

Deposit Return Scheme

Blueprint for Return Point Operators
and Hospitality Providers



Returning for
SCOTLAND



This document was last updated on 28 February 2023.
Updates will be made as more information becomes available.

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**Helping you find the information
you need quickly and easily**

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1. Introduction

An overview of Scotland's Deposit Return Scheme

About the scheme

Scotland's Deposit Return Scheme goes live on 16th August 2023. The scheme is designed to encourage everyone in Scotland to return drinks containers, by charging people a small deposit (20p) for each bottle or can they purchase to take away.

Consumers get money back when they return the empty bottle or can to a collection point for recycling. Circularity Scotland will organise the collection of returned PET plastic, aluminium and glass drinks containers, and reimburse deposits and operating costs across Scotland.

What this means for you

As a retailer who sells packaged drinks in Scotland, you have a key role to play in ensuring the Deposit Return Scheme operates successfully. Retailers include all those who market, offer for sale or sell drinks in Scotland. This can be face-to-face, online retail, sales in a hospitality setting, sales from vending machines and wholesalers.

Using clear labelling on shelves and display units holding deposit-bearing drinks will help consumers understand the system. Wherever a deposit-bearing drink is for sale, retailers need to display information about the value of the deposit and how to redeem it.

Under the terms of the scheme, drinks retailers also have a legal requirement to accept returns of empty drink containers for collection for recycling. They are responsible for paying the deposit on the drinks they buy, and charging the deposit on drinks they sell.

In addition, retailers are legally required to operate a Return Point. However, exemptions are available on proximity or environmental health reasons. These are managed by Zero Waste Scotland.

If you are a closed loop hospitality provider, where the drinks you sell are consumed on the premises, you don't charge the deposit to your customers. You will pay the deposit on drinks bought from your wholesalers or suppliers, and the deposit will be refunded after Circularity Scotland collects your containers. In this situation you do not need to operate as a Return Point for consumers returning containers bought elsewhere.

What does being a Return Point Operator (RPO) involve?

RPOs are a vital part of the processes associated with the collection of Scheme Articles from RPO locations across Scotland. You will sign the RPO Agreement, which sets out the joint obligations with Circularity Scotland Ltd.

As a Return Point Operator, you can decide on the safest and most accessible location for your collection areas.

There are different ways you can manage your responsibilities, and we'll describe each of these clearly in this guide.

Together, we can ensure everyone in Scotland has access to a local Return Point. And by making it as easy as possible for people to return their empty drinks containers, we can achieve a high recycling rate.

Who benefits from DRS?

In a word, everyone. The Deposit Return Scheme aims to improve recycling rates, reduce litter and help to build a circular economy for Scotland. It means that all of us in Scotland will feel the benefit.

1. Introduction continued

What items are included in the scheme?

All drinks that are sold in single-use containers made from PET plastic, glass or aluminium and sized between 50ml and 3 litres are included in Scotland's Deposit Return Scheme.

These are defined as 'Scheme Articles'. You may also see them being referred to as scheme containers or, once empty, scheme packaging.

If you are a retailer selling Scheme Articles in Scotland, you will have legal responsibilities that you must comply with under the Deposit Return Scheme for Scotland Regulations 2020.

These are called retailer obligations.

What are the retailer obligations?

In summary, as a retailer you must:

- ▶ Only sell drinks from registered producers.
- ▶ Only sell drinks to consumers in Scotland that a producer has made available for sale in Scotland.
- ▶ Charge the 20p deposit when selling a drink that is part of the scheme.
- ▶ Make it clear to the customer that the drink is part of the scheme and a deposit applies.
- ▶ Clearly display the price of the deposit (20p) in any place that a drink is displayed for sale.
- ▶ Clearly display information on how the customer can redeem the deposit.
- ▶ Operate a Return Point (unless exempt).
- ▶ Store returned empty containers in a safe way, following the Duty of Care code of practice.

How can I check if a producer is registered for the scheme?

SEPA will publish and maintain a register of all producers who are registered to market and sell Scheme Articles in Scotland. The register will be available after producer registration closes in March 2023.

You can use it to check that you are only selling drinks from producers who are registered to be part of Scotland's Deposit Return Scheme.

Important note

From 16th August 2023, if you sell any drinks that were available for sale before the scheme went live, you must communicate to the customer that the drink is not part of the scheme and the empty container cannot be returned for a deposit.

2. Exemptions

If you sell Scheme Articles in Scotland for consumption off the premises, you are required to act as a Return Point Operator and accept returns of all containers within the scope of the scheme – unless you are granted an exemption.

Applications for exemptions should be submitted to Zero Waste Scotland and will be considered by Scottish ministers. For more information, visit zerowastescotland.org.uk

Proximity Exemption

A retailer may be granted an exemption from operating a Return Point from their premises if there is an alternative Return Point of equal convenience nearby that has agreed to accept scheme containers on their behalf. This is what is known as a proximity exemption.

Environmental Health

Return points may be provided with an exemption on the grounds of environmental health, if there is significant risk that operating a Return Point on their premises would put them in breach of: Food safety; Health and safety; Fire safety; Environmental protection; or Public health. See page 8 for details.

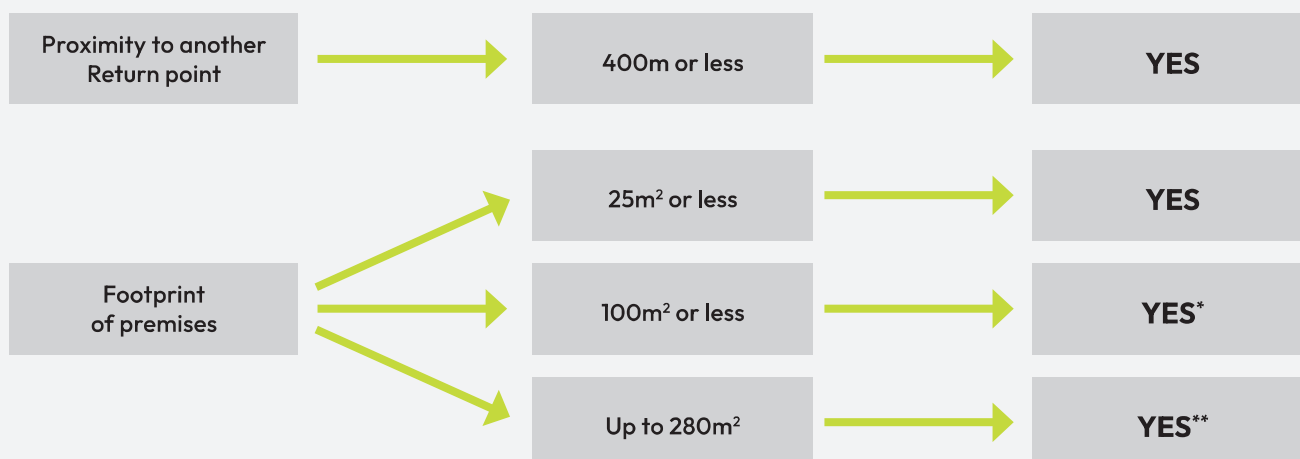
The exemption only applies to accepting returns

If an RPO is granted an exemption, they must still charge the deposit on all Scheme Articles and meet all other requirements of the scheme, including:

- ▶ Charging the deposit when selling in-scope products
- ▶ Making it clear the container is part of the scheme
- ▶ Displaying the deposit value separately from the product price

The Scottish Government has now made it even easier for thousands of retailers to apply for an exemption to operate as a Return Point.

