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Consultation document

Delivering a Best for Wales Deposit Return Scheme

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Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

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Overview

This consultation builds on the previous consultations which have informed the development of the deposit return scheme (DRS) for Wales and focuses on gathering feedback which will shape the implementation of a DRS that includes both reusable and single-use drinks containers.

The previous consultations covered the principles for a DRS and its scheme design, which included the scope of the DRS in Wales:

- 18 February – 13 May 2019: [Introducing a Deposit Return Scheme for drinks containers \(bottles and cans\)](#)¹
- 24 March – 4 June 2021: [Introducing a Deposit Return Scheme in England, Wales, and Northern Ireland](#)²

In November 2024 the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs [announced](#) the next steps for a DRS in Wales, which included the commitment to this further consultation. As set out in the statement, this consultation aims to gather views on how the DRS can be most effectively implemented, ensuring it delivers benefit to Wales and supports the transition to a circular economy, whilst maximising environmental, economic and social benefits.

This announcement was followed by a further [statement](#) in July 2025, following extensive pre-engagement undertaken. The statement set out the intention to accelerate the timescales for the implementation of the DRS in Wales, so that it aligns with the introduction of DRS in the rest of the UK. This decision follows extensive engagement with industry and the other governments in the UK and reflects the need to support interoperability between the schemes within each nation and provide certainty for producers and retailers. The statement also set out that reuse will be phased in to allow industry the time to adapt to the move to reusable drinks containers, with this consultation informing the approach.

In parallel, where there is a difference in scope between the DRS in Wales and the other schemes within the UK, the phased approach will include transition arrangements such as a zero deposit for single-use glass containers to avoid the need for changes to labelling, production, or distribution systems.

With Wales ranked second in the world for recycling, implementing a DRS that will deliver benefit in a Welsh context is essential, but it also means that Wales is in a unique position to build on the leadership it has shown to date. In line with the Welsh Government's circular economy strategy, this means moving *Beyond Recycling*, by transitioning to a circular economy. In doing so, the aim is to deliver a scheme that is in line with the World's best, by drawing on proven international experience. This will ensure that the scheme not only delivers environmental benefits and supports the sector to reduce emissions, but also that

¹ <https://www.gov.uk/government/consultations/introducing-a-deposit-return-scheme-drs-for-drinks-containers-bottles-and-cans/outcome/introducing-a-deposit-return-scheme-drs-in-england-wales-and-northern-ireland-executive-summary-and-next-steps>

² <https://www.gov.uk/government/consultations/introduction-of-a-deposit-return-scheme-in-england-wales-and-northern-ireland>

industry can benefit from the reduction in materials needed and our communities can benefit from the reduction in litter from all container types.

Your responses will therefore be important in helping to inform the next steps in the development of a DRS that delivers for Wales.

How to respond

To respond to this consultation, please complete our online form and submit.

Alternatively, you can download, complete our response form and email: wg.drsprogramme@gov.wales or post to:

Deposit Return Scheme Policy Team
Welsh Government
Cathays Park
Cardiff CF10 3NQ

The Welsh Government is holding a series of consultation events, for further information and to reserve a place to attend email: wg.drsprogramme@gov.wales

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details for further information: Deposit Return Scheme Policy Team Welsh Government Cathays Park Cardiff CF10 3NQ

Email: wg.drsprogramme@gov.wales

Mae'r ddogfen yma hefyd ar gael yn Gymraeg / This document is also available in Welsh.

UK General Data Protection Regulation (UK GDPR)

The Welsh Government will be data controller for Welsh Government consultations and for any personal data you provide as part of your response to the consultation.

Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. The lawful basis for processing information in this data collection exercise is our public task; that is, exercising our official authority to undertake the core role and functions of the Welsh Government. (Art 6(1)(e))

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. In the case of joint consultations this may also include other public authorities. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation and that the Welsh Government may be under a legal obligation to disclose some information.

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the UK GDPR, please see contact details below:

Data Protection Officer:
Welsh Government
Cathays Park
CARDIFF
CF10 3NQ
e-mail: dataprotectionofficer@gov.wales

The contact details for the Information
Commissioner's Office are:

Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 0303 123 1113
Website: <https://ico.org.uk/>

Introduction

A Deposit Return Scheme (DRS) is simply a scheme where a small deposit is paid when you buy a drink and then refunded when you return the empty container. Returned containers are either crushed and recycled, or, in the world's best DRSs, are also washed and reused. Washing and reusing containers multiple times is the most environmentally sustainable and cost-effective option because it keeps them in use for longer before they are recycled. When containers are recycled, it creates high-quality recycled material that can be used to make into new containers.

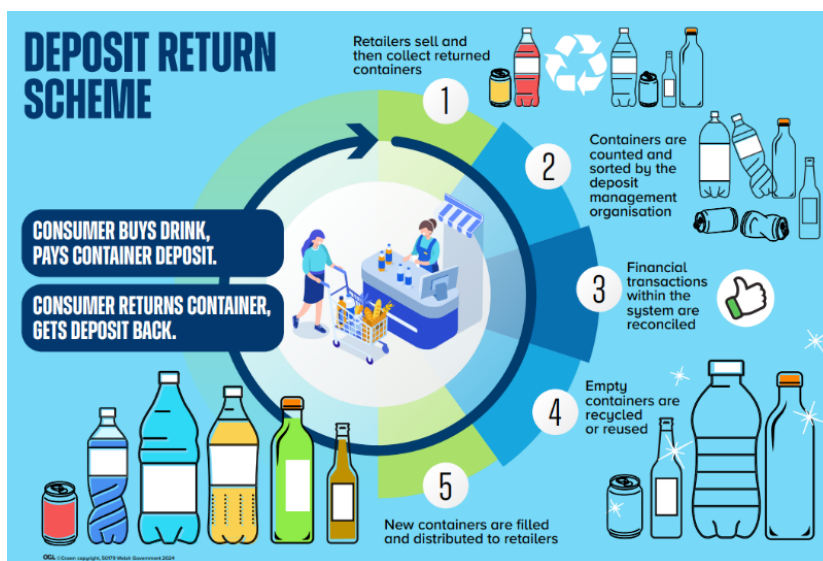


Image 1 - How a deposit return scheme works in a retail environment

A DRS is a form of Extended Producer Responsibility (EPR), where businesses are responsible for the products they place on the market from the point they are made, right through to their disposal. This approach means producers are responsible for paying the costs of their disposal, which incentivises the reuse and recycling of material rather than those costs falling to the public sector.

Most international DRSs work by people returning empty drinks containers to shops. This will often consist of supermarkets and larger stores having reverse vending machines (RVMs) with some smaller stores taking returned containers over the counter, known as a manual return. New technology is however developing which will allow more options, for example by utilising digital tracking of serialised containers to allow deposits to be refunded at home.

