approach and the systems and processes that will be established to prevent and mitigate fraud and theft.
- A statement that demonstrates sufficient funds are or will be made available to cover these costs. Where appropriate your statement should demonstrate that there is access to sufficient borrowing resources.
- Supporting evidence of this needs to be provided and included with the submission of this application. Examples include:
 - A letter from your bank regarding any overdraft facilities.
 - Documentation which shows that a holding company, sister company or another company is able to and will supply financial support if required.

SECTION 5: ADDITIONAL BENEFITS

The Scottish Government identified a number of environmental, economic and social benefits that could be realised by the introduction of a Deposit Return Scheme. Many of these benefits are out with the scope of the Regulations but are of significant interest to the public and the Scottish Parliament.

Any organisation acting as a Scheme Administrator could support the realisation of these benefits. This section provides an opportunity to identify what additional benefits, going beyond fulfilling regulatory obligations, would be supported by your organisation and the proposed approach to acting as a Scheme Administrator.

Examples identified by Scottish Government are included under each area however this is not intended to be an exhaustive list and if other benefits have been identified by your organisation then these should be included too.

This section is NOT part of the approval process for the application to act as a Scheme Administrator.

Environmental Benefits

Examples could include:

- How quality of materials collected will be maximised and % to high value or closed loop recycling.
- How producer fees are being used to affect onto market container design to improve recyclability and maximise recycle value.
- How communication channels and materials are being used to support messaging beyond in-scope DRS materials e.g. utilising advertising space at return points to promote litter prevention, reuse or recycling.
- Contribution to sector sustainability strategies and generating USP for producers to support growth in their categories.
- Operational decisions and efficiencies that reduce or minimise the environmental impact of operations e.g. backhauling material as part of logistics operations, BREEAM certification for buildings and low carbon energy choices.

- Circular economy exemplar practices e.g. leasing of RVMs or other equipment, integrating circular procurement principles into purchasing activity, identifying reuse and remanufacturing opportunities to provide a second life for equipment where it is no longer suitable for DRS operations.

Economic

Examples could include:

- Payment of the Living Wage and signing up to the Scottish Business Pledge.
- Utilising materials in Scotland to support economic activity through either existing reprocessing capacity or attracting new infrastructure.
- Providing additional security to existing collection infrastructure by using these facilities.
- Supporting economies of scale in collections to allow otherwise unviable recycling e.g. collection of colour separated glass from distilleries.
- How contracts and terms and conditions utilised maximise the opportunities and minimise challenges for small to medium-sized businesses.
- Creation of employment opportunities for groups including apprenticeships and those furthest from the labour market.

Social

Examples could include:

- Supporting financial contributions to community organisations e.g. facilitating donations to good causes via Reverse Vending Machines.
- The use of community clauses in major contracts issued and the creation of opportunities for the third sector to be involved in delivery.
- Providing access to data to support projects with societal benefits e.g. targeting health projects in areas with high consumption of sugar drinks.
- Supporting community and formal education through establishment of an education resources and learning hub.
- Creation of additional return points to maximise accessibility in economically deprived areas e.g. in areas where ownership of a private vehicle is especially low.

Scotland's Deposit Return Scheme:

Application form for Return
Point Exemption and Voluntary
Return Point Approval

The Deposit and Return Scheme for Scotland Regulations 2020 ("the Regulations") require all retailers who sell, to consumers on their premises, in-scope drinks for take away to also operate a return point, allowing the public to return empty packaging and redeem their 20p deposit.

The principle behind this is that it should be as simple for the public to return an empty container as it was to buy the drink originally.

The Regulations also allow for return points to be operated from other types of premises, recognising that there may be circumstances where additional return points are required or that alternative premises may offer an equally convenient option. These are defined as voluntary return points, as they are not automatically required to act as a return point.

The Scottish Government recognise that where multiple retailers and/or voluntary return points are in close proximity to each other, it may not be necessary for all organisations to act as a return point to maintain this principle.

The Regulations therefore allow exemptions to be considered by Scottish Ministers in situations such as:

- One retailer agrees to act as a return point on behalf of one or more other retailers.
- Retailers collaborate to establish a voluntary return point, (which could allow automated returns) rather than each retailer individually taking manual returns.
- A voluntary return point being established by someone other than retailers and agreeing to act on behalf of one or more retailers.

This application form may be used by retailers looking to apply for an exemption or organisations looking to become a voluntary return point. These have been combined into one form as, in many circumstances, we anticipate such applications will be connected. The form itself is split into sections and you only need to complete the sections relevant for the situation you are applying for.

Please note that the registration of voluntary return points is intended to capture those who wish to act as an alternative return point for retailers and/or those who want to operate a permanent non-retail return point. It is not intended to capture organisations that want to collect containers on an ad hoc basis or from a specific audience e.g. a group doing fund raising.

Information relating to a return point exemption

Applications for an exemption to act as a return point will be assessed against two key criteria:

- 1) There is an alternative return point located within reasonable proximity to the premises, and the operator of that return point has agreed to accept the return by consumers of items of scheme packaging on behalf of the retail applicant for an exemption, and
- 2) If the exemption is granted, this will still provide consumers with reasonable access to a return point throughout the area of the local authority in which the retail premises are located.

Both of these criteria must be met for the Scottish Ministers to grant the exemption.

Scottish Ministers must consider a submitted application for exemption and make a decision within 28 days of receipt of the application. They must, within 7 days of that decision:

Where granted: notify the retailer of that decision in writing and the date that the exemption takes effect.

Where refused: notify the retailer of the refusal and give reasons for the refusal in writing.

A retailer who has been granted an exemption must clearly display information at the retailer's premises indicating:

- that by virtue of an exemption granted under these Regulations, they do not operate a return point, and
- the location of the alternative return point.

An exemption may be revoked by Scottish Ministers where there has been a material change of circumstances against the two key criteria identified above. Before revoking this, a written notice of the reason for the decision and the date on which it takes effect will be provided.

Information relating to a voluntary return point application

Applications to act as a voluntary return point will be assessed against the accessibility of the return point, requiring information on the physical location, routes of access and proposed hours of operation.

Confirmation will also be required that all registered producers, or a Scheme Administrator acting on their behalf, has agreed that the organisation may operate a return point on their behalf in that location.

Scottish Ministers must consider an application and make a decision within 28 days of receipt of the application. Within 7 days of the decision:

Where granted: notify the applicant of that decision in writing and the date that it takes effect.

Where refused: notify the applicant of the reasons for the refusal in writing.

Approved return points will be added to a list of registered voluntary return points, maintained by Scottish Ministers. All return point operators are required to:

- Accept an item of clean, empty, identifiable scheme packaging returned to them .
- Refund the 20p deposit for each item returned.
- Retain the packaging for collection by, or on behalf of, a producer or scheme administrator .
- Display information on a complaints procedure and contact details of SEPA.

Scottish Ministers may cancel the registration of a return point where they are not fulfilling these obligations. Before cancelling this, a written notice of the reason for the decision and the date on which it takes effect will be provided.

