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**From:** [REDACTED]  
**Sent:** 12 November 2020 15:24  
**To:** wastecomments  
**Cc:** [REDACTED]  
**Subject:** Submission: Deposit Return Scheme - Consultation on Potential Models for Ireland  
**Attachments:** DRS Consultation Group Submission.pdf

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To whom it concerns,

Please find attached a submission in response to the consultation on potential models for a Deposit Return Scheme.

Yours faithfully,

[REDACTED]  
*for and on behalf of:*

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]  
*Graduate Student, PgDip (Design Thinking for Sustainability)*

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[REDACTED]

[REDACTED]

County [REDACTED]  
Ireland

Thursday, 12 November 2020

Department of Environment, Climate & Communications  
29-31 Adelaide Road  
Dublin 2, D02 X285

**Re: Group Submission for Deposit Return Scheme - Consultation on Potential Models**

To whom it may concern,

We are a small group of private citizens and post-graduate students who are currently pursuing a Postgraduate Diploma in Design Thinking for Sustainability in the Innovation Academy, University College Dublin.

We are very much in favour of introducing a Deposit Return Scheme (DRS) in Ireland. We have a number of overarching principles which have guided our submission:

1. Transparency and value for money for the tax-payer.
2. Easy for consumers/citizens to understand and use.
3. Cooperation with civic authorities, waste management operators, retail outlets, other stakeholders including Northern Ireland and the UK.
4. Leverage existing international and domestic technology and systems.
5. Reporting and accountability in meeting our Climate Action Targets.

We want the DRS scheme to be as successful, innovative and impactful as the plastic bag levy and no-smoking ban in Ireland.

In the first section, we will directly address the questions posed in the consultation document ([DCCAE, 2020](#)). In the second section, we will provide additional considerations, general comments and proposals.

## Part One: Consultation Paper Questions

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

In principle, we agree that a centralised, operational model would be most effective for Ireland. Ireland is a small country with a population of just 5 million people. Compared to nations like Germany (the leader in DRS), we do not have the critical mass or context to have a

decentralised model. For this reason (and the associated implications) we are not generally in favour of a decentralised / financial DRS, or even a hybrid.

***There is no need to reinvent the wheel:*** It is the model used in most jurisdictions where there is a DRS across the world and while it will need to be adapted to Ireland, we believe it would be a waste of time and resources to invest in other models when there is international evidence to support the centralised model.

In Germany, The Netherlands and Switzerland supermarkets have self-scanning machines and provide the receipt/ cash deposit. If the bottle is not suitable, it's simply rejected. The system today is working very well.

***We need to prevent fraud to protect end-consumers*** The centralised model is generally less open to fraud. From a consumer perspective, this is incredibly important because we do not want prices of products to be inflated to compensate for the high cost of fraud.

***We need to ensure that operators are accountable and appropriately motivated:*** We do, however, have serious concerns around the business and revenue model (i.e. funding model) which underpins the centralised model, as recommended in Woods *et al.* (2019), which proposed that unredeemed deposits would be a primary revenue stream for the operator.

We are concerned that the reliance on unclaimed deposits would have unintended consequences such that the operator would not be motivated enough to encourage behavioural change amongst consumers. In other words, they may benefit from a low uptake. We see this as a considerable risk to be managed and mitigated to ensure that Ireland meets its EU commitments. Non-redemption is almost inevitable to an extent, but given our EU targets, we believe there is next to zero flexibility. Five to ten percent, in our view, is the absolute maximum level of non-redemption that would be acceptable.

One suggestion is that unredeemed deposits should not be material to the operator's bottom line. To compensate the operator, the Government should foot the bill and pay an operator's fee to the operator.

Unredeemed deposits could form part of a new scheme similar to the Dormant Funds Account, or go back to the Exchequer.

***We need to innovate and adopt new technologies where they are available:*** A centralised mode offers the best opportunity to adopt scalable technologies while ensuring they are commercially viable to adopt and implement.

Optel Group's Intelligent Supply Chain platform records the digital journey of any material flow from cradle to grave – from raw materials to the consumer and beyond. This enhanced visibility is used by companies to optimise their material flows and make more informed circular decisions related to product design.

In any and every case, it is crucial that the Government or an appropriate Agency actively oversees the operations.

