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**From:** [Redacted]  
**Sent:** 11 November 2020 12:21  
**To:** wastecomments  
**Subject:** DRS consultation  
**Attachments:** 8 Consultation questions.docx  
**Categories:** Consultation Submission

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To whom it concerns,

Please see attached my comments in regards to DRS.

[Redacted]

[REDACTED]

[REDACTED]

## 8 Consultation questions:

- The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation? Yes
- If not, do you favour a:
  - a) decentralised / financial DRS; or,
  - b) hybrid.

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

- What role should waste collectors play in the operation of a DRS? – they should change guidelines for their recycling collation to inform about plastic bottles and cans to be subjected to DRS;
- 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? – should be higher, like €0.50 or even €1. Should be flat, keep it simple.
- 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? – leaflets, television and social media campaign would do
- What enforcement measures should be considered in parallel with the introduction of a DRS? – Measures that will prevent producers/distributors to switch to non-recyclable or Non-DRS Complaint containers. Non-DRS compliant containers should be taxed/levied etc.
- How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland? – Every container introduced to Irish (Republic) market should to be “taxed” with DRS. Doesn’t matter where it has been made.

## My own comments:

1. DRS relate to “producers” only as a source of plastic subjected to scheme. What about beverages that are imported and not produced within the state? They should be addressed and in the system as well.
2. Cashless system for returning deposit is great but I doesn’t necessarily encourage trash pickers to make some cash by collecting litter and returning for small profit. I think there should be option for cash or debit card top up on the return.
3. **Non-recyclable packaging:** Producers and distributors might try to avoid DRS with slight change in their packaging to make them non-recyclable or non-DRS compliant (or switching to tetra pack as well). In my opinion every disposable single-use plastics should be heavily taxed or subjected to DRS in order other technologies are introduced to the market (biodegradable packaging etc.). So end the end we will have mostly:
  - a. Packaging subjected to DRS
  - b. Compostable packaging (paper, starches, cellulose, fibres etc.)
4. Plastic TAX should be introduced in Ireland (and elsewhere). Taxing single use of plastics and also other plastics with level of taxation depending on recycled plastic content.