There are successful DRSs across the world and it is a proven way of ensuring containers are returned for reuse and recycling. This in turn supports the move to a circular economy, where materials are used and then reused to keep them in use for as long as possible before being recycled.

As Wales is already a world leader in recycling, there is a crucial need to ensure that in bringing in a DRS it will help Wales to achieve even better results, whilst not impacting on the progress made already. As well as further improving recycling, using DRS to phase in reuse in line with the world's best schemes will further reduce packaging waste, lower our carbon emissions and make our communities cleaner by cutting down on litter.

But the benefits go even further. A DRS that improves recycling and incorporates reuse can improve the availability of high-quality recycled material back into the economy, improve resource efficiency and the resilience of supply chains, reduce material costs for producers and create opportunities for green jobs as part of the transition to a circular economy. DRS therefore has the potential to unlock significant green growth opportunities. Independent analysis suggests that the shift to a circular economy could generate up to £3.8 billion³ in savings for the Welsh economy, while creating high-quality green jobs, fostering innovation, and strengthening resilience in key sectors such as logistics and manufacturing, including within the drinks industry. It is therefore not only good for the environment — it also brings significant economic opportunity and competitiveness benefits in a decarbonising economy.

Scope of the DRS in Wales

In line with the outcome of the previous consultations, the DRS will cover containers made from Polyethylene Terephthalate (PET) plastic, glass, aluminium and steel from 150ml, up to 3 litres. To ensure we deliver a Best for Wales DRS, the scheme will cover both single-use and reusable containers.

Drinks containers that are sold in low numbers (low volume product lines) and containers that are already part of a well-run, closed loop reuse system (such as glass bottles used in doorstep milk) will be exempt from the DRS in Wales.

Aligned with the outcome from previous consultations, glass will be included in the DRS from the outset, but there will be a carefully phased approach that will allow for the gradual introduction of reuse and single use glass-related obligations. This will include transitional arrangements to avoid disruption and the need for different labelling or changes to production and distribution systems.

Also in line with international best practice, a Deposit Management Organisation (DMO) will be appointed to manage the scheme and will have the flexibility to make decisions that ensure operational feasibility.

³ Levelling Up Through a More Circular Economy Final Report, Table 7, page 18, Scenario 3: Transformation, Wales GVA gain subtotal [LEVELLING UP THROUGH A MORE CIRCULAR ECONOMY_2.pdf](#)

What reuse means for Wales

The introduction of a DRS is an opportunity for Wales to follow international best practice by including reusable as well as single-use drinks containers. This in turn is a key opportunity for Wales to continue its progress to a more sustainable and efficient circular economy. Having reusable containers that are designed to be collected, washed and refilled multiple times is better for the environment, the economy and benefits society. It cuts down on waste, encourages better use of resources, supports new businesses and can create more green jobs in Wales.

A reuse-focused DRS will reduce the number of raw materials needed to make packaging, encourage people to use products more sustainably, reduce litter and save energy. It can also help contribute to lower living costs and reduced inequality. All these benefits will support delivery against our policy objectives and commitments for a better environment and economy in Wales:

Beyond Recycling⁴ is Wales's circular economy strategy. It focuses on keeping materials in use and avoiding all waste and commits to making Wales a zero waste, net zero carbon nation by 2050.

The Wellbeing for Future Generations (Wales) Act⁵ sets out the legal framework to improve social, economic, and cultural well-being for everyone in Wales. It requires the Welsh Government and public sector to consider the long-term impact of their decisions, work closely with people and communities, and tackle issues like poverty, health, and climate change.

Towards Zero Waste⁶ is Wales' plan for improving waste management and resource efficiency. It includes targets to cut overall waste by 25% and to halve avoidable food waste by 2025. By 2050, the aim is to have no waste going to landfill or incineration, and to reduce the environmental impact of waste to within "one planet" ecological limits; roughly 65% less waste than current levels. The plan is underpinned by three principles: waste prevention, resource efficiency and maximising recycling. It is supported by regulations and sector plans that require action from all parts of society.

Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill⁷ introduced to the Senedd in June 2025 for Senedd Members consideration, sets a strong foundation for DRS, embedding key environmental principles into Welsh law that requires environmental protection to be integrated into all relevant policy decisions. This includes ensuring the DRS for Wales reduces waste and pollution,

⁴ <https://www.gov.wales/beyond-recycling>

⁵ <https://www.gov.wales/well-being-future-generations-act-essentials-html>

⁶ <https://www.gov.wales/towards-zero-waste-our-waste-strategy>

⁷ <https://www.gov.wales/introduction-environment-principles-governance-and-biodiversity-targets-wales-bill>

aligns with wider goals for sustainability and the prevention and reversal of biodiversity loss.

[A Climate and Nature Emergency](#)⁸ was declared in 2021 by the Welsh Government. We are committed to take action to cut carbon emissions and address the global nature crisis. Avoiding waste, reusing and recycling materials and maximising resource efficiency are crucial actions for achieving a sustainable, resilient Wales for future generations.

A DRS that helps to further improve recycling and roll out reuse is a big step towards these goals. It will reduce litter and help build a circular economy that rewards good habits and delivers environmental benefits beyond recycling. This is important in both tackling climate change and making our economy stronger.

Tackling litter

Litter is a problem in communities across the world. Surveys in Wales show that drinks containers make up a large part of litter on Welsh streets, green spaces and beaches, which can harm people, pets and wildlife. It can be expensive to clean up and makes our communities less attractive, which affects both wellbeing and tourism.

- [Keep Wales Tidy](#)⁹ surveys in 2023- 2024, found high levels of drink containers on **43.6%** of streets, with levels in individual counties ranging from **19.4%** of streets to **86.1%**. Worryingly, this data shows the presence of glass bottles more than doubling in four years.
- The [Marine Conservation Society](#)¹⁰ reported in 2024 that littered drinks containers were found on **99%** of beaches surveyed in Wales.
- [Trash Free Trails](#)¹¹ reported that **33%** of the 9.2 million items found on trails and public rights of way in the UK are drinks containers and **8%** of surveys reported at least one animal death due to interaction with single-use item pollution.

DRSs have been [shown to be effective in reducing litter](#)..

Improving our economy

Wales is already attracting investment because of our world class recycling performance. A DRS that includes reuse will build on this by keeping more containers in use in Wales, reducing the need for new single use ones and creating new industry opportunities and jobs in manufacturing, collecting, sorting and cleaning reuseable bottles.

⁸ <https://www.climateaction.gov.wales/climate-change/the-nature-emergency/>

⁹ <https://keepwalestidy.cymru/blog/deposit-return-scheme-needed-now-more-than-ever/>

¹⁰ <https://www.mcsuk.org/what-you-can-do/join-a-beach-clean/beachwatch-2024-what-you-found/>

¹¹ <https://www.trashfreetrails.org/state-of-our-trails-report>

Go Unpackaged's [A 30% reuse future for the UK](#)¹² reports that reuse at scale across multiple grocery products can deliver significant economic benefits including:

- create up to 13,000 new jobs
- save £314m to £577m per year from end-to-end system costs
- save £136m per year in pEPR costs

Businesses will also benefit from the availability of high quality recycled materials, more resilient supply chains and greater resource efficiency with containers designed for reuse and closed loop production cycles.

