

From: [Redacted]
Sent: 12 November 2020 13:31
To: wastecomments
Subject: Deposit Return Scheme Consultation

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Hello,

I wanted to voice my support for the proposed Deposit Return Scheme, having noted its success in other countries. Answering some of the questions from the report:

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

I agree with this recommendation, preferring it to the alternatives.

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

I think commercial waste collectors are likely to already be incentivised to perform sorting themselves (in order to claim any unclaimed deposits that were mixed in with undifferentiated waste). I'm not sure further incentives are needed.

Similarly, there's likely an incentive for them to simplify redemption of deposits (perhaps by providing a separate bin for that purpose) so that they can take some of the deposit as a fee for taking care of the redemption.

> 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?

I think the deposit is appropriate, but would support higher deposits for larger containers - these are worth more to get back into the cycle, after all.

> 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?

Point of sale advertising. It also seems likely to me that many retailers that sell appreciable volumes of containers qualifying for the DRS are likely incentivised to advertise at their own cost, to explain the sudden increase in price in a wide range of products.

> How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland?

I think limiting this concern to Northern Ireland is likely to be a bit short-sighted (while acknowledging the particular complexities of trade across that border). This will likely apply equally to all imports that don't go through the DRS.

However, through that lens, I would suggest that a solution here is to introduce the deposit into the scheme at the point the container enters the market, i.e. the importer pays rather than the beverage producer. This solution introduces its own issues (e.g. fraud potential by attempting to deposit or sell containers that were imported without payment of the deposit), of course, but feel more solvable to me.

Kind regards,

[Redacted signature]

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