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

We feel it is essential to engage with waste management operatives in the DRS process to ensure a smooth and just transition to the scheme - the danger being that they may increase service costs or even discontinue kerbside collection when valuable materials such as aluminium and plastic quantities are reduced combined with the fact that the bottom has fallen out of the recycled paper market. The DRS needs to ensure that nobody is left behind, and this includes waste collectors. Ultimately, if waste collectors' businesses are made unviable then costs will increase for consumers. We need a bespoke centralised model for Ireland that recognises the role of kerbside collection in Ireland and includes them so that their operations do not become unhelpful in the ultimate goal of reducing waste.

So the scheme could be hybrid that's centralised in a way that considers the current garbage collectors needs.

- Will Waste Management Operators continue to do kerbside collection if valuable plastic and aluminium are not in the recycle bin? How can they be compensated?
- How do we ensure their viability so that they don't inflate their prices?
- Should Aluminium bring banks be withdrawn? Replaced with Reverse Vending Machines (RVMs).
- Is it possible to have an option for smart home bins where the public can deposit their plastic/ aluminium which will later be collected by waste management operatives?
- Would it be possible for kerbside collectors to scan eligible items at collection and deposits are credited to the homeowner and deducted from customers' bills to ensure that the waste collectors (and their customers) are not left behind?
- These two options would require that the latest DRS technology be employed- ie: to offer serialisation of the system. This puts a unique serial on every item - bottles, cans, etc.
- Split the collection by the percentage of their market share , keep them involved in the process of collection allowing them a clean stream of waste collection
- They should follow the system that is provided and not invent their own methodologies
- Rubicon enables worldwide traceability of material flows with their software-as-a-service and data analysis for waste, recycling and smart city solutions. These services are fundamental for responsible and sustainable waste management, helping businesses and communities to fully understand and track the composition, flows, scale, impacts and costs of their waste.

### **The DRS study proposes a deposit per container of €0.20. Do you think this is appropriate?**

We do not agree with the fixed cost of €0.20 per container.

Considering the recommendation of €0.20 container we do not feel that to be appropriate as it oversimplifies the recycling process. Considering other DRS systems, we feel that the deposit per container should reflect the size of the container and ease of recyclability. In other words: a smaller deposit for smaller bottles / cans to motivate producers to use more 'easy to recycle plastic' - fewer mixed materials/ colours.

Aluminium price should reflect the value of aluminium as a noble metal to encourage near to 100% recycling. As it can be infinitely and easily recycled therefore a higher deposit than plastic, which might encourage producers to use it more in packaging - *Can O' Water* in the United Kingdom.

### **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?**

Glass bottle return schemes were popular in Ireland in the late 70s and early 80s - it incentivised people - particularly kids - to return their glass to points of purchase and redeem a few pence. Some welcome pocket money for sweets! The consumer facing deposit return system should be designed in a way that builds on what consumers already know, are familiar with and use. A simple system that is easy to use should be developed that makes it easy to redeem the deposit . Furthermore, the job of work now is to get public buy-in to this as a first-phase remedial step on the road to ultimate eradication of single use plastic by incentivising them to take action.

#### ***Digital credits rewards***

Like a travel card or electric vehicle charging card or cashless transaction card - consumers could be issued with a unique identification card (eg Visa 'Earthwise High Content Card' made with up to 98% upcycled plastic) which can be tagged-on and tagged-off at point of plastic returns - with their account debited with the total value of their plastic returns. These 'Plastic-Free Points' or 'Plastic-free Vouchers' could then be redeemable at various participant retailers or service providers. Imagine being able to use your DRS refunds to pay off some of your Electricity Bill or buy a book through the National Book Scheme. Or donate to charity.

If seeing is believing, then the 'smart' dimension to the DRS system will enable consumers to track their 'sustainability data' - how many bottles they have re-cycled, how much rewards they have earned, how many bottles they have saved from landfill, etc. We are at the cusp of a national and global sustainability revolution and consumers will be enticed to participate - even 'compete' - if he/she can track their efforts over time especially against that of their friends and peers - in the same way that apps like Strava or Run Keeper which creates a competitive community among keen cyclists and runners. We suggest running pilot schemes initially in a number of towns / locations to perfect the digital communications and technology - and also to engender a sense of pride and social value in using the DRS which will catch on throughout the country.

