

**From:** Matthew Kay  
**Sent:** 12 December 2025 10:40  
**To:** Gruffydd, Llyr (Aelod o'r Senedd | Member of the Senedd); Climate Change, Environment, and Infrastructure Committee | Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith  
**Subject:** Welsh Deposit Return Scheme

Dear Llyr,

I am writing to you in your role as Chair of the Senedd Climate Change, Environment, and Infrastructure Committee on behalf of British Glass, the Trade Association for UK glass manufacturing, to express our concerns regarding the Welsh Government's proposal to include glass beverage packaging within its Deposit Return Scheme (DRS), which it is currently seeking an exemption from the UK Internal Market Act for.

We fully support efforts to improve recycling and sustainability, but we believe that including glass in the Welsh DRS will lead to unintended negative environmental and economic consequences. Glass recycling in Wales already exceeds 90%, primarily through effective curbside collections. Introducing glass into the DRS, especially with a zero deposit, will not improve recycling outcomes but will impose significant costs on producers and retailers without the usual mitigating factors (e.g., unredeemed deposits). These costs could lead to:

- Delisting glass products in Wales, reducing consumer choice.
- Switching to alternative packaging materials, many of which are less recyclable and have higher environmental footprints than glass.

Both the UK and Welsh Governments have made it clear that reuse systems are the long-term ambition, and British Glass is happy to be involved in these conversations, however inclusion of glass in DRS is a hindrance, rather than a stepping stone, to these ambitions. Material collected in a DRS is not reused and the capital investment required for the DRS systems will mean time is needed to see a return on this before then investing in reuse systems. Rather than doing so, producers are more likely to switch to plastics or composite materials, undermining circularity. Also, as DRS materials do not pay packaging Extended Producer Responsibility (pEPR) fees there is no incentive to move into reuse to avoid these fees.

Further, impacts on the Packaging Recovery Note system and the reduction in glass use generally will, we believe, mean less glass is available for remelting into new products, increases the use of raw materials, and therefore the environmental impact, of glass manufacturing. We also have concerns regarding the steps, processes, and level of consultation that has been undertaken by the Welsh Government on the matter.

We would welcome the opportunity to provide further details and speak to yourself and/or a representative of the committee.

Yours,

Matthew Kay  
*Glass Packaging Policy Lead*  
British Glass