Use the chart below to find out if you could be eligible for an exemption:



*More information required.

**If you are primarily a food to go retailer.

A closer look at exemptions, and how to know if you are eligible...

2. Exemptions continued

For Proximity Exemptions

Where retailers may also be granted an exemption if there is an alternative Return Point within a reasonably accessible distance, that agrees to accept returns on their behalf:

- ▶ This is considered to be approx. **400m as a pedestrian would travel**, instead of a straight-line distance.
- ▶ Retailers can check distances and provide evidence of this by using Google maps or another online mapping tool.

Consumers should have reasonable access to the alternative Return Point, as it should have similar opening hours and accessibility features:

▶ Opening times

The alternative Return Point should be open at least 80% of the time that you are. There is some flexibility to this percentage depending on your individual circumstances.

▶ Accessibility

If you have made any changes to your premises e.g. you have installed a wheelchair access ramp or lift, does the alternative point have something similar?

Has the alternative Return Point agreed?

You will require consent from an alternative Return Point. You can make arrangements with alternative Return Point for them to take your returns.

For Zero Waste Scotland to facilitate these discussions, and provide a suitable alternative Return Point, you must submit your information through the **Return Point Mapping and Exemption Support Tool**.

You can find out more about Zero Waste Scotland guidance on proximity exemptions at **zerowastescotland.org.uk**

In some cases, Zero Waste Scotland are likely to request more information on the challenges you would face operating a Return Point, and the volume of Scheme Articles you are likely to collect.

2. Exemptions continued

For exemptions on grounds of environmental health

You must be able to demonstrate that there is no reasonable way for you to operate a Return Point on your premises without breaching your obligations towards:

- ▶ **Food safety**
- ▶ **Health and safety**
- ▶ **Fire safety**
- ▶ **Environmental protection**
- ▶ **Public health**

Or, you must be able to demonstrate that modifying your premises to ensure compliance could not reasonably be achieved.

Depending on the type of business you operate, Zero Waste Scotland are likely to consider the potential costs of modifying your premises to ensure compliance with the scheme. For example, an exemption may apply where the cost of modifying premises could not reasonably be achieved without exceeding:

- ▶ £500 (excl. VAT) for Food-to-go retailers
- ▶ £2,000 (excl. VAT) for all other retailers

In determining exemptions for any of the above obligations relating to environmental health, Zero Waste Scotland will take into account the size of premises.

- ▶ Exemptions are likely to be automatically granted if your premises is
 - smaller than 25m²
- ▶ You are also likely to be granted an exemption if your premises is:
 - smaller than 100m²
 - primarily a food-to-go retailer

To find out more

For more details on Zero Waste Scotland guidance on Environmental Health Exemption, visit zerowastescotland.org.uk

3. Registration

All Return Point Operators and Closed Loop Hospitality Providers need to register for the Deposit Return Scheme

Retailers who are not applying for an exemption must register as a Return Point Operator (RPO) online at circularityscotland.com

As part of the online registration process, RPOs will need to confirm their location and whether they are planning to operate a Manual Return Point, Closed Loop hospitality or an Automatic Return Point (incorporating an RVM).

If you haven't already done so, it is recommended that you visit circularityscotland.com to find out more about the scheme before you register to become a Return Point Operator. You will find a wide range of information and resources specifically for RPOs.

During the registration process, RPOs will be asked to provide details which will help the Logistics Service Provider (LSP) provide an efficient collections schedule.

As a guide, this will include:

Information	Details
Operating Hours	Details of location operating hours – to help with accurate collection scheduling, and avoid missed collections.
Access	RPOs must provide easy access at the collection point for collection operators. Details of any access constraints will support accurate vehicle planning, route optimisation, and quicker collections.
Collection Area	As well as details of space availability, and secure storage of materials, the collection area should be clear of obstruction and easily accessible. This enables quicker collections and avoids any uplift refusals by LSPs.
Restrictions	Details of any local council restrictions for vehicle access, vehicle parking and loading. This optimises route and vehicle planning, and collection times.
Scheduling	RPOs must ensure material is available for collection to meet the uplift schedule. It's important to avoid missed collections, as this can result in additional costs and delays in payment.
Out of Hours	To support efficient route planning, please provide details if material for collection can be accessed out of hours.
RVM Sorting Configuration	This includes source segregated material or co-mingled PET/Alu.
Volume	Expected quantities of returns per week.

4. Cashflow

The Deposit Loop

The 20p deposit will remain in circulation throughout the sales cycle. Here's how it works:

- ▶ The producer or importer pays a 20p deposit for each drinks container they put into the Scottish market. This is paid to Circularity Scotland, as the scheme administrator, and informs how many containers they sell so that producer fees can be allocated accordingly.
- ▶ If the product is passing through a wholesaler, they will pay the producer or importer a 20p deposit which they will recoup when they sell on to the next business in the supply chain.
- ▶ The retailer will then pay their drinks supplier 20p per container, which they will get back from the customer at the point of purchase.
- ▶ The retailer receives their 20p back from the customer, who pays the container or bottle deposit at the point where they purchase their drink.
- ▶ The consumer gets their 20p back when they take the empty container back to a Return Point. The scheme administrator uses the 20p they originally received from the producer or importer to refund the Return Point Operator.
- ▶ As mentioned earlier, if you are a Closed Loop Hospitality Provider, you don't charge the deposit to your customer, but you get the deposit back after Circularity Scotland collects your empty containers.
- ▶ Any deposits that are not redeemed by the consumer will be held by the Scheme Administrator and used to help fund the operation of the scheme.

5. Return Points

What is a Return Point?

Return Points are where consumers can return their empty scheme containers and get their deposit back. It should be as easy to return an empty scheme container, as it is to buy a drink. This means all retailers and hospitality business that sell drinks to take away are legally required to operate a Return Point, unless they are awarded an exemption by Zero Waste Scotland.

