

# Response ID ANON-C7NB-RXFQ-B

Submitted to **A Deposit Return Scheme for Scotland**

Submitted on **2018-09-25 12:30:19**

## What materials will be collected

### 1 Which of the options do you prefer? Please chose one or more options from below and explain your reasoning.

#### Comments :

FDF Scotland does not have a preference although we think that options 2 and 3 are the most likely based on how other schemes work in other countries.

FDF would strongly advocate that any final decision on which materials, sizes, formats and products to include within a DRS should be based on the best available data and impact assessments of each option. We would also recommend that a number of different options for combinations of container material and format/size be considered in much more specific detail.

The analysis should also take into consideration the wider policy context, for example new or known future policy initiatives, such as extended producer responsibility (EPR) reform, which may affect the conclusions.

There must be a clear commercial case for each material stream that is to be included. Each material included in the scheme must be self-funding e.g. deposits from PET should not shore up the economic viability of collecting glass under the DRS.

### 2 Do you think the scheme should start with a core set of materials and then be expanded as appropriate?

No

#### 2a If yes, which materials should it start with?

#### 2b If yes, which materials do you think should be added later?

### 3 Are there any materials that you think should not be included?

#### Please explain your reasons.:

In principle, the scope of a DRS should cover all beverage containers of whatever material type to avoid the risk of producers trying to circumvent the DRS scheme by switching to a material not covered. For example, if PET was included in the scheme but HDPE was excluded, there may be manufacturers that choose to switch their bottles from PET to HDPE to circumnavigate the scheme.

However, we recognise there may be significant practical and financial constraints in doing this, for example the cost of installing reverse vending machines (RVMs) that can accept cartons which can cost up to 4 x more. We understand that the starting price for an RVM is ~£10k, for a machine to accept cartons in addition to other materials, the starting price would be nearer to ~£40k. It is not clear from the consultation supporting evidence what price has been applied for an RVM.

FDF urges the Scottish Government to look at all mechanisms for driving up recycling holistically. A DRS should not be viewed in isolation and the best mechanism for specific material streams should be used. Certain materials or products may be better tackled under ongoing packaging recovery note (PRN) reform or EPR reform.

### 4 Are there any other materials that should be included?

No

#### Are there any other materials that should be included?:

See our response to previous question - any materials that for whatever reason are not covered by the DRS scheme should be captured by a reformed PRN system.

The DRS must avoid "double charging" materials covered by the PRN system and vice-versa.

### 5 Are you aware of any materials currently in development that should be included?

**Are you aware of any materials currently in development that should be included? For instance, there is currently a great deal of interest in making 'bioplastics' either from starch derived from plants or food byproduct streams. Whilst these can look and behave like plastic, it is often important to ensure they are kept separate from plastic in the waste stream as they are recycled differently.:**

No.

BioPE and bioPET are chemically identical to their fossil based versions "PE" and "PET" and can be recycled through mechanical recycling. However, some compostable and biodegradable plastics are not recycled in the same manner as PET as they are chemically different. Assuming this question refers to biodegradable and compostable plastics, they should be out of scope of a DRS until the sorting technology is ready and systems established to ensure no cross contamination of conventional recycling streams.

Whilst it is important that innovation is not stifled, due to the varied properties of different types of plastics, minimising the types of plastics in the waste stream maximises yield and leads to higher grade recycle.

Poly(lactic acid) (PLA), for example has unique properties that lead to issues when recycled in conjunction with other materials. "Plastic Packaging: Recyclability by Design" (Recoup, p27, 2017) <https://bit.ly/2vDp6hj> covers this in some detail:

"Use of PLA (a biodegradable material) with PET should be avoided as the polymers are incompatible and not readily separable. The presence of very low levels of PLA in PET causes haze and a deterioration of physical properties with the recycled PET.

In addition, PLA causes problems in the drier as it melts at the drier temperature"

As mentioned in our response to question 3, the issue that needs to be addressed is the potential risk of material substitution. This could (unless managed effectively) result in containers still entering the recycling stream which ultimately cause contamination.

## **6 What are your views on the cost implications for local authorities?**

### **What are your views on the cost implications for local authorities?:**

Local Authorities are better placed to answer this question.

However, a poorly designed DRS system in Scotland is likely to have a negative impact on local authorities as it will remove valuable materials from kerbside collections. Local authority infrastructure for collections usually operates on a fixed cost basis so any savings from a reduction in the volume of materials collected will be minimal.