(Note: 1 Litre bottle carries the same returns value as 6 x 250ml bottles - to deter consumers from buying more bottle units).

### ***Partner with Existing Zero Plastic Initiatives***

Ireland's first Reverse Vending Machine began operating in Carrickmacross, Co Monaghan in Sept of last year - the machine was programmed to recognise barcodes from all plastic bottles on the Irish Market and consumers redeemed 10cent vouchers for every bottle return which could be redeemed at their local SuperValu store. It has garnered a lot of interest from Tidy Town organisations around the country interested in rolling out a similar machine. There are also many other Zero Plastic initiatives operating around the country zoning in on different population segments and age groups to communicate the message about plastic waste - eg Plastic Free 4 Kids, Plastic Free Towns and Change by Degrees. Partnering with existing zero plastic initiatives and providing reward incentives to return plastic bottles and containers through DRS would accelerate the move towards achieving plastic reduction targets and the associated greenhouse gas emissions.

### ***Strategic Partnerships***

An Post as a semi-state organisation has strong green credentials and is also highly networked to every home, school, business, organisation throughout the country - by piggy-backing on their daily postal delivery service, they too could bring the message of DRS to the population of Ireland through crystal clear messaging landing in their postbox. Furthermore, their move towards an electric powered fleet could also help with plastic collections from remote, elderly or disabled customers not in a position to go to plastic return points themselves. Drop their post - take their bottles and cans-type circular transit.

### ***Target the Influencers***

From school kids to celebrities - we live in a culture of 'influencers' - our aim would be to target and lobby key influencers to spread this message. In the same way that people like Keelin Moncrieff, Molly Parsons and Taz Kelleher have used their platform on Instagram and Podcasts to promote the message of Sustainable Fashion - we would look to identify and champion the young emerging voices in Environmental Sustainability- like 12 year old Flossie Donnelly - the young environmental activist who with her crew of friends is clearing South Dublin beaches of plastic waste - her Instagram @flossieandthebeachcleaners has over 2,500 followers.

Flossie is not alone - there is a definite emergence of sustainability awareness among school going kids - both primary and secondary. If we convince these citizens, the rest will come. What is taught in school is brought home in the feedback, stories and homework of the students. Schools offer another pre-existing network of collaborative potential through the 'Green Flags Network' - which we could partner with to roll out another publicity stream for DRS, and also tying it in with the 'plastic free schools' initiative as mentioned above.

Schools are always looking for additional resources to support extra activities and learning ambitions - kids are familiar and motivated to get behind campaigns that have the potential to reap rewards for their school such as 'Computers 4 Schools'. We would propose a schools benefit dimension to DRS to further engage and motivate students to get involved. Competition between schools is a positive when its driving them to achieve sustainability targets that convert to resource rewards such as 'Plastic-Free Points Badges' (like the Green Flag awards) or indeed, 'Plastic-free Points Vouchers' redeemable in bookstores, top-up on STEAM cards for kids vouchers, DRS apparel (kids love (sustainable merchandise).

There is also an opportunity to inspire Sustainability Innovation in Schools through DRS - by establishing something like a 'Retirement Home for Plastic' type competition to see what creative solutions kids can come up with for plastic that has reached its end of days. For eg - Vertical Gardening Projects or Biodiversity Centres / Wormery using empty bottles/containers.

### ***Strong Brand and Slogan and Consistent Brand Management***

The branding logo and slogan for DRS must become unequivocally linked with positive frontline sustainability action in this country. The logo must be instantly recognisable - like Twitter's little blue bird or Nike's Tick - and the associative slogan should be an ear worm that motivates to action not annoy - like 'Know the Safe Cross Code' or "Should have Gone to Specsavers" - but it would be a government owned / state owned brand and licenced to operators. A robust tendering process would identify the right-fit agency to devise and deliver a compelling advertising and PR campaign coupled with the incentivised remuneration dimension of DRS would inspire and motivate every citizen to leave no plastic un-returned!

