



Submission to DEFRA consultation on Deposit Return Schemes for UK by Mintfinity Ltd.

1. The consultation limits itself to drinks bottles (round fixed form containers which do not change shape when emptied) because these are the only items reverse vending machines can accept.
2. Reverse vending machines (RVMs) use rotation of the item combined with barcode reading and colour pattern recognition to authenticate an item as being valid for deposit return.
3. The limitation and usage of RVMs is entirely attributable to using generic barcode type as the only identifier of a product. Because all bottles with the same barcode cannot be uniquely identified, then extra processes are required from RVMs to exclude multiple returns of deposits on one single item.
4. In contrast to RVMs, digital printing allows each label to carry a unique identifier making all items trackable whilst retaining the existing barcode so negating a need for entire retail system change.
5. **Uniquely identifying each product item at production removes the need for RVMs, replacing them with significantly lower cost SmartBins, and with that remove many of the limitations of current DRS implementations including**
 - a. **Remote location of return points owing to RVMs requiring new buildings.**
 - b. **Cost of installation and maintenance of expensive RVMs.**
 - c. **Limiting schemes to fixed form round packaging – hence excluding crisp packets, bags, sandwich wrappers.**
 - d. **Very high operational costs for buildings and staffing.**
 - e. **The conflict with kerbside collection.**
6. Government involvement in commerce comes with political contentions which lead to long lead times for decisions and implementation followed by little innovation.
7. Government involvement removes the power of the market to innovate through competition to deliver better results more cost effectively and efficiently.
8. DRS is an effective mechanism for rapidly changing consumer behaviour that should be applied to all products carrying an environmental pollution risk.
9. We do not believe that measuring waste in tons is an informative or useful measure compared to producers measuring production in unit items. Therefore, we recommend that waste is measured in unit items per producer.
10. We recommend that in addition to DRS for plastic products the Government sets targets for the following for all producers of plastic packaging items.
 - a. A monthly report of the number of items fully and verifiably recycled into further use of their constituent materials compared to the month they were produced with a 12-month window for reporting.
 - i. This would mean a packaging producer would have to report on February 1st 2022 the number of items produced in January 2021 that were fully and verifiably recycled.
 - b. A monthly report of the number of items collected by disposed of without being fully recycled compared to the month they were produced.
 - i. As above.
 - c. A monthly report of the number of items that were not accounted for in the above two reports along with steps the producer is taking to reduce this number.
11. We recommend that businesses be free to choose whichever method they wish for implementing the above reporting to Government.

12. We recommend that the Government targets have a scheduled increment such that all businesses can foresee their future obligations.
13. We recommend that businesses that fail to meet targets should be subject to a schedule of fines based on the number of items their results fall below the target.
14. **We do not recommend the Government pursue installation of RVMs as a policy for implementing DRS because it addresses only a segment of packaging polluting the environment. This policy penalises drinks businesses whilst ignoring producers of food packaging with an equally damaging effect on the environment.**
15. We recommend the Government to use the setting of targets with enforcement alongside DRS legislation as a means of achieving more with less investment and less political contentions.
16. We make these recommendations as a UK technology provider with a fully operational **Recycling Engagement Platform** which will deliver them to all plastic container producers today.
17. We do not seek to be a sole supplier as we recognise that competition provides a key driver to surpassing current expectations and delivering services more efficiently each year.
18. We believe that the deployment costs of RVMs are challenging for the UK, and hence, project that developing nations would not follow this same approach to DRS. We therefore hope the UK, as a thought leader, should include worldwide delivery in developing nations as a factor in the decisions it makes.
19. We believe that digitising the relationship between consumers and their regularly purchased products offers many improvements and efficiencies that are necessary if worldwide consumerism is to become truly sustainable.
20. Finally, we believe the issue of environmental plastic pollution is too significant for a conservative piecemeal approach to solutions that address only a portion of the real issues. We must act faster and more effectively to save the environment.

Mintfinity Ltd
Gateway 1 Collegiate Square
Thames Valley Science Park,
Shinfield,
Reading
RG2 9LH

Website: corporate.mintfinity.com
Contact: info@mintfinity.com