

[Redacted]

From: [Redacted]
Sent: 09 November 2020 11:07
To: wastecomments
Subject: Deposit Return Scheme Consultation
Attachments: DRS Public Consultation.pdf

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Dear sir/madam,

Please see my submission attached,

Kind regards,

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]



9th of November, 2020

Dear sir/madam,

Please find attached my submission in relation to the Public Consultation for Deposit Return Scheme - Consultation on Potential Models for Ireland

1. The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?
 - Yes
2. If not, do you favour a: a) decentralised / financial DRS; or, b) hybrid.
 - N/A
3. Are there other models you believe could work in an Irish context?
 - No
4. What role should waste collectors play in the operation of a DRS?
 - Collectors should play a role in so far in that there is a role for them.
5. 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?
 - The value of deposit must be high enough to encourage consumers to return empty packaging. The higher the deposit fee, the higher return rate. However, the deposit value that exceeds the packaging production cost can encourage committing malpractices. The proportion of deposit fee value to product price should be considered in two dimensions: high deposit value as compared to the low product value can discourage from its purchase or, conversely, too low deposit fee as compared to the high product price can discourage from returning the packaging. The deposit fee value should be established at the level not to be perceived as artificial increase in product price, as it can result in more serious economic consequences. I think that different deposit rates should exist depending on the the container size, 0-500ml, 500ml to 1l, 1l + the type of material, and the economic value of the recycled material.
6. 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?
 - A widespread advertising campaign is the simplest measure. It is not that complicated. Retailers need to be consulted also. They need to be informed about the rules of system operation, how to re-arrange sales spaces, adjust financing systems and employee trainings;
7. What enforcement measures should be considered in parallel with the introduction of a DRS?
 - The basis of a proper assessment system for extended producer responsibility (EPR) should make a precise and reliable reporting system using properly selected indexes that will allow for performing comparable analyses and providing transparent information on meeting the targets. This needs to be considered as part of this Public Consultation with reference to International best practice in this field.
8. How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland?
 - Engagement should be sought with representative in NI as to their appetite to implement such a scheme.

Other

- a) No consideration has been given as to how this scheme is to be funded. The financial contribution provided by suppliers/ producers should cover the total costs of packaging waste management (collection, sorting, preparation and management less the income obtained from the raw material sales).
- b) The scheme should include glass bottles to encourage their return to producers (see C below) rather than being ground to powder.

- c) Consideration needs to be given to the on-trade return system for alcoholic beverages and replicating this system in an off-trade environment. In a Polish context, Per 36 million litres of beer supplied annually onto the market about 50% comes in returnable glass bottles. Non-returnable bottles make up about 6% of the volume. The remaining volume is supplied in aluminum cans and reusable kegs. The system is very efficient and its recycling rate ranges from 91% to 94%, which means that only 6–9 bottles out of 100 put on the market do not return to the system. A practical solution that could be looked at would be to mandate that suppliers provide rigid plastic packaging for the sale of bottles in off licenses to aid the return of specific bottles to specific producers, as is currently required by all pubs/ restaurants/ hotels.
- d) No consideration has been given as to how to force producers to reach the goals required of the EU/ Irish government nor are there any penalties to those that miss the national targets as laid out in the report.
- i. *The Single Use Plastics Directive sets a collection target of 90% for plastic bottles by 2029 with an interim target of 77% by 2025.*
 - ii. *The SUP Directive also requires that PET beverage bottles contain at least 25% recycled plastic by 2025 and that all plastic beverage bottles contain 30% by 2030*

As you can see from the below example, I propose that where the stated goals as above are not achieved that the producer/ polluter pays in this regard, depending on 1) the national performance of the DRS and 2) each individual companies use of recycled products. Where companies are deemed to have poor adherence to the goals of the scheme they should be penalised by way of an additional balancing charge at the end of the reporting period. And conversely, where companies do well, there is no additional surcharge levied upon them.

Company A - DRS Assessment				
Deposit Income Received (A)	€15,000	€15,000	€15,000	
	Poor	Median	High	
Actual Collection target for the year (B)	59%	68%	77%	
Target Collection Target for the year (2025) (C)	77%	77%	77%	
Actual % of recycled materials used in products (D)	1%	12.50%	25%	
Target % of recycled materials used in products (2025) (E)	25%	25%	25%	
Adjusted Deposit Income for Period ((A)*(B/C)^(D/E)^) (@)	€459.74	€6,623.38	€15,000.00	
Refund Payable to Scheme Manager (@)-(A)	€14,540	€8,377	€0	
^Capped at 100%				

- e) The SUP directive should be extended to glass products also in Ireland to encourage the use of recycled materials.

Kind regards,