Different consumer segments will require tailored messaging - and we would potentially envisage as part of the communication's strategy the creation of a DRS cartoon character - potentially created through a pre-teen art competition like Doodle for Google - who would become a mascot for DRS sustainability values and ambitions. In the same way the Ronnie Drew singing Canary is associated with carbon monoxide monitoring - or the Panda is associated with the World Wildlife Fund. DSR branded merchandising to encourage plastic sorting in the home - including smart bins - would also be available e.g. plastic storage containers for domestic, office, community, school use.

Sadly, all evidence points to a persistent disconnect between the contributing factor of plastic to our climate crisis and the day to day purchase habits of consumers - single use plastic is still the most prevalent packaging in the majority of grocery goods and we are buying them week on week, month on month, year on year. Part of the communications strategy for DRS is to bridge that disconnect and inspire consumers to play their part in eradicating plastic waste - through a crystal clear, compelling video with high production values and a 'call to action' to 'share' this video widely online and among social networks with Plastic-free Points' awarded to citizens who achieved the most impactful engagement.

If the mountain won't come to Mohamed then DRS must go to the masses with brand placement and endorsement at high profile national events such as the National Ploughing



Championships, RDS Young Science Exhibition, Community Games, Music Festivals - indeed anywhere where there is a large footfall of consumers using and disposing of plastic, DRS should be there with a strong promotional push and marketing drive. Similarly, strategic brand positioning on shows like 'Fair City' with an average audience of 300,000 each night on air. As a public service broadcaster RTÉ has a role to play in sustainability messaging - and should be receptive to sustainable and science themed content and programming with DRS features. In the same way that RTÉ Supports the Arts - it should also be supporting Sustainability in partnership with DRS.

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

In any walk of life, there is a risk of stakeholders and parties acting without integrity and without due regard for the protection of citizen-consumers, other stakeholders, or the environment. The objective of any enforcement strategy should not be to add additional burden to the courts, but rather to make the repercussions of acting badly so high such that no individual or entity would ever think of engaging with it. We want strong legislation that hopes for the best but plans for the worst (fraud).

We are also of the opinion that both the "carrot" (incentivisation) approach *and* the "stick" (repercussions) are needed to ensure the scheme can effectively and efficiently meet its goals and that Ireland can achieve its targets.

***We need to ensure the Government maintains power through soft enforcement:*** We suggest that the Government of Ireland would develop the brand and intellectual property for the scheme and license the use of this brand to the chosen operator. The rationale is that this more equally divides the power between the operator and the Government and ensures the Government always has collateral and negotiating power. For example, if the operator is performing poorly but the brand they have developed is what citizens associate the scheme with, it puts the Government in a very precarious position where changing operators would be extremely challenging without changing the whole brand, which would be detrimental to consumer uptake and relationship with any deposit return schemes. This is similar to how the National Transport Authority (NTA) owns the BusConnects brand and licenses out routes to Dublin Bus and Go-Ahead Ireland, who use the BusConnects livery.

***We need to ensure that consumers do not end up paying for the cost of fraud:*** As previously mentioned, Fraud is a major concern. Fraud is, of course, an issue from the commercial perspective but from the consumer perspective, we do not want prices to increase. Therefore, protection against fraud is incredibly important. We believe that a "stick" approach is needed to prevent fraudulent activity. Legislation should include very heavy criminal penalties for activities such as forging codes, overclaiming or misreporting. Legislation should also allow civil proceedings between, for example, a producer who is over-paying because another party is over-claiming.

From our research, fraud has been prevalent in other systems. Therefore it would be prudent to use the expertise and experience from other countries, like Germany, Lithuania or Holland, where the system is operating well. There is equally an opportunity to innovate and use technologies like Blockchain and leverage on upcoming EU legislation and directives to both learn from and improve the DRS scheme in Ireland.

***We should consider the structure of the Waste Industry in Ireland:*** Ireland's waste industry is complex with a huge number of stakeholders in both the public and private sectors. The Waste Regions have recently been established but the Government should consider reviewing the sector and how stakeholders interact with one another.

One consideration would be whether there should be a central State Agency for Waste Management that absorb, centralises and oversees some of the functions of, *inter alia*, the National Waste Collection Permit Office (NWPO); the National TransFrontier Office (TFS); the Environmental Protection Agency (EPA); the Office of Environment Enforcement; the three waste Regions; the Local Authorities; the DHLGH and the DCCAE? This agency could also be mandated to oversee the DRS.

