

From: [Redacted]
Sent: 12 November 2020 15:08
To: wastecomments
Cc: [Redacted]
Subject: Deposit and Return Scheme

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To whom it may concern;

I am writing to you on behalf of Panda and Irish Packaging Recycling, subsidiaries of the Beuparc Utility group. Combined, we export more than 200,000 tonnes of recycled packaging from Ireland every year. Panda's household collection business has more than 250,000 customers and our recycling facility, the largest of its kind in Ireland, processes material from more than 350,000 households. I outline the above so you understand we are the "boots on the ground", so to speak, of current recycling practices in Ireland. Changes proposed, such as the Deposit and Return Scheme, will have significant negative implications for our business.

The proposed traditional DRS (return vending at retail locations) will remove all of the PET and Aluminium from the household recycling bins. We currently depend on these products as a source of revenue to bolster those products which currently cost money to recycle such as; soft plastics, low-grade composite plastics and for a large portion of 2019 and 2020, mixed paper.

In March 2020 we completed a €2M upgrade to our Ballymount facility installing 3 new optical separators with the ability to separate the mixed plastics into 5 distinct products; PET clear, PET coloured, HDPE clear, HDPE coloured and a Pots Tubs & Tray grade (PTT) comprising PP, PVC and PS.

In 2020 we expect to recycle more than 6,500 tonnes of rigid plastics including 3,000 tonnes of PET bottles worth between €700,000 and €800,000 at an average LTM market price (including the subsidy paid by Repak). We will also recycle more than 1,500 tonnes of Aluminium worth almost €1M.

The impact of losing this revenue are wider than those seen by the recycling plant and the 120 people it employs. Losing this revenue means we have to increase the gate-fee to receive domestic recycling. 70% of the material we process comes from Panda's household collection but the plant also serves; Citybin, Greyhound, Oxygen, Dublin City Council (Civic Amenity) and many others. Increasing the gate fee pushes the cost of recycling potentially higher than SRF. Either way, eventually, the householder will pay this increase cost.

There is an alternative to traditional DRS by reverse vending machines and the exorbitant costs associated. Smart DRS is being trialled currently in Ireland, further trials are needed but this system, if successful, will demonstrate Ireland as a world leader in the producer pays/circular economy model.

Smart DRS offers the ability to expand deposits beyond the easily recyclable PET and Aluminium to problem packaging such as composite food trays and cosmetics containers. Smart DRS has the flexibility of adding more and more materials and products to the system, allowing the DCCAE to target problem packaging and push producers to innovate or pay accordingly, helping Ireland achieve its recycling targets.

Ireland has the opportunity now to be a pioneer in recycling and make headlines throughout the world. If we proceed beyond a trial with a Smart DRS, and the beverage producers comply with the labelling requirements to make it work, Ireland will make headlines similar to the plastic bag tax in 2002. Once the smart DRS is embedded in beverages it can be rolled out to problem packages such as food trays, yoghurt pots etc. At that point we will be world leaders in recycling.

Yours Sincerely,



[Redacted]
MRF General Manager

[Redacted]
A: Regional Materials Recovery Facility, Merrywell Ind.
[Redacted]

Our company is a part of the Beauparc Utility Group.
To find out more about us, please see www.beauparc.ie

We all have an important part to play, to help prevent the spread of Covid-19

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| Wash your hands well and often to avoid contamination | Cover your mouth and nose with a tissue or sleeve when coughing or sneezing and discard used tissue | Avoid touching eyes, nose or mouth with unwashed hands | Clean and disinfect frequently touched objects and surfaces | Stop shaking hands or hugging when saying hello or greeting other people | Distance yourself at least 2 metres (6 feet) away from other people, especially those who might be unwell |

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