POSITIVE ID LABELS

DEPOSIT RETURN SCHEME

DRS BARCODE CHECKLIST

Producer registration
New GTINs and barcodes
9 July 2027 Article List deadline

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How to use this checklist

Use this checklist to get every in-scope drinks product registered and re-barcoded for the UK deposit return scheme (England, Scotland and Northern Ireland). Work through it by role. Items marked CRITICAL have a fixed deadline; URGENT items should start now. Facts are taken from Exchange for Change and SI 2025/67, correct as of 20 October 2026.

Questions about fitting these details on your labels? Talk to Positive ID Labels: **01332 864895** **sales@pid-labelling.co.uk**

Key compliance dates

DATE	REGULATION	REQUIREMENT
29 Sep 2026	Phase 1 registration	Business registration opens (company details); no formal deadline
Jan 2027	Phase 2 registration	Role-specific information requested
May 2027	Producer fees	Fees from 2029 reviewed
9 Jul 2027	**Scheme Article List**	**Existing products registered with new DRS barcodes**
1 Oct 2027	**Scheme go-live**	**Scheme logo and return code mandatory on in-scope containers**
After go-live	New products	Register before sale; 2 weeks (standard) or 4 weeks (non-standard) to listing

Brand owner and registration

Who registers, and when. Scheme producers are UK-established brand owners, importers and fill-to-order businesses supplying in-scope drinks in England, Scotland or Northern Ireland.

■ BUSINESS REGISTRATION

- [ ] **1. Complete Phase 1 registration now** — URGENT
  Phase 1 opened on 29 September 2026 and asks for company details, contacts, trading names and addresses. There is no formal deadline; Exchange for Change asks producers to register as soon as possible.

- [ ] **2. Diary Phase 2 for January 2027**
  Phase 2 asks for information specific to your role. The exact data fields have not been published yet, so check the Exchange for Change portal in January.

- [ ] **3. Check whether contract-filled lines make you a producer**
  Businesses that fill to order are producers for those drinks. Agree with your filler who registers each product.

■ PRODUCT REGISTRATION

- [ ] **4. List every in-scope product (SKU)**
  Include brand name, container material, capacity and multipack sizes. These are among the statutory application contents under SI 2025/67 Schedule 1.

- [ ] **5. Register existing products on the Scheme Article List by 9 July 2027** — CRITICAL
  That is 12 weeks before go-live on 1 October 2027. Later registrations are handled on a reasonable endeavours basis only.

- [ ] **6. Register low-volume SKUs too**
  Products at or below 6,250 units per SKU in the first period (1 Oct 2027 to 31 Dec 2028), then 5,000 a year, are exempt from producer fees and the logo but must still register and report volumes.

- [ ] **7. Plan launches after go-live**
  From 1 October 2027, new products must be registered before going on sale. Allow 2 weeks to listing for standard containers and 4 weeks for non-standard containers, which may need physical testing.

Artwork and barcodes

Every existing barcode on an in-scope container has to change. The new barcode must meet the Exchange for Change Material Specification (v6, June 2026).

■ NEW GTINS

- [ ] **8. Allocate a new GTIN for each deposit product** CRITICAL
  Exchange for Change says all existing product barcodes must change, including international barcodes. GTINs come from GS1 UK. International barcodes may attract an extra producer fee charge; the amount has not been announced.

- [ ] **9. Give multipack outers their own barcode**
  Every container carries its own scheme barcode, and the outer multipack barcode should not match the containers inside.

- [ ] **10. Keep export-only versions separate**
  Products sold only outside the UK scheme should not carry the DRS logo or barcode. Ask GS1 UK whether your export version needs a different GTIN.

■ BARCODE SPECIFICATION

- [ ] **11. Use an accepted symbology**
  EAN-13, EAN-8, UPC-A or UPC-E, GS1-compliant and unique to the product.

