



ACS | advice

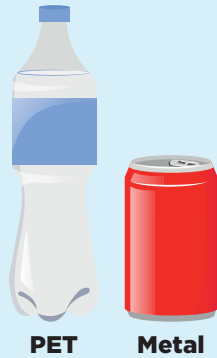
DEPOSIT RETURN SCHEME
GUIDANCE FOR
CONVENIENCE STORES

An ACS advice guide for retailers
www.acs.org.uk

ACS | the voice of
local shops



The UK Government is introducing a Deposit Return Scheme (DRS) in October 2027 which will operate in England, Scotland and Northern Ireland and be overseen by Exchange for Change (formerly the UK Deposit Management Organisation).



PET Metal
Volume between 150ml and 3 litres

The Welsh Government intend to introduce a DRS by October 2027 that also includes glass. Glass containers in Wales will not have a deposit applied to them until 2031, but must still be accepted in stores.

Customers will pay a deposit when purchasing a drink in single-use container and receive the deposit back when they return the empty container to a Return Point Operator.

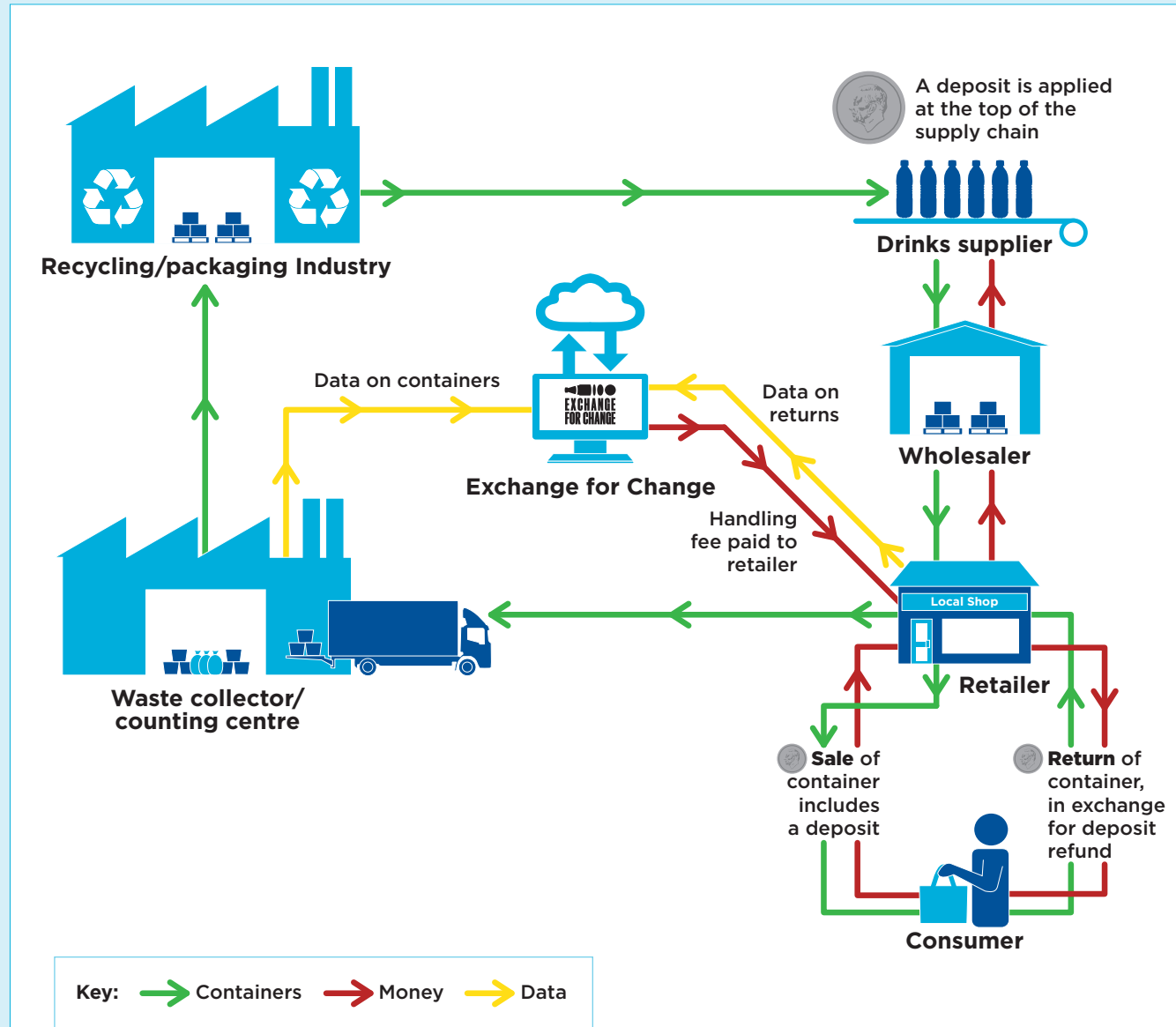
Single use containers in scope include PET plastic bottles and metal cans (volume between 150ml and 3 litres).

