Julie James MS Minister for Climate Change Welsh Government 5th Floor Tŷ Hywel Cardiff Bay CF99 1NA

19 June 2023

Making the UK a world leader in recycling

Dear Minister,

As a range of businesses and organisations representing manufacturers, producers and hospitality establishments operating in Wales, we are calling on you to urgently review the Welsh Government's Deposit Return Scheme (DRS) to prevent the creation of trade barriers and to avoid putting the future of our businesses at significant risk.

We appreciate your willingness to meet with us and discuss the measures and the access we have to your officials. We want to help you ensure that Wales' once in a generation opportunity to get recycling right is achieved in full, but, of course, without harming the producers and manufacturers at the heart of Wales' diverse economy.

We are greatly concerned that Wales' position on glass is now in conflict with all other schemes across the UK - following the UK Government's decision to only grant a limited exemption to the Scottish Government, requesting they remove glass from their DRS. Including glass in Wales' DRS will create confusion and inevitable fractures of trading activity. It will not only lead to higher industry emissions, but also significant additional costs for business, and the creation of a confusing system where glass food and drink packaging is split into two waste streams. Ultimately, it will make it more difficult for consumers to recycle.

Given the significant border between Wales and the rest of the UK, the difference in the scope of DRS materials across nations raises serious questions about labelling and logistics. Producers and retailers will have tough choices to make, deciding which products are sold in which markets, at a time of soaring costs and inflation. For example, glass bottles in Wales would likely be required to carry a specific label and/or demarcation indicating it is part of the scheme, which would not be the case in England, Scotland and Northern Ireland. This will mean that many businesses, especially smaller ones, will simply not be able to trade across the nations. We could also see producers switch to plastic packaging to reduce costs, leading to more plastic on the market.

Furthermore, including glass in a DRS will mean the Welsh public will be unable to conveniently recycle their glass bottles in a bin at their home, at least until enabling technology can be implemented at a large scale. YouGov polling highlights that over 70% of people are satisfied with the current collection system for glass packaging and every single region in Great Britain would prefer to recycle their glass through kerbside recycling.

Wales is already achieving a glass capture rate of 87.3% as evidenced in WRAP Cymru's national municipal waste compositional analysis, reflecting the world leading glass recycling already being

achieved in Wales. The evidence shows that a DRS will actually undermine glass recycling rates, and puts Wales' impressive recycling record at risk.

Given the complexity and cost associated with including glass in a DRS, the quickest way to expedite the DRS implementation date is to ensure glass is omitted from the scope of materials. It is crucial that we get the right recycling infrastructure implemented in the most efficient manner to ensure Wales can build on its recycling record as soon as possible.

We urge the Welsh Government to follow the evidence and keep all glass packaging in an improved, consistent kerbside scheme, not a DRS. Only this will help create a truly circular economy.

Yours sincerely,

The undersigned

















THE TREFFOREST BREWERY



CARLSBERG MARSTON'S BREWING COMPANY





AUSTRALIAN VINTAGE























































TREASURY WINE ESTATES





Full written list:

Alliance Wines	Knauf Insulation
Ancre Hill Estates	Llanerch Vineyard
Australian Vintage	Magic Dragon Brewing
BFBi	Marstons
Bang On Brewery	MKD32 LTD
Berkmann Wine Cellars	Monty's Brewery
Bluestone Brewing Co	Naked Wines
Bragdy Twt Lol Brewery	Penderyn
Branded Drinks	Radnor Hills
CWRW Nant Brewery	Robinsons Brewery
Carlsberg Marstons	S.A Brain & Co
Casella Family Brands	S.H Jones Wines
Champagne Lanson	Simpsons Wine Estate
Clun Brewery	Spring Hollow Vineyard
Concha Y Toro UK	St David's Old Farmhouse Brewery
Continental Wine and Food LtD	St Hilary Vineyard
Cullercoats Brewery	Tanners Wines Merchant
Dog's Window Brewery	Thames Distillers Ltd
Enotria &Co	The Chandler Wine Co
Evan Evans Brewery	The Dell Vineyard
Felinfoel Brewery	Thorman Hunt
Freixenet Copestick	Titanic Brewery
Geipel Brewing	Treasury Wine Estates
Glamorgan Brewing Co	Vale
Gower Brewery	Velfrey Vineyard
Guy Anderson Wines	Vog Brewery
Hensol Castle Distillery	WX Brands
Hwgga Brew	Well Drawn Brewing Co
In the Welsh Wind Distillery	Whinyard Rocks
J.W Lees Brewery	White Castle Vineyard
Jeroboams	