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From: [redacted]
Sent: 12 November 2020 13:11
To: wastecomments
Subject: RVM Systems submission for Ireland DRS Consultation, Read receipt Requested
Attachments: DRS Consultation Questions RVM Systems.pdf

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Dear DCCAE,

Please find attached RVM Systems submission for Ireland DRS Consultation.

RVM Systems is a multinational company headquartered in Sweden specialized in providing Reverse Vending Machines and high speed counting and sorting solution for beverage containers. Our products and solutions are found in most deposit systems around the world. RVM Systems is present with its own RVM Systems companies in many countries. We have already registered our Irish company and we like to be involved as a product and solutions provider for the coming Irish deposit return system. We want to be informed about the process for the Irish DRS and we are happy to give our best advice on how a cost efficient and well performing DRS can be set up.

Please give us a read receipt of this e-mail. We look forward to be able to contribute to the Irish DRS success!

Best regards/Med vänlig hälsning
[redacted]
CEO

RVM SYSTEMS

[redacted]

Ireland DRS Consultation Questions RVM Systems Input

Consultation questions:

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

As highlighted in the Eunomia updated report dated 8th November 2020 (Link) RVM Systems agree that Centralised schemes are generally more transparent and accountable than decentralised ones, as there is a dedicated organisation – the Central System Operator (CSO) – responsible for the scheme's data management and overall success.

Centralised systems are often more efficient, in part because the CSO can achieve economies of scale (as they are managing all returned containers).

RVM Systems work closely with Centralised Organisations such as Infinitum in Norway, Returpack in Sweden , Palpa in Finland who all publish annual reports and accounts so that their board members, funders, consumers and regulators can monitor their activities and the results they achieve.

We believe that the DRS Administrators should be a *not for profit* company as seen in most existing DRS schemes.

Centralised schemes are producer owned and led.

If not, do you favour a

a) decentralised / financial DRS or

Not applicable

b) hybrid

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

RVM Systems do not believe that a hybrid model is feasible.

We have seen the recent press releases about the green-tech start-up company which has recently launched a recycling app In Northern Ireland, we do not believe that this type of scheme is plausible. (link)

We encourage new technologies and green tech but strongly believe that a robust proven system as undertaken by Infinitum and Returpack is the correct scheme to emulate.

Using only cryptocurrency an app and a mobile phone with existing kerbside is potentially open to a high risk of fraud, you could scan a used beverage container a number of times, also if used with kerbside there is still a high risk of contamination and waste crime

Most importantly with a cryptocycle app you are preventing the elderly and young who do not have a mobile phone or an opportunity to use cryptocurrency and we believe that many people would not trust or use such a system.

The Mandatory Deposit Return Schemes are proven with accurate "real" recycling statistics, total transparency and most importantly managed by the producers.

Sweden's deposit return scheme has one of the highest return rates of any such system across the globe, with 85% of target materials captured. The aim is to reach 90% (link)

We recommend a Centralised Scheme based on tried and tested models such as Sweden, Norway.

The introduction of a DRS would represent a significant change in how two key material streams are collected in Ireland: PET bottles and aluminium cans and the introduction of a DRS would mean a decrease in beverage containers captured at bring sites and within the existing kerbside recycling collections.

However, as recently proposed in the "draft" proposals for the forthcoming Deposit Return Scheme in Scotland the waste collectors could run the "Counting Centres" and assist with the backhauling of the manually collected used beverage containers back to their own run "Counting Centres"

RVM Systems group company Anker Andersen who are the market leaders in "Counting Centres" who already work in most Deposit Return Schemes globally would be happy to engage in conversations with the DRS Administration Group/Government and stakeholders to explore opportunities in Ireland.

The Counting Centres Counting centres for manual returns could easily be operated by existing waste management companies with spare capacity.

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?

The study is in line with the forthcoming Deposit Return Scheme in Scotland where

4 in 5 Scots back a 20p deposit return scheme (link)

RVM Systems understand why the Scottish Government chose a flat rate redeemable deposit of 20 pence (link) to avoid confusion to the citizens

RVM Systems work in many deposit return schemes with variable deposits and understand the logic in having a flat rate deposit (as will be used in Scotland)

We believe that a flat rate redeemable deposit of €0.20 is appropriate, it should not be any lower as this may hinder the success of the scheme

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?

Zero Waste Scotland have proven that it is possible to educate the public an stakeholders months prior to a Deposit Return Scheme becomes operational. https://depositreturnscheme.zerowastescotland.org.uk

Iain Gulland and his team at Zero Waste Scotland would be able to assist the stakeholders in Ireland as would the team at Eunomia.

Also RVM Systems have undertaken a large number of "pilots" with retailers in England and Scotland pre DRS this allows the consumer to understand the technology whilst allowing the producers and retailers to assess the impact on the stores/return points

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

In Scotland The Environmental Regulation (Enforcement Measures) (Scotland) Amendment Order 2020 has also been passed, giving additional powers to the Scottish Environmental Protection Agency (SEPA) to enforce the scheme.

Ireland would be able to emulate the enforcement powers recently given to SEPA in Scotland

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

RVM Systems would be happy to engage with stakeholders to explore cross border fraud solutions as we have experience of working in countries without a DRS bordering a deposit return scheme such as Estonia who shares a border with Latvia (DRS scheduled to start in 2022) and Russia who are non DRS markets currently.