Ensure that an existing and strong national agency has enforcement powers. Like the EPA. Do not use Local Authorities because their resources are stretched and they are decentralised.

## **Cross Border Considerations**

Waste and recycling policy is a devolved function in the United Kingdom and therefore the Northern Ireland Assembly has a level of autonomy. However, it was noted in a 2019 Consultation on behalf of the UK Government, Welsh Government & the Northern Ireland Executive that, "[any] DRS should form part of a coherent packaging producer responsibility system across the UK". Scotland is implementing its own DRS. Scotland, meanwhile, has enacted legislation and their DRS will go public on 1 July 2022. The close relationship that the United Kingdom has with Ireland highlights a need for not only North-South cooperation, but also across England, Scotland, Wales, Northern Ireland and the Republic of Ireland (the Common Travel Area).

We have a number of options for your consideration but these are inconclusive.

Create a UK and Irish joint DRS and/or Standards. We believe that this would also be beneficial for manufacturers and producers. Given that it will be likely that producers will need to begin labelling for the UK and Ireland separately, in light of Brexit, it will facilitate the incorporation of two changes simultaneously on assembly lines. In essence, producers will be able to kill two birds with one stone. Notwithstanding that we acknowledge the challenges that the different currencies pose on a logistic level and that it could be difficult to implement a cross-border solution as a result.

Operators across the different jurisdictions could be facilitated to credit or debit one another for the management of returns. In any case, it should be seamless and easy for citizens of Northern Ireland and Ireland.

The border will be a point of leakage. Irish coded products will leave the jurisdiction, and hopefully enter a good waste stream in the UK. The opposite is also true for British products entering Ireland. The surplus deposit could be used to offset funds lost through fraud, while ensuring foreign returns are captured.

In the case of a smart DRS, NI codes may not be recognised by the Irish DRS so any deposit will not be returned. However, it is essential that the plastic and aluminium are captured and enter the Irish waste management system. We do not have any solutions for compensation for the citizens/consumers in this case, but it is important to consider this.

Another option is to create a Cross Border Agency, as allowed in the GFA, and have a single island waste area for the Deposit Return Scheme.

We are confident that the unique relationship between Northern Ireland and the Republic of Ireland, and our citizens, will provide motivation for all Governments to work together and develop innovative solutions that are citizen-centric. This will be challenging, but it is possible.

We also acknowledge that this is challenging to pin-down because the impact of Brexit is poorly understood right now without a deal. We concede however that this is a matter that will be of benefit to the UK and Ireland equally, and therefore should be relatively easy to negotiate depending on whether this would, post-Brexit, fall under the remit of the European Union given international trade is a competence of the European Union and not member states.

In any case, the issue with leakage is probably most likely going to relate to people going north of the border to buy products without the Deposit and then putting them into the Irish waste stream. Regardless of the ultimate decision, we agree that any DRS Scheme can not disproportionately impact Irish citizens who live in the Border Region and border counties. As we justly transition to a circular economy, we cannot leave any group of citizens behind.

## Part Two: Additional Considerations

### **Ireland future leader in sustainable innovation**

Considering the difficulties of recycling plastic and limited facilities for recycling plastic world wide, Ireland is in a strategic position and has great potential to become a leader in plastic recycling with our easy access to ports infrastructure. The time has come for us to start taking responsibility for our waste rather than passing it on and exporting it.

Increased awareness and accountability will drive behaviour change in the wider public and will increase capture of single use plastic as well as reducing plastic consumption long term which should enable us to reach our Climate Action bill target 95% collection and recycle rate by 2025.

### **We should use familiar systems to build new infrastructure**

Ireland is not the only country to implement the DRS scheme, best practice examples should be studied and learnt from. The chosen system should be resilient and flexible to future changes and allow for inclusion of more materials in DRS schemes , particularly as a serialised system will be able to accept all shapes and sizes of containers and allow for multiple and varied collection options,

Efforts must be made to balance the interest of citizens and privatized waste collectors in Ireland. Due to the privatised nature of of Irish waste collection system. There is a conflict of interest between the two parties. The system should not run for profit in a way that disadvantages the citizens.