Types of Return Point

A Return Point can be:

- ▶ **Manual Return Point:** operated manually where scheme containers are handed over the counter and the deposit refunded from the till.
- ▶ **Reverse Vending Machine:** where a retailer installs a reverse vending machine (RVM) on their premises which automatically accepts empty containers.
- ▶ **Voluntary Return Point (VRP):** when an organisation has no legal obligation to operate as a Return Point, but chooses to be a Return Point.

A Closed Loop Hospitality Provider does not need to accept returns of containers purchased elsewhere and so is not a Return Point.

Collections

All collections of Scheme Articles are collected by an appointed Logistics Service Provider and are free of charge.

Reimbursing RPOs

All RPOs and Closed Loop Hospitality Providers will receive a Return Handling Fee, as well as the return of the 20p deposit. See Section 8 'Reimbursement' for details.

In summary, all Return Point Operators must:

- ▶ Accept scheme packaging from consumers.
- ▶ Pay back the deposit for each scheme container returned.
- ▶ Keep the scheme packaging for collection by the scheme administrator.
- ▶ Clearly display information at the Return Point about how to make a complaint to the person responsible for operating the Return Point.
- ▶ Display SEPA's contact details.

A closer look at the different types of Return Point...

5. Return Points continued

Manual Return Point

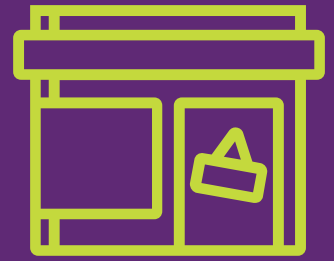
This is when a retailer accepts returned containers over the counter and repays consumers from the till.

- ▶ Consumer returns container to the manual Return Point Operator.
- ▶ The manual Return Point Operator checks the item to ensure it is a scheme article. RPOs will have access to an app to help with checking Scheme Articles and they may be able to use their existing EPoS to scan and check the returned container.
- ▶ If the item has been confirmed as a Scheme Article, the RPO will issue the consumer with the 20p deposit.
- ▶ The Return Point Operator will then place the Scheme Article in the correct receptacle. Place glass into totes (boxes) being careful to not break the glass. Whole and uncrushed PET & metal should be placed into plastic sacks.
- ▶ Once the plastic sack or tote is full it must be closed and sealed with barcoded tags.
- ▶ On the designated uplift day, the plastic sacks and totes are collected by the LSP or subcontractor thereof (the designated waste removal company selected to fulfil that requirement).
- ▶ The collections driver will scan the barcode and take the plastic sacks and totes to the nearest counting centre to be counted.
- ▶ After the LSP has scanned and picked up the collection an email notification will be sent to the RPO to confirm this.
- ▶ Once the Scheme Articles have been counted and verified, the deposits and handling fees for the Scheme Articles are then returned to the manual RPO.

Counting of Scheme Articles will be completed 7 days from collection, and payment will be issued the following Friday.

Manual Return Point collections

This is when a retailer accepts returned containers over the counter and repays consumers from the till.



1

Consumer returns scheme article to RPO location. RPO checks if item is within scheme and pays out deposit. The barcode must be legible and visible to a scanner otherwise the deposit will not be refunded.



2 Empty any residue liquids, and place returned PET / Alu scheme articles into plastic sacks. **Do not crush PET / Cans**



2 Empty any residue liquids and place returned glass scheme articles into tote boxes. Bottles should be stacked to maximise fill. **Do not break the glass**



3 Once plastic sacks are full, close and seal with barcoded tags (leave 30cm empty so that bag can be sealed)



3 Once tote box is full, close lid and seal with barcoded tags. The maximum weight is 15kg



4 Place bags in secure designated uplift area. Ensure area is clear of obstacles, ready for uplift



4 Place tote boxes in secure designated uplift area. Ensure area is clear of obstacles, ready for uplift

5. Return Points continued

Reverse Vending Machine

Reverse vending machines (RVM) are able to identify drinks containers inserted and refund a customer's deposit once the container has been scanned and validated. RVMs can generate vouchers that can be used at retailers to pay for shopping, or to get a cash refund at the till. In some cases, consumers will be able to donate the refunded deposits to charity.

It is up to the RPO to select their preferred RVM, and it must comply with the RVM Specification issued by Circularity Scotland.

RVM sorting

- ▶ RVMs are sophisticated machines, capable of automatically sorting containers by material into separate areas. This will be determined from the data collected via the barcode.
- ▶ Plastics and metals can be collected in the same container or separated.
- ▶ Glass **MUST** be collected in its own wheelie bin.
- ▶ Glass can be allowed to break naturally or, if broken mechanically, fragments must be greater than 10mm.
- ▶ Mechanical breakage must be agreed with Circularity Scotland beforehand.
- ▶ Small RPOs may choose to use RVMs for cans and PET bottle collection, and take in glass bottles manually.

Deposit payment methods

- ▶ A Return Point Operator using an RVM must work with the RVM vendor to designate their preferred repayment method.
- ▶ For repayment there must be a cash equivalent option.
- ▶ The RVM must pay out the sum equal to the deposit paid (20p) for each empty scheme article accepted by RVM.
- ▶ The RPO can offer consumers options, alongside the cash equivalent, as to how the deposit is returned e.g. charity donation, store points/vouchers, wireless transfer.
- ▶ Circularity Scotland must be provided with details of the repayment method to help with VAT calculations.

Receipts

- ▶ RVMs must produce a receipt of the deposit given. This can also be used as a voucher for the redemption of the deposit, and can be provided in print or electronically.
- ▶ RVM receipts must contain:
 - RVM identifier
 - number of containers returned
 - total deposit paid
 - date and time
 - and the payment method used.

The receipt must also indicate how many **non-scheme** containers were returned.

5. Return Points continued

Recognition methods

There are numerous recognition methods that RVMs may use to determine whether a container is a Scheme Article. However, the key criteria are:

- ▶ Barcode
- ▶ Weight
- ▶ Material / Metal Recognition
- ▶ Basic shape

Container properties are validated against the parameters provided in the Scheme Article Register. This is to ensure that the containers entering the RVM are Scheme Articles registered by producers. Within this method, metal recognition must be used. In cases where metal is recognised, the container must be handled in accordance with the treatment parameters outlined by the Scheme Article Register.

No recognition

- ▶ If a container is not recognised according to the previously described methods, it must be returned to the consumer. The consumer will then be informed accordingly.
- ▶ No deposit will be paid on these items.
- ▶ As previously mentioned, registered non-Scheme Articles made of PET plastic, glass and metal may be accepted by RVMs to encourage and increase recycling of these materials. It is up to the RVM operator whether to allow this functionality or not.
- ▶ In the case of no recognition, the RVM will not recycle these materials, and will return the items/containers to the consumer.

For example, a shampoo bottle or yoghurt container will be rejected as this is outwith the scope of the scheme in terms of material and barcode recognition.

