



# Scotland's Deposit Return Scheme

## Exemptions and Voluntary Return Point FAQs

If you are looking for information on whether you might be eligible for an exemption, please read our exemptions eligibility guidance [here](#).

If you are looking for information on becoming a voluntary return point, please read our guidance [here](#).

If you are looking for help on completing the application process, please read our application guidance:

- Proximity exemption guidance [here](#)
- Environmental health exemption guidance [here](#)
- Voluntary return point guidance [here](#)

### **Do I have to make an application if I want to ask for an exemption?**

If you are required to be a return point operator under Scotland's Deposit Return Scheme but wish to be exempt, you must complete an exemption application. Find out more about retailer obligations [here](#).

### **If I get an exemption, do I still need to charge a deposit?**

Yes. All drinks sold in scheme containers must carry a 20p deposit. If you receive an exemption to act as a return point, you will still have to meet your other requirements as part of the scheme. These include:

- Charging the deposit when selling in-scope products
- Making it clear the container is part of the scheme
- Displaying the deposit value separately from the product price

### **I have multiple stores – do I need to submit more than one application?**

If you have multiple stores, you would be advised to speak to us first and we can advise on how to submit your application. Please contact us at: [DRS.ExemptionsEnquiries@zerowastescotland.org.uk](mailto:DRS.ExemptionsEnquiries@zerowastescotland.org.uk).

### **Can I submit a paper application?**

Yes, you can. Please email us at [DRS.ExemptionsEnquiries@zerowastescotland.org.uk](mailto:DRS.ExemptionsEnquiries@zerowastescotland.org.uk)

## Proximity exemptions

### **Is there any leeway on the proximity eligibility?**

It is important that everyone in Scotland has easy access to a return point. That is why proximity-based exemptions will only be granted where there is an alternative return point nearby.

In your application form, you will have the opportunity to provide further information in support of your application, that may be considered.

The decision as to whether or not to grant an exemption is that of the Scottish Ministers and is made in relation to each application on a case-by-case basis

### **How do I identify an alternative return point**

For help finding alternative return points near to you, please go to [Return Point Mapping & Exemption Support](#)

### **How do I estimate the number of containers an alternative return point will receive?**

Once Scotland's Deposit Return Scheme starts, return points looking for an exemption will be able to enter the average number of eligible bottles and cans they receive.

For now, please enter the approximate number of eligible bottles and cans you sell on a monthly basis.

### **I'm happy to be an alternative return point. How do I let other retailers know?**

If you are looking to act as an alternative return point for other retailers, you can sign up at [Return Point Mapping & Exemption Support](#)

## Environmental Health exemptions

### **I'm a mobile caterer. Do I need to apply for an exemption?**

Yes. You are still required to be a return point operator under Scotland's Deposit Return Scheme, unless you are granted an exemption. If you wish to be exempt, you are very likely to be approved for an environmental health exemption.

### **Do you provide advice on environmental health?**

Zero Waste Scotland is not able to provide any technical advice.

## What to do if your circumstances have changed

### **I've changed my mind – can I ask to revoke my exemption?**

If you wish to withdraw your application, or to wish to have your previously granted exemption revoked, please contact [DRS.Applications@zerowastescotland.org.uk](mailto:DRS.Applications@zerowastescotland.org.uk)

### **I'm moving premises – does my exemption come with me?**

The exemption granted is in relation to the retail premises named on the application and under the conditions stated on the application. Therefore, if you move premises you will need to re-apply, if you still want an exemption for the new premises.

You are required by law to notify the Scottish Ministers of a material change in circumstances, which includes change of ownership or closing of a shop.

### **The alternative return point that has agreed to accept returns on my behalf is closing / moving / changing ownership – do I need to apply again?**

In this case, your first step is to notify the Scottish Ministers of the material change in circumstances. If you are able to, provide details of a new alternative return point in the same format as in your original application. If the new alternative return point is sufficient and there have been no other material changes in circumstances, your exemption should remain in place. If not, you will have to submit a fresh application.

## Retailers not required to operate a return point

### **Are there any retailers that don't have to operate a return point?**

The requirement to operate a return point does not apply to the following retailers (and therefore they do not need to apply for an exemption):

- export shops
- hospitality outlets that sell drinks exclusively for on-site consumption
- premises that only sell scheme articles by way of distance sales
- premises that only sell scheme articles through a vending machine.

The requirement to operate a return point also does not apply to any premises granted an exemption.

Nevertheless, other obligations relating to Scotland's Deposit Return Scheme will apply in relation to these premises.

### **I sell most of my drinks on-site, but sell some off-sales. Do I need to operate a return point.**

Yes. You are required to be a return point operator under Scotland's Deposit Return Scheme if you sell drinks in single use containers for consumption off the premises, unless you are granted an exemption.

If you wish to be exempt and the number of off-sales is small, you will be considered to be a food-to-go retailer and are likely to be approved for an environmental health exemption.

## Voluntary Return Points

### **Am I allowed to offer a return point if I wish to?**

Anyone who wishes to operate a return point that doesn't have a statutory duty to do so must apply to register as a voluntary return point operator. You can find out more and apply on our [voluntary return point](#) page.

### **I am the manager of a retail park, shopping centre or transport hub. Can I help the retail units on my site?**

To help the retail units on your site, you could consider becoming an alternative return point. To find out more about becoming an alternative return point, please visit our dedicated page about voluntary return point applications [here](#).

## **Do I have to accept all scheme containers?**

Yes, once registered as a voluntary return point operator you will be legally required to comply with the obligations placed on all return point operators, including to accept all in-scope containers, including PET plastic bottles, steel and aluminium cans and glass bottles.

## **Completing your application**

### **Is there a deadline for applying?**

There is no deadline for you to submit an application. Applications can continue to be made at any time after the scheme goes live on 16 August 2023.

If you are not granted an exemption before the scheme starts, you will have to allow yourself time to prepare to become a return point for the scheme going live on 16 August 2023. As a result, you should make sure you leave yourself sufficient time to prepare. Find out more about retailer obligations [here](#).

### **Can I save my application and come back to it?**

You must complete your application in one sitting, as there is no option to save your application and return to it at a later point. As a result, you are strongly advised to gather all the information that is required first, draft your text in a separate document and copy and paste when you are confident you have all the information ready to submit. There is no time limit for completing the form, it will not 'time out'.

## **Support with your application**

### **How will I find out whether my application is successful**

The decision as to whether or not to grant an exemption is that of the Scottish Ministers and is made in relation to each application on a case-by-case basis. You will receive a decision letter from the Scottish Government to notify you of their decision.

### **Can I appeal the decision?**

There is no specific procedure provided to appeal a decision. However, if your situation has changed, or if you have additional evidence that would support your application, you are welcome to submit a new application.

## **How do I make a complaint?**

You can make a complaint about the way Zero Waste Scotland has handled your application by emailing [DRS.Complaints@zerowastescotland.org.uk](mailto:DRS.Complaints@zerowastescotland.org.uk)

Our [complaints procedure](#) can be found on the Zero Waste Scotland website.

You can make a complaint about the way Scottish Ministers have handled your application by emailing [sgcomplaints@gov.scot](mailto:sgcomplaints@gov.scot). Further information about the [complaints procedure](#) can be found on the Scottish Government website.

## **I have a question that I can't find the answer to – who can I speak to?**

All enquiries should be directed to  
[DRS.ExemptionsEnquiries@zerowastescotland.org.uk](mailto:DRS.ExemptionsEnquiries@zerowastescotland.org.uk).