If you sell drinks in single-use containers, you are obligated to:

- Register your store with Exchange for Change.
- Pay the deposit back to consumers at the point of return. Payment methods are to be determined by Exchange for Change.
- Ensure that customers can redeem their deposit through a voucher at the checkout.
- Display information so customers know how the scheme works.

You can apply for an exemption from operating a return point. However, every store must charge a deposit on containers, even if they are exempt from hosting a return point.

HOW A DEPOSIT RETURN SCHEME WORKS

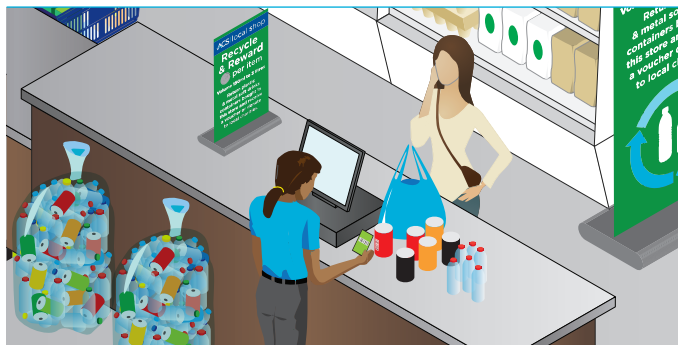




WHAT ARE THE RETURN POINT OPTIONS FOR CONVENIENCE STORES?

if you sell drinks in single-use containers, you will need to register with Exchange for Change. You will have three options:

Manual return



- Colleagues will manually collect and scan returned containers at checkout and refund deposits to customers based on how many containers were collected.
- Scanned containers are then stored in bags at the checkout, and when bags are full, they can be moved by colleagues to a storage area ready for collection.
- You need to record and submit container returns in order to be paid a handling fee by Exchange for Change.

Things to consider

- Lowest cost option.
- Pressure on colleagues and queues at checkout.
- Space behind checkout to store containers.
- Hygiene issues, such as handwashing.

Reverse Vending Machine (RVM)



- You can choose to buy or lease a RVM that can be used by customers to return empty containers.
- Containers will be scanned and stored inside the machine until the machine is emptied by a store colleague for collection.
- Customers will be refunded their deposit via the machine. The machine will print a voucher that customers can redeem at the till. Alternative repayment methods are currently being considered by Exchange for Change.

! You must check that any RVM you buy or lease meets the RVM specifications that have been published by Exchange for Change before investing. These can be found [here](#).

Things to consider

- Positive customer experience in stores.
- Reduced impact on colleagues.
- Compacting of returned containers saving space.
- Capital outlay in buying/leasing, running and servicing RVMs.
- Cleaning & emptying machines on daily basis.
- Storage space for higher volume of returns.
- Permission from landlord before installing a machine.

