

From: [REDACTED]
Sent: 12 November 2020 15:55
To: wastecomments
Subject: FW: DRS consultation on potential models for Ireland

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The CSNA is the representative body for convenience stores, forecourt and newsagents throughout the Republic.

We represent the owners of the stores and have in excess of 1200 members in 1500 stores.

There are a number of questions posed in the document forwarded on October 6 that we do not intend to submit any position upon, and will be asking the Department to give consideration to a number of points we will raise.

We note that The Programme for Government has reaffirmed a commitment to introduce a DRS for plastic bottles and aluminium cans.

If and when the Scheme is being designed, it is imperative that the Department engages in an ongoing and meaningful way with all stakeholders, and with regard to the retail sector, the CSNA urges the inclusion of representatives of small, independent beverage retailers.

CSNA favours a scheme that will provide a financial reward to the participating retailer in recognition for the considerable administrative, financial and payroll costs they will incur, on an ongoing basis in providing a base or depot for the return of bottles and cans.

CSNA is acutely aware of our members duties to our shared environment and wishes to place on record the desire of those businesses to play our part in the Scheme.

On the question of the type, or style of Scheme, we would prefer that there would be a single, centralised Scheme, administered by a single entity with a Board comprising of the various stakeholders similar to the Repak model. CSNA have a very good working relationship with Repak and would be very happy, if the opportunity arose, to work with them in a DRS.

Those designing the Scheme will need to give thought to whether there will be a Statutory obligation on each entity retailing or providing beverages to a member of the public to charge a deposit, regardless of the style of entity. It is possible that the Regulations will provide for a de minimus threshold or limit the application of the deposit to an end user only if the products are retailed in the container.

The members of CSNA occupy a very large section of the chain of distribution of bottles and cans, particularly in the carbonated sector and believe the application of a DRS fee should not exceed 20 cent, nor should it be a different fee for different sizes or type of container.

There will be a real need to ensure the integrity of the system to prevent it being gamed or abused by opportunists and criminals. The fact that Northern Ireland will not operate a DRS will need to be considered in the context of

designing an RoI Scheme that will be able to exclude products that did not have a deposit applied within the Republic.

CSNA does not consider it likely that Reverse Vending Machines (RVM) will be universally available in all beverage retailing outlets, yet are most concerned that whatever return solution is considered to be the model (for what will actually be the majority of retailing outlets) will not be viewed as a second or third rate service. It cannot be a feature of this Scheme that any existing sales of beverages migrates away from those without RVM due to any inconvenience, perceived, real or imaginary.

The CSNA urges the Department to engage with other Statutory Agencies and Local Authorities to ensure that there will be a universal approach to the physical infrastructures and suggested operating parameters to enable a consistency throughout the country. The Environmental Health Service will need to be satisfied that the return of empty/partially full beverage containers does not constitute a hazard as may the Food Safety Authority. The RVM may or may not require the consent of planning officials but once again, it would be important that there is a consistency of approach.

There are very real problems for those retailers that source their product from outside the Republic if the barcode on the product is the sole "identifier" for return.

The Department will need to give consideration as to what will the "lead in" time be for selling through stock that has not had a deposit applied.

We understand that it is considered by the Consultants (with whom we have engaged) that there will be around 10% of deposits unredeemed. This is an estimation, but is critical to the financing of the Scheme; if community, Civic and voluntary groups get behind the Scheme and collect for charitable purposes, the success (redemption) rate will be much higher, leading to shortfalls from Year one.

Throughout the EU, there is a Track and Trace scheme in place for tobacco products. Every individual packet of cigarettes manufactured in the EU has a unique identifier, as have each carton and case. These identifiers are separate to visible barcodes and can be read by Customs and Police to prevent smuggled and counterfeit products ending up in the retail supply chain.

We are unsure how the Scheme will prevent the refund being paid more than once on products if they are not crushed or compacted at the same time as a deposit is repaid but perhaps if each individual container had its own Q code applied at manufacturing it would be possible.

As to Enforcement, CSNA would be willing to assist the Department in considering this once we have a better idea of the totality of the obligated market.

Bottles and Cans are not always sold, the product can be decanted; as the purchaser has paid the deposit from their supplier (wholesaler/Cash and Carry, Beverage Distributor, is it envisaged that each of these upstream operators will also be obliged to operate a "takeback" facility?

On the question of Communications, it is not only consumers that will need to have adequate time to get used to the changes, all retailers and suppliers of bottles and Cans will need a very good and inclusive series of communications and Calls to Action.

Retailers will have a very legitimate right to be properly rewarded for this additional work. The Department needs to be aware that the only fair and equitable way for such fees to be agreed is to permit representative groupings and primary entities to discuss and negotiate collectively rather than a "take it or leave it" structure for an obligatory Scheme.

If there are any other matters on a DRS that the Department would like the Association provide our insight upon, we will be pleased to assist.

Kind Regards,

[Redacted signature block]



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