Metal and weight detection only

- ▶ Must not be used on its own for recognition purposes.
- ▶ For recognition, this requires a combination of one of the previous methods.
- ▶ This is because a barcode is required to determine whether a container is a scheme article.
- ▶ However, weight detection can be used to reject containers which are too heavy i.e. if it contains too much liquid that exceeds the 5% margin.

5. Return Points continued

RVM Manufacturers

Here are some of the RVM manufacturers that Circularity Scotland are aware of. Circularity Scotland are not in a position to advise or recommend a specific supplier.

RVM Vendors	Contact
EcoVend	www.eco-vend.com
Diebold Nixdorf	www.dieboldnixdorf.com
Envipco	www.envipco.com
Recyclever	www.recyclever.com
RVM Systems	www.rvmsystems.com
Sielaff	www.sielaff.de
TOMRA	www.tomra.com

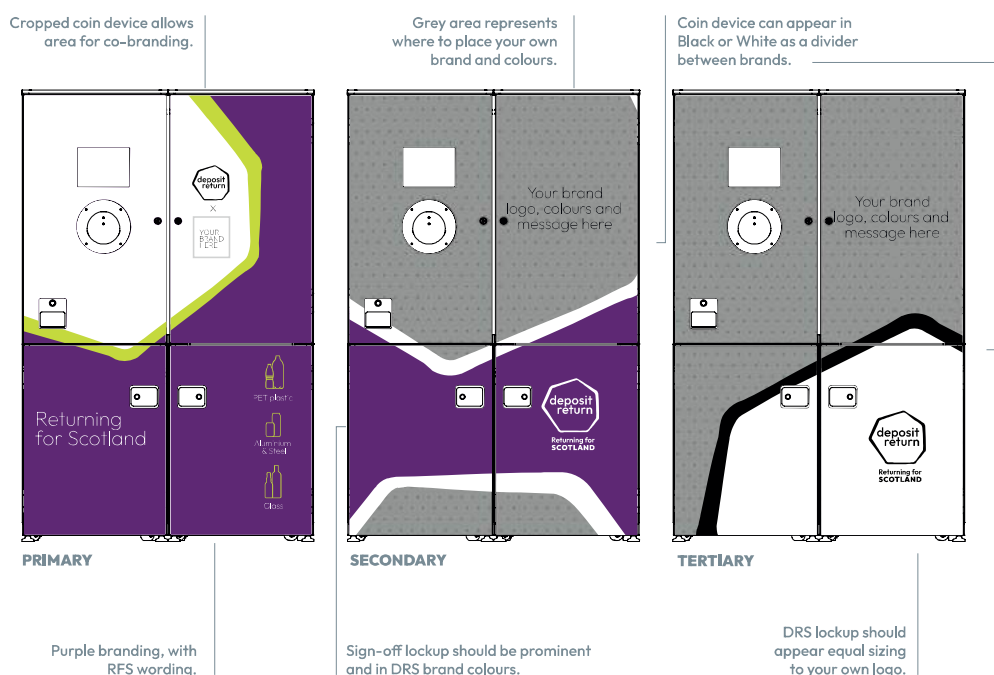
RVM Specifications

The branding of Scotland's Deposit Return Scheme (DRS) needs to be consistent, and should be easily recognised by consumers wherever it appears.

Circularity Scotland suggests the following visual assets as an option for retailers to use for RVM branding.

Here are some examples of how an RVM could be branded, depending on the manufacturer.

Envipco:



5. Return Points continued

EcoVend:

Cropped coin device allows area for co-branding.

Grey area represents where to place your own brand and colours.

Coin device can appear in Black or White as a divider between brands.

PRIMARY

SECONDARY

TERTIARY

Purple branding, with RFS wording.

Sign-off lockup should be prominent and in DRS brand colours.

DRS lockup should appear equal sizing to your own logo.

RVM Systems:

Cropped coin device allows area for co-branding.

Grey area represents where to place your own brand and colours.

Coin device can appear in Black or White as a divider between brands.

PRIMARY

SECONDARY

TERTIARY

Purple branding, with RFS wording.

Sign-off lockup should be prominent and in DRS brand colours.

DRS lockup should appear equal sizing to your own logo.

5. Return Points continued

Sielaff:

Grey area represents where to place your own brand and colours.

Coin device can appear in Black or White as a divider between brands.

Cropped coin device allows area for co-branding.

Your brand logo, colours and message here

Your brand logo, colours and message here

DRS lockup should appear equal sizing to your own logo.

Purple branding, with RFS wording.

Returning for Scotland

PET plastic Aluminium & Steel Glass

deposit return Returning for SCOTLAND

deposit return Returning for SCOTLAND

PRIMARY SECONDARY TERTIARY

Sign-off lockup should be prominent and in DRS brand colours.

Tomra:

Grey area represents where to place your own brand and colours.

Coin device can appear in Black or White as a divider between brands.

Cropped coin device allows area for co-branding.

Your brand logo, colours and message here

Your brand logo, colours and message here

DRS lockup should appear equal sizing to your own logo.

Purple branding, with RFS wording.

Returning for Scotland

PET plastic Aluminium & Steel Glass

deposit return Returning for SCOTLAND

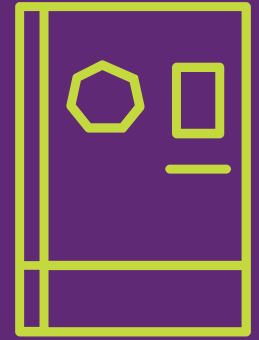
deposit return Returning for SCOTLAND

PRIMARY SECONDARY TERTIARY

Sign-off lockup should be prominent and in DRS brand colours.

Reverse Vending Machine collections

Reverse vending machines (RVMs) are able to identify drinks containers inserted and refund a customer's deposit once the container has been scanned and validated. RVMs can generate vouchers that can be used at retailers to pay for shopping, or to get a cash refund at the till.



1

Consumer returns scheme article to RVM location and deposits into RVM.
RVM checks item is within scheme.



PET plastic



Aluminium & Steel



Glass



2 PET/ Alu scheme articles are scanned and crushed and placed in segregated or co-mingled bags within storage bins



2 Glass scheme articles are scanned and broken into bins either naturally – or, if mechanical breakage is used, fragments greater than 10mm must be achieved



3 Once plastic sacks are full* close and seal with barcoded tags (leave 30cm empty so that bag can be sealed). Replace with empty sack



3 Once bin is full, close bin lid. Remove from RVM, and replace with empty bin



4 Place bags in secure designated uplift area. Ensure area is clear of obstacles, ready for uplift



4 Place bins in secure designated uplift area. Ensure area is clear of obstacles, ready for uplift

*Bag capacity should be set with RVM manufacturer and comply with manual handling regulations (maximum bag weight is 15kg).