## **What types of products will have a deposit on them**

### **7 Do you think the material the container is made from or the product it contains should be the key consideration for deciding the scope of the scheme?**

Material the container is made from

#### **Please explain your reasons.:**

The content of a container is not related to the environmental performance of the packaging.

This is in line with the Commission of the European Union, in its Commission Communication 2009/C107/01 that advises that any differentiation should in principle be based on the material used for the containers and not on the content of the beverages.

There may be instances of specific hygiene issues associated with collecting used containers for certain products that need to be considered.

### **8 Are there any product categories that should be excluded from the scheme?**

#### **Please explain your reasons.:**

Individual sub sectors are better placed to respond to this question

### **9 Are there any product categories listed above that you broadly agree with but think that certain products within them should be excluded?**

Not Answered

#### **Please give us specific reasons for exempting anything.:**

Individual sub sectors are better placed to respond to this question

### **10 Are there any other products that broadly fall into the category of 'drinks' that we have not included that you think should be?**

**Are there any other products that broadly fall into the category of 'drinks' that we have not included that you think should be?:**

No

### **11 Do you think that the deposit return scheme should be limited to "on the go" only?**

No

#### **Please explain why.:**

No, we do not recommend this as an option. There is no single definition of 'on the go' and it may cause consumer confusion resulting in fewer containers being collected and the consumer losing their deposits.

In practice, many consumers purchase products as part of their grocery shop that they plan to consume 'on the go' at a later date e.g. multipack of soft drink cans. This makes it difficult to differentiate between on-the-go products and products meant for home consumption.

#### **Do you agree with how we have defined on the go?:**

No – see our response to Q11

**12 Specifically on dairy products, do you think including dairy carries hygiene or related risks above those posed by other products?**

Don't know

**Please provide evidence.:**

Individual sub sectors concerned specifically with dairy products are better placed to respond to this question

**13 Should any dairy products be excluded from the system?**

**Please explain your reasons.:**

Individual sub sectors concerned specifically with dairy products are better placed to respond to this question

**Where you will be able to get the deposit back**

**14 Which option for return location do you prefer?**

Mixture of takeback to a place that sells drinks and designated drop-off points

**Please explain your reasons.:**

FDF prefers a mixture of take back to a place that sells drinks and designated drop-off points.

Convenience for consumers must be the overriding feature for any successful DRS. The greater the number of return point options and accessible locations, the greater will be the engagement of consumers

Due to Scotland's geography and there will be certain locations in Scotland where a reverse vending machine is not financially viable or practical.

**15 In any model involving return to retail, are there any types of retailer that should be excluded?**

Don't know

**Please explain your reasons.:**

The retail sector is better placed to give a fuller response to this question.

FDF Scotland's starting position on this is to suggest there should be no exclusions but we acknowledge that Scotland's rural and island community will face some particular challenges that the Scottish Government should investigate thoroughly before any decisions are made.

If a retailer is selling a format then they should be obliged to take back that format; e.g. if a small kiosk only sells 330ml aluminium cans and 500ml PET bottles they should not be obliged to handle 2 litre HDPE bottles.

Further consideration should also be made regarding drinks delivered from vending machines. Vending machines could be available at or near a retail location, but not owned by any specific retailer, therefore the take back responsibility for this type of selling will need further consideration

**16 Do you agree that online retailers should be included within the scheme?**

Yes

**Please explain your reasons.:**

The retail sector is better placed to give a fuller response to this question.

In theory online retailers could be included subject to consideration of practicalities.

**16a What provisions do you think should be made to ensure online shopping is included successfully?**

**What provisions do you think should be made to ensure online shopping is included successfully?:**

FDF considers this is a matter for the retail sector to consider.

**How the scheme will be paid for**

**17 Do you agree that deposit return should be seen as a form of producer responsibility?**

Yes

**If yes, how do you see deposit return interacting with other producer responsibility obligations?:**

FDF recommends the Scottish Government to look at all policy options for driving up recycling holistically and not view a DRS in isolation. In particular, we would expect those drinks containers covered by a DRS to be excluded from the Packaging Regulations system otherwise the producer would be charged twice for the same policy outcome.

DRS must be carefully considered in line with the expected consultation on reform of the EPR system.