SECTION 1: APPLICATION FOR RETURN POINT EXEMPTION

Part 1: to be filled in by the business applying for the exemption

Business 1: applying for exemption	
Organisation name	
Address and postcode of retail premises applying for exemption	
Address for service of notices (if different from above)	
Company/Charity registration number	
Contact name	
Job Title	
Telephone number	
Email address	

Print name: _____

Job title: _____

Signed: _____
(applicant)

Date: _____

Tick box

- Confirmation that you have an agreement in place with the alternative return point identified in this application?
- Agreement to display information informing customers that not acting as return point and location of alternative return point – A5 minimum and visible at point of purchase and entry to store.
- Commitment to notify Scottish Government of change in circumstances or if alternative return point no longer acting on behalf.

Question 1: physical location

1a: Are the retailers or voluntary return points physically connected e.g. part of the same block of buildings or located in the same level in a shopping centre?

Yes No

If Yes, go to 2. If No, go to 1b.

1b: If not physically connected, are retailers or voluntary return points within 20m of each other and have a clear line of sight?

Yes No

If Yes, go to 2. If No, go to 4.

Question 2: opening times

Will this be open at the same times as the retailer(s) identified in this application?

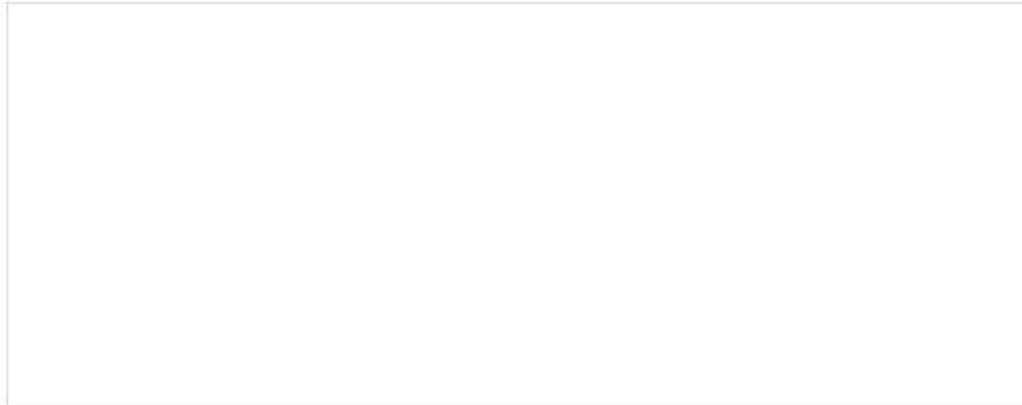
Yes No

If Yes, go to 3. If No, go to 4.

Question 3: additional information

Please include any additional information which you believe will support your application. This might include:

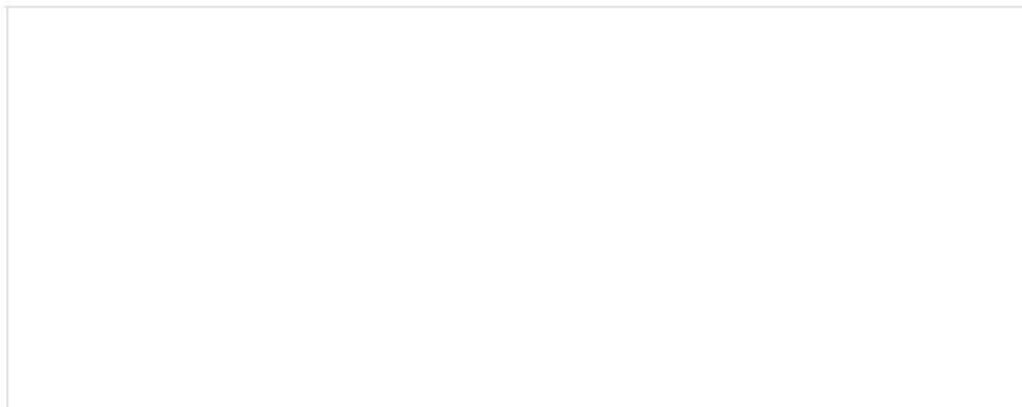
- a map identifying the retailer and return point and the route between them.
- details of any obstacles in between e.g. a road.
- any elevation difference i.e. slope or stairs.



Question 4:

If the answer is no to all of the above questions, please explain how you consider the proposed exemption is compatible with the principle of it being as simple to return the container as it is to purchase it? You may wish to include

- a map identifying the retailer and return point and the route between them.
- details of any obstacles in between e.g. a road.
- any elevation difference i.e. slope or stairs.



Part 2: to be filled in by the operator of the alternative return point

Alternative Return Point Details	
Organisation name	
Address and postcode of alternative return point	
If another voluntary return point, please fill in Section 2	
Address for service of notices (if different from above)	
Company/Charity registration number	
Contact name	
Job Title	
Telephone number	
Email address	

Print name: _____

Job title: _____

Signed: _____
(applicant)

Date: _____

Tick box

- Confirmation that you are agreeing to act as a return point for other retailer(s) identified in this application and we have permission to contact you to verify this agreement is in place?
- Confirmation that you have considered the number of containers likely to be returned and have arrangements in place to manage this?
- Commitment to notify Scottish Government of change in circumstances or if no longer acting on behalf of retailer(s) identified in this application.

SECTION 2: APPLICATION FOR VOLUNTARY RETURN POINT

Alternative Return Point Details	
Organisation name (including business or trading names if different)	
Address and postcode of proposed return point	
Address or telephone number of registered or principal office of proposed return point operator (if different from above)	
Address for service of notices (if different from above)	
Company/Charity registration number	
Contact name	
Job Title	
Telephone number	
Email address	

Print name: _____ Job title: _____

Signed: _____ Date: _____

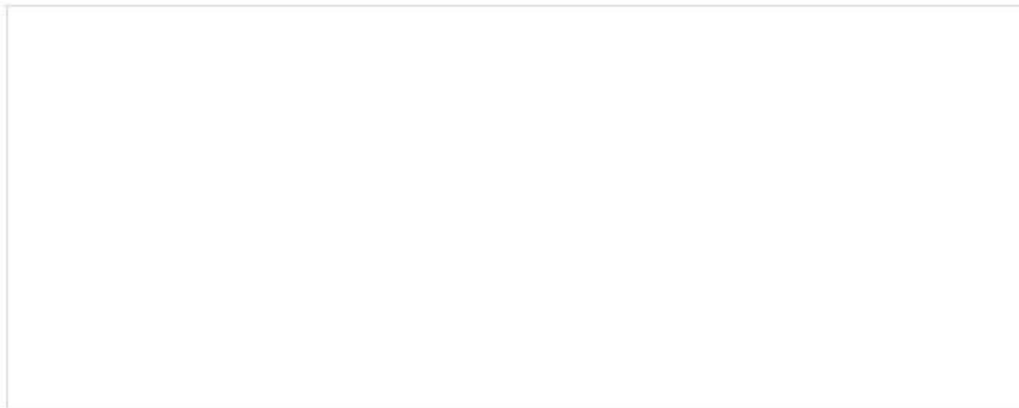
(applicant)

Applications must include:

- A map showing the physical location of the proposed return point if there is a large site covered by the address details provided.
- Proposed operating hours including any proposed seasonal operations.
- Visibility and accessibility of the proposed location including highlighting routes of access.

