

[Redacted]

**From:** [Redacted]  
**Sent:** 12 November 2020 15:56  
**To:** wastecomments  
**Subject:** Public Consultation on Deposit Return Scheme Consultation Document on Potential Models for Ireland  
**Attachments:** Aldi Ireland Deposit Return Scheme Consultation Submission.pdf

To whom it may concern,

Hope you are well.

Please see attached Aldi Ireland's submission for the Public Consultation on Potential Deposit Return Scheme Models for Ireland.

If you have any queries please do not hesitate to contact us.

Kind regards,

The Aldi CR Team

[Redacted]

ALDI Ireland  
Newbridge Road  
Naas  
W91 VE40  
Ireland

[Redacted]

**🌐 SAVE PAPER - THINK BEFORE YOU PRINT**

-----  
ALDI Stores (Ireland) Limited is a limited company registered in Ireland with registration number 294035 whose registered office is at 67-68 Fitzwilliam Square, Dublin 2.  
This message is intended solely for the addressee and is private and confidential. If you have received this email in error please delete it immediately and let us know by contacting the sender, do not use, copy or disclose the information contained in this message or in any attachment. For information about how we process data and monitor communications please see our Privacy Policy at [www.aldi.ie](http://www.aldi.ie).  
-----

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Aldi Ireland,  
Newbridge Road,  
Naas,  
Co. Kildare,  
W91 VE40.

By email only to [Wastecomments@DCCAE.gov.ie](mailto:Wastecomments@DCCAE.gov.ie)

12th November 2020

**Re: Public Consultation on Deposit Return Scheme Consultation Document on Potential Models for Ireland**

Dear Sir/Madam,

As a major retailer in Ireland, we believe the Deposit Return Scheme will have a significant impact on our business, therefore we think it is important that we contribute to this consultation on potential models for Ireland.

At Aldi, we are committed to offering our customers responsibly sourced, quality products at unbeatable prices. Our customer-centric approach and competitive pricing strategy have fuelled our exponential growth since launching in Ireland in 1999, firmly establishing the Aldi brand as a household name. As one of the fastest growing grocery retailers in Ireland we understand that our business growth must go hand-in-hand with a robust Corporate Responsibility policy. We have 144 stores in Ireland employing over 4,000 people and expect to have over 180 stores opened by 2030.

In order to support this growth while fulfilling our promise to customers, we have always aimed to prioritise our ethical and moral responsibilities to the environment by adhering closely to our three core values – Consistency, Simplicity and Responsibility. Based on these working principles, our dedicated Corporate Responsibility team has introduced a wide range of projects and initiatives to deliver our services in an environmental and sustainable manner.

We have become more aware of the damaging effect of non-recyclable plastic and have decided to speak out and demand change. Aldi have sent zero waste to landfill since 2014. All general waste is sent to energy recovery facilities. In July 2020, Aldi updated its plastic and packaging pledges to the public, aiming to achieve all targets by 2025. In order to achieve these pledges, it has created a Packaging Working Group made up of various departments within the business including Buying, Logistics, and Corporate Responsibility & Communications. In addition, Aldi is a member of Repak and has signed their Plastic Packaging Pledge. Since announcing these pledges, we have made some significant plastics and packaging savings throughout our product range, including removing over 610 tonnes of plastic and moving 870 tonnes of non-recyclable packaging to recyclable.

Further to your call for consultation on the above-referenced subject, I offer the following responses and comments from Aldi Ireland.

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

No, Aldi is in favour of a Hybrid system. For this system to operate as efficiently as possible having one scheme operator, such as Repak, will increase the chances of the DRS succeeding in Ireland. The board can set policy & fees for producers which will lead to greater accountability, transparency & cost effective target

achievement. A not for profit company would represent the interests of the stakeholders involved in the scheme.

Assigning a recovery operator to be responsible for collecting all of the material would make the model more structured. The operation would run smoother having a body who already has the infrastructure to manage collecting material from reverse vending machines across the country.

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

The Welsh Government are looking to progress the virtual DRS trial which involves the use of QR codes and a mobile app rather than reverse vending machines. The Welsh Government have confirmed (alongside the UK Department for Environment, Food & Rural Affairs - DEFRA) that they expect this trial to commence in Q1 2021 with any findings to be shared with the UK & IE Governments. This would be more cost effective in the long run and would not involve retailers having to get planning permission, expand their stores or upkeep the reverse vending machines.

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

Waste collectors should be responsible for collecting the materials from the reverse vending machines located across the country. A regular collection schedule should be made and collected directly from each reverse vending machine. Alternatively, retailers could backhaul the collected material to their RDC and waste collectors could collect it from there.

**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 deposit should be proportionate to the price of the product and should be cost neutral for all stakeholders. Deposit rates should vary depending on container size to be able to build up a sinking fund to allow for fluctuations in the price of materials in scope. The deposit value should be set by the Minister of DCCAE in order to ensure Ireland meets its collection and recycling targets. This way retailers cannot be accused of rising prices and have an obligation to all follow deposit ratings set by the government.

**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?**

A unity of purpose in communication is key to the success of the DRS. The DRS must be clearly explained to the public with a consistent message from all stakeholders. Consumers must be aware that the reason prices will increase for beverages is due to this scheme. This way customers will be more likely to utilise the service. A nationwide communications campaign must take place in Ireland and all stakeholders should partake. It should be up to the Government and DRS operator to lead the campaign and stakeholders to follow. Social, radio, TV and print should all be used in the months leading up to the implementation of the DRS, the launch and after it is installed. A public countdown to the launch of the DRS would help build momentum and increase awareness amongst the public.

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

Well designed, clear and robust legislation must be implemented prior to introducing a DRS in Ireland in order for it to be successful and run smoothly.

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

The main cross-border issue would be fraud. Labelling is key to fraud prevention. An example of common fraud is claiming a refund on an item that no deposit was paid; deposit claimed twice etc. We would suggest a unique barcode for the Republic of Ireland that differs from Northern Ireland. A mark indicating inclusion in the Ireland DRS would also help prevent fraud. This would need to be clear and consistent across the Republic of Ireland.

To summarise the above, we believe that a Hybrid model would be most suited for Ireland's Deposit Return Scheme. In order for it to be a smooth transition, having an operator such as Repak, who have a wealth of

knowledge and experience in the industry, managing the operation, whilst a waste collector takes responsibility for the collected materials, would be the best solution.

We hope that this submission is helpful and we look forward to further positive engagement with the DCCAE on this and other waste policy issues.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "P. Barry". The signature is written in a cursive style with a small flourish at the end.

**Padraig Barry**  
**Communications Director**