

Rosemary Gaul

From: [Redacted]
Sent: 12 November 2020 16:58
To: wastecomments
Subject: DRS Consultation
Attachments: DRS-Consultation-12-11-20-Thornhill.docx

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To whom it may concern,

Please find attached my initial thoughts on the Consultation questions at the end of the DRS Consultation Document.

Best regards

[Redacted signature]

[Redacted]
Lecturer and Research Fellow,
Department of Food Business and Development,
Cork University Business School,
University College Cork, Ireland

[Redacted contact information]



Response to Consultation Document on DRS

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

Its important to take a step back before commenting on this question, especially in relation to the recycling of plastic bottles. The main goal of any waste strategy should be to REDUCE waste, particularly the use of fossil-fuel based resources such as plastic which create emissions in their production.

Deposit Return Schemes (DRS) do not encourage a move away from plastic, but rather the continued manufacturing and use of plastic goods, particularly in the packaging industry. So if pictures of reusable coffee cups and drinking bottles are included as examples of best practice in government reports (eg the recent Waste Action Plan), then this should also be recognised in policies to encourage their use rather than encouraging a continued use of plastic bottles and other plastic products.

It is therefore more important that policies to discourage oil-based plastic use are in place whether or not DRS are introduced. For example, an increasing tax on, or regulatory phasing out of, plastic goods would encourage manufacturers to switch to more sustainable options, such as cardboard rather than plastic punnets and trays, and reusable drinking bottles and refill stations rather than plastic bottles. This would drastically reduce the number of plastic bottles and make it much easier to meet the 90% recycling target.

Unless the amount of plastic bottles are significantly reduced over the coming years I would suggest that it will be very difficult to reach the 90% recycling target. The rollout of sufficiently large DRS will be expensive, both in financial and resource terms, and it would be interesting to know whether any life cycle analyses have been conducted in this regard.

I make this point having recently listened to how a DRS machine for plastic bottles has worked in the north over the past year. Operated by Tidy Towns volunteers, the machine only accepted clean plastic bottles, so many were discarded and re-entered a non-recycling waste stream. The volunteers had to regularly empty the machine for the clean bottles left (making sure no-one re-used the bottles to claim deposits twice or more times on the same bottle) and then transport them in their van to the processing centre, involving costly emissions and fuel costs, and they were then transported from there to a plastics recycling plant where they were made into plastic trays for meat and other products that are unlikely to be recyclable due to contamination, again involving a lot of resources and emissions. In other words, the recycling was only limited and, rather than circular, the system was mostly "extended linear".

However, it is clear that a transition period will be needed to phase out plastic bottles, so, as long as there is a tax and/or regulatory system introduced to encourage the move to more sustainable packaging and reusable vessels, then a centralised DRS could help to work in parallel to ensure that recycling improves in terms of both quality, through less contamination, and quantity, in terms of the percentage recycled.

BUT, there should also be a stipulation (regulation) that the plastic recycled should only be used for fully recyclable plastic products rather than those likely to end their life cycle at the next stage, which would then result in more material for incineration and landfill (which as

the consultation document rightly points out will lead to more greenhouse gas emissions and other air pollutants).

In the case of aluminium cans, which can be recycled 100%, there is a clear case for a DRS if current systems are not working and leading to more contamination. As a metal we only have a finite resource of this material so incineration in particular has to be avoided.

If not, do you favour a:

a) decentralised / financial DRS; or,

b) hybrid.

Are there other models you believe could work in an Irish context?

As noted above a centralised DRS is the best of the DRS options, but should only be a transition until fossil fuel based plastic products, including bottles, are phased out.

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

We need to revise our waste collection system and move to municipal government rather than private control. For example, in my town there are 5 waste collection companies competing, so 5 lorries collecting from different houses, when 1 would be far more efficient and lead to less transport emissions, pollution and traffic. At the very least councils could tender for one company to operate in each location with an ombudsman to set rates, and regulations on separate collection of waste. This would then encourage better separation of waste with perhaps a different bin collected each day and better inspection of bins to reduce contamination.

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?

Any scheme should discourage the use of plastic containers and encourage renewable alternatives. One suggestion could be a significant producer responsibility tax and then a smaller additional tax included in the DRS, so that perhaps the deposit is 30 cent and the consumer can then reclaim 20 cents deposit with the other 10 cent going as tax to add to the higher producer tax. This would then dissuade both producers and consumers from continuing to use fossil fuel based plastics and seek renewable alternatives.

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?

One way is to involve local community groups, such as Zero Waste and Tidy Towns. These are volunteer-based so providing grants to help them deliver this information would be very cost-effective. Public awareness campaigns on social media, TV and radio would also be beneficial.

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

Enforcement is difficult but repeat offenders mixing plastic bottles and cans in with residual waste should be fined. This is more easily achieved through public municipal waste collection rather than privatised services.

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

Does this mean producers of plastic goods? If so, I do not think the state should be encouraging the continuation of fossil fuel based plastic producers whether or not they do so in Northern Ireland. Also, with Brexit it is not clear what policies will be adopted by the UK government in this area or indeed what trade barriers will be in place. It seems likely that the EU will want to discourage the import of such products.

Apologies for the brevity of these responses but I only learned of this consultation an hour before the deadline.