In order to assist in development of an overview of the network of return points throughout Scotland the following information would also be helpful:

- An estimate of the number of containers you expect to capture.
- The source of these containers e.g. acting on behalf of local retailers, high numbers of additional containers arising due to tourism etc.
- Why the proposed location has been chosen i.e. why do you think it will be convenient for people to return the containers there?
- Where offering an alternative return point for retailers, demonstrate how this will be as convenient for the public as return to those retailers.
- How will resources be secured to establish and operate the return point e.g. financing the purchase of machine or staff to facilitate the returns.
- Additional benefits you are proposing to deliver through the return point e.g. creating employment opportunities for long-term unemployed.



Tick box

- Confirmation that you are agreeing to fulfil the requirements of acting as a return point under the Regulations?
- Commitment to notify Scottish Government of change in circumstances or if no longer wishing to act as a return point?
- Confirmation that you have agreement with registered producers and/or Scheme Administrator(s) to operate as a return point on their behalf?

Annex D.3: Updated Scottish DRS business forms

Form 1: 'Scotland's Deposit Return Scheme: Application form for producer registration'

Scotland's Deposit Return Scheme:

Application form for producer
registration

Please read the guidance document: "Deposit Return Scheme Scotland: Producer Registration Guidance" before filling in this form.

By **1 March every year** you must register or be registered with the Scottish Environment Protection Agency (SEPA). You can either join the Scheme Administrator or register yourself. The Scheme Administrator will register you, and assume most of your legal obligations under the Scheme.

If you choose to register yourself, you will be responsible for meeting all of your obligations under the Scheme.

To register as a producer, you'll need the following information:

- The name and address of the legal entity being registered.
- Company Registration number, if applicable
- Where the producer is a partnership, the names of all the partners.
- SIC code for the activities carried out by the producer.
- Contact details of a contact person for the producer.
- The name and European Article Number (EAN) for each product placed onto the Scottish Market in the previous calendar year and in the calendar year the application is being made.
- For each EAN:
 - The number of scheme articles placed on the market for retail sale in Scotland in the previous calendar year. This should be broken down by material type (PET plastic; Steel; Aluminium; Glass).
 - The number of scheme articles the producer anticipates it will place on the market for retail sale in Scotland in the calendar year in which the application is being made. This should be broken down by material type (PET plastic; Steel; Aluminium; Glass).
- Your operational plan that demonstrates how you intend to comply with your legal obligations under the scheme.

Once you have completed the form you will need to pay the correct fee using a credit or debit card:

- Micro producers (turnover <£85,000): zero fee
- All other producers: £360

It's quicker to register online. If you can't do this or need help to do this, call us on 03000 996699, or email: scc@sepa.org.uk

If you want to communicate with us through sign language, the Contact Scotland BSL service will give you access to an online interpreter.

After you apply

You will receive an automatic e-mail confirming that we have received your application. Please check the details you provided are correct.

Within 35 days you will be sent an e-mail confirming your registration as a producer, and a link to your entry on the public register. Keep this safe, as retailers may ask to see it, in order to comply with their own obligations.

Applicant type

Are you registering as (please select all that apply):

Brand owner based in the UK

Importer based in the UK

Are you registering as:

Individual/ Sole Trader

Individual/ Sole Trader Trading As

Partnership Names of all partners:

Partnership Trading As

Company/ PLC
Company Registration number
(as kept by Companies House):

Other Please specify:

Are you registering as a:

Micro producer (Turnover < £85,000)

Other producer (Turnover > £85,000)

Business Details

Organisation name (including any business names)	
Address of registered or principal office	
Telephone number of registered or principal office	
Address and telephone for correspondence (if different from above)	
UK Standard Industrial Classification (SIC) Code for your business activity	

Contact Details

Forename	
Surname	
Job title	
Email address	
Telephone number	
Notifications preference (Email or Post)	

Number of scheme articles placed on the market for retail sale in Scotland in the previous calendar year

Please see the guidance document for definitions of scheme articles.

Number of scheme articles placed on the market for retail sale in Scotland in the previous calendar year:

SCHEME ARTICLE BREAKDOWN (FOR PREVIOUS CALENDAR YEAR)						
Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode/EAN number	Other unique ID and data capture markers	No of packs placed on market	No of scheme articles placed on market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

NB: All barcodes will be validated on entry

Number of scheme articles you anticipate placing on the market for retail sale in Scotland in this calendar year

Please see the guidance document for definitions of scheme articles.

Number of scheme articles to be placed on the market for retail sale in Scotland in the current calendar year:

FORECASTED SCHEME ARTICLE BREAKDOWN (FOR CALENDAR YEAR THAT THE APPLICATION IS BEING MADE)						
Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode / EAN number	Other unique ID and data capture markers	No of packs anticipated placed on market	No of scheme articles anticipated placed on market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

NB: All barcodes will be validated on entry

Operational plan

Please include your operational plan. This document should outline how you plan to fulfil your legal obligations under the Scheme. The guidance document contains a sample template for you to use.

Declaration

I declare that all the information provided in this registration form is accurate and complete at the time of completion.

I declare that I am authorised to act on behalf of the producer.

I commit to notify SEPA of change in circumstances or information provided in this form.

Signed (applicant): _____ Print name: _____

Date: _____ Job title: _____

(applicant)

Producer Registration

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**Form 2: 'A Scheme Administrator for Scotland's Deposit Return Scheme:
Application Form and Operational Plan Template'**

**A Scheme
Administrator for
Scotland's Deposit
Return Scheme:
Application Form and
Operational Plan Template**

The Deposit and Return Scheme for Scotland Regulations 2020 (“the Regulations”) require any organisation wanting to operate as a Scheme Administrator for Scotland’s Deposit Return Scheme to apply in writing to Scottish Ministers.

A Scheme Administrator is defined in the Regulations as a person that has been approved to submit applications for registration on behalf of producers and to discharge the obligations on behalf of those producers under the Regulations in relation to managing the collection and financial payments associated with returned containers.

Applicants completing and submitting this form to Scottish Ministers are, where approved, committing to fulfilling the legal obligations required of a Scheme Administrator under regulation 13 of the Regulations. This includes:

- Accepting the return of scheme packaging from wholesalers and retailers on behalf of producers for whom they have registered and paying them a deposit for each item accepted
- Collecting scheme packaging from return point operators, hospitality retailers and distance retailers in accordance with agreed timescales, on behalf of producers for whom they have registered
- Making payments of deposits and handling fees to return point operators, hospitality retailers and distance retailers in accordance with pre-arranged timetables, on behalf of producers for whom they have registered
- Meeting collection targets for scheme packaging in relation to scheme packaging of producers for whom they have registered
- Collecting and keeping information about scheme articles sold by producers for whom they have registered and scheme packaging handled by the scheme administrator
- Providing that information and any other information requested by Scottish Ministers or SEPA for the purposes of monitoring compliance.
- Providing information to Scottish Ministers or SEPA within 28 days of any material change in circumstances either for the Scheme Administrator or information provided
- Notifying Scottish Ministers if a decision is taken to stop acting as a Scheme Administrator

Upon submitting this form, Scottish Ministers have 28 days from receipt to approve or reject the application

and will provide notification of the decision within 7 days of this decision.

If the application is rejected, then the reasons will be included in any correspondence and there is a further 28-day period during which the applicant can request a review of the decision. The review process is detailed in Part 6 of the Regulations. The review may be carried out in writing or through a hearing if requested by the applicant or the Scottish Ministers.

