Cyswllt Amgylchedd Cymru | Wales Environment Link

WEL Response: Delivering a Deposit Return Scheme for drinks containers in Wales

Date: Monday 10th November 2025

Summary

This is a high-level response from the Wales Environment Link (WEL) network, to demonstrate our support for a Welsh Deposit Return Scheme and for it to be functioning as soon as possible as a way of reducing litter across Wales. Although we defer to the main experts in our network on this issue – Keep Wales Tidy and Marine Conservation Society – our members, particularly land managers, are hugely supportive of the policy. The nature-rich areas they manage are still finding litter reduction a significant issue, despite Wales' progress in recycling and litter reduction over the years, so we anticipate this being an important intervention that will impact their day-to-day work positively. The less time they have to spend removing litter, the more time they can spend on active restoration of nature; recycling alone will not stop on-the-go litter and adding value to the packaging for both the consumer and the industry should change behaviour enough for us to notice the difference.

Political Continuity and Co-operation

The timeline of a Deposit Return Scheme (DRS) from initial commitment from the UK Government in 2017 to the current potential launch of 2027 has been astonishingly drawn out and fraught with delays and is at odds with other schemes around the world which have an average development to launch time of around two years. We very much hope that the pending regulations will future proof against any further delays to implementation in as much as it is possible.

Material focus

Instead of focusing on the items and contents, it is important to focus on the materials which are part of the scheme and restrict diversity of materials on the market. For example, perhaps as a result of pEPR, Keep Wales Tidy surveyors are starting to see more plastic cans which are both metal and plastic. The single-use

plastics ban has also brought about more so-called ‘biodegradable’ materials which are not suitable for recycling or reuse and can cause public confusion.

Clear criteria for reusables

Learning from the recent single use vapes ban, producers are very adept at finding loopholes in product design to circumvent policy. It will be crucial to establish very clear criteria around material expectations and precise definitions as to what is meant by ‘reusable’ to ensure that new products are part of the scheme. Criteria also need to consider chemical additives to ensure that the reusables that will be placed on the market will be PFAS and BPA free and avoid any harmful chemicals which can harm water courses and / or human health in the long term. We would strongly urge the ‘precautionary principle’ to be applied to any future R&D and product placement, which will be Welsh law after the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill passes.

Embedding principles

The DMO and other stakeholders should operate from a set of guiding principles set out by the Welsh Government. To avoid issues with the above and to cover all bases, producers would be required to operate in the spirit of the established principles to avoid unintended consequences. As well as closing any potential loopholes, we would also expect the following principles to be embedded:

- Interoperability with the UK scheme on shared materials
- Simple but regular review mechanisms to embed scheme reviews, and evaluation of the scheme, and operations of the DMO to respond to any improvements and / or adjustments which may be needed rapidly.

Monitoring

We defer to input from Marine Conservation Society (MCS) and Keep Wales Tidy on monitoring, as two organisations well-experienced in organising litter collection and analysing the data. However, we do commend the Welsh Government at keeping glass within the scope of the DRS, with MCS finding that glass bottles are found on 49% of beaches they surveyed in 2024. Glass also has the most potential to be dangerous to wildlife and people when littered, and it significantly helps to have a DRS that’s understandable and easy to use, so covering ‘nearly all bottles’ is going to be the most effective with return rates.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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