Exemption



- Retailers in urban areas are exempt from hosting a return point if they have a retail space of less than 100 square meters. If your store is automatically exempt, you can still apply to be a voluntary return point.
- If you are not automatically exempt, you can still apply for an exemption based on how close your store is to another return point, or based on the location, layout or size of your store. We await further clarification from Exchange for Change.

Things to consider

- No need to take back or store containers.
- Loss of footfall to competitors.
- Must apply to Exchange for Change for exemption.
- You must display signage in your store for explaining your exemption and pointing out the closest alternative return point.



KEY CONSIDERATIONS: HOW MANY CONTAINERS WILL BE RETURNED TO YOUR STORES?

Container return rates will directly influence how your store is involved with the Deposit Return Scheme. You should estimate the volume of in-scope containers you sell and consider what percentage of those containers you expect to be returned.

It is important to consider other factors affecting footfall and the volume of containers returned to your store, some of which may include:

Local housing and vehicle ownership



The type of housing and vehicle ownership of customers near your store may determine when and how frequently containers are returned to your return point. People living in smaller dwellings may return more frequently compared to those in larger dwellings that have more space to store containers.

Other return points



What other businesses near you will be hosting return points and what format of return point will they offer?

Supermarkets and convenience stores will be the main return points for customers to return empty containers. Hospitality venues are not required to take back any returns.

Other businesses can also apply to host a voluntary return point, meaning there might be another return point near you.

Footfall and transient customers



Return points in locations with high volumes of transient customers, for example bus and train stations, may receive lower volumes of container returns compared to neighbourhood stores, which experience more predictable footfall.



KEY CONSIDERATIONS: OPERATING A MANUAL RETURN POINT

NEW STORE SIGNAGE

You must display the following information clearly and accessibly at the return point:

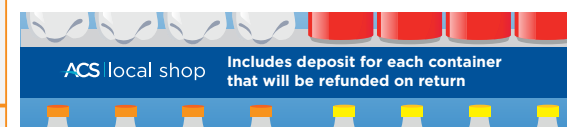
- A statement that Return Point Operators may refuse containers if they have a reasonable excuse for doing so, and no deposit will be paid.
- A summary of Exchange for Change's procedure to make a complaint about a return point.
- Contact details for Exchange for Change.

DEPOSIT RETURNS

At the checkout, you will be able to offer a refund for deposits of any returned containers.

SHELF EDGE LABELLING

The exact layout and content of shelf edge labels is still being determined by government. You should consider how to communicate the price of the product, deposit and the total cost to consumers. We will confirm exact specifications when they are available.



MOVING CONTAINERS

Returned containers, kept at the checkout, will need to be moved safely across the shop floor to a secure storage space. You will need to review your store's risk assessment and the equipment available to colleagues for moving containers.

CLEAR COMMUNICATION

Exchange for Change and retailers will need to work together to provide customers with clear instructions, so they know what to do when DRS is first introduced. Consumers will need to understand which containers are part of the scheme and where empty containers can be returned, so that they can redeem their deposits.



PROCESSING RETURNED CONTAINERS AT THE CHECKOUT

Returned containers will have to be collected, processed and initially stored at the checkout in bags.

REFUSING CONTAINER RETURNS

You can refuse to accept a returnable item if you have a reasonable excuse for doing so. The definition of reasonable excuse is yet to be determined by Exchange for Change.

INCREASE CLEANING

You will need to increase cleaning protocols around the checkout area where containers are returned. Dirty containers or residual liquids in containers may increase the likelihood of wet floors and therefore slips and trips.

HAND CLEANING FACILITIES

Returned containers can be dirty or have residual liquids inside. Colleagues handling the returns should have a place to clean their hands after touching the containers, as they may also be handling other products. You will need to consider providing hand washing facilities, anti-bacterial wipes, or Personal Protective Equipment (PPE) to your colleagues.



KEY CONSIDERATIONS: OPERATING A REVERSE VENDING MACHINE

IS AN RVM THE RIGHT CHOICE FOR YOUR STORE?

To assess whether you want to provide an RVM, you will need to estimate whether you will receive enough returns to justify the additional investment and maintenance. You will receive a handling fee from Exchange for Change per item collected to help cover the cost of collection.