Where the application is approved, it will take effect from the date of decision until any withdrawal of approval by Scottish Ministers in accordance with the grounds in regulation 17. The business name provided in this application will then be added to the public list of approved Scheme Administrators, maintained by Scottish Ministers, and the Annual Operational Plan published online.

1.0: Contact Information

Scheme Administrator Registration Details	
Organisation name (including any business names)	
Registered or principal office address, postcode and telephone number	
Address for correspondence (if different from above)	
Company/Charity registration number if relevant	
VAT Registration number if relevant and available	
Contact name	
Job Title	
Telephone number	
Notifications preference (email or post)	

Signed: _____

Date: _____

Print name: _____

Job title: _____

(applicant)

2.0: Founding Documents

A copy of the founding documents of the Scheme Administrator should be submitted with this application. Where they exist, this should include a copy of articles of association and memorandum of association used to form the constitution of the company. As a minimum this should define the purpose of the Scheme Administrator, any subscribers to the formation of the company or body, any director roles and responsibilities and administrative arrangements.

Where these are not available at the time of application, then they should be submitted once drafted and submitted to Scottish Ministers as a material change in information since the submission of the original application.

3.0: Producer membership agreement

Scheme Administrators are taking on potential significant liabilities for the Producers that they are acting on behalf of. Specifically, this is in relation to the payment of redeemed deposits and the operation of the necessary infrastructure to meet obligated collection targets.

You must therefore supply with this application a copy of the agreement, covering the rules and procedures that producers on whose behalf the applicant intends to register will be required to adhere to. We suggest that as a minimum this demonstrates:

- A copy of the contract between the parties, which outlines the obligations to be undertaken by both parties.
- How financial risk is to be allocated between the parties.
- How the Scheme Administrator intends to identify that producers have sufficient funds to cover their financial obligations under the scheme.
- How producer fee(s) are to be calculated and charged, including the process and frequency at which such fees will be reviewed.
- Data submission requirements and verification processes including frequency of reporting of containers placed onto market .
- Any requirements to allow the identification of scheme containers and updating or changing packaging specifications.
- Processes for termination of membership and how containers placed onto the market while a member will be handled if membership is terminated.

4.0: Producer Registration

All producers must be registered with SEPA in order for their products (contained in scheme packaging) to be sold by anyone in Scotland. A Scheme Administrator that has been approved following submission of this application may register on behalf of producers.

Completing the tables below will provide the necessary information required under the Regulations to allow SEPA to progress registration. A table should be completed for each producer on whose behalf the Scheme Administrator is acting.

In relation to producers operating as producers before [1 April 2020], a first application for producer registration should be submitted by [1 May 2020]. It will be possible to submit applications from [1 January 2020].

Once registered, a producer will continue to be registered unless their registration is cancelled by SEPA in accordance with regulation 9. However, a further application for registration in relation to a registered producer should be submitted to SEPA annually, before 1 March.

If the timescales above do not apply to a producer because they become a producer after [1 May 2020], an application for registration is refused, or their registration has been cancelled, an application for registration should be submitted to SEPA within 28 days of:

- that producer becoming a producer,
- that producer receiving notification that a previous application has been refused, or
- that producer receiving notification that a previous registration has been cancelled.

Where this application is approved, producer details included will be passed onto SEPA for registration i.e. there is no need to submit these separately again. SEPA will contact the named individual for the Scheme Administrator to discuss payment of the regulation fee for each producer.

When registering producer details in future years, the forms below can be submitted direct to SEPA. There is no need to notify Scottish Ministers of the registering of producers, or where a Scheme Administrator stops acting on behalf of a producer, unless it has a substantial impact on the Operational Plan e.g. a major producer is added or removed requiring changes to key infrastructure or financial arrangements.

In year 1, the number of articles placed onto the Scottish market in the previous calendar year should be estimated including providing a range where required. It is recognised that until the scheme is operational that imperfect data exists to use for reporting this detail.

A Scheme Administrator must collect and keep information for producers they have registered for a minimum of four years from the date on which the information is collected. This information must include:

- Number of articles [each producer] place[s] onto the market.
- The primary material from which the packaging used for those articles is made.
- The number of items of scheme packaging returned directly to the producer or Scheme Administrator from wholesalers or retailers.
- The number of items of scheme packaging collected by the producer from return points, hospitality retailers and distance retailers.

SEPA are required, under the regulations, to publish and maintain a list of registered producers. The purpose of this list is to allow retailers to ensure that they are only purchasing containers for sale that fulfil the requirements of these regulations. The additional details being captured will provide the necessary granularity to be certain down to the individual SKU that it is registered as a scheme article and can be sold in Scotland.

Applicant type

Are you registering as (please select all that apply):

Brand owner based in the UK

Importer based in the UK

Are you registering as:

Individual/ Sole Trader

Individual/ Sole Trader Trading As

Partnership Names of all partners:

Partnership Trading As

Company/ PLC
Company Registration number
(as kept by Companies House):

Other Please specify:

Are you registering as a:

Micro producer (Turnover < £85,000)

Other producer (Turnover > £85,000)

Business Details

Organisation name (including any business names)	
Address of registered or principal office	
Telephone number of registered or principal office	
Address and telephone for correspondence (if different from above)	
UK Standard Industrial Classification (SIC) Code for your business activity:	

Contact Details

Forename	
Surname	
Job title	
Email address	
Telephone number	
Notifications preference (Email or Post)	

Print name: _____

Job title: _____

Signed: _____

Date: _____

(applicant)

**BREAKDOWN OF SCHEME ARTICLES PLACED ON THE MARKET
(FOR THE PREVIOUS CALENDAR YEAR)**

Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode/EAN	Other unique ID and data capture markers	No of packs placed on the market	No of scheme articles placed on the market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

**BREAKDOWN OF SCHEME ARTICLES ANTICIPATED TO BE PLACED ON THE MARKET
(FOR THE CALENDAR YEAR THAT THIS APPLICATION IS BEING MADE)**

Brand	Stock Keeping Unit (SKU) Description	Primary packaging material	Barcode/EAN	Other unique ID and data capture markers	No of packs anticipated placed on market	No of scheme articles anticipated placed on market
Total number of Scheme Articles, where the primary material is PET						
Total number of Scheme Articles, where the primary material is Glass						
Total number of Scheme Articles, where the primary material is Aluminium						
Total number of Scheme Articles, where the primary material is Steel						

5.0: Annual Operational Plan

A Scheme Administrator must fulfil a number of obligations on behalf of all the Producers that it is acting on behalf of. Specifically, these include:

- Accepting the return of scheme packaging from wholesalers and retailers – this obligation only extends to scheme packaging sold in Scotland by a producer registered through the Scheme Administrator to the wholesaler or retailer returning it
- Paying a deposit to the retailer or wholesaler for each item of packaging returned as above
- Collecting scheme packaging from return point operators, hospitality retailers and distance retailers in accordance
- Setting out the timescales within which these collections will be made and operating within them
- Making payments of deposits and handling fees to return point operators, hospitality retailers and distance retailers
- Setting out the timescales within which these payments will be made and operating within them.
- Meeting collection targets for collection of scheme packaging.

Collection targets for producers are detailed in schedule 3 of the Regulations and relate to a percentage of the total number of scheme articles made available by that producer for retail sale in Scotland in any one year.

