

From: [REDACTED]
Sent: 12 November 2020 13:28
To: wastecomments
Subject: DRS Consultation

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A Chairde,

please find my responses to the public consultation on the DRS system below:

Consultation questions:

The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?

Yes. I agree.

Are there other models you believe could work in an Irish context? Yes, the German model or in fact, any model currently operational in any of the other 15 European countries that already successfully operate such systems.

What role should waste collectors play in the operation of a DRS?

- What does this question mean?

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?

Why would you impose a standard fee per container and not look at the different types of plastic. There are Deposit and Return systems in place all over the world that have been tried and tested and that work very effectively. Take for example Germany and Austria, where the distinction is drawn between single use bottles and mutli use bottles and the deposit varies in accordance with the environmental impact and cost of disposal.

Germany: In general, a distinction must be made between one-way disposable bottles/can and reusable cans/bottles. In the case of deposit and return systems for reusable bottles, the bottle is refilled, whereas the deposit on non-refillable bottles usually applies to non-refillable packaging such as beverage cans, non-refillable glass bottles and non-refillable PET bottles, which are usually recycled. More info on the rates applied in Germany and the systems is available online, as I'm sure you are aware, even wikipedia has a [page](#).

Also, we previously had DRS systems in Ireland that was based on glass bottles, many years ago. Has this system been assessed, learnings made and noteworthy components carried over into considerations for the plastic bottle DRS?

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?

- Consumers are driven by money/financial gain. As soon as bottles become valuable, they will begin to recycle them. Yes, you need to run a campaign, a successful social media and radio campaign would certainly be valuable.
- The campaign needs to think outside the box though and account for all the social issues that other countries have encountered. Ireland's system could avoid problems such as people who don't want to recycle by putting the bottles in the bin or burning them. Targeting people and letting them know that one person's rubbish, could mean a meal or a bed for the night to another (possibly homeless)

person, can prevent enforcement measures having to be taken and encourage a culture of recycling and societal care. The German, "Pfand gehört daneben/ Bottles that carry deposit shouldn't be in the bin, but beside the bin so other people can recycle them for you"

What enforcement measures should be considered in parallel with the introduction of a DRS?

- All legislation and regulations put in place to enforce the DRS should be based on the producer.
- A management and enforcement organization needs to be created and enabled to enforce the legislation and monitor it's development.
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How should cross border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland?

Given that a similar scheme is underway for Northern Ireland (the UK consultation happened in February 2019) I doubt very much that a competitive disadvantage will occur here. If anything, I would enquire as to their plans to prevent such a competitive disadvantage in relation to producers in the Republic, in particular given that this was not considered in the UK public consultation.

With kind regards,

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