**18 Do you think it is appropriate for the scheme administrator to maintain ownership and income from sales of the material?**

Yes

**Please explain your reasons.:**

FDF believes it is very important that the income from the sales of material should be retained within the system and off-set against the operating costs if industry owns and runs the scheme on a not for profit basis. This is in line with the Extended Producer Responsibility minimum requirements, as outlined in the Circular Economy Package updates to the Waste Framework Directive (Directive 2008/98/EC of the European Parliament and of the Council) on waste and repealing certain Directives), which require extended producer responsibility systems to ensure coverage of full net costs. The same would apply for the value of any unredeemed deposits.

**19 If the scheme administrator maintains ownership of the material, should it prioritise maximising profit from sales or should it seek to achieve additional benefits?**

Not Answered

**If you selected achieve additional benefits, which benefit should the administrator pursue?:**

Neither, As the legislative driver behind the scheme is the Climate Change (Scotland) act, the need to maximise the environmental benefits of collecting a high-quality material for recycle must remain the priority consideration. However equally important is to maximise profit from sales as this will help to offset the scheme operating costs and create revenue streams that can be used for example to boost consumer participation.

**20 Should any excess funding or unredeemed deposits be ringfenced for the continued maintenance or improvement of the system, or do you think it would be appropriate to divert funding to other purposes?**

Funding should be ringfenced

**21 How would you define a producer?**

**How would you define a producer?:**

A producer under a DRS should be defined as the brand owner or importer of the goods (including the retailer in case of own brands). The definition should include producers which manufacturer under their own name or trademark or resells products under their own name or trademark, but which are produced by other suppliers.

A definition of a producer is defined within The Producer Responsibility Obligations (Packaging Waste) Regulations 2007. The "producer" is defined in regulation 4 and includes a small producer unless otherwise stated, and the classes of producer are those set out in column 4 of Table 1 in Schedule 1 of the aforementioned legislation.

Using this definition would help to align DRS and producer responsibility obligations.

**How the scheme is communicated so everyone understands it**

**22 Do you agree that producers should be required to put Deposit Return Scheme-related information on each container?**

Yes

**22a If yes, should those putting small amounts of material onto the market in Scotland be exempt from this labelling requirement?**

No

**If so, what do you think the limit for this should be?:**

n/a

**22b Rather than be exempt, should small importers be required to put a label with deposit return-related information onto the existing packaging?**

Yes

**If no, what are your reasons?:**

n/a

**How to prevent fraud in the system**

**23 Which option for labelling do you believe offers the best balance between reducing potential for fraud and managing costs to producers and retailers?**

Specific barcode

**Please elaborate.:**

To guard against fraud irrespective of whether it ends up a GB wide system or just Scotland the most effective labelling would be a combination of:

- A specific bar code at EAN level (if it is a Scotland-only system then a Scottish specific barcode would be required)
- An on-pack identifier for the consumer to know that a bottle is part of the DRS

**24 Are there other security measures we should be considering, for instance heightened security measures at key return locations?**

Don't know

**Comments: :**

FDF Scotland believes security measures should be a matter for the scheme administrator or owners of the RVM to consider.

**How much the deposit should be**

**25 Do you have a preference for what level the deposit should be set at?**

Don't know

**Please indicate what level you think it should be and explain your reasoning for choosing this level. :**

FDF does not believe that the level of deposit should be decided as a result of this consultation. This should be decided by the scheme administrator.

We recommend that the Scottish Government should set clear outcomes in terms of recycling targets for a DRS to achieve. It should then be up to the scheme owners to set the deposit level to ensure that these targets are reached.

**26 Do you think that certain types of drinks containers should carry a different deposit level?**

No

**Please explain which ones and why you think the deposit should be varied.:**

Different deposit levels would be confusing for consumers. It may be appropriate to scope differing levels of producer fees depending of the value of the material the container is made from. We believe this should be decided by the scheme operator based on financial modelling to ensure scheme viability and fairness.

**What infrastructure to put in place, and the logistics involved**

**27 Which sorts of takeback do you think the system should include?**

Combination of the two

**28 How should the handling fee paid to retailers be calculated?**

**How should the handling fee paid to retailers be calculated?:**

FDF believes the scheme owners should decide how the handling fee to retailers is calculated. It should account for the costs to retailers of handling containers.