Where the targets apply to the Scheme Administrator, they relate to a percentage of the collective number of scheme articles placed on the market by all producers registered through that Scheme Administrator during the same year. The targets are:

- 1 January 2022 - 31 December 2022: 70% of total number of containers
- 1 January 2023 - 31 December 2023: 80% of total number of containers
- 1 January 2024 - 31 December 2024 (and each subsequent calendar year): 90% of total number of containers (with each packaging material type achieving a minimum 85% collection rate).

In relation to the obligations above, a “reasonable handling fee” for return point operators and distance retailers should take account of the following

- Costs of purchase, lease, maintenance or upkeep of any return vending machines and any vehicles, used for collection and storage of scheme articles
- Costs of materials used for collection and storage of scheme articles
- Rental value of floor space used exclusively for collection and storage of scheme articles.
- Staff time dedicated to the collection and storage of scheme articles
- For hospitality premises that do not operate a return point, a reasonable handling fee should take account of the cost of materials used for collection and storage of scheme articles.

This Operational Plan should set out how, as a Scheme Administrator, you will fulfil these obligations on behalf of producers you have registered. Therefore, the detail contained should take account of the size and number of producers that are covered by this plan and, by extension, the scale of the responsibility being adopted.

An Operational Plan must provide sufficient detail to demonstrate to Scottish Ministers that the proposals for discharging the obligations are realistic and will allow the Scheme Administrator to subsist for a period of at least five years. The application should also demonstrate that, if approved, the entity applying has sufficient resources, knowledge and detailed proposals that it is likely to be able to subsist for a period of at least five years.

A Scheme Administrator must inform the Scottish Ministers and SEPA in writing of any material change in the information provided in the application. This includes any significant changes to the operational plan. In that event we will request an updated operational plan. A Scheme Administrator may include an updated operational plan when notifying the Scottish Ministers of a material change if it

considers it helpful.

As a guide, you should notify the Scottish Ministers where:

- The number of producers that you are acting on behalf of changes, to the extent that it increases or decreases the number of containers by 10% or more of a specific material
- Where producer estimates of scheme articles placed on the market change significantly from those provided at the time of registration
- There are changes to the data verification, infrastructure or delivery approach to achieving targets

Once approved, a Scheme Administrator must comply with its obligations under the Regulations. The Scottish Environment Protection Agency (SEPA) will monitor compliance with this throughout the year. If you fail to comply with the obligations placed on the Scheme Administrator then Scottish Ministers may withdraw your approval meaning you can no longer operate as a Scheme Administrator.

Scottish Ministers will be assessing the ability of applicants to fulfil obligations under the regulations and not assessing the "quality" of the proposed

approach.

The Full Business Case for Scotland's Deposit Return Scheme identified a number of additional environmental, economic and social benefits that could be realised through the implementation of a Deposit Return Scheme.

Any Scheme Administrator could play a significant role in delivering some of these benefits. A section is included in this template offering applicants the opportunity to identify what, if any, of these benefits their proposed operational plan will support, either directly or working with others. This section will NOT be part of the approval process, as there are no obligations to deliver these under the Regulations.

Organisation name	
-------------------	--

OPERATIONAL PLAN

Scheme Articles placed on the market by represented Producers (for the previous calendar year)

Total number of Scheme Articles, where the primary material is PET	
--	--

Total number of Scheme Articles, where the primary material is Glass	
--	--

Total number of Scheme Articles, where the primary material is Aluminium	
--	--

Total number of Scheme Articles, where the primary material is Steel	
--	--

Scheme Articles anticipated to be placed on the market by represented Producers (for the calendar year that the application is being made)

Total number of Scheme Articles, where the primary material is PET	
--	--

Total number of Scheme Articles, where the primary material is Glass	
--	--

Total number of Scheme Articles, where the primary material is Aluminium	
--	--

Total number of Scheme Articles, where the primary material is Steel	
--	--

SECTION 1: DATA VERIFICATION

A successful application must demonstrate how the scheme administrator intends to comply with regulations 10 and 11 on behalf of any producer registered or to be registered by them; and information demonstrating that they are likely to subsist for a period of at least five years.

In order to properly comply with obligations under regulation 10(d) and 11(b) to (i) on behalf of producers, and regulation 16, we expect that the Scheme Administrator will need to be able to verify the accuracy of information provided to them by producers; and the information available on containers collected from return points.

Please demonstrate how you will verify the accuracy of information both from producers on containers placed onto the market and also for containers collected from return points.

Applications should include all relevant information. The following information will help us assess whether your operational plan is viable:

- How will information from return points be analysed, to identify fraud and misreporting of data
 - How will information on scheme packaging returned will be reconciled with material collected, to confirm collection of this packaging and evidence performance against regulated targets
 - Systems and processes in place to prevent data being corrupted or changed when in possession of the organisation
- The format of information requested from Producers that you will be acting on behalf of
 - Information demonstrating how information from producers you are acting on behalf of will be checked for accuracy (for example in the form of a monitoring plan). This should include methodology to be adopted, frequency and method of checks to be carried out and frequency of monitoring
 - Information demonstrating what will be done if errors are suspected in the submitted information.
 - The systems and processes in place to complete checks and submit a robust data set to SEPA ahead of the deadline for the relevant year
 - How changes to producer data will be captured and reported to SEPA in a timely manner
 - How you intend that retailers will know how to identify scheme articles from producers that you are acting on behalf of or how you will mitigate their difficulty in doing so
 - How you will verify that containers collected by return points are scheme packaging
 - How you would manage both non-scheme packaging or scheme packaging belonging to another Scheme Administrator or producer that was returned

SECTION 2: INFRASTRUCTURE AND LOGISTICS

You must demonstrate how the infrastructure and logistics is either in place or will be secured to deliver the proposed approach to servicing return points and verifying delivery against required targets.

In order for your application to be considered you must provide the following information:

- How frequently will you collect packaging from return point operators, retailers offering takeback service and hospitality retailers, and how has this frequency been established?
- How frequently will you pay to the retailers and return points listed above a sum equal to a deposit for each item of scheme packaging collected?
- How frequently will you pay to the retailers and return points listed above a reasonable handling fee, if charged, for each item of scheme packaging collected?

Applications should include all relevant information but the following information will help us assess whether your operational plan is viable:

- How are retailers, hospitality premises and voluntary return points being advised to collect and present scheme packaging for collection?

- What are arrangements for customer service and complaint management from retailers, hospitality premises and voluntary return points?
- How are you identifying return points and ensuring that they have access to the required infrastructure and information ahead of collections commencing?
- How are you going to service the number of return points where producer packaging is likely to be returned to?
- How are you going to service ad hoc collection arrangements or where additional resources are required to complete collections?
- Reimbursing the deposit in full for scheme packaging returned by retailers or wholesalers.
- What infrastructure will be used to identify and verify that containers returned belong to producers that you are acting on behalf of?
- How are you ensuring this infrastructure is appropriately sized and can provide either redundancy or if additional capacity is required?
- How are you ensuring legal compliance with all required regulations and standards for delivery of necessary infrastructure and logistics?
- How will packaging collected be recycled, including the length of contract and security of this end destination?

SECTION 3: DELIVERING COLLECTION TARGETS

You must demonstrate how you intend to achieve the specified collection targets for the calendar year that this operating plan is being submitted for.

