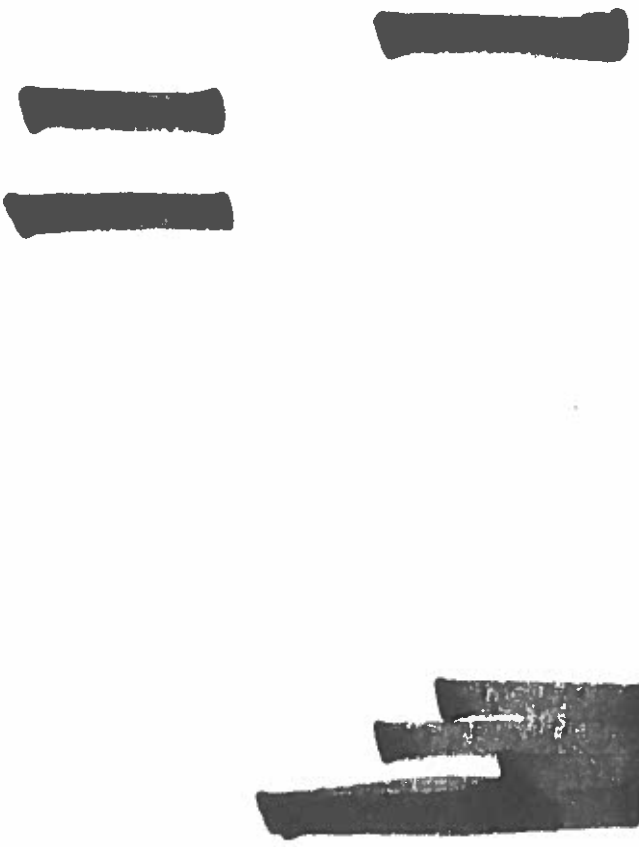
[redacted]

From: [redacted]
Sent: 12 November 2020 16:05
To: wastecomments
Cc: [redacted]
Subject: Response to Deposit Return Scheme Public Consultation
Attachments: anois_DRS.pdf

To whom it may Concern,

Please find attached our response to the public consultation on Deposit Return Schemes for Ireland.

[redacted]



Public Consultation on Potential Models for Ireland

Deposit Return Scheme

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1

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

A centralised model will certainly provide multiple benefits such as ease of management, compliance, surveillance and enforcement. However, the centralised model proposed does not contain the required flexibility for future proofing. A DRS should prioritise reuse over recycling to ensure "productive use and securing the resource value" at its highest possible resource value. The highest resource value will be only be retained when a material is kept in its original produced state (with its embedded energy), i.e. as a container that is reused, ideally over and over, as once a material is broken down either mechanically or chemically it instantly loses value, and the embedded energy is lost. In addition, recycling materials will always eventually be downgraded, due to laws of thermodynamics, therefore a DRS for recycling alone should not be a long-term objective. A DRS solely for recycling is not responsible or sustainable, either environmentally or economically. In addition, the EU Green Deal will see the introduction of reuse targets. Without a DRS targeting reuse, Ireland will struggle to meet these future reuse targets. Therefore, reuse should be the priority for a DRS as it achieves a far higher level of circularity. We accept that this requires a change in mindset, from circularity through 'reuse' instead of through 'recycling', and as a result it may require additional work up front on infrastructure and multi-actor capacity building. However, this type of thinking and action will reap significant long-term benefits.

We agree that a DRS should initially be started for plastic and metal recycling to enable citizens, retailers and the DRS operator to become familiar with the approach. This type of staged approach will help embed DRS practice into Irish citizen's retail routine and facilitate a change of culture and mindset around the value of and relationship with packaging materials. The proposed plastic and metal recycling DRS should then be expanded to glass containers and to reuse models within 3 to 5 years of the launch. This public consultation and the supporting Eunomia commissioned study, both insufficiently justify why DRS for reuse is not considered, likewise they insufficiently justify why glass containers will not be included. The embedded energy in glass alone is significant, while their current recycling system is unsustainable, with the embedded energy loss through the recovery process just one of many concerns.