By including reusable drinks containers in our DRS, we can make a big difference and build on Wales' environmental leadership, whilst reducing emissions and building a stronger, greener economy for everyone, now and in the future.

Delivering the best DRS for Wales

Taking proactive, collective action is key to making the DRS in Wales a success. The Welsh Government is working closely with the other UK nations, the drinks industry, retailers, communities, environmental groups and local authorities to make sure the DRS delivers real improvements in Wales by going *Beyond Recycling*.

Reuse is an important part of the most successful international schemes and is essential for Wales if we are to make further progress and move to a circular economy. We have therefore been drawing from the best international DRS examples to understand how Wales can make the most of the environmental, economic and social benefits.

To make sure the DRS works for everyone in Wales, it will also need to be easy to use and accessible. It will need to use clear and accurate communications that meet the Welsh Language Standards, including signs, instructions, and information as a mandatory standard across all DRS touchpoints. All communications to the public about the DRS will also be shared bilingually and bilingual templates will be provided to all partner organisations. Offering the service bilingually will help engage with people more effectively and boost participation in the scheme. We will also take the opportunity of signposting partners in the private and third sector to support such as *Helo Blod*, a free Welsh translation and advice service, to help them incorporate the Welsh language into their businesses and communications to the public. This supports the ambitions of Cymraeg 2050, our strategy to meet our target of achieving a million Welsh speakers by 2050 and increase the daily use of the Welsh language by ensuring that Welsh is an integral part of the scheme and the visual landscape across the country.

¹²

<https://static1.squarespace.com/static/64f87d1ca3b62218f953f0c8/t/68557b025be3d06cb083511a/1750432514856/30percent-reuse-future-for-UK-report-GoUnpackaged.pdf>

Return point design

The Welsh Government is committed to delivering a high-performing DRS that includes both single-use and reusable containers, while ensuring the scheme is flexible enough to be future proofed, encourage innovation and avoid unnecessary restrictions.

The approach to locating return point and their design must fully align with the Wellbeing for Future Generations Act by being accessible and easy to use for everyone, including people with different needs. They must also use clear communications and adhere to the Welsh Language Standards, in terms of signage and branding.

Return points are commonly located at shops; with, for example, bigger shops usually having RVMs and smaller stores able to take returned containers over the counter, known as a manual return.

However, there are other innovative options such as:

- large return centres or kiosks at Household Recycling Centres (HRCs) and in busy urban residential areas, so people can return lots of containers at once
- doorstep return points: empty containers are taken back by online grocery retailers when they deliver to homes
- kerbside return points: containers can be returned using local authority recycling collections from households
- return points located at community infrastructure, such as community centres, libraries and sports centres.

Innovative options may require new or upgraded digital systems for labels and barcode scanning, as well as changes to infrastructure like recycling collection vehicles and sorting facilities.

About this consultation

This twelve-week consultation runs from 18 August to 10 November 2025.

The purpose of this consultation is to collect feedback to shape a DRS that is Best for Wales and includes both reusable and single-use drinks containers.

Previous consultations on a DRS showed overwhelming support for not only including glass containers (83% of respondents) in the scheme, but 73% of respondents were also supportive of glass bottles being refilled and reused, rather than recycled after a single use. This consultation builds on the clear feedback to the previous consultation and focuses on how a DRS in Wales can best incorporate reuse.

The basic principles of a DRS (its scope, how it could be managed, funded and monitored) have already been part of earlier consultations, and the information collected has informed the development of the DRS to date. As such, these are not the focus of this consultation.

Consultation questions

We want to hear your views on how a DRS with reuse can bring the greatest benefits for Wales and help achieve our goals in both tackling the environmental imperatives and growing a greener, more resilient economy as we move to a circular economy, and a cleaner environment.

The development of this consultation has been informed by feedback we have already received from a range of engagement sessions with stakeholders earlier this year, as well as the responses to the previous consultations on DRS.

Proposed approach for the Best for Wales DRS

In line with the world's best schemes, DRS in Wales will incorporate both single-use (for recycling) and the phasing in of reuseable drinks containers. This will work alongside other policies and regulations, such as the Extended Producer Responsibility scheme for packaging (pEPR), as well as the DRSs planned within the other UK nations.

A key aim of this consultation is to get your views on how our DRS will incorporate reuse in a way which is robust and brings clear benefits to Wales. In doing so, it will also need to both build on our recycling progress to date and be flexible so it can incorporate future changes, such as new technology and increases in the types and numbers of reusable containers in circulation. The responses to the consultation will be used to inform both the development of legislation to establish the DRS in Wales and subsequent legislation, which will cover the more detailed provisions in relation to reuse.

Exemptions for low-volume producers – glass in DRS

We have heard from industry that for glass, the exemption for product lines with less than 5,000 units placed on the market annually in the DRS, will not sufficiently support small producers.

In response, recognising the arrangements in place under the Extended Producer Responsibility scheme for packaging, we are proposing an alternative approach, namely:

That producers who already qualify for the low-volume exemption under the packaging Extended Producer Responsibility (pEPR) scheme (those responsible for less than 25 tonnes of packaging per year) would also be exempt from the DRS. However, small producers that are responsible for more than 25 tonnes of packaging per year who currently qualify for reduced requirements under pEPR would not be eligible for this DRS exemption.

This proposal aligns the DRS glass exemption with pEPR thresholds, providing more targeted support for small producers. In doing so it would not however create new exemptions or undermine the effective operation of the scheme

Question 1. Do you agree with the proposed approach to exempt glass product lines from the DRS for producers who meet the low-volume exemption threshold under pEPR?

- Yes
- No
- Don't know
- Please provide details for your response: Free text

The road to reuse

The DRS in Wales will progress our journey towards a circular economy by supporting the roll out of reusable drinks containers alongside the recycling of single-use ones. We propose to create a system of rules known as a “regulatory framework”, that will require the proportion of reusable drinks containers made available for sale to increase over time.

A plan called a “reuse roadmap” will be created to show how Wales will move to reusable drinks containers, in line with the targets set out in the regulatory framework. The roadmap will explain the types of drinks containers that will be targeted for reuse over time and will consider:

- Each type of packaging material (glass drinks bottles, plastic PET drinks bottles and aluminium drinks cans)
- Each type of drink: beer (including ciders and low/no alcohol options), soft drinks, bottled water, wine and spirits
- Different container sizes for drinks between 150ml - 3litres
- The places where drinks are sold or consumed (shops, pubs, hotels, restaurants, cafes and catering)

We believe that the drinks industry (coordinated by a DMO) is best placed to develop the reuse roadmap and will ensure it is informed by industry expertise while also encouraging innovation.