- [ ] **12. Plan for Grade 1.5 for the life of the pack**
  Print quality must meet ISO 15420 and hold Grade 1.5 (ISO 15416) throughout the life of the pack, including chilled storage and transit.

- [ ] **13. Place the barcode correctly**
  Readable at a 30 degree tilt, vertical (ladder) layout preferred. Bottles: main label, not the neck. Cans: at least 8mm from the base, never on the top or base.

- [ ] **14. Add the scheme logo at the same time**
  Deposit items must carry the scheme logo and a scheme return code. Update both in one artwork change.

Production and purchasing

Turn registration into printed labels on the line in time for the first fill after 1 October 2027.

■ PRODUCTION

- [ ] **15. Lock the final label design before you register**
Changes to container dimensions, material, label coverage or cap design need a new material specification submission. Bottle labels should aim to cover less than 50% of the container.

- [ ] **16. Prepare samples for acceptance testing**
After registration, samples may be needed for reverse vending machine acceptance testing. Non-standard containers need physical testing before go-live.

- [ ] **17. Check barcodes survive your conditions**
Think about ice, condensation, crates and transit. Choose a label material and finish that keeps the barcode clean and readable.

■ PURCHASING

- [ ] **18. Book artwork and print slots early**
GS1 UK advises that barcode work should not be left until the final stages of an artwork schedule. Work back from 9 July 2027.

- [ ] **19. Time your last pre-DRS label run**
Order enough current labels to cover fills before 1 October 2027, without leaving stock that cannot be used after launch.

- [ ] **20. Expect customers to check your registration**
Under SI 2025/67 reg 23, retailers and wholesalers must not supply deposit items from an unregistered producer.

What we can do, and sources

Positive ID Labels prints drinks labels for brewers, soft drinks makers and contract fillers. We do not allocate GTINs or register products with Exchange for Change; we print the labels that carry them.

■ HOW WE HELP

- [ ] **21. Crisp barcodes on digital presses**
Our Xeikon prints at 1200dpi and our Screen UV inkjet at 600dpi, both suited to sharp linear barcodes.

- [ ] **22. Materials and finishes for chilled, wet drinks**
White polypropylene resists water, and varnish or laminate (Xeikon and Screen) adds protection against scuffing in crates and transit.

- [ ] **23. Two versions without the waste**
Short digital runs make a UK DRS version and an export version practical. Published digital target: 3 to 5 working days.

- [ ] **24. Artwork and reorder support**
Press-ready artwork is processed free; design changes are quoted separately. We can talk through barcode placement on your artwork and set a reorder reminder to help time your last pre-DRS run.

■ SOURCES (CHECKED 20 OCTOBER 2026)

- [ ] **25. Exchange for Change**
Registration opens (29 Sep 2026): exchangeforchange.co.uk/news/exchange-for-change-opens-registration-for-deposit-return-scheme/. Material Specification v6 (June 2026) and FAQs: exchangeforchange.co.uk.

- [ ] **26. Legislation**
SI 2025/67 regs 11, 23, 24, 57 and Schedule 1: legislation.gov.uk/uksi/2025/67/contents/made. Scotland: 2020 Regulations as amended (SSI 2025/188). Wales has a separate scheme (WSI 2026/103); arrangements to follow.

- [ ] **27. GS1 UK**
DRS barcode readiness: gs1uk.org/insights/news/Exchange-for-Change-update-puts-DRS-barcode-readiness-on-the-agenda. This checklist is general information, not legal advice.

NEXT STEPS

New barcodes to print?

We can help.

Labels printed in Melbourne, South Derbyshire, ready for your DRS launch.

Positive ID Labels prints drinks labels for brewers, soft drinks makers and contract fillers.

Tell us your labelling challenge. We can talk through materials, finishes and barcode placement on your artwork, then give you a fixed-price quote.

The price we quote is the price you pay.

CALL
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SCAN TO READ THE FULL GUIDE

pid-labelling.co.uk/drs-barcode-registration-guide/