



British Glass

Eluned Morgan MS
First Minister
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
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11th March 2026

Dear First Minister,

We are writing on behalf of Welsh businesses, businesses that supply packaged beverages into Wales, and trade associations to set out our significant concerns relating to the inclusion of glass beverage packaging within the Deposit Scheme for Drinks Containers (Wales) Regulations 2026. We are committed to supporting a circular economy in Wales and across the UK, but as currently drafted, the Regulations present material risks to consumers, producers, recycling systems, and the functioning of the UK internal market.

Wales is now the only UK nation choosing to include glass beverage packaging in its DRS. While no explicit labelling requirement exists in the Regulations, the practical effect is unavoidable, producers will need Wales only labelling to comply with a divergent collection scheme. This will result in:

- Increased costs passed directly to Welsh consumers
- Significant removal of glass packaged products from the Welsh market
- Potential substitution to other materials with poorer environmental profiles

Industry groups across the UK have already warned of these outcomes, and we stress divergence will subject Welsh consumers and retailers to unnecessary disadvantages while fragmenting established UK supply chains.

The Regulations leave critical questions unanswered at a time when businesses are making long-term investment decisions. These include:

- Whether Producers will be required to fund glass collections during the transition period and how Local Authorities will be paid for kerbside collections.
- Whether glass Producers remain liable for packaging Extended Producer Responsibility (pEPR) fees while other materials included in DRS are exempt
- How kerbside and DMO run systems will interact and be cost reconciled

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- How a very high 80% return target by 2030 can be met under a zero-deposit regime and whether Producers risk penalties if it is not.

Such uncertainty undermines investment planning and risks distorting normal packaging decisions and undermines producer participation in Wales, with knock on effects for recycling markets across the UK.

Glass recycling in Wales is a well-established, closed-loop (remelt) system. However, under the Regulations:

- DRS collected glass will not generate Packaging Recovery Notes (PRNs), removing a key economic incentive for high quality recycling
- It will be impossible for reprocessors to reliably distinguish Welsh DRS glass from other glass streams
- Reduced remelt incentives risk driving material toward lower value uses, undermining circularity and Wales' strong performance single use glass recycling to date.

The 2025 Welsh Government consultation focused extensively on reuse proposals. It did not meaningfully consult stakeholders on the consequences of Wales acting alone on glass inclusion. Moreover, the Regulations were notified to the World Trade Organisation before this consultation closed, giving a strong impression that the policy was already settled regardless of stakeholder input. The consultation findings were not published.

No consultation directly asked whether Wales should diverge from all other nations in the UK by including glass in a single use DRS. This has denied stakeholders the opportunity to properly evaluate or mitigate risks before the Regulations were laid.

The accompanying impact assessment does not reflect accurately how the scheme will be implemented, including supply chain preparedness and local authority collection funding 2027-2031. It relies heavily on a 2021 three nations assessment developed under a different policy landscape. It does not analyse the consequences of Wales acting alone, and contains targets and DMO duties for reuse, despite no permission for a glass reuse scheme in Wales being granted in the UKIMA exclusion.

Finally, it is concerning both that the UKIMA exclusion process, which did not seek advice from the Office of the Internal Market, and the consideration of the regulations in the Senedd have been advanced at pace. This is despite unresolved questions on unique identification, cost allocation, interoperability, supply chain impacts, and consumer harm. Whilst we support the introduction of a DRS for PET plastic, steel and aluminium containers from October 2027, we remain committed to the removal of glass and full alignment with the rest of the UK.

Industry stands ready to work constructively with the Welsh Government to develop a deposit scheme that supports Wales' environmental goals while ensuring fairness for

consumers, producers, and the wider UK market. We welcome the opportunity to meet with you as a matter of urgency to discuss these issues.

Yours Faithfully,



British Glass

Dr Nick Kirk, Federation Director, British Glass



Mike Beale, CEO, Wine and Spirit Trade Association



Andy Slee, Chief Executive, Society of Independent Brewers and Associates



Andy Mounsey, Chair, Gwin Cymru



Neil Hargreaves, MD, Knauf Insulation Northern Europe