Question 2. Do you agree that the drinks industry should develop the reuse roadmap, coordinated by a DMO?

- Yes
- No
- Don't know
- Please provide details for your response: Free text

Regulatory framework - targets for increasing reusable containers

Other countries, particularly in Europe, have set targets for the proportion of reusable drinks containers available on the market. For example, Germany has a high market share of reusable PET plastic and glass drinks containers, with 50% of all drink

containers placed on the market¹³ being reusable. In Latvia, 15% of all drink containers are reusable, including 67% of glass drinks bottles¹⁴.

Within the European Union, a law called the Packaging and Packaging Waste Regulation (PPWR) came into force in February 2025. This sets targets for how much drinks packaging must be reusable. The law requires at least 10% of alcoholic and non-alcoholic drink packaging (excluding milk, wine, and some spirits) to be reusable by 2030 and will increase to 40% by 2040. This means more drinks containers across the EU will be sold in reusable packaging in the future.

In Wales, as part of the DRS we propose to introduce reuse targets that will require the Deposit Management Organisation (DMO) to ensure that a minimum percentage of drinks containers are collected for reuse, rather than used once and recycled. These targets will be measured per item (rather than by weight) and will increase over time, with specific milestones to be met by 2031, 2035, and 2040. This approach is designed to support the increase in reuse, reduce waste, as a key part of Wales' transition to a circular economy.

In addition to collection targets, we propose to introduce reuse targets that will apply to producers. These targets will require a minimum percentage of drinks containers placed on the market in Wales to be reused. Targets will be measured per item and will increase over time, with specific milestones to be met by 2031, 2035, and 2040. This will help ensure that more reusable containers are available for sale, supporting a move away from single-use packaging and contributing to a circular economy

¹³ 50% of drinks containers that are in scope of Germany's DRS are reusable.
<https://www.reloopplatform.org/global-deposit-book-2024/>

¹⁴ 15% of drinks containers that are in scope of Latvia's DRS are reusable.
<https://www.reloopplatform.org/global-deposit-book-2024/> Information shared by Latvia's scheme operator tell us that 67% of glass bottles that are in scope of Latvia's DRS are reusable. Wine (including sparkling wine and fruit wine), hard liquor, milk and dairy products and not included in scope of the DRS.

Question 3a: DMO Collection Targets for Reuse

Do you agree that the Welsh Government should set mandatory collection for reuse targets for DMOs in 2031, 2035, and 2040, requiring a minimum percentage of drinks containers to be collected for reuse?

- Yes – I agree targets should be set for these dates
- Yes – I agree targets should be set, but for different dates
- No – the Welsh Government should not set targets
- Don't know

Targets for the minimum proportion (percent) of drinks containers collected for reuse	Target year		
	2031	2035	2040
5%			
10%			
20%			
30%			
40%			
50%			
Other (free text)			
Don't know			

Question 3b: Producer Placed-on-Market Targets for Reuse

Do you agree that the Welsh Government should set mandatory reuse targets for producers, requiring a minimum percentage of drinks containers placed on the market to be reused by 2031, 2035, and 2040?

- Yes – I agree targets should be set for these dates
- Yes – I agree targets should be set, but for different dates
- No – the Welsh Government should not set targets
- Don't know

If you answer 'No' please do not respond to questions 4 & 5 and move to 'Support the transition to reusable containers'.

Question 4. Do you think there should be one collection for reuse target for all drink containers in the DRS, or a separate target for each type of material? (e.g. a target for PET plastic bottles, a different target for glass bottles, and another for aluminium and steel cans)

Targets for the minimum proportion (percent) of drinks collected in reusable containers	Yes	No	Don't know
A single target for all DRS drinks containers			
Separate targets for each type of material			

Please provide details for your response: Free text

Given Wales' already high recycling performance, there is a need to ensure collection targets are set at a rate which will deliver improved recycling performance against the baseline recycling rates in Wales. It is proposed however that the initial collection targets will be set at 70%, 80% and 90% for the first three years of the scheme. These targets will not however apply to glass containers whilst they have a 0p deposit. These interim targets are consistent with previous consultations and align with the approach for the DRS in the rest of the UK. However, beyond the first three years there will be a need to deliver at a level that is in line with the world's best DRS

Question 5: What should the target level be set at beyond 2030 in order to ensure the scheme delivers a collection for recycling rate that is in line with the world's best?

- Please provide details for your response: Free text

Question 6: When reusable containers are introduced, should the total number of containers (single-use and reusable) contribute to the same collection target?

- Yes – the single-use or reusable drinks containers should contribute to the same return rate target.
- No – there should be separate return rate targets for single-use containers and reusable containers
- Don't know
- Please provide details for your response: Free text

Question 7. When reusable containers are introduced to the DRS, should their collection target increase over the first few years?

- Yes, the return target for reusable containers should be set to increase over 3 years
- Yes, the return target for reusable containers should be set to increase over 5 years
- No, the return target for reusable containers should not increase over the first few years.
- Don't know
- Please provide details for your response: Free text

Supporting the transition to reusable containers

Transitioning from single-use to reusable glass bottles

Reusable drinks containers in a DRS are specifically designed to be used, collected, cleaned and refilled many times and this needs systems in place for transport, sorting and cleaning to support their reuse. They are most commonly made from glass, but there are examples made from PET plastic and aluminium in use.

Previous UK-wide consultations on a DRS showed strong support for including reusable containers, with 73% of respondents agreeing that glass drinks containers should be reused for refill rather than recycled.

A range of drinks are packaged in glass, including beer, soft drinks, wine and spirits. When other countries have introduced a DRS, they often begin with a basic selection of containers and add more over time. Typically, soft drinks, beers and ciders are included in the initial selection with wines and spirits phased in later.

We want to find out if gradually introducing certain types of glass drinks containers into the DRS in the way other countries have done would best support the transition to reuse. We would consider a maximum timeframe of three years to phase in different types of drinks if this approach is taken forward.

Question 8: Would gradually expanding of the range of drinks packaged in glass bottles to the DRS make it easier for industry to move to reusable packaging?

Type of drink packaged in glass	No - include from the start	Yes – transition into up to 3 years	Don't know	How would it support the transition to reuse? (Free text)
Beer and cider including low/no alcohol options				
Soft drinks				
Wine including low/no alcohol options				
Spirits* including low/no alcohol options				

* Alcoholic strength of 15% volume or higher

Other containers that could support the switch to reusable containers

Several countries with DRS have expanded their schemes over time - either by including **more types of drinks** within existing container formats or by adding **new types of containers** altogether. These expansions have helped them achieve high return and reuse rates. For example:

- Denmark expanded its DRS in 2005 to include alcopops, cider, and energy drinks; in 2008 to non-carbonated drinks like water and iced tea; and in 2020 to fruit juices and concentrates. Return rate 92%.
- Finland added PET plastic bottles in 2008 and glass bottles in 2010. Return rate: 97%
- The Netherlands included small plastic bottles in 2021. Return rate: 68%.
- Croatia added milk and dairy products and 200ml bottles in 2021. Return rate: 79%.
- Germany included milk and dairy products in 2024. Return rate: 97%.

