

Application 1 – Clarifications

Section	Sub Section	Clarification required
B	4.2	Table does not contain key information, including contact number, contact name, and job title.
B	5.6	Applicant states use of retained amounts (unredeemed deposits) will be applied towards the furtherance of the business of the DMO. However, applicant does not describe what will happen to funds if retained amounts exceed what is needed by the DMO. Little or no mention re: consumers,
B	5.8	Further information is needed not sufficient on glass or reuse.
B	5.9	Not clear on how the proposed group will operate, a diagram would be helpful to accompany the narrative, no timelines given
C	7	<p>Major gaps</p> <ul style="list-style-type: none"> • Lack of plans for glass and reuse. • Overdependence on future trials rather than concrete proposals. • Missing or vague methodologies, especially regarding litter, technology, and behaviour change. • Very limited detail on partnerships with Welsh local authorities, community groups, or third sector. <p>Not tailored to Wales - approach appears primarily UK-oriented, insufficiently reflecting Welsh policy, geography, industry, or regulatory requirements.</p> <p>Insufficient evidence - minimal detail, missing methodology, weak rationale, and absence of supporting documentation across multiple sub-sections.</p>
C	8	<p>Across all six questions, assessors highlight the same core issues:</p> <p>Major omissions</p> <ul style="list-style-type: none"> • No contracts • No fee-setting rationale • No Wales-specific processes • No operational detail on how data, fees, or agreements will be managed

		<p>Inconsistency - adequate information appears for some aspects, making for an uneven and incomplete submission.</p> <p>Structural concerns - applicant appears to have misinterpreted sections, placing content in the wrong locations or omitting it entirely.</p>
C	9	<p>More detail required on:</p> <ul style="list-style-type: none"> • How fees will be reviewed • How consultation will actually be undertaken • How the approach differs for DMO Cymru versus UK DMO
C	10	<p>Critical lack of detail</p> <ul style="list-style-type: none"> • Many answers are high-level or incomplete. • Key operational components (contracts, criteria, monitoring processes) are missing. <p>Insufficient Welsh-specific planning - responses refer to UK-wide arrangements but are not clear on how they will be adapted to Wales' regulatory, geographical, or operational context.</p> <p>Missing or undeveloped documents - required draft contracts, criteria, and processes are repeatedly absent.</p>
C	11	<p>Major lack of Welsh-specific planning - nearly every comment notes that the response works for the UK system but does not translate to Wales, especially for glass, but also reuse.</p> <p>High-level descriptions with missing operational detail - no explanation of processes, criteria, logistics, costs, partnerships, or timelines for take-back services in Wales.</p> <p>No integration with local authorities or existing Welsh recycling systems - absence of references to kerbside systems, community networks, or LA-run services.</p>
C	12	<p>Welsh context is almost completely missing - responses do not describe any DMO Cymru arrangements.</p> <p>High-level answers lacking operational detail</p> <p>Information is generic and does not include:</p>

		<ul style="list-style-type: none"> Processes Data models Timelines Roles & responsibilities Regulatory interactions - NRW engagement is unclear or absent;. <p>Further detail required on:</p> <ul style="list-style-type: none"> Specific detail for proposed DMO Cymru arrangements Actual deposit level proposals Detailed consultation plans Evidence to justify deposit decisions
C	13	<p>Major lack of Wales-specific detail - handling fees, consultation, payment processes, and local authority engagement all lack meaningful detail for proposed DMO Cymru arrangements.</p> <p>High-level, incomplete answers - key operational details - fee calculations, verification methods, variations for rural or small retailers - are missing.</p> <p>No draft outputs or evidence - no draft fee levels, models, formulas, or supporting documents.</p> <p>Weak recognition of Welsh local authorities - Engagement with Welsh LAs is missing or superficial.</p>
C	14	<p>Additional clarity required on:</p> <p>Bilingual requirements and how they will be applied across all container types including glass</p> <p>Missing detail for glass and reuse - not clear how logos or return codes will be incorporated for these materials / products – more clarification required for proposed DMO Cymru.</p>
C	15	<p>Missing or incomplete detail - across reimbursement, reconciliation, and charitable donations, the responses are vague or lacking practical explanation.</p> <p>Wales-specific processes not described - arrangements are missing or only implied, with no clarity on how Welsh requirements will be met.</p>