5. Return Points continued

Voluntary Return Point

- ▶ Voluntary Return Points are hosted by people who have no legal requirement to provide one.
- ▶ Typically, they will be property owners managing facilities, such as shopping centres and transport hubs, that house multiple retailers or hospitality businesses who want to claim exemptions.
- ▶ You can find out how to apply to set up a Voluntary Return Point at the Zero Waste Scotland website [zerowastescotland.org.uk](https://www.zerowastescotland.org.uk)
- ▶ Anyone can apply to operate a Voluntary Return Point, if they can prove that they have significant and comprehensive financial and operational plans in place to set up, and then run the Return Point for at least one year.

Want to operate a Voluntary Return Point?

Here's what you need to qualify:

- ▶ Show that funds are in place to pay start-up costs.
- ▶ Demonstrate ability to cover costs that will not be reimbursed through the handling fee.
- ▶ Provide analysis of expected number of returns in the average month.
 - As they are acting as a Return Point on behalf of any number of retailer(s), VRPs can base their expected returns on the expected sales volume of retailer(s)
 - In the case of public/civil areas such as a transport hub or a shopping centre, expected returns may be based on footfall of passengers or shoppers that pass through the facility

It is up to the Voluntary Return Point Operator whether they wish to use a manual process, or an RVM.

6. Closed Loop

Not all hospitality businesses will have to charge their customers a 20p deposit. This is defined as a 'closed loop'.

- ▶ A closed loop establishment is one where all containers are retained on site.
- ▶ If you only serve drinks in single use containers on your premises, you can operate a 'closed loop system'.
- ▶ A closed loop system involves you collecting all the containers used on the site, and reclaiming the 20p container deposit yourself through the scheme.
- ▶ Empty scheme containers will be collected by the Logistics Service Provider (LSP), where they will be counted and verified at the LSP's counting centres.
- ▶ Venues will be reimbursed the 20p by Circularity Scotland, along with a handling fee.
- ▶ All scheme containers will be collected by the LSP. These collections are included in the producer fee, at no cost to the Return Point.

Please note: If you serve drinks for customers to take away and consume elsewhere, you will have to follow the same procedure as other retailers – i.e. charge the consumer 20p on all scheme containers, and operate as a Return Point (although you may be able to qualify for an exemption). This is known as 'open-loop'.

Closed Loop collections

If your customers only consume the drinks you sell on site, and you collect all the containers, you can operate what's known as a closed loop system. This means you can choose not to charge customers a deposit, and recover the 20p you pay your wholesaler or producer by getting containers collected directly by the scheme administrator. It also means you don't have to operate a public Return Point.



1

Scheme articles are retained at RPO location



PET plastic

Aluminium & Steel



Glass



2 Empty any residue liquids, and place returned PET / Alu scheme articles into plastic sacks. **Do not crush PET / Cans**



2 Empty any residue liquids and place returned glass scheme articles into bins or tote boxes* (bottles double stacked to maximise fill) depending on volume. **Do not break glass when using tote boxes / glass in bins naturally broken**



3 Once plastic sacks are full, close and seal with barcoded tags (leave 30cm empty so that bag can be sealed)



3 Once tote is full, close lid and seal with barcoded tags / close bin lid



4 Place sacks in secure designated uplift area. Ensure area is clear of obstacles, ready for uplift



4 Place totes / bins in secure designated uplift area. Ensure area is clear of obstacles, ready for uplift. Glass bins will be weighed by collection driver prior to tipping into vehicle.

*The use of bins or tote boxes for glass will be determined by information provided during registration process and predicted volume of returns. Container type may change once scheme is live

7. Takebacks

Online retailers or distance sellers do not need to operate Return Points. Instead, the Deposit and Return Scheme for Scotland Regulations 2020 state that an online or distance seller must offer a takeback service to consumers in Scotland for the collection and return of the empty drink containers from the drinks they purchased. This is to ensure the scheme is accessible for all, including those who rely on home deliveries or who may not be able to return scheme containers to a physical location.

On 15 December 2022, the Minister for Green Skills, Circular Economy and Biodiversity proposed to bring forward amendments to the Regulations so that initially only the largest grocery supermarkets will be obliged to provide an online takeback service; all other businesses will be exempt. A new date was proposed for online takeback to be available to the public in 2025.



8. Reimbursement

What will RPOs be reimbursed for?

RPOs will be reimbursed the 20p deposit for each valid scheme article collected from consumers. In addition, RPOs will receive a handling fee for each scheme article, which is dependent on the type of RPO they operate.

How will Circularity Scotland reimburse RPOs?

- ▶ Reimbursements to all RPOs will be made using direct credit electronic transfer.
- ▶ Invoices are automatically generated by Circularity Scotland's core DRS system.
- ▶ The invoices raised are 'self billing' and are based on the information provided by the counting machine, RVM or Closed Loop Hospitality.

What triggers the reimbursement?

▶ Manual RPO

Collection data is generated from the Counting Centre. The data feed to Circularity Scotland from the Counting Centre registers:

- Date of collection
- Identification of RPO
- Number of Scheme Articles (by SKU/material type/producer)

▶ Reverse Vending Machine (RVM)

The RVM delivers the same collection data to Circularity Scotland as the machines at the Counting Centre detailed above.

What are the payment terms?

▶ Manual RPO

Paid weekly, based on counted volumes in a given week, on the Friday of the following week.

▶ Reverse Vending Machine (RVM)

Paid monthly, based on RVM data on collection volumes in a given month.

▶ Closed Loop (PET/Metal/non-Bulk Glass)

Paid weekly, based on counted volumes in a given week, on the Friday of the following week.

▶ Closed Loop (Bulk Glass)

Paid on the amount stated to Circularity Scotland as amended for weights collection and verification process. Paid weekly, on the second subsequent Friday.

▶ Takeback

To be determined once a detailed operational model is available from retailers affected by this.

8. Reimbursement continued

Return Handling Fees

- ▶ Return Point Operators will receive a handling fee designed to address the costs of the time, equipment and additional storage space needed to operate the scheme.
- ▶ The level of this fee will be determined annually by Circularity Scotland, based on data and analysis provided by independent consultants to ensure it remains reasonable and current.
- ▶ A detailed cost model aligned to the requirements of the regulations was developed. Data to populate the model was sourced from the broad range of RPOs that will operate in Scotland and augmented with and validated by input from other operating schemes around the world (where appropriate), and major independent reference points and indices.
- ▶ The model is designed to reflect the variation in costs across different types and sizes of RPOs and materials.

For Return Point Operators, it accounts for the costs of:

- ▶ The purchase, lease, maintenance and upkeep of any reverse vending machine associated with the collection and storage of scheme packaging.
- ▶ Materials used for the collection and storage of scheme packaging.
- ▶ The rental value of any floor space used only for deposit return scheme collection and storage.
- ▶ Staff time dedicated solely to the collection and storage of scheme packaging.