In Wales, the base range of containers included in the DRS will be **PET plastic bottles, glass bottles, and aluminium and steel cans** ranging from 150ml to 3 litres. In some countries, reusable glass dessert containers are also included. Looking ahead, we may see the introduction of new reusable formats, such as **aluminium drinks bottles with screwcaps**.

Question 9: To support higher reuse targets, should the DRS in Wales be expanded in future to include:

- **Additional types of containers** (e.g. different materials, sizes, or reusable formats)?
- **Additional types of drinks** within the existing container types (e.g. milk, juice, dairy-based drinks)?
- **Both?**

Please provide details for your response: Free text

	Types of containers (Free Text)
To be added	
Not to be included	

Other levers to support the transition to reusables

Welsh Government research into international DRS models for reusable containers shows that setting minimum targets for the collection of containers for reuse is the most effective way to drive producers to shift away from single-use packaging.

Other opportunities to further encourage producers towards reusable containers are having lower fees for producers using reusable containers, restricting products that can be sold in single-use containers, providing technical or financial support to help producers switch to reusable containers.

Question 10: Which of these (or other) measures would be best to encourage and support producers to use reusable drinks containers in Wales?

Measures	Yes	No	Don't know
Lower fees for producers using reusable containers			
Restrictions on products that can be sold in single-use containers			
Technical or financial support to help producers switch to reusable containers			

Other: Please provide details for your response: Free text

Regulatory framework – minimum standards for reuse

A regulatory framework is a set of rules and guidelines that organisations must follow to make sure they operate safely and fairly. As part of the regulatory framework for the DRS in Wales, we propose to set clear minimum standards that the reusable container system must meet. This will make sure that industry can help deliver the necessary environmental, economic and social benefits.

The proposed minimum standards are described in the table below:

Proposed minimum standard	Purpose of standard
Reuseable drinks containers must be used at least 8 times on average (regardless of material type).	To make sure containers are returned and reused multiple times and are handled carefully during processing and transport.
Returned reusable containers that are damaged, broken or no longer suitable for reuse must be recycled, ideally into new food and drink packaging.	To maximise the availability of recycled materials for food and drink packaging. This will reduce the need for new (virgin) materials and increase the use of recycled materials in packaging.
A DMO is required to incentivise the use of standardised reusable bottles.	To make the reuse system simpler, cheaper and better for the environment whilst avoiding being overly restrictive on industry.

Number of uses of a reusable container

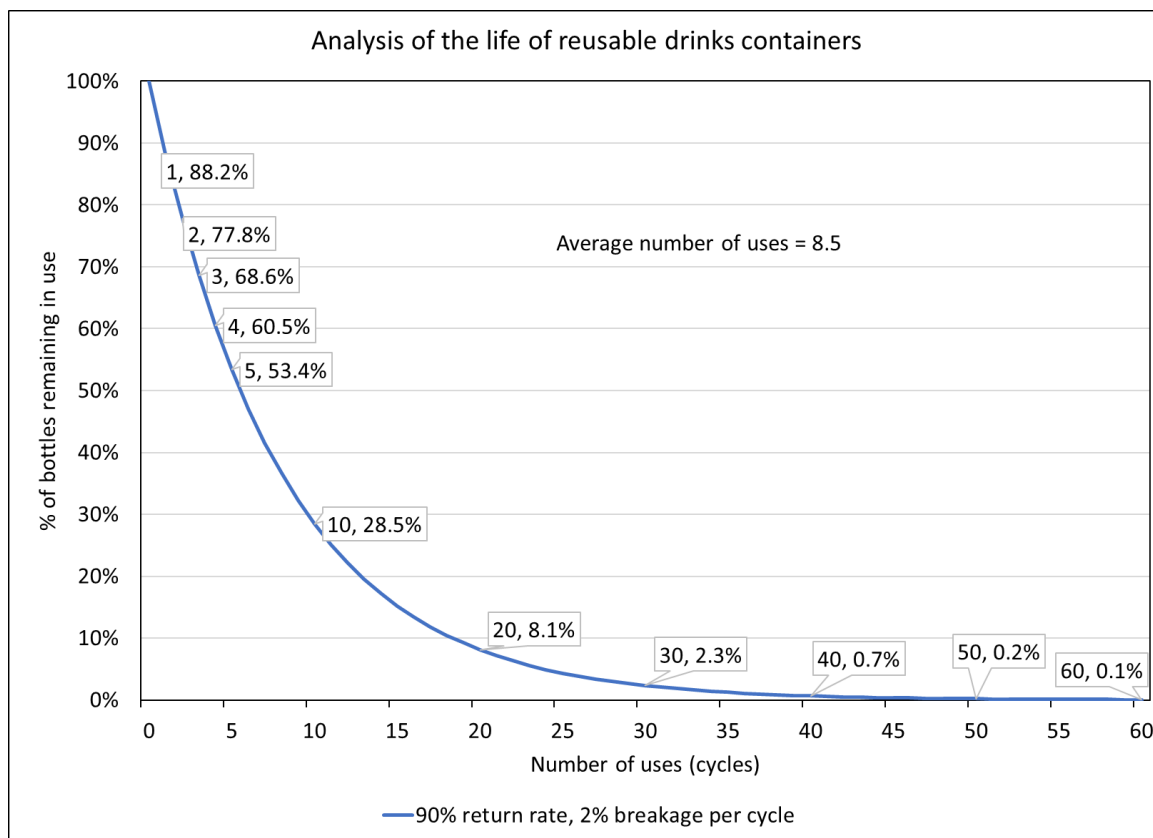
In other drinks container reuse systems, including those in Europe, the average number of uses of reusable glass drinks containers can be as high as 33. This is achieved because of a high return rate of 97% (Finland, Sensoneo¹⁵).

The graph below shows what happens if 90% of a new batch of reusable drinks containers are returned each time they are used.

In this example, after the first use, 88% of the containers are still being used. After 5 uses, 53% are still in use and after ten uses, 28% are still in use. On average, each container is used 8.5 times before it needs to be recycled due to loss of quality or damage.

¹⁵ <https://sensoneo.com/waste-library/deposit-return-schemes-overview-europe/>

Figure 1: Example of reusable drinks containers with 90% return rate per use cycle and 2% quality failure



This scenario assumes that 2% of the containers do not meet quality standards and need to be removed and recycled.

