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From: [Redacted]
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To: wastecomments
Subject: Dublin Chamber submission to DRS Public Consultation
Attachments: Dublin Chamber_Submission DECC re DRS_Nov 2020.pdf

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Good afternoon,

Please find attached the Dublin Chamber of Commerce response to the Department of Environment, Climate, and Communications public consultation on a *Deposit Return Scheme-Potential Models for Ireland*.

Kind regards,

[Redacted]

[Redacted]
Senior Public Affairs Executive

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**Submission to the Department for the Environment, Climate, and Communications in
response to its Public Consultation on Deposit and Return Schemes**

November 2020

Introduction

Dublin Chamber represents businesses from across the Greater Dublin Area, spanning the spectrum from SMEs to large multinational organisations. Dublin Chamber has been at the forefront of driving the green agenda within the Dublin business community for the past decade and welcomes the public policy direction toward waste management for a circular economy.

Dublin Chamber strongly supports initiatives to facilitate the move to a more circular economy and welcomes the consultation from the Department for the Environment, Climate, and Communications (DECC) on a possible Deposit and Return Scheme (DRS) model for Ireland. The theory and intent behind DRS are in keeping with circular economy principles, and a DRS can help Ireland to reach its EU waste reduction targets. However, there are facts that we urge Government to consider when planning for implementation of any of the models proposed in the Consultation Document on Potential Models for Ireland.

DRS Integration

Firstly, the system introduced should ensure that the least possible burden, and no additional cost be placed on retailers. The Covid-19 crisis and the necessary public health measures to battle the pandemic have put significant stress on many retailers, while Dublin city centre and highstreets may face numerous closures in the year ahead. It is essential that a significant burden is not introduced for retailers in the coming years. The handling fee and support for setting up Reverse Vending Machines (RVMs) and manual systems by retailers should reflect this. Extended Producer Responsibility (EPR) places the onus of managing and covering the cost of sustainable waste management upon the producer. This is core to DRS and must remain as such in the introduction of such a scheme. The proposed date for the introduction of a DRS in Ireland 2022, and at this point the economic impact of Covid-19 will still be prevalent for retailers. There must also be a generous lead-in time and very clear instructions for its rollout prior to announcement.

Whichever model is used, the system needs to be cost effective and easily integrated into current Irish waste management systems which are fully privately operated.

The 2019 EU Directive on Single Use Plastics (SUP) is due to come into effect in Irish law in July 2021, requiring that a number of steps be taken in order to reduce the prevalence of single use plastics in Ireland and to meet overall targets for plastic recycling. Currently, only 31% of plastics in Ireland are recycled. The SUP Directive puts in place a target of 90% by 2029 for plastic bottles. Introducing a DRS to contribute to reduction in single use plastic bottles is positive and will contribute to meeting that target; however, it cannot be viewed as a silver bullet.

While Dublin Chamber is broadly supportive of EPR and of DRS, we argue that these mechanisms cannot replace the role to be played by a vastly improved communications campaign around recycling at a basic level. In our submission to the Department in response to the consultation on a Waste Action Plan for a Circular Economy in February 2020, we argued that better communications in relation to separation and correct recycling would prove to be a cost effective means of reaching goals around waste management. The cost of an increased communications campaign to improve recycling practices is minor in comparison to the estimated cost of DRS and would yield a positive outcome for improving recycling practices and therefore it should remain a priority in action to tackle waste management for a circular economy. The estimated cost by the Waste Management Association per tonne of DRS recycled materials is €7,500, to put this in context, the cost of kerbside collected waste is €500 per tonne.¹

Further to this, Government should consider in its plans the existing efforts being made by producers and consider in planning that many producers have invested heavily in improving their sustainability through their packaging practices and have engaged with expert operators in the recycling and waste management field to act responsibly as producers. For example, a number of producers have joined Repak in its Team Green initiative.²

Deposit Cost Point

Further detail is required on the 20c deposit and its general application. For example, is this rate too high for producers that are providing a product at a lower cost point? The addition of 20c to a 75c item may have a deterrent effect on consumer purchases that the addition of 20c to a €5 product would not. There is a possibility that the rate is somewhat of a blunt instrument.

Dublin Chamber supports the decision for glass bottles to be left out of the scheme as recycling for such items is functioning well in the Irish system at present.³

¹ Irish Waste Management Association *Likely Impact of a Deposit Return Scheme on Waste Management in Ireland* <http://iwma.ie/wp-content/uploads/2020/01/Likely-Impact-of-DRS-on-Irish-Waste-Management-Final-Report-Jan2020.pdf>, p.70

² Repak, <https://repak.ie/team-green/>

³ EPA Packaging Waste in Ireland 2018, <http://www.epa.ie/media/EPA-Packaging-Waste-Ireland-Infographic.pdf>

Summary

While Dublin Chamber is broadly in favour of the introduction of a DRS, we urge Government to adequately support retailers to minimise any form of disruption to business. Furthermore, the model that is introduced must work with the current and evolving waste management systems – particularly the recycling mechanisms – that are functioning in Ireland already. This is both for functional and financial reasons. The model should also make room for the efforts being made by many producers to operate sustainably. Finally, the DRS needs to be a part of a wider push and cohesive messaging campaign around recycling, the circular economy, and resource management, and not be an isolated policy programme.