Applications should include all relevant information but the following information will help us assess whether your operational plan is viable:

- A communications plan to detail how the scheme will be promoted and the channels to be used
- How will this communications plan be delivered and resources and expertise to be deployed
- Key messages to be used to engage key audiences in how to participate and the benefits of participating
- How will awareness of corporate branding be increased, and positive associations constructed, to build awareness of activities
- Materials and collateral to be developed for producers and retailers to use in communicating

their involvement

- What information will be provided to the public to ensure that they understand the scheme and allow them to engage with your organisation
- How will partnership activity be leveraged in communication and engagement activities to maximise impact
- How will you identify geographical areas or demographic groups that are not performing and target these to enhance performance?
- Intention to operate, or work with others, to establish voluntary return points where there are significantly more containers returned than sold
- How will target performance be monitored and remediation plans developed if there is slippage against the target in year.

SECTION 4: FINANCING

You must demonstrate how the financing is in place or will be secured to deliver the proposed approach for those producers that you are acting on behalf of and to deliver against required targets.

Applications should include all relevant information but the following information will help us assess whether your operational plan is viable:

- A breakdown of costs and revenue streams in the format of a P&L account and Summary Balance Sheet for a 5-year period.
- How will increased costs or reduced revenues will be compensated for to ensure sufficient financing is available?
- How do you propose to agree a 'reasonable' handling fee' with retailers?
- Specify the proposed time limit for payment of refunded deposits and handling fee to retailers.
- Demonstrate that there are no liquidity issues caused by payment terms and conditions for income and expenditure e.g. any observatory period required for financial auditors to define deposits as unredeemed.
- Engagement of a financial auditor to verify that financial statements are stated in line with international accounting standards.
- Evidence of insurance and sufficient indemnity cover.
- Description of corporate governance approach and the systems and processes that will be established to prevent and mitigate fraud and theft.
- A statement that demonstrates sufficient funds are or will be made available to cover these costs. Where appropriate your statement should demonstrate that there is access to sufficient borrowing resources.
- Supporting evidence of this needs to be provided and included with the submission of this application. Examples include:
 - A letter from your bank regarding any overdraft facilities.
 - Documentation which shows that a holding company, sister company or another company is able to and will supply financial support if required.

SECTION 5: ADDITIONAL BENEFITS

The Scottish Government identified a number of environmental, economic and social benefits that could be realised by the introduction of a Deposit Return Scheme. Many of these benefits are out with the scope of the Regulations but are of significant interest to the public and the Scottish Parliament.

Any organisation acting as a Scheme Administrator could support the realisation of these benefits. This section provides an opportunity to identify what additional benefits, going beyond fulfilling regulatory obligations, would be supported by your organisation and the proposed approach to acting as a Scheme Administrator.

Examples identified by Scottish Government are included under each area however this is not intended to be an exhaustive list and if other benefits have been identified by your organisation then these should be included too.

This section is NOT part of the approval process for the application to act as a Scheme Administrator.

Environmental Benefits

Examples could include:

- How quality of materials collected will be maximised and % to high value or closed loop recycling.
- How producer fees are being used to affect onto market container design to improve recyclability and maximise recylate value.
- How communication channels and materials are being used to support messaging beyond in-scope DRS materials e.g. utilising advertising space at return points to promote litter prevention, reuse or recycling.
- Contribution to sector sustainability strategies and generating USP for producers to support growth in their categories.
- Operational decisions and efficiencies that reduce or minimise the environmental impact of operations e.g. backhauling material as part of logistics operations, BREEAM certification for buildings and low carbon energy choices.

- Circular economy exemplar practices e.g. leasing of RVMs or other equipment, integrating circular procurement principles into purchasing activity, identifying reuse and remanufacturing opportunities to provide a second life for equipment where it is no longer suitable for DRS operations.

Economic

Examples could include:

- Payment of the Living Wage and signing up to the Scottish Business Pledge.
- Utilising materials in Scotland to support economic activity through either existing reprocessing capacity or attracting new infrastructure.
- Providing additional security to existing collection infrastructure by using these facilities.
- Supporting economies of scale in collections to allow otherwise unviable recycling e.g. collection of colour separated glass from distilleries.
- How contracts and terms and conditions utilised maximise the opportunities and minimise challenges for small to medium-sized businesses.
- Creation of employment opportunities for groups including apprenticeships and those furthest from the labour market.

Social

Examples could include:

- Supporting financial contributions to community organisations e.g. facilitating donations to good causes via Reverse Vending Machines.
- The use of community clauses in major contracts issued and the creation of opportunities for the third sector to be involved in delivery.
- Providing access to data to support projects with societal benefits e.g. targeting health projects in areas with high consumption of sugar drinks.
- Supporting community and formal education through establishment of an education resources and learning hub.
- Creation of additional return points to maximise accessibility in economically deprived areas e.g. in areas where ownership of a private vehicle is especially low.

Scotland's Deposit Return Scheme:

Application form for Return Point Exemption

This form is for:

- Retailers seeking to be exempted from operating a return point, where another retailer or voluntary return point operator has agreed to take back containers on their behalf; or
- Retailers who have agreed to take back containers on behalf of one or more other retailer(s), and who wish to act as an alternative return point; or
- Existing voluntary return point operators who have agreed to take back containers on behalf of one or more retailer(s)

The Deposit and Return Scheme for Scotland Regulations 2020 (“the Regulations”) require all retailers who sell, to consumers on their premises, in-scope drinks for take away to also operate a return point, allowing the public to return empty packaging and redeem their 20p deposit. (NB: for the sake of brevity, the word “retailer” in this form should always be taken to mean a retailer selling drinks as described above.)

The principle behind this is that it should be as simple for the public to return an empty container as it was to buy the drink originally.

The Regulations also allow for return points to be operated from other types of premises, recognising that there may be circumstances where additional return points are required or that alternative premises may offer an equally convenient option. These are defined as voluntary return points, as they are not automatically required to act as a return point.

The Scottish Government recognise that where multiple retailers and/or voluntary return points are in close proximity to each other, it may not always be necessary for all organisations to act as a return point to maintain this principle. The Regulations therefore allow exemptions to be considered by Scottish Ministers in situations such as:

- One retailer agrees to act as a return point on behalf of one or more other retailers
- Retailers collaborate to establish a voluntary return point rather than each retailer individually taking returns
- A voluntary return point being established by someone other than retailers and agreeing to act on behalf of one or more retailers

This application form may be used by retailers looking to apply for an exemption. Applications will be assessed against two key criteria:

- 1) There is an alternative return point located within reasonable proximity to the premises, and the operator of that return point has agreed to accept the return by consumers of items of scheme packaging on behalf of the retail applicant for an exemption, and

- 2) If the exemption is granted, this will still provide consumers with reasonable access to a return point throughout the area in which the retail premises are located.

Both of these criteria must be met for the Scottish Ministers to grant the exemption.

NB: Until an exemption is granted, the retailer must continue to act as a return point.