A DMO will need to gather and report data to the Welsh Government's enforcement agency to show how many times reusable containers are being used on average. Examples of how the number of uses is monitored in other schemes includes:

- Keeping track of how many reusable containers are added to the scheme to replace ones that are not returned or are no longer suitable for reuse
- Giving each container a unique code and counting how many times it is used (for example, how many times it is refilled)
- Marking the containers when they are returned and regularly checking how many marks each container has

Question 11. Which of the following best describes your view on the targets for the number of uses of reusable containers within the DRS as described above:

Options	Yes	No	Please provide details for your response
Minimum target of 8 uses for all materials			
Minimum target appropriate to the material			
Minimum target for all materials should not be 8 (please specify)			
A target should not be set			
Don't know			

End of life reusable drinks containers

When reusable drinks containers are damaged, broken or no longer meet the standards for food or drink packaging, they are at the end of their life and need to be removed from the reuse system.

We propose that returned reusable drinks containers that are at the end of life should be recycled, ideally into new food and drink grade packaging, to keep material in the packaging cycle for as long as possible.

A DMO will be required to have an Operational Plan which describes how it will ensure end of life reusable containers will be recycled into new food and drink grade packaging.

Bottle standardisation

A standardised bottle in a DRS means that different drinks are sold in bottles that are the same size and shape, making it easier to collect, clean and refill for reuse. This approach can save producers money and is better for the environment because bottles can be reused more often and more efficiently.

Standardised or universal reusable containers are designed so that different producers or brands can use the same shape and size for their products, while still applying their own labels and branding. These containers can be owned by individual producers, shared in a group (a managed pool) or rented from a supplier such as a circular economy rental service.

In Latvia, 27 producers have collaborated to use the same standardised bottle design. This means about 70% of reusable bottles available for sale are the same shape and size, simplifying the sorting and washing process.



Image 2 - Clear glass standardised reusable bottles used in Latvia's DRS



Image 3 - Brown glass standardised reusable bottles used in Latvia's DRS

In Germany, groups of producers share standardised bottles in a bottle pool. In these pools, everyone agrees to the same quality standards and the cost of adding new bottles to the pool is shared among the producers.

The Ellen MacArthur Foundation has highlighted the benefits for using standardised bottles and bottle pools in its report: *Unlocking a Reuse Revolution - Scaling Returnable Packaging*¹⁶. Some of the main benefits are stated to include:

- Lower costs for buying bottles
- Lower costs for sorting and cleaning
- More efficient collection, sorting, cleaning and refilling
- Fewer bottles needed overall in the system
- Shorter transport distances
- Easier to recognise reusable packaging
- Easier for people to return containers (for example, bottles that stack easily or fit into crates)
- Ready-made returnable, reusable bottles that small producers can use without extra costs and effort.

We recognise the significant potential that standardised bottles and bottle pools offer in supporting an efficient and scalable reusable drinks container system and providing benefits to producers and consumers. We therefore expect a DMO and industry to work collaboratively to realise these opportunities, although in line with

¹⁶ [Unlocking-a-reuse-revolution-Scaling-Returnable-Packaging.pdf](#)

international schemes the DRS will also need to support the collection of bespoke bottles for producers that use them.

Question 12. Do you agree that a DMO should be required to incentivise the use of standardised bottles and managed bottled pools (rather than the Welsh Government setting mandatory minimum targets for their use)?

- Yes - DMO should incentivise
- No – the Welsh Government should specify targets
- No - other method for encouraging reuse
- Don't know
- Please provide details for your response: Free text

Other minimum standards

Question 13. Are there any other minimum standards that could be introduced to ensure that the reuse system delivers the aims of a circular economy, including the transition to zero waste and net zero carbon? If yes, please describe below.

- Free text

Handling and logistics

Receptacles for handling reusable drinks containers

Reusable drinks containers will need to be carefully handled to prevent damage and maximise the number that are returned for reuse. In some countries with drinks container reuse schemes, shops sell drinks in reusable bottle crates. Customers use these crates to take their empty reusable bottles to return points. Because the size and shape of reusable bottles can vary, different types of crates are needed. Some schemes and trials have used bottle bags and plastic boxes.

We propose that the decision to use crates, bottle bags, boxes or an alternative approach for handling and storing returned drinks containers should be left to industry, coordinated by the DMO.

Question 14. Do you agree that industry should decide whether to provide crates, bags or boxes for returned reusable bottles?

- Yes
- No – Welsh Government should specify this
- No - other
- Don't know
- Please provide details for your response: Free text

Return point operator handling fees

When citizens return empty drinks containers at return points, they will be stored and collected in bulk for onward processing. Reusable containers will need to be handled and stored carefully so they are not damaged or broken.

A DMO will be required to pay a handling fee to the businesses or organisations that run return points. We propose that regulations require a DMO to set the handling fee with retailers and the regulator. The fee will need to consider the cost of floor space taken up by the return point, the cost of buying or renting equipment (like RVMs), and the value of time spent by staff managing the returned drinks containers. These requirements should fairly reflect any extra costs of handling reusable containers.

Question 15. Do you agree that the proposed approach will ensure that the extra cost of managing reusable drinks containers as the scheme transitions to widespread reuse, is reflected in the return point operator handling fee?

- Yes
- No
- Don't know
- Please provide details for your response: Free text

Processing containers for reuse

Once reusable drinks containers have been taken to return points by citizens, they will need to be transported to a sorting and washing facility and then returned to producers/fillers for refilling, relabelling and distributing for sale.

