

DEPOSIT RETURN SCHEME

DRS TRANSITION CHECKLIST

Existing stock and packaging rules
Scheme logo and new barcodes
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Actions by role

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The deposit return scheme starts on 1 October 2027 in England, Scotland and Northern Ireland. Use this checklist to plan your switch to DRS labels without wasting stock. Tick each item as you complete it. Items marked CRITICAL carry a hard deadline or a legal requirement. Flexibility for packaging tied to pre-launch orders is not yet agreed, so this checklist assumes it will not apply.

Need help? Contact Positive ID Labels for a free 20-minute compliance review: [01332 864895](tel:01332 864895)
sales@pid-labelling.co.uk

Key compliance dates

DATE	REGULATION	REQUIREMENT
29 Sep 2026	Registration Phase 1	Producer and return point registration open (company details). No formal deadline: register as soon as possible.
Jan 2027	Registration Phase 2	Further role-specific information requested from producers.
9 Jul 2027	Article List	Deadline to register existing products and their new DRS barcodes (12 weeks before go-live).
30 Sep 2027	Last fill outside scope	Drinks made and filled up to this date are outside the scheme and can still be sold after launch.
1 Oct 2027	Scheme go-live	England, Scotland and NI: scheme logo and scheme return code required on every in-scope container. Wales launches the same day.
Apr 2028	Sell-through	Suggested date to have sold pre-launch stock (guidance, not law).
30 Sep 2031	Wales: glass	Welsh glass transition ends. Deposit and DRS labelling then apply to glass in Wales.

Section 1: Brand owner and compliance

Decide what is in scope, register on time and set the switchover date that everything else hangs on.

■ SCOPE AND REGISTRATION

1. List every in-scope product

- ☐ Single-use PET, aluminium or steel bottles and cans, 150ml to 3 litres, sold in England, Scotland or Northern Ireland. Glass is out of scope there.

CRITICAL

2. Flag low-volume lines

- ☐ Lines of no more than 5,000 units a year (6,250 in the first 15 months) need no logo, barcode or fee, but must still register and report volumes.

3. Complete Phase 1 registration now

- ☐ Exchange for Change asks producers to register as soon as possible. Phase 2 opens in January 2027.

URGENT

4. Register existing products by 9 July 2027

- ☐ Each product and its new DRS barcode goes on the scheme Article List.

CRITICAL

5. Separate export-only products

- ☐ Products sold only outside the UK must not carry the UK DRS logo or DRS barcode.

■ SWITCHOVER DATE

6. Fix your final pre-launch fill date

- ☐ Drinks filled before 1 October 2027 are out of scope. Empty packaging with no pre-launch order cannot be filled and sold after launch without the logo and registered barcode.

CRITICAL

7. Do not rely on pre-launch order flexibility

- ☐ Flexibility for packaging tied to orders placed before launch is under discussion with regulators and is not agreed.

8. Check Wales separately

- ☐ Welsh rules for PET and cans are still to be published. Glass in Wales needs no DRS labelling until 30 September 2031.

Section 2: Artwork and production

Every in-scope label in England, Scotland and Northern Ireland needs new artwork. These points come from Exchange for Change's Logo Requirements and Material Specification.

■ ARTWORK

9. Add the scheme logo once per container

- ☐ Single colour, black or white preferred. Use the portrait (primary) logo unless space demands landscape. Keep 1mm clear space and check the minimum and maximum sizes in the guidance.

CRITICAL

10. Decide on the OPRL mark

- ☐ The DRS logo can sit alongside or replace the OPRL recycling label. It is your choice.

11. Replace the barcode

- ☐ All existing product barcodes must change. Use EAN-13, EAN-8, UPC-A or UPC-E to GS1 specifications, unique to each product.

CRITICAL

12. Place the barcode correctly

- ☐ Bottles: main label, not the neck. Cans: at least 8mm above the base, never on top or base. Vertical ladder orientation preferred. Must read at a 30 degree tilt.

13. Keep bottle label coverage under 50%

- ☐ Exchange for Change asks for label and sleeve coverage below half the bottle surface. Cans are exempt.

14. Multipacks

- ☐ Every container inside carries its own logo and barcode. The outer pack barcode must differ from the containers.

Section 3: Production, purchasing and stock

Protect barcode quality in production, and avoid the biggest avoidable cost: old-artwork label stock that can no longer be used.

■ PRODUCTION

15. Protect barcode quality for the life of the pack

- ☐ The barcode must hold Grade 1.5 throughout the pack's life. Consider moisture-resistant materials and a varnish or laminate for chilled and transit-heavy products.

16. Test with Exchange for Change early

- ☐ Non-standard containers should be tested early. Over-labels (stickers) are allowed only by exception with prior approval.

■ LABEL STOCK

17. Audit current label stock by SKU

- ☐ Count the labels you hold and on order for each in-scope product, and estimate usage to your final pre-launch fill.

URGENT

18. Size your last pre-DRS run

- ☐ Order only what you will fill before 1 October 2027. Anything left after that is likely to be waste.

19. Book the new-artwork run

- ☐ Allow time for proofs and approvals before your first post-launch fill. Running both versions in parallel for a short period is common.

20. Plan finished-goods sell-through

- ☐ Aim to clear pre-launch filled stock by April 2028 so the old and new packs are not on shelf together for long.

What Positive ID Labels can do

Practical help for the changeover. Talk to us on 01332 864895.

■ HOW WE HELP

21. Short digital runs for transition stock

- ☐ Xeikon (1200dpi) and Screen UV inkjet (600dpi) suit short runs and several artwork versions at once. Digital orders typically despatch in 3 to 5 working days.

22. Materials and finishes for drinks

- ☐ White polypropylene for moisture resistance, with gloss or matt varnish or laminate to protect against scuffing in transit.

23. High-volume flexo

- ☐ For large runs, our flexo presses and over 1,000 dies in stock often mean no tooling charge.

24. Reorder reminders and fixed-price quotes

- ☐ We can set up usage-based reorder reminders to help you run old stock down, and every quote is a fixed price.

Sources

Correct as of 12 October 2026. Check the latest Exchange for Change updates before final artwork sign-off.

■ PRIMARY SOURCES

☐ **S1. Exchange for Change: update on transition arrangements (30 Sep 2026)**
exchangeforchange.co.uk/news/deposit-return-scheme-update-on-transition-arrangements

☐ **S2. Exchange for Change: Material Specification v6 (June 2026)**
exchangeforchange.co.uk/resources (Material Specification)

☐ **S3. Exchange for Change: Logo Regulatory Requirements (Feb 2026) and FAQs**
exchangeforchange.co.uk/resources and exchangeforchange.co.uk/faqs

☐ **S4. SI 2025/67: Deposit Scheme for Drinks Containers (England and NI) Regulations 2025**
legislation.gov.uk/uksi/2025/67

☐ **S5. SSI 2025/188 (Scotland) and WSI 2026/103 (Wales)**
legislation.gov.uk/ssi/2025/188 and legislation.gov.uk/wsi/2026/103

NEXT STEPS

Planning your DRS switch?

Let's time it right.

Production-ready, compliant labels across all four print technologies.

Positive ID Labels prints drinks labels on digital and flexo presses in Melbourne, South Derbyshire.

We can help you size your last pre-DRS run, proof new artwork for logo and barcode placement, and get new labels on press quickly.

Call us or send your label spec for a fixed-price quote.

CALL

01332 864895

EMAIL

sales@pid-labelling.co.uk

WEB

pid-labelling.co.uk

SCAN FOR COMPLIANCE RESOURCES

pid-labelling.co.uk/resources