Scottish Ministers must consider a submitted application for exemption and make a decision within 28 days of receipt of the application. They must, within 7 days of that decision:

Where granted: notify the retailer of that decision in writing and the date that the exemption takes effect

Where refused: notify the retailer of the refusal and give reasons for the refusal in writing

A retailer who has been granted an exemption must clearly display information at the retailer’s premises indicating:

- that by virtue of an exemption granted under these Regulations, they do not operate a return point, and
- the location of the alternative return point

An exemption may be revoked by Scottish Ministers where there has been a material change of circumstances against the two key criteria identified above. Before revoking this, a written notice of the reason for the decision and the date on which it takes effect will be provided.

How to fill in this form

I am a retailer seeking to be exempted from operating a return point and another retailer or existing voluntary return point operator has agreed to take back containers on my behalf.

You should:

- Fill in Section A;
- Ask the retailer or existing voluntary return point which has agreed to take back containers on your behalf to fill in Section B and return to you;
- Send the completed Sections A and B to [XXX].

I am a retailer seeking to be exempted from operating a return point and the operator of a new voluntary return point (not yet approved) has agreed to take back containers on my behalf.

You should:

- Fill in Section A (ignore section B);
- Send this form to the operator of the new voluntary return point which has agreed to take back containers on your behalf;
- They will attach your partially completed Retailer Exemption Application form to their application to set up a new voluntary return point.

I am a retailer who has agreed to take back containers on behalf of another retailer, and act as an alternative return point.

You should:

- Fill in Section B;
- Send this partially completed form to the retailer seeking an exemption, on whose behalf you will be taking back containers;
- They will fill in Section A of this form and send the fully completed form to [XXX].

I am the operator of an existing approved voluntary return point and I have agreed to take back containers on behalf of one or more retailer(s).

If you have agreed to take back containers on behalf of only one retailer, you should:

- Fill in Section B;
- Send this partially completed form to the retailer seeking an exemption;
- They will fill in Section A of this form and send the fully completed form to [XXX].

If you have agreed to take back containers on behalf of more than one retailer, you should:

- Ask these retailers seeking an exemption to, each, fill in Section A of this form and return to you their copy of their partially completed form;
- Fill in Section B of this form (you only need to complete it once);
- Send all partially completed copies of this form (provided by the retailers) alongside your partially completed copy of the form to [XXX].

SECTION A: APPLICATION FOR RETURN POINT EXEMPTION

Who should fill in this section?

A retailer applying for an exemption;

Retailer Applying For Exemption Details	
Organisation name (including business or trading names if different)	
Address and postcode of retail premises applying for exemption	
Address for correspondence (if different from above)	
Company/Charity registration number (where applicable)	
Contact name	
Job Title	
Telephone number	
Email address	
Notifications preference (Email or Post)	

- I have an agreement in place with the alternative return point operator identified in Section B of this application or identified in the attached Voluntary Return Point application form?
- I will clearly display information informing customers of the fact that I am not acting as a return point and of the location of the alternative return point – A5 minimum and visible at point of purchase and entry to store
- I will notify Scottish Government of change in circumstances or if alternative return point no longer acting on behalf

Signed: _____ Date: _____

Print name: _____ Job title: _____

(applicant)

Question 1: opening times

Will the alternative return point be open at the same times as the retailer seeking an exemption identified in this section of the application?

Yes No

If Yes, go to question 2
If No, go to question 4

Why are we asking this question?

If the alternative return point is always open whenever your business is open, that makes it easier to show that consumers will still have reasonable access to a return point.

If the alternative return point isn't always open when your business is open, that might not be a problem if the difference is small (for example, if you normally open at 07:00 and they normally open at 07:15). Just tick No to this question and use the space under Question 4 to explain why the impact will be small. Your application will be considered on its merits.

Question 2: physical location

2a: Are the premises of the retailer seeking an exemption and the alternative return point physically connected e.g. part of the same block of buildings or located on the same level in a shopping centre?

Yes No

If Yes, go to question 3
If No, go to question 2b

2b: If not physically connected, are the premises of the retailer seeking an exemption and the alternative return point within 20m each other and have a clear line of sight?

Yes No

If Yes, go to question 3
If No, go to question 4

Why are we asking this question?

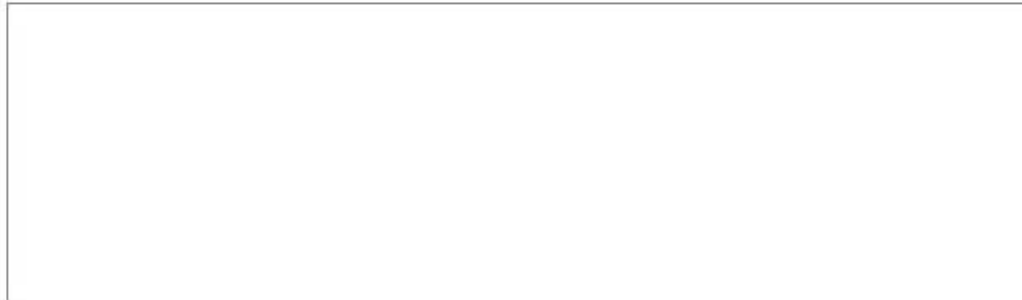
This question is included to give you the opportunity to tell us some information which could help make your application easier to process. It doesn't mean you will automatically get an exemption, but it gives you a simple way of showing you meet the condition of reasonable proximity to the alternative return point.

If you can't tick Yes to either Questions 2a or 2b, it's still possible that you could get an exemption if you meet the right conditions. Use the space under Question 4 to show how you meet the criteria of reasonable proximity and reasonable access. There is further guidance under Question 4.

Question 3: additional information

Please include any additional information which you believe will support your application. This might include:

- a map identifying the retailer seeking an exemption, the alternative return point and the pedestrian route between them
- details (text and/or images) of any obstacles in between e.g. a road
- any elevation difference i.e. slope or stairs



Question 4: additional information

If you have answered No to Question 1 and/or 2 above, we need some more information from you in order to demonstrate that your application fits with the principle that it should be as easy to return the container as it is to purchase it.

At a minimum, this should be a map identifying the retailer seeking an exemption and the alternative return point and the pedestrian route between them. This should also make clear the distance to travel between them on foot.

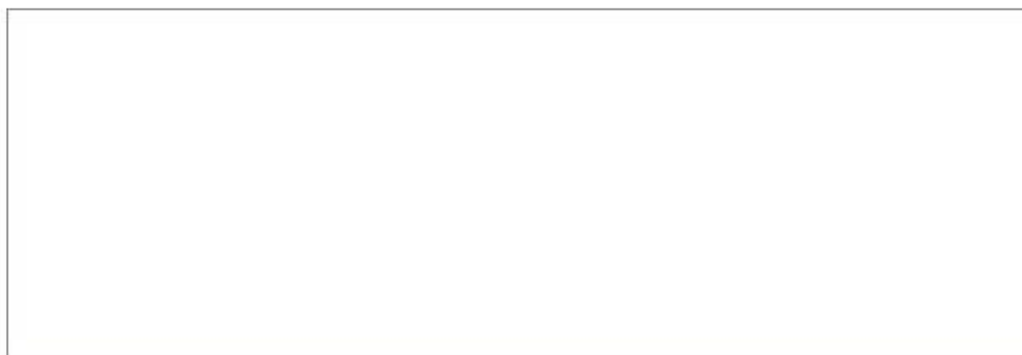
If you have told us that the alternative return point is not always open when your business is open, you should include a table comparing your opening times with theirs.