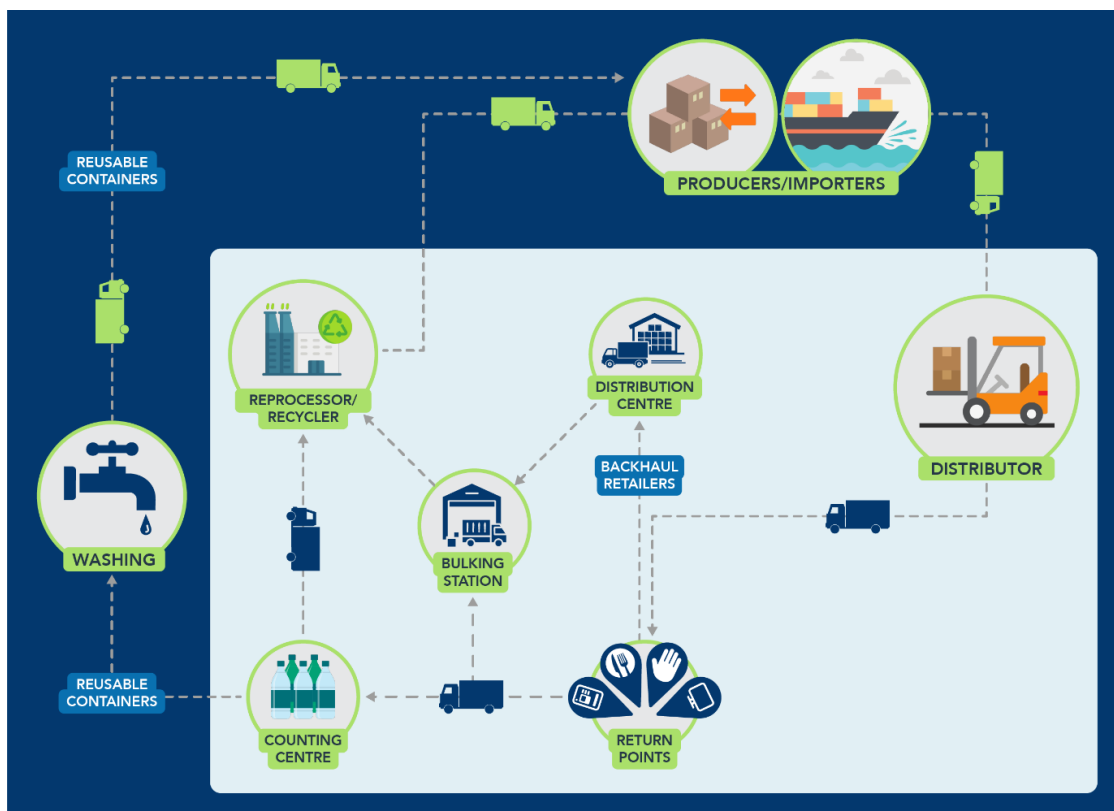


Image 3 – Picture showing the processes and infrastructure of a DRS that includes reuse.

Reusable drinks containers will be sorted by shape, size and what they are made of before being sent to industrial washing facilities. In other countries, these facilities use different methods to make sure they meet industry standards such as:

- Using smart designs and technology to save energy and water, such as ultrasonic cleaning and reusing water during the process
- Using different cleaning steps to wash and dry containers including caustic solutions and advanced filtration to remove caps, labels, germs, dirt, soap and toxins
- Checking the containers with tools like x-ray scanners to make sure they are safe to use again and to remove any containers that need to be recycled
- Storing and transporting clean containers in sealed and tracked packages in line with food and drink safety standards
- Making sure that any water leaving the facility is safe and meets environmental standards.

Question 16. How can businesses, local government and the third sector in Wales support a DMO with collecting, transporting and processing reusable drinks containers?

Organisation type	Collecting	Transporting	Processing	Free text
Local authorities				
Other public sector organisations				
Private waste management companies				
Other private businesses				
Charities, environmental groups and other third sector organisations				

Setting up a DRS will mean building new facilities and systems to for example handle and transport the reusable drinks containers so they can be refilled. It is important that these new developments are designed to minimise environmental impact.

Environmental considerations include the materials used to build new facilities, how much energy and water they use, the chemicals used for cleaning, the quality of water that is released from the facilities, how far the containers must be transported and whether existing buildings and equipment can be adapted and used.

Deposit levels

Setting the right deposit level is a key factor in the success of any DRS. Experience from other countries shows that the deposit amount affects how likely people are to return their containers. Some countries use the same deposit for all containers, while others set different amounts depending on the size of the container, what it is made from and whether it is single-use or reusable.

Example deposit levels from other countries are:

	Single-use container deposits ¹⁷	Reusable container deposits
Germany (Euro) ^{18, 19}	€0.25 flat rate	Glass beer bottle (all sizes): €0.08 Glass beer bottle with swing top: €0.15 Glass / PET plastic mineral water bottle: €0.15 or €0.25 Glass / PET plastic juice or soft drink bottles €0.15 Glass 1L wine bottles: €0.02 or €0.03
Latvia (Euro) ²⁰	€0.10 flat rate	€0.10 flat rate
Finland (Euro) ²¹	Plastic ≤350ml: €0.10, Plastic 351ml to 999ml: €0.20, Plastic ≥1L: €0.40, Metal: €0.15, Glass: €0.10	Glass 300ml to 350ml: €0.10 Plastic 500ml: €0.20 Plastic 1L and 1.5L: €0.40
Denmark (Danish Krone) ²²	Metal, glass <1L: 1DKK, Plastic <1L: 1.5DKK, Metal, plastic, glass 1-20L: 3DKK	Glass <500ml = 1DKK Glass >500ml = 3DKK Plastic <1L = 1.5DKK Plastic >1L = 3DKK

We propose that a DMO should determine deposit amounts, except where specific deposit values—such as the **0p deposit for glass containers and reusable containers between 2027 and 1 October 2030**—are set directly in the regulations. To do this it will be expected to use examples from other countries, consider what works best for Wales and carry out regular monitoring to make sure the deposit is effective and fair for citizens and businesses.

¹⁷ https://www.reloopplatform.org/wp-content/uploads/2023/05/RELOOP_Factsheet_Flat-and-Variable-Deposits_Jan-2023_Web.pdf

¹⁸ <https://www.bottlebill.org/index.php/current-and-proposed-laws/worldwide/germany>

¹⁹ <https://dpg-pfandsystem.de/images/pdf/220105-DPG-Overview-beverages-3cols-S.pdf>

²⁰ <https://likumi.lv/ta/id/316731-depozita-sistemas-darbibas-noteikumi>

²¹ <https://www.palpa.fi/beverage-container-recycling/deposit-refund-system/>

²² <https://danskretursystem.dk/en/about-deposits/deposit-marks-and-amounts/>

Question 17. How do you think the deposit level for reusable drinks container should compare to single-use containers?

- Reusable container deposit should be higher than single-use
- Reusable container deposit should be lower than single-use
- Reusable container deposit should be the same as single-use
- Don't know
- Please provide details for your answer

Technology and innovation

New technology like two-dimensional (2D) barcodes (such as QR codes) can help to identify individual containers. These barcodes can store detailed information, such as where the container was sold, and whether a deposit has been paid and/or redeemed. Using this technology, which is already starting to appear more widely in the drinks industry, can help to reduce fraud in future by stopping deposits being claimed on containers that do not have a deposit attached. It can also support interoperability between the DRS in Wales and the schemes in the other nations of the UK.

Question 18. What processes, technology and/or innovation do you think could be used to make sure Wales's DRS works well with other schemes? Please provide details/examples where available.

Area of innovation/technology	Yes	No	Don't know	Details/examples – free text
Communications and engagement				
Container labelling				
Barcode/container scanning at return points				
Barcode/container scanning elsewhere				
Other tracking of containers				
Data sharing with other schemes				
Other				

The benefits of the Best for Wales DRS

A DRS which in line with the world's best schemes includes both reusable and single use containers delivers greater benefits than a DRS collecting only single-use containers that are recycled:



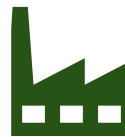
Saving resources - each time a container is reused, it has less impact on the environment because we need fewer raw materials and there is a more local and reliable supply of them.