**29 Do you agree with the assessment of the potential job creation of between 12 and 116 jobs?**

Don't know

**Please explain your reasoning.:**

FDF believes that job creation should not be the primary driver behind introducing a DRS; increasing capture rates for materials and driving high quality recycling should be the primary goals. We do not have a view on the number of jobs cited in the consultation, only that "between 12-166" is a broad parameter.

FDF Scotland is more concerned about the potential for job losses if the introduction of a DRS results in a loss of sales as has happened in some other European countries e.g. Germany. This must be considered in the final assessment.

**How to create additional benefits from the scheme**

**30 Do you think a deposit return scheme for Scotland should pursue any additional benefits?**

Don't know

**31 Are there additional benefits we have not covered that you think should be considered?**

**Are there additional benefits we have not covered that you think should be considered?:**

Achieving environmental goals such as increasing recycling rates, developing reprocessing capacity in Scotland and producer higher quality recyclate will all help industry's ambition to increase the use of recycled content in packaging where this can be done in accordance with food contact regulations.

We re-emphasise that cash-flow within the scheme should be ring-fenced to ensure that the scheme maximises capture rates of containers and the priority for the scheme is improving these capture rates and not additional benefits.

**Who owns the system**

**32 Which option do you think offers the best system ownership model to ensure the primary goals of a deposit return system are met?**

Industry operated not-for-profit

**If you selected a combination, please provide more details.:**

FDF strongly recommends that the scheme should be an Industry operated not-for-profit scheme.

Industry is best placed to understand material flows and supply chains. Industry has expertise in communicating with consumers on a range of issues including environmental and will use this expertise to maximise the effectiveness of the DRS.

We also recommend that the Scottish Government should set clear outcomes in terms of recycling targets that a DRS is to achieve.

**33 How much emphasis should be placed on the system administrator achieving secondary benefits like ensuring Fair Work practices are followed and that the material collected is reprocessed in Scotland?**

**How much emphasis should be placed on the system administrator achieving secondary benefits like ensuring Fair Work practices are followed and that the material collected is reprocessed in Scotland?:**

We would assume that any operator would need to meet Fair Working practice, as would any operating business.

We have concerns that there is not currently the infrastructure or capacity to reprocess the material in Scotland. If this changes as collection rates increases and the logistics are not detrimental to the overall carbon lifecycle of the scheme then we do not have an issue with material being reprocessed in Scotland in the future.

**34 What do you see as the main roles for a scheme administrator?**

**What do you see as the main roles for a scheme administrator?:**

The administrator is there to initially design the scheme to ensure that the scheme can achieve the recycling targets set by the Scottish Government.

Once the scheme is established, the administrator would then establish itself up as a not-for-profit company with a board made up of obligated industry representatives who would oversee the day to day running of the DRS. This company in turn would tender for critical providers e.g. logistics, administration and software. Both these providers and the administrator should operate on a fixed term contract basis.

Roles and responsibilities for the scheme administrator should include:

- Overall governance and strategic decision-making
- Responsible for setting and delivering KPIs
- Overall financial responsibility for the system, including fee setting and ownership of the material
- Operational responsibility for the system and implementing strategic direction
- Providing anti-fraud systems
- Liaising with producers, retailers and any clearing houses or other organisations operating within the system, including any complaints, and fee management
- Approving packaging which falls in scope of the system
- Ensuring material reaches end markets

**How the system is regulated**

**35 Which option for regulating producers do you think is most appropriate?**

Regulation by the scheme administrator

**Please explain your reasons.:**

FDF recommends that producers should be regulated by the scheme administrator as in Norway.

The system would be run by a not-for-profit management company which would be accountable to both government through agreed targets and scrutiny of companies obligated to fund it.

**36 Which option for regulating return sites, including retailers, is most appropriate?**

Regulation by the scheme administrator

**Please explain your reasons.:**

Regulating the return sites should be carried out by the same regulator as the producers to minimise confusion. As per many international examples, the scheme administrator sets the handling fee, working with industry. This does not require any additional regulation or oversight.

**37 What level of regulatory power do you think is appropriate for the system administrator?**

**What level of regulatory power do you think is appropriate for the system administrator?:**

The Regulatory Reform (Scotland) Act 2014 includes provisions on promoting regulatory consistency, improving environmental regulation and a duty on regulators to contribute to achieving sustainable economic growth.

The accompanying Scottish Regulators strategic code of Practice set's out several principles that Scottish Regulators should follow.

