#### Aldi

Aldi is a member of the British Retail Consortium and our current position on the proposed DRS is aligned with that of our trade association.

We welcome the Government's consultation on this matter and look forward to hearing more about the specific details of any proposed scheme.

#### Lidl

At Lidl UK we fully support the need to tackle the important issue of plastic pollution and the detrimental impact that this is having on the marine environment. Lidl has long been committed to the reduction of unnecessary plastic waste, and was one of the first retailers in the UK to encourage customers to re-use their shopping bags. We have charged for our plastic carrier bags for the last 23 years for this reason. This commitment was further reinforced this summer through the removal of all single-use bags from our stores.

In tackling plastic pollution we believe that, rather than focusing efforts on one system and one waste stream, the most effective way to achieve this is through a fully developed and comprehensive approach to combatting littering, minimising waste and strengthening resource efficiency.

Whilst the potential benefits that a deposit return system could deliver can not be ignored, it is vitally important to fully analyse and evaluate the application of such a system in the UK, which already benefits from an extensive and matured approach to kerbside collections. A national DRS system will require significant investment, which must be fully understood to effectively assess the long-term value relative to building on and improving existing infrastructure.

We will work closely with the industry and government in developing a progressive and fully developed approach to resource efficiency and circular economy, in order to deliver an effective long term solution to the issue of plastic pollution.

# Marks & Spencer

We recognise the enormous challenges, particularly in our oceans that the current approach to plastic use globally is causing.

We do not believe that plastic is an inherently bad material, indeed it has and continues to bring enormous benefit to society and the economy in terms of cost, efficiency and the prevention of waste.

However, we do need to create collectively a very much better approach to preventing the leakage of plastic into the environment. Beyond the obvious environmental benefits that this will bring, we support the view of the Ellen MacArthur Foundation and its work on a New Plastics Economy that this can also create significant, positive economic opportunities too.

In 2007 we launched our 100 point sustainability plan, Plan A. This has led us to simplify the types of plastic we use in our food packaging from 11 to 3, improving substantially its recyclability; introduced a voluntary 5p charge on plastic carrier bags in our food halls which in turn helped inspire regulatory action across the UK; removing microbeads from our products ahead of legislation; and as the third largest coffee shop chain in the UK, 90% of our coffee and tea is served in reusable china cups.

In June 2017, we published our updated Plan A 2025 sustainability commitments which contained a bold overall ambition to become a zero-waste business, supported by eleven specific targets including ensuring all our packaging is widely recyclable. We are committed to helping local authorities improve recycling rates and will investigate the feasibility of making all our packaging from one polymer which will both help recovery rates and create a marketplace 'pull' for the use of recycled content.

To achieve this move to zero-waste, we'll need to bring together elements of in-house eco-design with collaborations to develop national re-use and recycling infra-structure. We are already engaged with Government to develop a holistic Waste and Resources Strategy which needs to address all sources of plastic pollution. We have joined WRAP's Pledge to Improve the Recycling of Plastic as well as the Ellen MacArthur Foundation's (EMF) commitment to make all our plastic packaging reusable, recyclable or compostable by 2025. We also support the EMF's call for a ban on the use of Oxy-degradable materials.

We agree that there is a need to increase the current 73% recovery rate of plastic bottles by improving 'out-of-home' recycling facilities using a range of collection and reverse vend options. We believe that mandatory deposit-return-schemes is an important solution to consider but also see that it may pose challenges, specifically by:

- Creating a single point of activity and investment focus on plastic bottles rather than a more holistic approach which addresses all types of plastic pollution.
- Distorting the market by driving drinks into non-DRS formats of packaging such as composite plastic film pouches, which have the potential to cause even greater environmental harm.

- Reducing overall UK packaging recycling rates by depriving local authorities of relatively valuable plastic bottle recycling revenues which currently provide cross-subsidy for other materials.
- Acting against consumer trends by trying to move the focus of recycling collections away from the home (kerbside collection) towards a system of centralised in-store collection points. How these 2 schemes might interact will be an important consideration.

All these issues need to be taken into account in deciding what role DRS may have in a holistic New Plastics Economy. We are committed to playing our part in trying to solve these challenges and assessing whether DRS or alternative approaches deliver better outcomes for the environment, consumers, councils and businesses alike.

We will only create a successful circular economy by addressing resource use – reducing demand and improving recovery, reuse and recycling - in a holistic way. So we will continue to work with policy makers across the UK, as well as fellow retailers, manufacturers, local authorities, the recycling and plastics industry, WRAP and the Ellen MacArthur Foundation to develop scalable solutions to the leakage of plastics into the Oceans.

#### **Morrisons**

We recognise the growing concerns about the harm that plastic can do when it enters to worlds oceans. Without being side-tracked from your question about DRS, I should add for context that the wider issue of plastic, type of plastic in product packaging and helping customers to recycle is high on the agenda of a number of retail industry bodies we are part of. Issues of this size and nature can only be effectively tackled collaboratively and there is significant industry awareness and willingness to tackle the issue.

Specifically on your question about DRS, we have mixed views (which I will explain) because the information we have seen and feedback we have received about the current system, and the effect that DRS may have on it, is not sufficiently clear.

If you are contacting other retailers it is likely that that you will receive similar views because the debate and concerns about the overall effect of DRS has been live for some time. Ultimately, with mixed views in industry, it may be that Government will have to decide which way to go.

I have read and respect the views and sentiments expressed in the articles that you shared in your e-mail. The other side of the debate does not question the desired outcome (all of us would like to see higher recycling rates) but how best to achieve it. Comparisons are often made to DRS systems abroad and whether they would work in the UK.

This is not clear because, in simple terms, our system with the two key elements of the Packaging Recovery Note system (PRN) and kerbside collection was designed both to reduce (by a form of tax on business) and then recycle (at home with ease). The principle of this system is sound but there is general agreement that it needs reform so that PRN is more effective, kerbside is simpler and more consistent and monies are utilised to enhance recycling as part of a wider more comprehensive approach to waste management.

According to information provided by industry experts Valpak, shared at the recent House of Commons Environmental Audit Committee (EAC) hearing around 73% of plastic drinks bottles are already recycled in the UK. Whilst the outcome of our current system is positive and the trend has been a massive increase over time it does appear to have plateaued and is behind some European countries.

The other indication from the EAC hearing was that it appeared that some local authorities are concerned about the introduction of DRS because of the infrastructure they have put in place for kerbside and it is a valuable income generator when well managed - incentivising collection. If plastic recycling drops at kerbside it may make it less viable for local authorities to collect, reducing services and losing other material that is currently recycled including glass, metal and card.

When you consider the cost of implementation and operation of an additional DRS system it is not conclusive that the major resource requirement needed and then ongoing would be the best way to improve recycling rates further. Other evidence given to the committee suggested that the cost of initial implementation in Germany was around 726 million Euros.

Customer feedback on the issue is also mixed as many prefer the ease of recycling at home and do not want the cost of having to pay more up front and then have to return to an outlet to receive repayment. Whilst there may be an assumption that large retailers would be against the principle for a management point of view it is probably the case that it could be seen as a customer service ( we already provide recycling facilities working with local authorities across the country). Potentially it could drive footfall and so larger retailers may benefit. On the other hand smaller retailers, local stores are more concerned because of space limitations.

What may be of beneficial is utilising PRN monies to enhance recycling in public spaces for 'on the go' purchases. This is something that the industry has raised and suggested to Government.

More evidence is needed to decide if DRS would achieve significant positive impact or whether reform and enhancement of our existing system in the UK would be more resource effective and have better impact. If a DRS system were to be created, then it clearly is in everyone's interest to make it simple and aligned across the whole of the UK.

### Sainsbury's

Sainsbury's has a strong record on recycling and reducing our environmental impact. We are committed to being the UK's greenest grocer and we understand the importance of producing recyclable packaging, cutting down on the use of packaging used altogether and increasing the amount recycled material used in the content of our packaging and products.