Going beyond recycling – reusable drinks containers is a true example of a circular economy where the product is kept in use for as long as possible before it needs to be recycled.



Reducing waste – replacing single-use packaging with reusable containers means less waste is produced over time.



Lower carbon footprint – Using more reusable containers means fewer new single-use containers need to be made. This leads to lower carbon emissions from production and recycling of single-use containers.



Cost savings – a reuse system, using the containers again and again can lead to long-term savings for producers which could in turn mean lower prices for customers over time.



Job creation – running a reuse system means more jobs in transport, sorting, washing, quality checking, compliance, monitoring and health and safety, creating more green jobs for people.

A shift to a circular economy can help Wales's economy²³, creating 'green' jobs, helping to deal with rising costs and securing a supply of materials for the future.

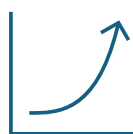
²³ Welsh Government. Beyond Recycling Strategy Consultation chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.gov.wales/sites/default/files/consultations/2020-03/consultation-circular-economy-strategy_1.pdf. Ellen MacArthur Foundation and Wrap (2013) Wales and the Circular Economy – Favourable system conditions and economic opportunities <http://www.wrap.org.uk/node/17570>

By making the most of these opportunities, we can move towards a fairer, greener and more prosperous society:



Fairer means using a fair share of resources and ensuring everyone gets the same quality of waste management services across Wales.

Greener means addressing the climate and nature crisis reduce emissions and minimising other environmental impacts.



More prosperous means capturing the benefits of moving to a circular economy - reusing and recycling more, making supply chains shorter and more efficient and supporting Welsh businesses to succeed in new markets and industries.

Question 19. How can the Welsh Government and a DMO maximise the benefits to Wales from a DRS for single-use and reusable drinks containers?

Benefit type	Measures to maximise the benefits to Wales	Yes	No	Details/examples – free text
A fairer society	Maximise access to the scheme and ease of use of the scheme for all.			
	Create training and vocational opportunities for communities in Wales with low employment rates.			
	Support charitable causes with donated deposits.			
	Others			
A greener society	Maximise the range of containers in scope for recycling and reuse.			
	Communicate the environmental benefits to incentivise consumer participation: e.g. reduced emissions and levels of littering.			
	Set minimum environmental and/or			

	operating emissions targets for the DRS.			
	Others			
A more prosperous society	Incentives for producers to transition from single-use to reusable containers.			
	Incentives to locate infrastructure in geographical locations that will maximise economic development in Wales.			
	Support local industry/suppliers to access any tender opportunities that are made available by a DMO (e.g. sub-contractor opportunities).			
	Maximise employment and career development opportunities associated with DRS infrastructure.			
	Integrate with wider circular economy initiatives.			
	Others			

A DMO will be responsible for ensuring the DRS is fair for producers and retailers and expected to represent the interests of small medium enterprises as well as large scale businesses.

Question 20. How can we ensure that Small and Medium Enterprises (SMEs) in Wales are supported, represented and can benefit from a reuse system for drinks containers?

Support to SMEs		Yes	No	Details/examples – free text
SME drink producers	Focused engagement sessions/materials for SMEs in the lead up to the launch.			
	Access to low-cost reusable drinks containers that meet required quality standards.			
	Centralised reusable drink container sorting and washing infrastructure.			
	Other			
SME retailers	Focused engagement sessions/materials for SMEs in the lead up to the launch.			
	Financial support to purchase return point infrastructure and/or reconfigure retail spaces.			
	Collections from return points that are aligned with frequency needs to prevent build-up of containers.			
	Other			
Other SMEs	Other			

Question 21. How can we make sure that communities in Wales benefit from a DRS for reusable drinks containers?

Benefits to communities in Wales	Tick box	Observations
Support community events where large numbers of containers are collected, and deposits are claimed (such as organised litter picks)		
Create local jobs and training opportunities		
Run educational workshops for schools and communities		
Integrate the DRS with other projects that support a circular economy		
Arrange local groups to visit DRS facilities such as washing facilities		

Economic development opportunities

A DRS will need new facilities, for example for sorting and washing containers for repeated use. It will also need transport systems capable of keeping reusable containers intact when they are refilled. It will also need counting centres where containers are counted before being recycled or reused.

The Welsh Government wants to understand how could the opportunities from a DRS can incentivise economic growth and green jobs in Wales. There may also be opportunities to use existing infrastructure to support the move to DRS. This in turn would reduce the initial costs of establishing the scheme and enable a smooth transition for Wales..

Opportunity	What this means
Sorting and washing facilities for reusable containers set up by a DMO in Wales	Containers are sorted and washed in Wales creating local jobs and reducing transport distances. Does not require individual producers to each establish container sorting and washing.
Linking DRS facilities with other industrial processes	For example, locating washing facilities near data centres so they can use the water for cooling before it is discharged (under consent).
Locate near container producers and fillers	Cut down on transport costs and emissions for clean containers.
Renewable energy sources	For example, use waste heat from nearby industrial facilities for heating water or use direct link to renewable

	energy source to minimise the environmental impact of the reuse system.
Waste and recycling infrastructure	Partner with local authorities and/or private waste management companies to share depots and transfer stations.
Vacant public and private land or sites	Make use of vacant land or buildings that need development and/or in areas where more jobs are needed.
Enterprise zones	Set up facilities in Wales's enterprise zones which are designed to support specialist skills and sectors associated with the local area.
Available water sources/discharge sites	Make sure washing facilities have a sustainable source of water and/or waterway for discharge, meeting safety and environmental standards.
Transport links	Minimise additional vehicle movements and impacts on local roads. Find opportunities for backhauling using existing transport networks and hubs.

Question 22. Do you agree with these opportunities to maximise economic development ?

Opportunity	Yes	No	Don't know	Please provide details for your response
Sorting and washing facilities for reusable containers set up by a DMO in Wales				
Linking DRS facilities with other industrial processes				
Locate near container producers and fillers				
Renewable energy sources				
Waste and recycling infrastructure				
Vacant public and private land or sites				
Enterprise zones				
Available water sources/discharge sites				
Transport links				

Question 23: Are you responding to this consultation primarily as:

- An individual
- Local authority
- Trade association
- Brand-owner
- Import/exporter
- Manufacturer
- Distributor
- Retailer
- Environmental group
- Charity
- Community Interest Company
- Community group or representative
- Other - please specify
- Prefer not to say

Question 24: What, in your opinion, would be the likely effects of the [matter, recommendation, option, proposal, policy, legislation etc] on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

Do you think that there are opportunities to mitigate any adverse effects?

Please enter here:

Question 25: In your opinion, could the [matter, recommendation, option, proposal, policy, legislation etc] be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Please enter here:

Question 26: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Consultation response form

Your name:

Organisation (if applicable):

email / telephone number:

Your address:

Consultation Questions:

Specifics (Plus mandatory below)

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: