

**From:** [REDACTED]  
**Sent:** 10 November 2020 12:10  
**To:** Denis Dunne  
**Subject:** Re: Deposit Return Scheme Consultation Comments attached  
**Attachments:** [REDACTED] Consultation Nov 10th 2020.pdf [REDACTED]  
**Categories:** Consultation Submission [REDACTED]

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Hi Denis,  
 Is this better. Sorry for the inconvenience and thank you for checking before the deadline.  
 Best Regards,

On Tue, Nov 10, 2020 at 10:27 AM [REDACTED] wrote:

Thanks Denis.

I will do. I am away from office so I will revert with different format when I get back this afternoon.

Sent from my iPhone

On 10 Nov 2020, at 10:15, Denis Dunne <[Denis.Dunne@decc.gov.ie](mailto:Denis.Dunne@decc.gov.ie)> wrote:

Unfortunately I cannot open your attachment, can you resend it in another format please?

Regards

Denis Dunne, Higher Executive Officer

Waste – Policy & Enforcement Division

—  
 An Roinn Comhshaoil, Aeráide agus Cumarsáide

Bóthar an Bhaile Nua, Loch Garman, Y35 AP90

Newtown Road, Wexford

**From:** [REDACTED]  
**Sent:** 08 November 2020 18:40  
**To:** wastecomments  
**Subject:** Deposit Return Scheme Consultation Comments attached

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Administrator

Please find my comments attached for your Consultation on DVS. The details are as follows:  
Thursday 12th November. If you have any difficulty in opening or reading the file, please let me know.

Thank you

Mob [REDACTED]

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

RE : Consultation Document DRS Deadline November 12, 2020  
Date Submitted: November 8, 2020

From: [REDACTED]  
[REDACTED]  
[REDACTED]

### Introduction:

Thank you for the opportunity to offer some thoughts on the proposed introduction of a DRS scheme in Ireland. I am in favour of such a scheme. I would favour a collaborative Hybrid model. The DRS study commissioned by the department is very helpful but their references refer to other reports totalling many thousands of pages which leave it difficult to summarise in brief comments but I will attempt. Key Questions emerge. What are your goals? What is the Litter problem you are trying to address? I think focusing on litter is a mistake and the DRS should be seen as the next logical step in part of a resource efficient requirement and waste reduction strategy that was started in 1996 with the Waste Management Act and, an opportunity to evaluate our performance against the goals set back then.

### Issue 1: Litter as a % of Packaging waste

Your consultation documentation says:

"In terms of litter, litter from packaging (which includes bottle caps, plastic bottles and cans) is a problem in Ireland, accounting for 18.2% of litter. Coastwatch estimates that plastic bottles and aluminium cans are among the top five marine litter items. While there are direct clean-up costs associated with littering, the report published alongside this consultation document shows that littering has a significant disamenity value on communities. The DRS study estimates that a DRS could reduce this disamenity value by €95m and reduce littering by 85%"

The €95m figure is based on a UK DEFRA commissioned Leeds University Research paper from 2011 on what people might be willing to pay through their council taxes for improvements in local environmental quality improvements. It was unclear to me if people would pay this in addition to their existing taxes or how they would like their existing taxes spent. The case study concludes that people would pay £264 a year or

£5.07 a week to reduce litter and I would have serious misgivings about using this English survey in an Irish context. People surveyed were from households used to paying from £960 to £2400 annually for council services. They actually listed actions on Dog Fouling on equal priority to actions on improving school scores in an initial scaling survey. Dog fouling was then included with litter in an environmental survey and the scaling for Eunomia consulting then used this £264 figure and multiplied by the number of households in Ireland to get a total litter disamenity figure. They then assume that 35% of all litter is made up of deposit return target containers by volume. This appears in direct conflict with your 18.2% figure above. Couple this with the Repak commissioned independent consulting report conducted by PMCA in 2017 that these items are between 3 and 3.5% of litter in Ireland and we are starting from a serious conflict in baseline figures.

The “disamenity value” term is used 8 times in their report but not mentioned at all in the Leeds research study that they base this figure on. The Leeds University study discussed an amenity value goal which reverses the whole survey integrity for the purposes used by Eunomia. They also omitted water quality or drinking water quality from their environmental goals or flood protection etc. (water management) Of course UK citizens are paying on average £415 per household per year for water in addition to their council taxes. Citizen funding and engagement with local council spending in the UK is now far different from the centralised system we have adopted in the Republic of Ireland and the objections we have on any local taxes.

So from 35% by Eunomia to 18% DCCAE to 3% by Repak study below the €95m “disamenity value” becomes a €46m or €7.5m argument.

“The quantitative analysis also reveals that beverage containers (including beverage cans for both alcoholic and non-alcoholic drinks plus beverage bottles for these drinks but excluding drinks cartons, which tend not to be included in deposit schemes) had a share of just 3% of all litter pieces in Ireland in 2016. When drinks cartons are included (for completeness), the share of beverage containers of all litter items is slightly higher (3.5% in 2016) but in both instances (i.e. including and excluding drinks cartons) the share of all litter due to beverage containers in Ireland has decreased over time, meaning that litter due to beverage container items has lessened through the years.”  
PMCA 2017 Executive summary. (it's largely a 139 page report supporting this position)

Given that Ministers Eamonn Ryan and Catherine Martin sponsored this initiative and in the Green Party press release 2017, Mr Eamonn Ryan said

“We want to help householders lower their waste bills by reducing the amount of waste materials at source. The implementation of a deposit refund scheme and the ban of plastic cups will take a few years and will have to be cleverly integrated into the existing Repak recycling system. We are convinced this can be done in a way which increases recycling, reduces litter, saves the householder money and wins public support for protecting our environment.”

There would appear to be a major conflict of opinion on the value of a DRS from the start by the Ministers proposed partner, Repak.

**Recommendation 1:** Figures should be used from the EPA household waste management studies. The very knowledgeable and experienced civil servants in the Waste division should be empowered by the Minister to guide the initiative instead of relying on competing non public servant consultancy frameworks. A new collaboration could be formed on Packaging waste reduction with the DRS as its funding mechanism. Figures should be used from the EPA household waste management studies. This Central System Operator (CSO) would be assigned as a second PRO style organisation under the existing Waste management Act. Some Repak members could be members of both if they choose. The newly licensed CSO/PRO would be a true stakeholder initiative with members drawn from businesses, materials producers, environmental NGOS, Universities, Government etc. There is only one existing PRO and this is heavily represented by the two largest retailers. Any quick survey of stores in Ireland would see little change in Packaging material since 1997. According to your National Strategy document 2020-2025, Ireland ranks top of the EU table in Packaging waste per capita and apart from better separation and more cardboard balers this is a poor result. If we are going to attempt a leadership position on this then copying other countries is not leading. We have excellent plastics and cardboard industries and leadership roles should be assigned to those business and research facilities to “design for the environment”.

For example, new products introduced by brand holders seem to have little incentive to reduce their impact. I think of the new domestically produced single serve cereal deserts with spoon included. Beautiful tasting product but a combination of two containers, a hard plastic lid, a foil seal, a tear off plastic tab, A plastic label wrap, a plastic spoon also in a plastic wrap. None of this realistically recyclable in Ireland and the

resulting plastic a contaminant if it ends up in a mixed recycling bin. Were these products Enterprise Ireland or Bord Bia funded and did any extended producer responsibility criteria even get considered by the marketing and design team. Did the subsequent retailers at DAA or elsewhere even consider the waste generation in their purchasing decision.

Almost 30 years ago I was fortunate to help build a Collaboration to supply appropriate recycled material for the construction of a new paper mill. It involved everyone in the lifecycle of a newspaper/magazine/ Glossy report from the designers, publishers, printers, ink manufacturers, pulp mill, waste collection companies, recycling centres and environmental NGOs. The mill needed a 10% plus supply of post consumer coated magazine stock to help lift ink off of other recycled papers to produce the recycled newsprint stock then in demand. This network became very strong in understanding each others problems and eliminating decisions which damaged the environmental result. Example; magazine inserts like CDs or fragrance samples that became a hot melt catastrophe on a production line.

It also allows manufacturers/retailers or brand operators who wish to break from the existing activities to pursue competitive strategies with environmentally responsible choices. For example: refillable containers. Government procurement criteria could help create initial market encouragement.

## **Issue 2: Reverse Vending Machines(RVMs)**

There is a lot of excellent data in the Case Study on the RVMs such as breakdown of capital costs, numbers needed and annual operating costs. Much of the data cites information from Norwegian RVM manufacturer Tomra and proposes a set up at almost 2,000 retail outlets around the country.

Having travelled to Vending Machine and Environmental tradeshow I have learned there are great differences in the cost of machines ranging from €2,900 to €10,000 approx depending on volume and technical specifications. I would avoid machines that print a receipt favouring ones that put credit on a loyalty card/fob or other such contactless system. I also favour a national barcode system as outlined in your case study. I have also discussed the placement of machines with some large retail

store owners and with some local authorities. I do not think this route will give you even and rapid deployment across the country. I think legitimate concerns about space, increased waste storage beside stores, labour and rejected container arguments with customers, are all large resistance points. The price point of 20c seems like a good incentive. Using the historical deposit nostalgia where premiums were received for returning large Lucozade or Bulmers bottles I would build in the potential for additional price points to be added by the manufacturer/retailer if they wished to incentivise further. For example, would a specific retailer offer a higher return if their fob is used in the RVM transaction? There is also the problem of properly disposing of containers rejected by the RVM so additional space for a regular recycling bin may be needed.

**Recommendation 2(A):** I think sports clubs around the country would be a better choice to site the machines. It would reduce the labour costs as many volunteers would undertake to operate in order to raise funds for their club. It would eliminate the high rental space cost. It would also cover the entire country, rural and urban, quickly for those clubs voluntarily signing up and meeting department criteria. Many clubs are near or beside schools which would allow Green School teams to perhaps also participate and raise monies for their school. I would suggest the EE unit at An Taisce could be a key participant. Ireland is pretty unique worldwide in the distribution and passion of our sports clubs particularly the GAA. If the Ministers goal is leadership then we need to consider our unique existing structures that do not exist in other countries.

**Recommendation 2(B):** We have domestic companies and colleges that already have the equipment and technology to produce machines tailored to the Irish requirements. I have had conversations with some of these but L&M balers in Portlaoise, CBE in Mayo, Debitrak in Larne and Waterford IT could be key team members to make this happen rapidly. Tomra have been very successful in partnering with foreign governments such as Singapore but if we are looking for Green Economy jobs then it behoves us to build our own. If we have a domestic manufacturer we should be able to design a machine for example, that could accept and divert milk containers, that we are currently proposing to exclude, into a separate collection receptacle in the same RVM. It's technically relatively easy, just not of much importance perhaps on a generic worldwide unit designed for many countries. From waste surveys, milk jugs are a major plastic disposed item but washing while shredding may be too costly.

**Issue 3: Enforcement** History does not support our ability to enforce waste laws so we need to build a programme that incentivises and

educates people to recycle and purchase the more responsible package. We need as big a carrot as possible because we don't use a stick. (based on court prosecutions on littering or fly tipping) I perceive producers potentially wooing RVM users if their product is accepted all over the country versus rejected products.

**Recommendation 3:** Barcodes are currently used on supermarket vouchers to ensure they are only scanned once and cannot be reused. A carefully designed system can help eliminate double counting or fraudulent attempts. Also abuses or attempted abuses of the RVMs will be easier to manage if it becomes an integral part of a clubs fundraising and the loss of the machine not desired. Payment of refund onto a fob would also help control this.

### **Conclusion:**

There are successful Government and NGO examples of vending and recycling initiatives being used to effect excellent social initiatives not just environmental. I think that opportunity is available here too. I have been directly involved in creating some small initiatives in Ireland and a brief description of some that are related to this issue might be helpful if you are looking for other ideas.

- 1) (Vending) The 1936 Randolph Shepherd Act signed by President FDR. This Act is effectively a legislated Procurement directive whereby all federal facilities in the United States must give the vending contracts to a Blind Enterprise. It has resulted in over 2800 blind run enterprises and 800million in revenues in the US. The mental health benefits and dignity of self employment are incalculable. I financed and ran a pilot in a Glasnevin secondary school for 4 years to prove the concept and see could it be replicated. I handed over the successful project to an NGO and a hybrid continues in a small capacity. Irelands medical card system negated a disability person having an independent self employed income but the restored pride and social interaction of the vending operator was credited with saving their life and restoring confidence, rebuilding skills and working elsewhere. Does that opportunity exist in maintaining RVMs. Maybe there is a Rehab style role though there can be negatives with assigning more waste industry style jobs to disadvantaged people. It's a a complex issue.
- 2) (Reuse/Recycling/Jobs) About 10 years ago, through my Rotary membership I was introduced to a bike recycling initiative in the UK. I contacted a friend who was then Governor of Loughan House Prison in Co. Cavan and started collecting bikes to bring the prisoners for



fixing for children to get to school in Africa. That programme has now grown exponentially to become a major initiative partly funded by your Department and is organised by Rotary colleague Jason Dempsey in Kilkenny. However I tried but failed to involve getting an educational course and job placement programme in bike maintenance for the prisoners completing their sentences. It just involves too complex a collaboration of Justice, Education and Local Government Authorities for a volunteer to make it happen. However again there may be comparisons where people could be trained for these new Green economy enterprises and maintenance qualifications achieved.

- 3) (Reusable Containers) Reusable Crisp Containers. Many years ago I discussed with management of Largo Foods the possibility of having crisps delivered in reusable large Plastic Palletised Boxes. Each Box could contain 2500 bags of each category crisps eliminating the use of 50 cardboard boxes each use. I conducted the trial including visiting the factory packaging line where boxes were packed manually. The palletised boxes were placed at the end of the relevant conveyors and the packing task eliminated but counting proved impossible though I was happy to go with a weight approximate. The owner was encouraging and we tried for a while but there were too many inconvenienced links in the chain. Production, Transport and storage logistics were just too difficult to coordinate at the time and my business too small. However the proof of concept and savings are definitely proven for a customer like a large scale retailer. Large reusable containers are widely used in the Pharmaceutical sector (purple/yellow boxes) and I wonder if this could be incentivised across the manufacturing or online sales sector. While not immediate relevant to this DVS analysis the logistics challenges and costs should not be underestimated which is why I favour sport club locations.
- 4) (Hand Sanitiser Containers) The current Pandemic has resulted in tens of millions of new plastic containers currently being disposed of in Ireland and elsewhere. Since 2011 I have invested in an environmentally responsible disinfectant and detergent production machine. They could be placed in any high use location such as a school/shopping centre to provide refills on site and eliminate waste. Again collaboration across Health, Agriculture, Education and Environment would be necessary but in the modern political and civil servant relationship that kind of dynamism seems to be very difficult. There are currently machines from several suppliers available to eliminate waste in this style while giving an environmentally responsible and sustainable solution. Its just one example.

- 5) (Recycling Beverage Cans 1996-2000) In 1996 I set up a canned drink vending machine operation and placed recycle bins and crushers beside the machines and we collected the containers for recycling. I competed against Coca Cola vending and they did the same thing in many of their locations (without the compactors). This disappeared when people requested plastic bottles over aluminium cans. Perhaps this needs to be revisited from a healthier choice (smaller serving sizes) and recyclable material perspective.

As you will have read from my submissions above I had investigated the DRS and RVMs to some degree. I stopped last year when I was told that the Government position was going to be to partner with one particular company and fund this choice by appointing a single CSO through RepaK. A machine had already being ordered for delivery to Department Headquarters canteen in Merrion Square and the roll out programme would then be launched by Minister Bruton at a press conference. I was unable to confirm this but if that is so could the Department have the courtesy to inform all involved in this consultation immediately, if that strategy has already being decided, and we can plan accordingly and not investigate investments that would be wasted if a Government choice has already being made. I believe in market competition and do not believe increasing the monopoly power of having just one PRO is getting the best results for the environment. I would agree with Cork Council executive, Tim Lucey , who was quoted when RVMs were discussed by Cork City councillors, "at the end of the day the commercial world is producing these goods.It (such a scheme) should therefore be funded by the commercial sector" (Oct 2019).

Unfortunately, the pandemic has resulted in years of advances on encouraging more reusable items being overturned and an unnecessary explosion in single use cutlery, takeaway containers, wipes and other disposable items. I wish you and your team the very best in your decisions and efforts.

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 12 November 2020 18:58  
**To:** wastecomments  
**Subject:** Deposit Return scheme consultation

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Dear Denis,

I submitted a formal consultation but by chance I was reading a book on the Templecrone Cooperative Store this evening which is the story of Pat "the Cope" Gallagher and I would like to add to my submission.

Stores like the Cope in Dungloe in parts of Ireland continue to provide critical employment opportunities in rural areas but also create market opportunities for local produce. Kinnegar beer and Silkie Whiskey to name two. Dungloe now has an Aldi, Lidl and SuperValu competing against this store. Pat the Cope was always innovative and looking to the future. Pat the TD, his grandson expressed in his foreword to a history of the Cooperative that his Grandfather would have "embraced the green movement" He hated waste.

So could Reverse Vending Machines be licenced to local town centre stores first where loyalty fobs would give rewards to be spent locally. There may be anti competition laws that prohibit this but if the eligibility criteria is That one RVM Only is placed per locality/parish/club Then maybe the reward voucher or redemption could be spent in a local store like the Cope locations which may be struggling to maintain loyalties versus international multiples.

Best Regards

[REDACTED]

Sent from my iPhone

[REDACTED]

[REDACTED]

[REDACTED]