For hospitality retailers, it accounts for the costs of:

- ▶ Materials used for the collection and storage of scheme packaging.

For distance sales retailers operating a takeback service, it accounts for the costs:

- ▶ Associated with use of a vehicle to collect scheme packaging;.
- ▶ Materials used for the collection and storage of scheme packaging.
- ▶ The rental value of any floor space used only for deposit return scheme collection and storage.
- ▶ Staff time dedicated solely to the collection and storage of scheme packaging.
- ▶ The delivery costs associated with return of that scheme packaging.

8. Reimbursement continued

How are Return Handling Fees calculated?

When retailers return scheme packaging for recycling, they will receive back the 20p deposit they refunded to the consumer. They will also receive a Return Handling Fee (plus VAT), to address their costs in managing the collection and storage of items for the scheme.

- ▶ The fee retailers will receive will vary depending on which type of Return Point they operate.
- ▶ Values are fixed for each type of Return Point, and will be paid out based on number of items returned – **NOT** the actual costs incurred by the retailers.

All handling fees are for Scotland only, and apply to businesses operating as a Return Point for the scheme.

Return Handling Fee (pence per returned Scheme Article)

▶ Manual Takeback

2.69p

▶ Reverse Vending Machine

3.70p (up to 8,000 Scheme Articles per week)

1.60p (per Scheme Articles thereafter)

▶ Closed Loop Hospitality

0.13p

The handling fees are subsidised by the Producer fee and distributed by the Scheme Administrator.

Reimbursement example

A Return Point Operator takes all items back manually and sends **100 Scheme Articles** back.

If these are all deemed as Scheme Articles the RPO would receive:

100 x 20p	£20.00
<hr/>	
They would also receive 2.69p plus 0.538p VAT per article x 100	£3.23
<hr/>	
Total reimbursement	£23.23

9. Collections

Returns collections

- ▶ The collection method will be determined by the RPO at registration, based on the volume of items of each type of material PET/Alu or glass they estimate will be returned to their premises, and their view of actual costs incurred in operating as a Return Point.
- ▶ Assessment of the most suitable collection vehicle for the RP will be undertaken during the registration process taking account of type of RPO (manual, RVM or closed loop), access restrictions, safety and operational efficiency.
- ▶ Frequency of collections will be based on information provided during the registration process and expected volume of returns and will be reviewed once scheme is live.
- ▶ Collections will be in line with optimum transport schedules and may require a minimum amount of returns for an uplift to be scheduled.
- ▶ LSP may require access to Return Point locations to complete risk assessments.
- ▶ RPOs will provide detail to support collection schedule as part of registration process.
- ▶ Drivers will not uplift any bags/totes which do not comply with presentation requirements.
- ▶ Only plastic sacks, totes, bins, tags as per Circularity Scotland guidelines can be used – any material presented outwith these guidelines will not be uplifted.
- ▶ Returned containers are the responsibility of the RPO until the LSP has collected them. RPOs should therefore consider carefully where to store bins, bags and totes securely.

What you need to do as a Return Point Operator

- ▶ RPOs must ensure safe operating environment for collections.
- ▶ For manual RPOs, there should be no broken glass presented and no liquid residue left in containers.
- ▶ Barcodes should be visible and legible.
- ▶ Bags, bins, or tote boxes should be undamaged and free from contamination e.g. non-Scheme PET/Can or glass bottles items.
- ▶ Bins and tote boxes will remain the property of Circularity Scotland, and any losses may be charged to the RPO.
- ▶ Glass must not be placed in plastic bags, only in totes or bins.
- ▶ For Non-Scheme Articles / OEANS (old EANs) - the RPO can choose to take back OEANS or Non-Scheme Articles, and return them via the collections process. Please note – these will not be eligible for deposit returns or handling fees.

Logistics Service Provider Collections



- 1 Driver arrives at RPO location, according to designated uplift schedule
- 2 Driver parks uplift vehicle in designated safe loading area
- 3 Driver enters RPO location by agreed route, to access returns from designated area

- LSPs may require access to RPO locations to complete risk assessments and back of house cards.
- As part of registration process, RPOs will provide detail to support collection schedules.
- LSPs will work with RPOs in relation to existing trade waste contract providers.
- Drivers will not uplift any bags/totes which do not comply with presentation requirements.
- Only plastic sacks, totes, bins, tags as per Circularity Scotland guidelines can be used. Other materials presented will not be uplifted.



**PET & Alu
bags**



**Glass tote
boxes**



Glass bins



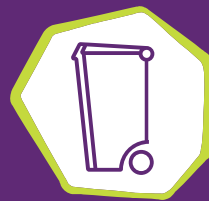
- 4 Driver scans barcoded tags on PET / Alu bags and glass totes and removes from RPO location



- 4 Driver removes glass bin from RPO location. Bins are weighed at collection point. Location matched to LSP routing system



- 5 Driver loads bags / totes into collection vehicle, then replaces number of totes collected with empties and exits RPO location



- 5 Driver tips glass from bin into collection vehicle, returns empty bin to collections area, and exits RPO location



- 6 RPO receives emailed receipt, confirming the collection



- 6 RPO receives emailed receipt, confirming the collection

9. Collections continued

Collection frequency

This is based on the information you provide during the registration process. The expected volume of returns will be reviewed once the scheme is live.

Collections will be arranged as efficiently as possible, and may require a minimum amount of returns for an uplift to be scheduled.

The below table provides an example of the collection frequency. The business type and collection frequency will be agreed following the registration process. This collection frequency will be reviewed once the scheme is live and volume data of returns including number of bags and totes is modelled and feedback gathered from RPOs. Collection profile may then be adjusted once steady state has been achieved and seasonal variations considered.

Business Type	Collection Frequency
Small retail (manual returns)	1 – 2 per fortnight
Medium retail (manual and RVM returns)	1 – 2 per week
Large retail (RVM returns)	5 – 7 per week
Small hospitality (manual returns)	1 – 2 per fortnight / On demand
Medium hospitality (manual returns)	1 – 2 per week
Large hospitality (manual returns)	5 – 7 per week
On Demand	Subject to three days' notice

9. Collections continued

Duty of Care

As a business, you have a legal responsibility to ensure that you produce, store, transport and dispose of your business waste without harming the environment. This is called your Duty of Care (DOC).

To ensure you are compliant with the DOC regulations for the collection of deposit return scheme items (defined as 'waste') from your business premises, you will be required to fill out a Waste Transfer Note (WTN).

This WTN covers all the regulatory requirements for the collection, movement and disposal of the waste, organised by a registered waste broker (Circularity Scotland), and collected and transported to a licensed waste handling facility by a registered waste carrier.

Here's an example of the Waste Transfer Note that all RPOs will be required to complete along with the correspondence guidance.

