



British Glass

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**Paper to Note: Impact of Glass Beverage Packaging Inclusion in the Wales Deposit Return Scheme (DRS) For: Senedd Climate Change, Environment & Infrastructure Committee
Focus: British Glass concerns and industry risks relating to the Deposit Scheme for Drinks Containers (Wales) Regulations 2026**

1. Summary of British Glass position

British Glass strongly cautions that the inclusion of glass beverage packaging in the Welsh DRS, divergent from the rest of the UK, creates significant commercial, consumer choice, operational, and environmental risks.

Key issues:

- Separate treatment of glass beverage packaging risks fragmentation of the UK market, increased costs, and confusion for producers, retailers, and consumers.
- The lack of clarity caused by the regulations and their interaction with existing legislation i.e. packaging Extended Producer Responsibility (pEPR) makes business and policy operation extremely difficult.
- The scheme risks unintended environmental impacts and may undermine established recycling systems, particularly closed loop recycling back into new glass products (remelt), and improvements to glass recycling in Wales, as well as the introduction of a glass reuse scheme.

2. Risks

2.1 Divergence from rest of UK creates commercial risks that will disadvantage Welsh consumers

Wales is the only UK nation opting to include glass beverage packaging. Despite no labelling requirements in the regulations, Producers will, in reality, need separate labelling for the Welsh market. This will result in all the following, to varying degrees.

- Additional costs for products in Wales, which will be passed onto consumers
- Significant delisting of products contained in glass packaging for sale into Wales, meaning less choice for Welsh consumers.
- Sourcing 'cheaper' glass beverage packaging imports that can absorb policy costs, reducing recycled content of the products, increasing their carbon footprint of those products, and displacing UK supply chains.
- Switching of products into plastic or other materials, many of which negatively impact on human health, the environment, and are less recyclable than glass.

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Industry groups (UK Spirits Alliance Wine and Spirits Trade Association, Scottish Whisky Association) have been clear that these are not unfounded fears¹² British Glass mirrors these concerns and emphasises that clarity, consistency, and risk mitigation are urgently required before the regulations are passed.

2.2 Lack of clarity on glass financial producer obligations (2027–2031)

The published regulations leave many unanswered but critical questions:

- Will Producers face costs for DRS glass collection during the 0p deposit period? Given no money will be raised through unredeemed deposits, glass material value is low, and collection rates will likely be low, this cost would be significant.
- If glass is to exempt from packaging Extended Producer Responsibility under DRS from October 2027, why are Producers still paying pEPR fees now, unlike other metal and plastic beverage packaging in all UK nations that are exempt from pEPR fees?
- How will the system interact with existing kerbside collection? Will the Deposit Management Organisation (DMO) have to reimburse Local Authorities for collecting glass beverage packaging from the kerbside, and if so, how will this be calculated to ensure that glass producers do not continue to pay for both collection systems?
- Given the 0p deposit, an 80% return target for glass beverage packaging by 2030 is very high, will Producers face a fine if this is not met?

2.3 Impact on remelt, recycling systems, and Packaging Recovery Note markets

British Glass warns that the current design risks an erosion of the incentives for glass circularity in Wales.

- Waste reprocessors currently receive funding via Packaging Recovery Notes (PRN) that they generate under the pEPR system, however DRS products are outside of this and cannot produce PRNs. It is unclear how any UK glass processor can know which glass comes from Wales, or indeed how much of the glass is beverage packaging vs non-beverage packaging.
- This weakens incentives for high quality remelt, which underpins circularity for glass.

3. Conclusion - Until clear answers are provided on costs, remelt incentives, cross border trading, and obligations during the transitional period, the inclusion of glass risks damaging the competitiveness of Producers, reducing consumer choice, and undermining Wales' circular economy objectives.

¹ [A Wales-only glass DRS puts UK trade at risk - The Wine and Spirit Trade Association](#)

² [Wales facing 'mass withdrawal' over DRS glass go-ahead | News | The Grocer](#)