REDEEMING DEPOSITS FROM RVMs

The RVM must be integrated with your store's EPOS system to ensure that the redemption can be processed. Vouchers should be unique and single use to prevent fraud. Exchange for Change will work with retailers and RVM suppliers to ensure that alternative repayments (such as digital payments or loyalty rewards) and donations to charities can be introduced in the future.

THINGS TO KNOW BEFORE YOU INVEST IN AN RVM

- Any RVM you choose to invest in must meet the RVM specifications set out by Exchange for Change [here](#). Ask your RVM provider if they can prove their RVM meets the **RVM specification**.
- RVMs must not accept non-scheme containers as they hold no deposit. Single-use beverage containers made from PET, aluminium and steel, between 150ml and 3 litres are within the scope of DRS.
- The RVM will require a power supply and internet connection to capture data about the volume of returns and must be connected to Exchange for Change's network at least 99.5% of the time.
- The machine should also compact the returned containers to prevent fraud, a compaction rate of at least 55% for PET and 75% cans must be achievable.
- As a minimum all RVMs must have the option to produce a paper voucher that enables the consumer to redeem their deposit for cash in store.



RVM MACHINE AND DIGITAL DISPLAY

RVMs must have place for Exchange for Change's branding on the physical machine in line with the RVM brand asset guidelines provided by Exchange for Change.

