

Huw Irranca-Davies AS/MS  
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet  
dros Newid Hinsawdd a Materion Gwledig  
Deputy First Minister and Cabinet Secretary for  
Climate Change and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Russell Davis  
CEO Exchange for Change

19 February 2026

Dear Russell,

Thank you for your application to act as the Deposit Management Organisation (DMO) for Wales.

With the UK Government now having indicated their agreement to bringing forward a UK Internal Market Act exclusion for single-use glass, following on from the agreement received from the Northern Ireland and Scottish Governments, I am pleased to confirm that the DRS regulations for the scheme in Wales were laid before the Senedd on 12 February. We have therefore reached an important milestone on the journey to implement a DRS that delivers for Wales.

The Assessment Panel has completed its initial review of your submission and has identified several areas where further information is required to assess the application against the Welsh Government's published criteria. As it stands, the application does not currently provide the detail, evidence and assurance Welsh Ministers will need. Therefore, as we discussed, in the meeting on the 11 February it is essential that your revised application clearly demonstrates how you meet the Welsh Government's published criteria for appointment in order to ensure the scheme will deliver for Wales. I would strongly encourage you to revisit the published criteria and work closely with my team of officials to ensure you understand what is needed as you work to provide the evidenced within your application.

I attach a formal schedule of clarification requests, which sets out the additional information required. These clarifications are intended to support a robust, evidence-based assessment of how you would deliver the requirements within the regulations and the Welsh Government's policy requirements to deliver the scheme outcomes in practice. They focus on specific operational, governance and financial detail where information is currently missing, unclear or provided only as a high-level narrative.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

In summary, the Panel's clarifications focus on:

- **Organisational completeness** — ensuring full organisational and contact information is provided.
- **Governance and accountability** — clear explanations of the governance arrangements that will support delivery of the scheme in Wales, including where a Wales-specific entity is proposed.
- **Operational delivery in Wales** — credible, detailed and Wales-specific operational plans, including key processes, contracting and criteria, consultation arrangements, data management, agreements, and how your delivery model reflects the Welsh operating context.
- **Consumer-facing arrangements** — practical plans for communications, accessibility, and bilingual delivery.
- **Financial robustness** — detail and supporting evidence for the financial plan, including treatment of unredeemed deposits, funding assumptions and timing, overhead allocation, liquidity, reserves, and scenario/sensitivity testing.

Several clarification requests relate specifically to reuse and to glass. The revised submission should set out credible, end-to-end plans showing how glass will be embedded across the operational model and how reuse will be phased in, including deliverables, timelines, and accountable roles.

### **Submitting your revised application**

Please submit a revised and complete version of the application form, with all clarifications addressed directly within the relevant sections and any supporting annexes clearly referenced. We would appreciate receiving your revised application by **close of play on 26 February 2026**. Submissions should be sent to **[wg.drsprogramme@gov.wales](mailto:wg.drsprogramme@gov.wales)**.

The assessment will then consider the evidence contained within your revised application and annexes. Where clarifications are not fully addressed, or where responses remain high-level without the detailed operational, governance or financial assurance requested, the Panel's ability to advise Welsh Ministers may be limited. If a clarification cannot be addressed, please state this explicitly and explain the reason.

This correspondence should not be interpreted as indicating any view on the outcome of the process. The clarifications are issued solely to enable a full, fair and transparent assessment of your application against the published requirements. Welsh Government remains committed to running a fair and transparent appointment process and to engaging constructively with applicants. However, Welsh Ministers can only make an appointment where the application clearly demonstrates deliverability of the scheme in Wales against the requirements and provides sufficient assurance of the accountability for Welsh scheme's outcomes.

If you would find it helpful to discuss any of these points further, officials would be happy to arrange a meeting.

We appreciate your cooperation and engagement to date, with the regulations now laid, this is an important milestone for the bringing forward of a DRS that delivers for Wales.

Yours sincerely,

**Huw Irranca-Davies AS/MS**

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