You should also consider including:

- details (text and/or images) of any obstacles in between e.g. a road
- any elevation difference i.e. slope or stairs

NB: applications will be judged on a case-by-case basis and what is reasonable may vary significantly between locations. As a guide only, Scottish Ministers are unlikely to approve an application where the distance on foot between your business and the alternative return point is more than:

- In a built-up urban area, 100 metres;
- In any other area, 200 metres.



SECTION B: AGREEMENT TO TAKE BACK CONTAINERS ON ANOTHER RETAILER'S BEHALF

Who should fill in this section?

- A retailer selling drinks, agreeing to take back containers on behalf of another retailer; or
- An existing voluntary return point operator, agreeing to take back containers on behalf of one or more retailers

Alternative Return Point Operator Details	
Organisation name (including business or trading names if different)	
Address and postcode of alternative return point premises	
Address for correspondence (if different from above)	
Company/Charity registration number (where applicable)	
Contact name	
Job Title	
Telephone number	
Email address	
Notifications preference (Email or Post)	

I agree to act as an alternative return point for the retailer(s) identified in section A of this application (and, where relevant, in the attached Retailer Exemption application forms) and you have permission to contact me to verify this agreement is in place.

I have considered the number of containers likely to be returned and have arrangements in place to manage this.

Please provide information to demonstrate this, including the number of other retailer premises you are currently acting and/or awaiting approval to act as an alternative return point for, and the number of containers you are expecting to receive in acting on behalf of all of those.

I will notify Scottish Government of change in circumstances or if no longer acting on behalf of retailer(s) identified within this application.

Signed (applicant): _____ Print name: _____

Date: _____ Job title: _____

(applicant)

Form 4: 'Scotland's Deposit Return Scheme: Application form for Voluntary Return Point Approval'

Scotland's Deposit Return Scheme:

Application form for Voluntary Return Point Approval

This form is for:

- A body/organisation intending to set up a voluntary return point to take back containers on behalf of one or more retailers who are seeking an exemption
- A body/organisation intending to set up a voluntary return point where no retailers are currently seeking an exemption in connection with this return point

The Deposit and Return Scheme for Scotland Regulations 2020 ("the Regulations") require all retailers who sell, to consumers on their premises, in-scope drinks for take away to also operate a return point, allowing the public to return empty packaging and redeem their 20p deposit. (NB: for the sake of brevity, the word "retailer" in this form should always be taken to mean a retailer selling drinks as described above.)

The principle behind this is that it should be as simple for the public to return an empty container as it was to buy the drink originally.

The Regulations also allow for return points to be operated from other types of premises, recognising that there may be circumstances where additional return points are required or that alternative premises may offer an equally convenient option. These are defined as voluntary return points, as they are not automatically required to act as a return point.

The Scottish Government recognise that where multiple retailers and/or voluntary return points are in close proximity to each other, it may not always be necessary for all organisations to act as a return point to maintain this principle. The Regulations therefore allow exemptions to be considered by Scottish Ministers in situations such as:

- One retailer agrees to act as a return point on behalf of one or more other retailers
- Retailers collaborate to establish a voluntary return point rather than each retailer individually taking returns
- A voluntary return point being established by someone other than retailers and agreeing to act on behalf of one or more retailers

This application form may be used by retailers or organisations looking to establish a voluntary return point. We also recognise that some groups (e.g. charities or community groups) may want to operate a return point without any specific retailers seeking an exemption as a result.

Please note that the registration of voluntary return points is intended to capture those who wish to act as an alternative return point for retailers and/or those who want to operate a permanent non-retail return point. It is **not** intended to capture organisations that want to collect containers on an ad-hoc basis or from a specific audience e.g. a group doing fund raising.

Applications to act as a voluntary return point will be assessed against the accessibility of the return point, requiring information on the physical location, routes of access and proposed hours of operation.

Confirmation will also be required that all registered producers, or a Scheme Administrator acting on their behalf, has agreed that the organisation may operate a return point on their behalf in that location.

Scottish Ministers must consider an application and make a decision within 28 days of receipt of the application. Within 7 days of the decision:

Where granted: notify the applicant of that decision in writing and the date that it takes effect

Where refused: notify the applicant of the reasons for the refusal in writing

Approved return points will be added to a list of registered voluntary return points, maintained by Scottish Ministers. All return point operators are required to:

- Accept an item of clean, empty, identifiable scheme packaging returned to them
- Refund the 20p deposit for each item returned
- Retain the packaging for collection by, or on behalf of, a producer or scheme administrator
- Display information on a complaints procedure and contact details of SEPA (Scottish Environmental Protection Agency)

Scottish Ministers may cancel the registration of a return point where they are not fulfilling these obligations. Before cancelling this, a written notice of the reason for the decision and the date on which it takes effect will be provided.

How to fill in this form

I intend to set up a voluntary return point to take back containers on behalf of one or more retailers who are seeking an exemption.

You should:

- Ask the retailers seeking exemptions, on whose behalf you will be taking back containers, to, each, fill in Section A of the Retailer Exemption Application form and return to you (you can make as many copies as you need);
- Fill in this form yourself;
- Send all the partially completed copies of the Retailer Exemption Application form (provided by the retailer(s)) alongside this completed form to [XXX].

I intend to set up a voluntary return point and there are no retailers currently seeking an exemption in connection with this return point.

You should:

- Fill in this form and send it to [XXX].

APPLICATION FOR VOLUNTARY RETURN POINT

Who should fill in this section?

- An organisation/body other than a retailer selling drinks, agreeing to act as an alternative return point on behalf of one or more retailers or
- An organisation/body other than a retailer selling drinks, wanting to operate a return point without specific retailers seeking an exemption as a result and where you have agreement with producers or a scheme administrator to operate as an additional voluntary return point.

Business details	
Organisation name (including business or trading names if different)	
Address and postcode of proposed return point (or grid reference for remote site)	
Address or telephone number of registered or principal office of proposed return point operator (if different from above)	
Address for correspondence (if different from above)	
Company/Charity registration number (where applicable)	
Contact name	
Job Title	

Telephone number	
Email address	
Notifications preference (Email or Post)	

Applications must include:

- A map showing the physical location of the proposed return point if there is a large site covered by the address details provided
- Proposed operating hours including any proposed seasonal operations
- Visibility and accessibility of the proposed location including highlighting routes of access
- An estimate of the number of containers you expect to capture
- The number of retailers seeking an exemption in connection with this application, if any
- The source of these containers e.g. acting on behalf of local retailers, high numbers of additional containers arising due to tourism etc.
- Why the proposed location has been chosen i.e. why do you think it will be convenient for people to return the containers there?
- How will resources be secured to establish and operate the return point e.g. financing the purchase of machine or staff to facilitate the returns.

I agree to fulfil the requirements of acting as a return point under the Regulations

I will notify Scottish Government of change in circumstances or if no longer wishing to act as a return point

I have an agreement with registered producers and/or Scheme Administrator(s) to operate as a return point on their behalf

Where you intend to operate as an alternative return point on behalf of one or more retailers seeking an exemption:

I agree to act as an alternative return point for the retailer(s) identified in the attached Retail Exemption application form(s) and you have permission to contact me to verify this agreement is in place.

Signed (applicant): _____ Print name: _____

Date: _____ Job title: _____

(applicant)