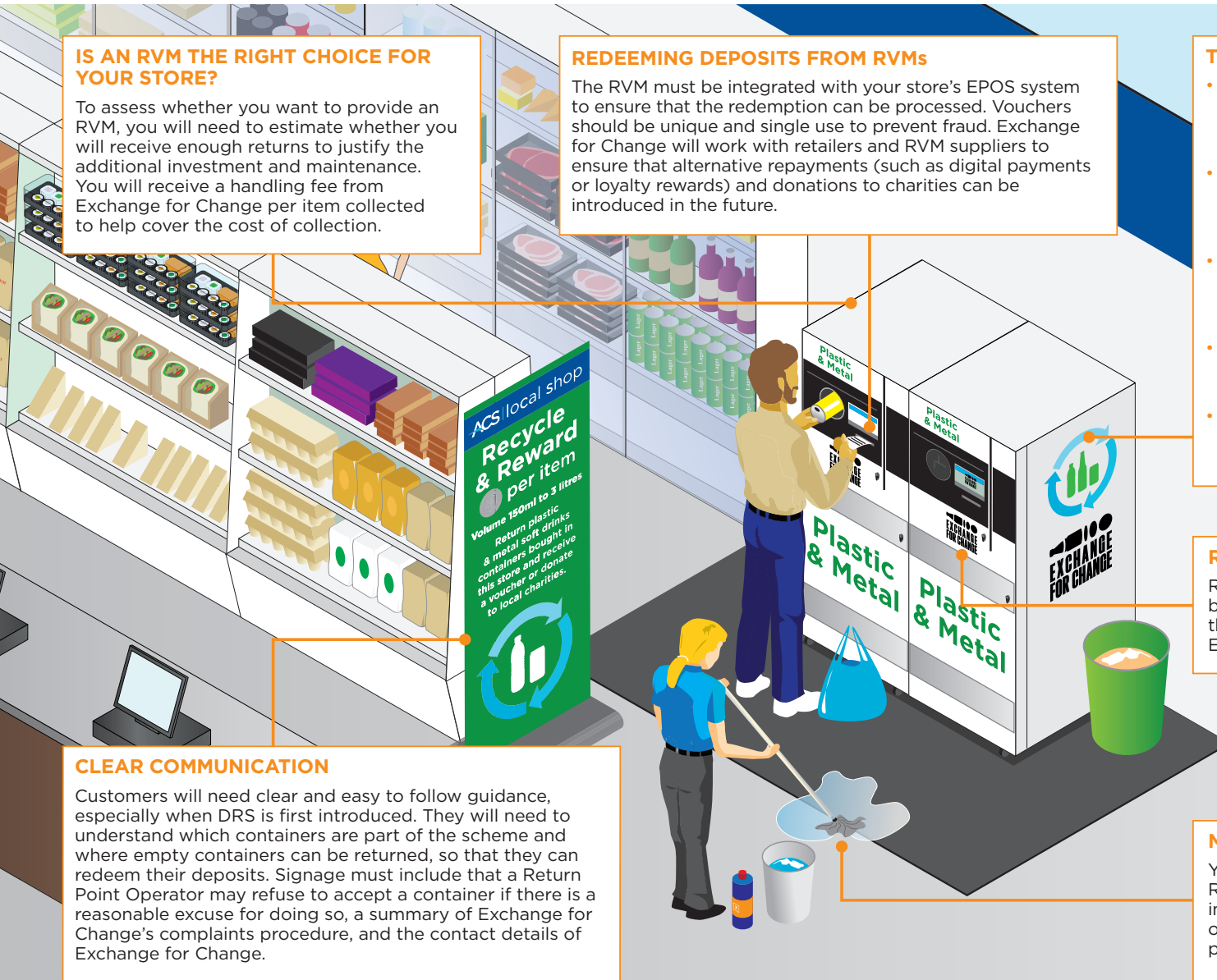


CLEAR COMMUNICATION

Customers will need clear and easy to follow guidance, especially when DRS is first introduced. They will need to understand which containers are part of the scheme and where empty containers can be returned, so that they can redeem their deposits. Signage must include that a Return Point Operator may refuse to accept a container if there is a reasonable excuse for doing so, a summary of Exchange for Change's complaints procedure, and the contact details of Exchange for Change.

MANAGING SPILLS AROUND RVMs

You will need to consider how to manage any spills around RVMs where residual liquid is left in containers. This could include rubber mats and bins. You should also consider the odour which may occur from returned containers and enhanced pest controls which may be needed.





KEY CONSIDERATIONS: BACK OF HOUSE FOR REVERSE VENDING MACHINE AND MANUAL RETURNS

COLLECTING THE CONTAINERS

The collection frequency is currently being determined by Exchange for Change, but the frequency of collections from your store will depend on your store size and how many containers you collect. You will also need to consider how to manage peaks in demand, for example seasonal events around your store and bank holidays, which may significantly increase the volume of returns.

STORAGE OF CONTAINERS

You will need to find safe and sufficient space to store containers separately from where open food is served or stored.

STORAGE BAGS AND BINS

You will need to buy bags from recognised suppliers to store plastic and metal containers. When bags are full, colleagues will need to add specific labels so that the returned containers can be collected and retailers can redeem their handling fee. We expect that wheelie bin(s) will be provided for the storage and collection of empty containers.





SEEKING AN EXEMPTION FROM HOSTING A RETURN POINT

Under the Deposit Return Scheme regulations there is an opportunity for all return points to apply for an exemption if they meet a criterion, which is yet to be determined. It will be up to Exchange to Change to administer and decide on applications for exemptions.

Automatic exemption



Stores **below 100m²** in an urban area can get an “automatic exemption”, but you may need to prove your store size.

Definitions:

- “100m²” (1076 sq ft) relates to space dedicated to sales of goods, not other parts of your premises.*
- “Urban Areas” will be defined by Exchange for Change.

Applying for an exemption



If you store is **over 100m²** or not in an urban area, you can still apply for an exemption based on other factors, including the location, layout, size, or design of your store.

We await further clarification from Exchange for Change on how retailers can apply and what evidence they would need to submit.

* Regulation 35 (1): Exemption for small groceries retailers in urban areas



CONTACT

For more details on this guidance, contact:

Aishwari Mahavir, Public Affairs & Communications Executive
Aishwari.Mahavir@acs.org.uk

Our website
www.acs.org.uk

Our social media
@ACS_localshops on X, TikTok and Instagram
Association of Convenience Stores on LinkedIn, Facebook and YouTube