Date Range: 16th August 2023 – 15th August 2024

Section A – Description of Waste

A1 - Describe the waste being transferred:

Source Segregated Recyclables

Mixed Waste

Both Source Segregated & Mixed Waste

A2 - How is the waste contained:

Bags (Plastic, Metallic or Mixed, **no** glass)

Tote Boxes (Glass only)

Wheelie Bins (Glass only)

A3 - European Waste Catalogue codes applicable:

Plastic packaging; 15 01 02

Metallic packaging; 15 01 04

Glass packaging; 15 01 07

Mixed packaging; 15 01 06

A4 - Total amount of waste:

Plastic bottles : _____

Metallic cans: _____

Glass bottles: _____

Section B – Current Holder of the Waste – Transferor

B1 - Full Name: _____

Address:

Postcode: _____

B2 - Are you the:

Producer of the Waste

Local Authority

Holder of a Waste Management License

License No: _____

B3 - Standard Industrial Classification Code:

Section C – Person Receiving the Waste - Transferee

C1 - Full Name: Biffa Waste Services Limited

C2 - Waste Carriers License: License No: CBDU104360

Address:

Accuray House, Coronation Road
High Wycombe, Buckinghamshire

1

Postcode: HP12 3TZ

Section D – The Transfer

D1 - Address of Transfer:

Postcode: _____

D2 - Broker of the Transfer:

Circularity Scotland
24 Douglas Street
Postcode: G2 7NQ

Section E – Broker and Transferors Signatures

Brokers Signature:

D3 - Broker License: D3

License No: WCR/R/3006986

2

9. Collections continued

Waste Transfer Note guidance notes

Section A

A1	<p>Source Segregated - is the waste individually separated into; bags of cans only, bags of plastic only, and tote boxes/wheelie bins of glass only?</p> <p>Mixed Waste - are the cans and plastic contained in the same bag? Note: glass cannot be mixed with other waste types.</p> <p>Both Source Segregated & Mixed Waste - do you have bags containing mixed cans and plastic waste, and tote boxes/wheelie bins containing glass?</p> <p>Please only tick one box that applies.</p>
A2	<p>How will the waste that you collect be contained, ready for collection?</p> <p>Please tick all boxes that apply.</p>
A3	<p>European Waste Catalogue codes - please tick all boxes that apply to the waste types you require collection of.</p> <p>Note: if you have bags of mixed cans and plastic, then you would only select 'Mixed Packaging,' and not the individual boxes for plastic and/or metallic packaging.</p>
A4	<p>Give your best estimate as to the amounts of waste you will generate on a weekly* basis:</p> <p>How many plastic bottles, how many cans and how many glass bottles, in a total of individual units, for each waste type.</p> <p><small>*Note: these figures are not being used to model any collections and are purely for SEPA environmental compliance purposes.</small></p>

Section B

B1	<p>Insert the full name and address of the business.</p>
B2	<p>Please tick all boxes that apply.</p> <p>Note: all Return Point Operator's (RPO's) will be identified as the 'producer of the waste.' Additional information included for any RPO's that are also local authorities. For those that hold a waste management license*; please provide the license number for our records.</p> <p><small>*Note: There are no regulatory requirements for a RPO to hold a waste management license in order to operate as a RPO</small></p>
B3	<p>Indicate your SIC code describing your economic activities, as registered with Companies House.</p>

Section C

This section does not require any input by the RPO.

Section D

D1	<p>Detail the RPO address where the waste will be collected from.</p>
D2	<p>This section does not require any data input by the RPO.</p>
D3	<p>This section does not require any data input by the RPO.</p>

9. Collections continued

Section E – Brokers and Transferors Signatures

The 'Transferors Signature' must be completed by a person who is able to sign on behalf of the business, is identifiable, and is content that the information on the Waste Transfer Note is correct.

To enter the signature electronically, right click the mouse on the 'X' marker in the Transferors Signature line, and select 'Sign' from the drop down menu that appears. Type your signature in the box provided and select the 'Sign' option at the bottom of the pop out box.

LSP Risk Assessment

The risk assessment will be completed by the appropriately trained LSP colleague and will look at various aspects in regards to safely accessing the RPO location.

The risk assessment is designed to ensure that the collection driver can safely access the RPO location, as well as assess or perceive any risk - allowing them to implement corrective actions that may be required.

To enter the signature electronically, right click the mouse on the 'X' marker in the transferors signature line, and select 'Sign' from the drop down menu that appears. Type in your signature in the box provided and select the 'Sign' option and the bottom of the pop out box.



10. Storage and Handling

Bags

- ▶ Bags will be to a specification approved by Circularity Scotland in conjunction with an appointed manufacturing partner.
- ▶ Bags will be ordered by RPOs using an online ordering portal in conjunction with the picking and distribution partner.
- ▶ Manual and closed loop locations should place the returned PET/Aluminium uncrushed into the bags.
- ▶ Crushed RVM Pet/Alu should be dropped into the bags in the storage bins to a maximum weight of 15kg.
- ▶ Bags which are damaged or not secured with a specified security tag will be rejected by the collection driver.
- ▶ Glass material must not be placed in bags.

Tags and Bar Codes

- ▶ Once filled, bags and totes should be secured with a security tag printed with a unique barcode to allow the container to be collected and deposit to be paid to the specific RPO.
- ▶ Bags and totes which are not secured with the specified tags will be rejected by the collection driver.
- ▶ The RPOs will order security seals direct from the Circularity Scotland appointed manufacturer via an online ordering portal.

Totes

- ▶ Totes will be supplied by Circularity Scotland based on the registration process.
- ▶ Only whole glass bottles (not broken) should be placed within the totes to a maximum weight of 15kg.
- ▶ Totes should be sealed with one barcoded tag and one blank tag.
- ▶ The frequency of collection will be determined by the volume of returns and number of totes which an RPO can store safely and securely – tote dimensions = Hx31cm Wx40cm Lx60cm.
- ▶ Totes which are damaged, not secured with the specified tags will be rejected by the collection driver.

RVM Bins (PET/Aluminium)

- ▶ Bins for RVMs will be provided by RVM manufacturers to individual specification.

Glass Bins

- ▶ Bins for bulk glass will be provided by Circularity Scotland based on the registration process and should be stored in a secure area.
- ▶ Consideration will be applied to bin size allocation in respect of manual handling H&S requirements. Bin sizes = 140L, 180L, 240L, 360L.

11. Frequently asked questions

Q What is a Return Point?

A Return Points are where consumers can return their empty drinks containers (Scheme Articles) and get their deposit back. A cash amount equal to the deposit will be reimbursed for each Scheme Article returned. Scheme packaging can be returned to any Return Point regardless of where the drink was originally bought. A Return Point can be operated manually – where scheme containers handed over the counter and the deposit refunded by the retailer. Or, a retailer can install a Reverse Vending Machine (RVM) on their premises – which automatically accepts empty containers and refunds deposits.

