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From: [Redacted]
Sent: 12 November 2020 13:28
To: wastecomments
Subject: Public consultation on DRS

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Hi there,

I have read the DRS Consultation Paper and I have listed my comments below based on the questions at the end of the paper. I had trouble downloading the DRS study so relied on references made to it in the consultation paper. Accordingly, the study may have addressed some of the issues I raise below.

* I have had a look at the consultation document and find it very hard to know whether a centralised operational model; or a decentralised/financial DRS model; or a hybrid model would be best. I think that this is a technical issue and one where the producers/suppliers are in the best position to advise the Government on what is practical, avoids bureaucracy, is cost effective and will achieve Government targets for recycling of plastic bottles and cans. Similarly the role which waste collectors should play is better left to the experts.

* I have seen the RVMs in operation in other countries and they seem effective both in reminding people to return their items and in seeing their money back. They also seem to incentivise people to pick up bottle and can litter that other people may have discarded in order to get the money back. I could see this part raising funds for tidy towns, youth clubs etc. However they do seem to give rise to queues and I'm not sure how these could be managed at local level. Christmas time would add a lot to the inconvenience. The manual take back at smaller outlets would seem more convenient and speedier for the customer. I note that the "specific methods of refund can vary but are generally cashless" I am not sure how you would intend this to work. Would RVM give you a receipt which you could cash in with a local retailer?

* In regard to aluminium can recycling I had always thought that it was advisable to crush the cans before putting them in recycling bin as this reduced the volume of space required and made them more compact for recycling. Any such advantages would not accrue with the new scheme.

* The size of deposit proposed at 20 cent will instantly add 15% to 20% to the cost of each bottle or can at point of sale. Is this fair to retailers many of whom rely on teenage & young adult consumers to purchase such products? I imagine the commercial effect could reduce the volume of sales of such items, at least in the short term. For this reason I think that the deposit may be too high initially. I think one deposit rate for all sizes of container is best as it keeps things simpler for the public and the retailer.

* In terms of communication with consumers, an advertising campaign with a startup, middle and ongoing message would probably be effective. It would need focus groups and social media elements and probably high profile "ambassadors"(and/or maybe football teams) to help with public buy in. You refer in your paper to further public consultation in Q1 2021. This should be widely publicised to help create awareness. (I was not aware of the current one until I saw an article on TheJournal.ie this morning - Poll: Would you use a deposit return scheme? <https://jrnl.ie/5263990> with a link to this consultation paper)

* I have no opinion on enforcement measures. Can one continue to place plastic bottles and aluminium cans into the usual recycling bin without penalties?

* I can see the cross border issues being a disadvantage, especially in border counties. There is nothing to stop ROI consumers buying their bottles and cans in Northern Ireland and then claiming deposit refunds in the South without having paid a deposit in the first place.

I hope the preferred scheme will be effective.

Regards

[Redacted signature]