As a signatory to Courtauld 2025 we work with the charity WRAP and other signatories to help reduce packaging and tackle food waste both around our products and in the end to end supply chain.

We have committed to reducing our packaging by 50% by 2020, compared to 2005 levels. To help reach this target, we already use 35% less glass in our 35cl spirit bottles and have reduced the size of our toilet roll cores, meaning we can also pack more into each delivery, cutting over 400 lorry journeys per year.

We also try to help our customers to recycle wherever possible by providing battery and carrier bag/film recycling bins in our supermarket stores, and provide and fund recycling facilities (incl. glass, cardboard, metals, wood, clothing etc.) at a total of 275 sites, in addition to working with local authorities to provide recycling facilities at a further 100 sites across the UK. All of our supermarkets have customer litter bins, as do most of our convenience stores where practical and allowed by local authorities.

We agree that more can be done to increase recycling rates and await the outcome of Defra's consultation and the deposit return scheme models put forward by both the Scottish and Welsh Governments. However, we would emphasise that drinks containers are only a small part of the broader waste and recycling challenge, to which a more holistic approach is required. We look forward to working with Government in developing a long-term strategy to boost recycling, reduce littering and protect the environment.

## Tesco

As a food business, we completely understand that our long-term success depends on the health of the natural environment. We are aware of the growing pressures being put on the environment and issues such as ocean plastic, and recognise that we can play a part in tackling these important issues.

In November 2016, we acted quickly to phase out microbeads from all our Tesco branded cosmetics and household cleaning products by the end of that same year. However, we know there is more to do to make packaging more sustainable and reduce the amount of plastic ending up in natural ecosystems such as oceans.

As part of our Little Helps Plan, in October we shared three new commitments concerning our own brand packaging:

- Our packaging will be fully recyclable or compostable by 2025
- All paper and board used will be 100% sustainable by 2025
- Halve packaging weight by 2025 (2007 baseline in the UK)

We are committed to working with our suppliers to achieve these targets and we also want to work with wider industry stakeholders to look for further opportunities and interventions that will have a positive impact. We would welcome any efforts that explores how recycling rates can be increased.

Specifically regarding a deposit return scheme for the UK, the government is currently reviewing ways to increase recycling and we are playing an active role in the discussions with DEFRA based on our own experience of operating recycling facilities at our stores. We have suggested that there are two considerations when exploring changes to the current system that will help reduce litter and increase recycling:

- 1. It must be as easy and accessible for consumers as possible. Systems should reflect the different ways that people choose to recycle and ensure that incentives to recycle are shared across these approaches.
- It must ensure good quality recyclate for end use. There are good examples of bottling companies making their packaging more recyclable, and we have been working with our suppliers so that our bottles are widely recyclable and that the printed sleeves do not contaminate the recycling stream.

More generally, we do believe that there is an opportunity to promote circular economies for plastics. We are working collaboratively within the industry to increase amounts of recycled material and we believe this is a key part of any solution. We are also leading discussions with Recoup and the wider recycling industry to find solutions to the challenge of recycling black plastics.

We look forward to seeing the output of the DEFRA study to help further inform our ongoing work on this challenge.

### **Waitrose**

We are absolutely committed to reducing the impact plastic packaging has on the environment. Not just because it's the right thing to do but because our customers expect it of us.

Our priority is making it easy for our customers to recycle our packaging using the existing kerbside recycling infrastructure, while exploring home compostable alternatives to plastic. We have pledged to make all our own-label packaging widely recycled, reusable or home compostable by 2025.

We believe kerbside recycling is the most effective solution for household recycling. It has been widely used by consumers for decades and it allows local authorities to remove material that's contaminated with liquid residue.

We do appreciate there is growing demand for a deposit return scheme (DRS), so if some form of DRS were to be introduced, we would work with the Governments across the UK to consider how the scheme could operate most effectively in a supermarket setting.

I have attached more information on our recent developments in packaging and plastic, which I hope is useful.

We know there is more work to be done across all areas of plastic, not just bottles, and we are determined to continue making progress.