#### **Taking time to care about small retailers and producers**

Transition grants ( De Minimis ?) should be considered for smaller producers to assist with labelling and retailers that need to invest in infrastructure -RVMs , hand scanners or smart bins to stay competitive and not be unfairly disadvantaged by the scheme because of their small size.

Local enterprise boards are well positioned to distribute funding and provide training and resources to facilitate transition to the new DRS Scheme .

We recommend a transition period to allow for comfortable and just transition to the new system.

#### **Locations of the machines**

The locations of the machines should be easily accessible for everyone- note bring banks are not accessible to wheelchair users.

People should have a say in where collection points are located in their community , as this engagement will raise awareness and improve uptake of the scheme.

#### **Use of technology to make the system work**

Balance must be struck between the intelligent use of technology and being inclusive of everyone.

Option of having an online account must be considered but the system also has to work without the account to include tourists and less technologically literate.

Supermarkets could incorporate returns collection in their home delivery infrastructure

- Tap On/ Tap Off Cards - Accounts for Consumers (Additional Anti Fraud Feature?)
- I think it should leverage on technology. If we had a digital wallet instead of vouchers printed? Given Ireland's leadership in Fintech this should be leveraged.
- Ireland is a small market and it needs to ensure consumers are protected BUT that the product range is maintained
- Incorporate collection in to the online shopping delivery
- Make it as simple as possible to use
- Order reusable boxes to be collected
- Easy accessible return options beyond retail ie. -bins , kerbside collection etc

- Scan at point of Return - using barcode tech and individual ID cards - returns money goes into account

## Concluding remarks

To summarise our submission and to reiterate our proposed guidelines:

- 1. Transparency and value-for-money for the tax-payer:**
  - a. We are in favour of a centralised model that is tailored to the Irish context;
  - b. It should be future-proofed and designed for future expansion; and
  - c. The DRS must not unintentionally cause price increases for consumers.
- 2. Easy for consumers/citizens to understand and use:**
  - a. The Government should seek to understand Irish consumers/citizens, the cultural context and the learning curve we are about to embark on;
  - b. It must develop a single and strong brand identity and marketing strategy; and
  - c. There should be multiple channels so citizens can choose how they wish to engage with the DRS in a way that suits their own needs and lifestyles.
- 3. Cooperation with civic authorities, waste management operators, retail outlets, other stakeholders including Northern Ireland and the UK:**
  - a. The chosen system should include and respect all stakeholders - be they a waste collector; a citizen living near the border; or a small producer or retailer;
  - b. There should be innovative solutions to overcome the cross-border issues; and
  - c. The system should motivate all stakeholders to work together towards the same objectives and goals.
- 4. Leverage existing International and domestic technology and systems.**
  - a. The DRS should enhance and integrate with the current waste management system in Ireland;
  - b. We must learn from our European neighbours about what works, what doesn't work, and what technologies could make systems work better; and
  - c. We should use technology as a way of engaging the end-consumer.
- 5. Reporting and accountability in meeting our Climate Action Target:**
  - a. The DRS should be underpinned by Key Performance Indicators and business analytics to inform the continuous implementation and improvement of the DRS across the country;
  - b. There must be regular Government oversight and auditing of the chosen operator; and
  - c. There must be reporting by the DRS Operator and other stakeholders.

To conclude, we believe a DRS has incredible potential and if done well, will be a valuable addition to Ireland's waste and recycling infrastructure. However, we concede that the DRS scheme should not be seen as a silver bullet and that it is only a small piece of a much larger issue.

The EU Hierarchy for Waste Management highlights that recycling is the third option. In the short and medium term, the scheme should be used to make citizens think about the waste they are producing and perhaps, consider moving to "better" waste like aluminium or glass, which are much more recyclable than plastics. In the longer term, schemes should motivate the reduction and reuse of waste.

Ireland has been a lagard in adopting innovative recycling initiatives among our European neighbours and we have incredibly challenging targets to meet. Therefore any and every factor which would increase Government action; consumer uptake/acceptance; and operator efficiency are fundamental and crucial to the scheme's success.

We are available for further comment and consultation if required. We look forward to seeing the development and launch of the DRS in the near future.

Yours faithfully,

1. ~~XXXXXXXXXX~~
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