

From: [Redacted]
Sent: 12 November 2020 12:41
To: wastecomments
Cc: [Redacted]
Subject: Submission: Deposit Return Scheme consultation

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A chara,

The deposit return scheme is a really welcome move to increase recycling rates and reduce litter. The centralised, operational model seems best placed to deliver a consistent, publicly accountable system.

Rate: The proposed 20c rate seems reasonable. It's a decent incentive to return, but also manageable for those cases where it's not immediately practical to recycle. The rate should be the same for all containers. I've seen first hand in Belgium how different rates for different containers can cause confusion with no clear policy aim. Keeping it at a simple, single rate would be easiest to explain and work with.

A quick Twitter poll on the rate with 500+ responses found:

- 69% said 20c was about right
- 10% said 20c was too high
- 17% said 20c was too low
- 4% were opposed to any deposit scheme

Glass: Expanding the scheme to cover glass bottles would be worthwhile. Glass has a very high recycling rate, but it is a common source of litter, and is dangerous when broken. While expanding the scheme to cover glass may not have a clear recycling rate purpose, it would be helpful in litter reduction, and mirror what is done in other countries. As below with plastic, there may also be potential for reuse above recycling.

Reuse: The scheme should consider how best to reuse bottles, not just recycle them. Some items will necessarily be recycled, but the German *pfand* system sees more durable plastic bottles, which are returned, cleaned and reused over and over. This is perfectly clean and far less energy intensive. It may also have advantages for retailers and producers to standardised bottle sizes. This could be a later-stage scheme, perhaps with some kind of state-initiated industry partnership on standardisation and reuse.

Retailer requirements: There should be an explicit legal duty on retailers to accept all covered containers, not just those sold in a specific shop. This could mirror the WEEE system. Without such clarity, many retailers would likely say they're only taking things sold there.

Medical exemptions: Exemptions and loopholes would generally be unwelcome and needlessly complex, but ensuring that any beverage containers necessary for medical purposes are clearly excluded.

Charity: If reverse vending machines are being used, there should be an option to donate your refunds to a selected charity. This is apparently the case in Denmark.

The scheme is a really positive step and its introduction would be a big step forward for the circular economy.

Best wishes,

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