Assuming the regulator is signed up to the Code of Practice, we are less concerned about the level of regulatory power.

Notwithstanding this we believe that the scheme administrator should have some 'powers' to investigate matters such as the accuracy of returns from producers and impose sanctions but these should be matters to consider when the DRS is being constituted and the procedures then established for scheme members.

**38 In particular, do you think the administrator should have a role in approving products that go on sale to make sure they are compatible with the scheme?**

Don't know

**Comments::**

FDF is unsure if this question relates to the material that drinks containers are made from or the finished product within the container.

If it is the latter, the administrator should not have any input in to products that go on sale – this is outwith the scope of a DRS.

If this question is referring to the material the container is made from then we agree the administrator should have a role in approving containers that should be compatible with the scheme.

**39 Do you agree that the Scottish Governments should be responsible for regulating the system administrator?**

Yes

**39a If yes, should this be done via SEPA?**

Don't know

**39b If no, what other organisation would take on this role?**

If no, what other organisation would take on this role?:

**Examples of Deposit Return Schemes**

**40 Which example do you think best matches the ambition of a deposit return system to increase the rate and quality of recycling and reduce littering?**

Not Answered

**41 Do you agree with the assessment of Example 1?**

Don't know

**Do you agree with the assessment of Example 1?:**

As the consultation outlines, there are 12 key components that interact with each other relating to the design of a DRS. We are not commenting on the examples listed in the consultation paper as they are not a definitive set of options.

We understand that a full impact assessment will not be published until after the consultation has closed.

FDF understands there will be a further consultation on the final design of the scheme and more specific Impact Assessments will take place once this is available.

**42 Do you agree with the assessment of Example 2?**

Don't know

**Do you agree with the assessment of Example 2:**

As the consultation outlines, there are 12 key components that interact with each other relating to the design of a DRS. We are not commenting on the examples listed in the consultation paper as they are not a definitive set of options.

We understand that a full impact assessment will not be published until after the consultation has closed.

FDF understands there will be a further consultation on the final design of the scheme and more specific Impact Assessments will take place once this is available.

**43 Do you agree with the assessment of Example 3?**

Don't know

**Do you agree with the assessment of Example 3?:**

As the consultation outlines, there are 12 key components that interact with each other relating to the design of a DRS. We are not commenting on the examples listed in the consultation paper as they are not a definitive set of options.

We understand that a full impact assessment will not be published until after the consultation has closed.

FDF understands there will be a further consultation on the final design of the scheme and more specific Impact Assessments will take place once this is

available.

#### 44 Do you agree with the assessment of Example 4?

Don't know

##### Do you agree with the assessment of Example 4?:

As the consultation outlines, there are 12 key components that interact with each other relating to the design of a DRS. We are not commenting on the examples listed in the consultation paper as they are not a definitive set of options.

We understand that a full impact assessment will not be published until after the consultation has closed.

FDF understands there will be a further consultation on the final design of the scheme and more specific Impact Assessments will take place once this is available.

#### 45 How do you think the NPV model could be further developed? What other factors should be included in the models?

##### How do you think the NPV model could be further developed? What other factors should be included in the models?:

It would be beneficial to also include a 5 or 10 year NPV which would enable further analysis of the initial phases of the system. Other economic analysis metrics, in addition to NPV assessments, would also be beneficial, e.g. Return on Investment (RoI).

#### 46 What economic risks or opportunities do you see in introducing a deposit return scheme in Scotland? Do you see particular risks with any of the examples?

##### What economic risks or opportunities do you see in introducing a deposit return scheme in Scotland? Do you see particular risks with any of the examples?:

FDF considers that there are many potential risks to the Scottish economy if a poorly designed DRS is introduced and that there is not at least some compatibility with any other schemes introduced in other parts of GB e.g. in respect of labelling.

In addition, all the example systems described within the consultation show a significant upfront investment by the drinks industry of between £132-654million. During this already uncertain and turbulent time for businesses this could result in them choosing not to sell products in to Scotland or manufacturing in Scotland to become non-economically viable.

The scheme raises significant cash flow challenges, particularly for smaller businesses as the scheme is set up.

There is potential for funding profit/shortfall – The administrator will need to consider a mechanism for the scheme to bank money for the years that there might be a shortfall and reinvest any overshoot.