Q What is a Closed Loop Hospitality Provider?

A A Closed Loop Hospitality Provider is a premises like a pub where drinks are sold for consumption on the premises. In that case, the deposit does not need to be charged to the consumer and the empty containers are retained by the premises, ready for collection by the LSP.

Q What is a Voluntary Return Point?

A A Voluntary Return Point (VRP) is where an organisation or business has no legal obligation to operate a Return Point, but they choose to do so. As an example, VRPs may be operated at transport hubs or in shopping centres, and can also be run by charities or community groups.

Q Do I have to register with Circularity Scotland to act as Return Point or Closed Loop Hospitality Provider?

A Yes. For the scheme to work seamlessly, we will need to reimburse you from the scheme funds for the deposits you pay. We will also monitor the articles that are collected from your Return Point/premises.

Q How do I register?

A You will be able to register online at circularityscotland.com. You'll just need to tell us where you are, so we can arrange collections, and whether you are planning to operate a manual Return Point, RVM or closed loop. We'll also need to know your opening hours, any access restrictions and how you want to be paid.

Q Do I have to accept returns when these are materials and products I don't sell?

A Yes. Every Return Point must accept every item that is included in the scheme. This ensures that consumers can return their recyclable bottles and cans and receive their deposits wherever they are in Scotland. People buying deposit-bearing products from your business will be allowed to return the containers to any Return Point in Scotland. You can reject returned containers if they are soiled, still have liquid in them, or the barcode is unreadable.

Q Can I be exempt from operating a Return Point?

A Yes, retailers can apply for an exemption from acting as a Return Point. There are two types of exemption:

- **Proximity exemptions** – where there is an alternative Return Point located within reasonable distance to your premises, and the operator of that Return Point has agreed to accept the returns on your behalf.
- **Environmental health exemptions** – where there is no reasonable way for you to operate a Return Point on your premises without risking of being in breach of other legislation, such as environmental health, food or fire safety, or environmental protection.

The exemptions service for Scotland's Deposit Return Scheme is run by Zero Waste Scotland on behalf of Scottish Ministers. Please visit the Zero Waste Scotland website at zerowastescotland.org.uk for more detail on exemptions.

11. Frequently asked questions

Q If there are multiple retail outlets in a single premises, would each outlet need to operate a Return Point?

A All retailers must operate a Return Point from the premises of sale (unless exempt). It is for the operator of the business to identify what their business premises is. Examples of multiple retail outlets operating in a single premises are visitor attractions and leisure facilities.

If multiple independent retail premises are identified at the site, a Return Point must be operated at each of the premises. Independent retailers may be able to apply for a proximity exemption to operate a Return Point if there is an alternative Return Point located close by, and the operator of that Return Point has agreed to accept the returns on their behalf.

The exemptions service is run by Zero Waste Scotland. For further information please visit zerowastescotland.org.uk

Q What do I do if a consumer is returning an article that is not registered?

A These items are Non-Scheme Articles/OEANS (old European article numbers). RPOs can choose to take back OEANs or Non-Scheme Articles and return them via the collections processes. However, these will not qualify for a deposit return or handling fee.

Q I've changed my mind – can I ask to revoke my RPO exemption?

A If you wish to withdraw your application, or want to have your previously granted exemption revoked, please contact DRS.Applications@zerowastescotland.org.uk

Q What happens if my RVM breaks down? Do I need to operate a Manual Return Point until my RVM is back up and running?

A You still have an obligation to take back returned containers so you should be prepared to accept containers manually whilst your RVM is being repaired.

Q Will I have to accept vouchers from other stores' RVMs?

A No. Only the store (or stores, if it is a VRP) that are linked to the RVM would have to accept the vouchers given out by that particular RVM.

Q As an RPO would I be able to only accept aluminium and PET and leave out glass?

A No. If you operate a Return Point you must accept all Scheme Articles within the scope of the DRS legislation.

Q What happens if the number of items I have returned differs from the count at the depot?

A If you have any queries about the collection and counting process, please contact Circularity Scotland who can deal with a dispute on your behalf.

Q A local event means that I have had more returns than normal. How do I organise an extra collection?

A Please contact the Circularity Scotland Customer support team for extra collections.

Q Can I crush cans before I put them into the bags at a manual Return Point?

A No. Items from a manual Return Point will be scanned at the collection depot so they should be undamaged.

12. Glossary

At a glance – some key terms and abbreviations, and what they mean

Automatic Return Point

A scheme item Return Point where the returns process is automated through an RVM. Consumer puts empty scheme item into machine, and gets the 20p deposit back. RVMs give out vouchers rather than cash

Closed Loop

A location where scheme items are retained on the premises for disposal. Items are sold to consumer without deposit

CSL

Circularity Scotland Limited. The scheme administrator for DRS in Scotland

Drinks Container

For the purposes of this document 'drinks container' is used to represent a Scheme Article and a Non-scheme Article and associated Scheme packaging

DRS

Deposit Return Scheme

EAN

European Article number (number part of the product barcode)

EPR

Extended Producer Responsibility

LSP

Logistics Service Provider

Manual Return Point

A scheme item Return Point where the consumer hands over empty containers at the counter and the RPO issues a cash refund. RPO stores the empty containers until they are collected

OEAN

Old European Article Numbers

PET

Polyethylene Terephthalate. The plastic that most drinks bottles are made from

PF

Producer Fee. The fee that a producer pays Circularity Scotland for each scheme article

introduced to the Scottish market, in addition to the 20p deposit

PTM/POM

Put To Market/Put On Market. The number of items made available for sale in a defined period

Return Point

A location where the operator has a responsibility to refund deposits or equivalent value and accept scheme items on behalf of Circularity Scotland

RHF

Return Handling Fee. The payment retailers receive towards costs of managing returned scheme packaging

RPO

Return Point Operator

RVM

Reverse Vending Machine

Scheme Article

A drink (regardless of whether sold alone or as a unit in a multipack) contained and sold in single use packaging that is made wholly or mainly from PET plastic, glass, steel or aluminium, sealed and containing at least 50ml and no more than 3 litres liquid

SEPA

Scottish Environment Protection Agency. The regulator of DRS in Scotland

SKU

Stock Keeping Unit

TA

Trade Association

VRP

Voluntary Return Point

WTN

Waste Transfer Note

ZWS

Zero Waste Scotland. A not-for-profit organisation promoting a circular economy in Scotland, who will handle RPO exemption and VPR

We're here to help

If you have any questions on anything contained in this guide, please contact Circularity Scotland:

Call **0141 401 0899**

Visit **circularityscotland.com**



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**Returning for
SCOTLAND**