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Lyndsay Parker
Zero Waste Scotland
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24th June 2015

Dear Lyndsay

Call for evidence on a Scottish Deposits Refund System

The Confederation of Paper Industries (CPI) is the leading UK trade association for the paper supply chain, comprising paper and board manufacturers, makers of soft tissue, and corrugated packaging converters. Across our membership we work on behalf of 65 companies with a turnover of £6.5 billion. We represent more than 90% of the paper packaging industry in UK and our packaging members turnover £1.4 billion. Many of these companies have important factories in Scotland.

While the proposals for a deposit scheme may not have an immediate or direct impact on secondary packaging, we recognise that these moves are the 'thin end of the wedge' and that future developments may well impact upon us. We are pleased to be members of the Packaging Recycling Group Scotland (PRGS) and fully support the PRGS response to the call for evidence on a Scottish Deposits Refund System, as attached in our covering email.

We have concerns over the Eunomia report that was commissioned. It has not consulted with local authorities or retailers but did consult a manufacturer of Reverse Vending Machines; the cost-benefit analysis is also lacking. There is little recognition of the practicalities of existing deposit schemes, and it makes an unsupported assumption that significantly higher return rates can be achieved.

The Deposits Refund System as proposed will lead to significant cost for the consumers and complexity on business, with no evidence that it will reduce litter. Further, it undermines the existing recycling system and is open to the risk of fraud.

The approach outlined by PRGS will have a more constructive result; we strongly support it and recommend that it is adopted. We are happy for these comments to be made public.

Yours Sincerely,



Andy Barnettson
Director of Packaging Affairs, CPI

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