A centralised operational system is a feasible and proven approach for both citizens and retailers, therefore it makes sense to have a centralised DRS model. All collection points should accept all plastic and metal containers regardless of whether they have a deposit assigned or not, so citizens are not left carrying recyclables home. It also reduces the risk of unaccepted containers becoming litter. Likewise, a situation where citizens must bring containers to multiple collection points should not be acceptable. Universal container acceptance and deposit return is key to the success of the DRS.

However, a note of caution here, taking a centralised approach to material ownership is not the optimum approach for responsible producers or for maximising returns for the Irish economy. Removing material ownership from producers changes their relationship with the material, and in essence removes their life cycle responsibility. This disincentivizes responsible producers from pursuing Circular Business Models and Circular Design Methods, such as reuse and refill. Discouraging producers from embracing circularity makes them less competitive and elevates their risk of being affected by future spikes in material costs and material shortages, something that is rapidly becoming a challenge for many global producers. Thus, the limitations of the proposed centralised model is cutting off future opportunities for Irish producers to potentially save on material costs through reuse and refill strategies. The proposed model locks producers into single use Linear Design and Business Models which will do more harm than good in the long term. As a result, the proposed centralised model will be a barrier to creating an effective and efficient Circular Economy in Ireland.

We believe the best model for Ireland would be a hybrid DRS, to ensure the system has the flexibility to branch out to facilitate reuse and glass collection within the next 3 to 5 years. In 2017, Ireland exported most of its metal (88%) and plastic (89%) for recycling, therefore our economy is not set to substantially benefit from a DRS that solely focuses on recycling. Instead a DRS that prioritise reuse should be the overall goal. Centralised collection and storage points should be utilised to ensure producers do not create additional transport emissions. A reuse DRS will ensure packaging materials are retained at their highest value for as long as possible, to the benefit of producers and the Irish economy. Without the flexibility of a hybrid model, the government will lock into a DRS model that is not future proofed and will become a significant cost burden to the Irish tax payer when it will need to be upgraded to facilitate reuse.

2

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

Ireland was the first country in the world to have a DRS for glass bottles ran by a private company (A & R Thwaites in 1799) who wanted to make sure customers brought back bottles to be refilled so they put a deposit on them.

Ireland also had a glass bottle DRS scheme up until the 1980's. Therefore, Ireland is an ideal location for a DRS that prioritises reuse. (See justification in answer to question 1).

3

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

Waste should have no role in a DRS. DRS is a great way of avoiding waste and ensuring that materials are retained in use at their highest value in the original product. If this is not possible, they should be secured as a clean stream of non-contaminated material that can be recycled into raw material for new products.

However, if recycling will be the only focus of an Irish DRS, then it could be incorporated into the household waste collection system. For example, households pay the deposit at the retail, they separate out deposit containers in their home for waste collectors, the waste collectors then scan these containers as they enter their vehicles and allocate a refund back to households. The material is then owned by the waste collectors who can sell it on the open market. This approach will potentially create less hassle for citizens and retailers than the proposed model of citizens returning full size containers to retailers (who have to handle and store them).

4

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?

A tiered deposit model could be applied where cheaper products (<€1.50) are allocated a lower deposit of €0.10 and a €0.20 deposit is applied for larger, more expensive products (>€1.50).

5

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 national media campaign, utilising all the available platforms, and utilising a variety of tools including character-based illustration and animation.

6

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

Design for Reuse and Extended Lifespan, Design for Non-Toxicity and Design for Recycling methodologies will need to be enforced to ensure that any additional materials used on containers do not contaminate the reuse or recycling process and have the necessary properties. For example, labels should be removable or contained within the container material itself (embossing/etching etc.) to reduce the need for expensive and excessive identification and separation methods. Likewise, materials standards will be needed to ensure that all the materials and are non-toxic, are of consistent quality to avoid downcycling to the lowest quality material.

Design for Tomorrow Do it Today

anois work globally to create value through good design, specialising in ethical branding, sustainable product design, responsible value chains and circular business models.

In this consultation we share our 50 years combined expertise on Circular Economy transitions, including training and advising regional, national and intergovernmental policy makers (e.g. European Commission, United Nations).

If not now, then when?

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