Reduced investment in Scotland from UK/global businesses

Cross border fraud between Scotland and the rest of the UK results in money leaking from the DRS.

There is anecdotal evidence that sales of soft drinks reduced in Germany when they introduced a DRS. Add potential impact on sales and on local authority cash flows..

As mentioned in Q6 we have concerns that a poorly designed DRS may have a negative impact on Local Authorities.

#### 47 Do you see particular risks with any of the examples?

##### Do you see particular risks with any of the examples?:

Launching a Scottish DRS system will be a massive undertaking and we foresee a number of risks. These are not associated with any particular examples.

- Conflicting priorities between PRN reform and DRS - there should be sequencing of PRN reform and a DRS system i.e. PRN system should be reformed first and time given to analyse the impact.
- Location - there are some questions that have yet to be answered on whether the Scottish system will be integrated in a UK-wide system and would it cover GB mainland, GB islands and Northern Ireland?
- Supply might outstrip demand for material in Scotland.
- An increase in litter of non-deposit items – e.g. round bins where people have searched for drinks containers and scattered rest of rubbish

#### 48 What action do you think we should take to maximise the opportunities and minimise the risks of any of the approaches?

##### What action do you think we should take to maximise the opportunities and minimise the risks of any of the approaches? :

The Scottish Government must view the introduction of DRS as the industry does – not in isolation but as part of a coherent package of environmental policy measures intended to increase recycling and drive the circular economy. At the very least introduction of a DRS needs to be considered alongside EPR reform,

The Government also needs to understand the cumulative burden of policies that can result in Scotland being viewed as a less attractive place to do business. For example; the soft drinks levy, the forthcoming work on restriction of promotions and regulating the out of home environment to improve public health in Scotland, the anticipated consultation on reform of the PRN system and any decisions made based on the HM Treasury call for evidence on how the tax system or other charges could reduce single use plastic waste. We emphasise that this is not an exhaustive list.

To maximise effectiveness any DRS should be part of a GB-wide system as this:



- Reduces the likelihood of cross-border fraudulent activity
- Increases the capture of material, and increases the ease of movement of material
- Reduces administrative burden and costs for producers, including labelling requirements for fraud prevention and lessening the need for Scottish specific SKUs
- Reduces confusion: amongst consumers; producers and retailers
- Impact assessments can consider GB-wide policy initiatives and their potential effects on a DRS

## Co-operation with the other UK administrations

### 49 Do you think being part of a UK-wide system would be beneficial for deposit return in Scotland?

Yes

#### Please explain your reasons.:

Yes – see reasons given under Q48

### 50 Do you think having compatible but separate systems would achieve the same effect as a single system?

No

#### Please explain your reasons.:

No. Our preference is for a GB wide system as set out under Q48

We cannot foresee having two separate schemes with separate administrators, being better value for the consumer.

### 51 Can you identify any risks with being part of a UK system?

#### Can you identify any risks with being part of a UK system?:

No but it should be GB wide. It may be more appropriate for any system in NI to be co-ordinated with any Irish scheme

### 52 Can you identify any risks with not being part of a UK system?

#### Can you identify any risks with not being part of a UK system?:

- Increased cross border fraud
- Scotland viewed as anti-competitive – smaller brands decide that Scotland is too expensive to do businesses,
- consumer confusion.
- Double charging – PRN/proposed UK single use plastics tax.
- Additional costs on business e.g. Scottish SKUs

See also answer to Q48

## Equality impact questions cross referred to the EQIA

### 53 Have we correctly assessed potential impacts?

Don't know

#### Have we correctly assessed potential impacts?:

### 54 Do you think the proposed mitigation is comprehensive?

Don't know

#### Do you think the proposed mitigation is comprehensive?:

## About you

### What is your name?

Name:

Cat Hay

### What is your email address?

Email:

cat.hay@fdfscotland.org.uk

### Are you responding as an individual or an organisation?

Organisation

**What is your organisation?**

**Organisation:**

Food and Drink Federation Scotland

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

**Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

The consultation and supplementary papers totalled over 600 pages of very technical detail. In contrast however, the "easy read" version was very high level with a lack of detail. This may result in a number of parties drawing conclusions without fully understanding consequences of the system.

We also query a number of statistics that were used in the report as being out of date - particularly the recycling figures of specific materials.

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

Putting the question numbers in the content page of the portal would have been helpful