

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 October 2020 12:35  
**To:** wastecomments  
**Subject:** Consultation on DRS

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Dear DECC,  
Please see below my submission to your consultation on the introduction of a DRS in Ireland.  
Many thanks for all your work on this

[REDACTED]  
**The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?**

Yes, I agree with this recommendation.

• **If not, do you favour a:**

a) **decentralised / financial DRS; or,**

b) **hybrid.**

N/A

• **Are there other models you believe could work in an Irish context?**

No.

• **What role should waste collectors play in the operation of a DRS?**

I think they need to play a key role – I think some waste collectors are concerned by the introduction of a DRS in Ireland, and believe it will divert a key and valuable waste stream away from what they get at kerbside collections. If we could assure them that they could have a role in this it may allay these fears, and increase buy in.

• **The DRS study proposes a deposit per container of €0.20. Do you think this is appropriate? If not should it be higher or lower or should different deposit rates apply depending on container size?**

€0.20 sounds good to me, however I think it is really important that this DRS tries to capture all container sizes, not just 'on-the-go' bottles of 750mls or less. It seems to me that an increasing proportion of supermarket shop floors is given over to larger (1 litre+) bottles of water and soft drinks, I think these should all be captured by this scheme – so an increased deposit per container of €0.30 / €0.40 may be needed.

• **Consumers need to know about a DRS long before it becomes operational – do you have any suggestions as to how best the introduction of a DRS can be communicated to the public?**

I think an information campaign which reminds people that we have done this in Ireland before, and draws on the memories that some of the population still have of returning milk bottles will resonate with people. I also think it should emphasise how easy it is to use, and the fact that it is the norm in many other countries.

Any campaign should also emphasise just how many plastic bottles end up in the seas around Ireland – the issue of plastic pollution in the sea seems to have really resonated with people in the last 5 years [REDACTED]

I also think collecting all container sizes and being comprehensive in this way makes the whole scheme easier to explain to consumers – if you start qualifying information by container size for example, people will pay less attention and won't understand the scheme and its aims as well as they might. If we say to people 'this is about increasing recycling, we throw away too many plastic bottles – but we're not talking about the big ones' we'll confuse people and undermine the objectives of a DRS. Also just anecdotally, I have seen plenty of larger bottles dumped and littered on the streets.

- **What enforcement measures should be considered in parallel with the introduction of a DRS?**

I think those operating the scheme should have targets set for them and graduated fines if these are not met. I also think there should be penalties for any retailers that don't do RVMs or other ways of taking the bottles back, you can be sure some won't bother and I think it should be mandatory by law to participate in the scheme, with prosecutions/ fines if you don't.

- **How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland?**

I understand that DEFRA is currently planning a DRS for Northern Ireland, and your department will need to ask for details of this scheme to analyse the two planned schemes to establish what possible disadvantage either scheme could create, and then see if that could be factored in or ironed out. If the schemes were as aligned as possible that would be a good start.