		<p>Glass and reuse of materials consistently omitted - these materials / schemes are not incorporated into reconciliation or refund processes, which is a significant gap.</p>
C	16	<p>Repeated lack of Welsh-specific detail - the approach relies on UK-wide assumptions and does not reflect the Welsh context.</p> <p>Weak engagement with local authorities – applicant needs to reconsider its stance of not working with Welsh LAs, which is unacceptable for a scheme in Wales.</p> <p>Insufficient operational clarity- no detailed collection models, rural logistics plan, or sorting/transportation strategy specific to Wales.</p> <p>Missed opportunities to use Wales’ existing infrastructure - the proposal fails to consider assets such as LA-run depots, kerbside collections networks, and community facilities.</p>
C	17	<p>Responses are high-level and lack operational detail - across all regulatory areas, the applicant provides statements of intent rather than actionable plans.</p> <p>Welsh-specific compliance is barely addressed - for Welsh Language, Minimum Price for Alcohol, and waste legislation, the applicant provides only generic compliance statements.</p> <p>Little evidence of active engagement or planning - assessors noted repeatedly that responses feel like “bare minimum”, “light-touch”, or “lacking evidence”.</p>
C	18	<p>Insufficient detail across all areas - Responses contain general statements but lack practical mechanisms, financial models, timelines, or responsibilities.</p> <p>Weak on engagement with Welsh regulators - the submission appears England-centric and does not properly address NRW’s role or requirements.</p> <p>Repeated absence of proposed DMO Cymru specifics - where UK DMO processes are mentioned, equivalent Welsh processes are missing or undeveloped.</p>

		Heavy reliance on “intent” rather than operational plans - the submission is deemed not credible, lacking evidence, and insufficient for regulatory assurance.
C	19	<p>High-level but lacking operational substance - across all areas, the submission outlines intentions but does not provide the detail needed for sufficient assurance.</p> <p>Where sections are described as strong, this generally refers to the UK framework; Welsh-specific delivery remains largely unaddressed.</p> <p>Missing clarity on implementation, comms, and complaints handling - a lack of practical detail on timelines, stakeholder communication, and consumer-facing processes.</p>
D	20.1	How can the input figures be reconciled with the assumptions commentary, and how will issues such as EPR diversion uncertainty, timetable slippage, funding availability, discrepancies in regulatory compliance fees (£315k vs £60k), funding of proposed DMO Cymru in years 1–2, breakeven viability from year 6, marginal profit risks in years 3–5, absence of deferred income adjustments for unredeemed deposits, year1 cashflow inconsistencies, and producer fee volume mismatches be addressed?
D	20.2	How viable are alternative funding sources if EPR fees are delayed or unavailable, and what rationale underpins proposed DMO Cymru overheads and cost recharging assumptions?
D	20.2	what further clarity can be provided regarding EPR approvals, alternative funding, overheads and cost allocations?
D	20.2	What is meant by “triangulation”, and can consistent, source based assumptions be provided alongside downside scenarios, confidence ratings and sensitivity analysis?
D	20.2	How would proposed DMO Cymru be funded without EPR income in years 1 and 2?
D	20.2	What is the current level of commitment regarding APFs, what third-party funding is required, what is the status of lender discussions, and how will proposed DMO Cymru manage liquidity?
D	20.2	What assumptions underpin the viability of the Welsh (Glass and Reuse) Co, and how will DMO Cymru maintain its reserve fund?
D	20.2	What scenario testing has been undertaken on the business plan model, and what levels of risk, contingency and

		scenario planning will be provided to demonstrate financial sustainability for the proposed DMO Cymru?
D	20.2	What scenario and sensitivity analysis will be provided?
D	21.2	Why is government underwriting of third-party facilities required for the UK DMO, and what further detail can be provided on income mitigation measures, scenario testing, and alternative mitigations should EPR fees not materialise?
D	22.1	What policies can be provided to support this section?
D	23.2	What further detail can be provided on funding requirements, sources and uses, downside modelling, funder commitments, viability of proposed DMO Cymru (Glass & Reuse), current financing discussions, alternative funding options, and funding needed for the Reuse trial?
D	23.2	What are the specific financing timelines for the UK DMO?
D	24.1	Can heads of terms be provided?
D	24.1	What additional evidence can be provided?
D	24.1	What is the current status of negotiations regarding external financing?
D	24.1	When will capital-financing timelines be confirmed?
D	24.2	What further detail can be provided on contingency funding for both the UK DMO and proposed DMO Cymru?
E	25.2	Can you provide more information?