Deposit Return Scheme Supplying drinks containers to

Crown Dependencies and British Overseas Territories (CD/BOT)

Practical guidance for producers, retailers, wholesalers and exporters

exchange for change

The key point

Crown Dependencies and British Overseas Territories sit outside the UK Deposit Return Scheme (DRS) regulation. Direct exports are excluded from UK DRS reporting and charging. Eligible indirect exports may give rise to a deposit refund and a standard producer-fee refund.

1 Which destinations are covered?

Crown Dependencies: Isle of Man, Jersey and Guernsey.

British Overseas Territories: Includes Gibraltar and the other territories as outlined by the Foreign, Commonwealth and Development Office (FCDO)

2 Decide which export route applies

DIRECT CD/BOT EXPORT
The producer ships containers to a CD/BOT before they are placed on the UK DRS market.

INDIRECT CD/BOT EXPORT
Stock was placed on the UK DRS market and is later supplied by a retailer, wholesaler or other business to a CD/BOT.

3 Direct exports to a CD/BOT

- No direct-export report or refund claim is submitted to Exchange For Change.
- No DRS deposit, standard producer fee or additional charge for use of an international barcode is due on those units.
- Where the same SKU is also sold in the UK, register the product through the Exchange for Change portal from early 2027 at www.exchangeforchange.co.uk but declare only the units placed within England, Northern Ireland, Wales & Scotland.
- A UK national barcode may be used for CD/BOT supply under this specific guidance. This does not, by itself, classify the barcode from national to international.

Example
A producer ships 40,000 cans carrying a UK national barcode directly to an Isle of Man retailer. The producer excludes those units from its placed-on-market declaration to Exchange For Change. No DRS deposit, producer fee or additional international-barcode charge applies.

4 Indirect CD/BOT exports

What happens when DRS stock is later supplied to a CD/BOT that was not known when sold/ procured?

Financial treatment Summary:

Scenario	Who acts	Deposit and producer fee	Barcode treatment
Direct export, any barcode	Producer excludes units from DRS volume	No deposit or producer fee	No additional international-barcode charge on direct-export units
Indirect export, UK national barcode	Registered Exporter submits claim	Eligible deposit refund to the Exporter and standard producer-fee refund to the Producer.	Remains a UK national barcode. No International Barcode Charge applies.
Indirect export, international barcode	Registered Exporter submits claim	Eligible deposit refund to Exporter and standard producer-fee refund to Producer	Any additional charge paid for use of the international barcode is not refundable

5 Claiming for an eligible indirect export

A retailer, wholesaler or other applicable business may apply to claim where DRS stock (national or international barcode) was placed on the UK market and later supplied to a Crown Dependency or British Overseas Territory without the producer knowing at the point of sale. The final process will be shared by Exchange For Change in Q3 2027.

1

Register:
Register with Exchange For Change before the first claim.

2

Identify the stock:
Provide the barcode/GTIN, SKU, container quantities, supplier information and relevant producer or importer where known.

3

Evidence the stock movement to CD/ BOT:
A refund will only be considered where the claim is supported by clear, auditable evidence demonstrating that the products were supplied to the CD/BOT, such as invoices and dispatch, shipping, customs or equivalent records.

4

Submit the claim application for a refund of deposit/ producer fee:
Further guidance on the evidence requirements and claim process will be shared by Exchange For Change ahead of the scheme launch.

5

Verification and settlement:
Exchange For Change will review the claim. An eligible deposit refund would go to the Exporter and the standard producer-fee refund to the Producer.

6 Important points for all businesses

- The application for a refund relating to exported products does not replace or change any regulatory requirements placed on producers. Nothing in this guidance removes the requirement to register and supply data on products supplied / made available to be marketed and producers are ultimately responsible for ensuring they meet the requirements of the regulations.
- Refunds associated with indirect exports are not governed by the regulations and are exclusively managed at the discretion of Exchange For Change.
- The same units cannot be excluded from a Producer declaration and also claimed as an indirect export.
- Use of a UK national barcode for CD/BOT supply does not, by itself, create an international-barcode product or additional charge. Crown Dependencies and British Overseas Territories are treated as part of the UK market for International Barcode Charge purposes. Supplying them does not change how a barcode is classified or charged.
- Any additional charge already paid for use of an international barcode is not refundable following an indirect export.
- The supporting information is requested only to identify the stock, confirm the destination and facilitate accurate settlement.
- The proposed solution should be treated as an initial launch position, with the charge, controls and any interoperability or refund mechanisms kept under review once operational evidence on barcode use, redemption behaviour and ineligible redemptions becomes available.

Further information

This guidance addresses DRS product treatment only and does not replace customs, tax, VAT, product-registration or other legal requirements. Questions should be sent to **enquiries@exchangeforchange.co.uk**