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From: [Redacted]
Sent: 12 November 2020 16:25
To: wastecomments
Subject: ACE Ireland's response to the Deposit Return Scheme Consultation on Potential Models for Ireland
Attachments: ACE Ireland response to DRS Public Consultation 12.11.20.pdf

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To whom it concerns,

Please find attached ACE Ireland's response to the Department's Deposit Return Scheme Consultation on Potential Models for Ireland. Great if you can confirm receipt of the attached and should you have any questions in relation to the suggestions ACE Ireland has put forward, please don't hesitate to get in touch. Many thanks.

Best Regards,
[Redacted]



ACE Ireland
a: c/o Instinctif Partners, 13 Merrion Square North, Dublin 2, D02 HW89
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Response by ACE Ireland to the Department of Communications, Climate Action and the Environment's consultation on a Deposit Return Scheme

Introduction

The Alliance for Beverage Cartons and the Environment (ACE Ireland) represents Tetra Pak, Elopak and SIG Combibloc, the leading manufacturers of beverage cartons for the Irish market, and it delivers sector-wide environmental initiatives on behalf of its members.

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

ACE Ireland agrees with the recommendations of the Eunomia report for a centralised operational model for Ireland that is producer owned and led. The establishment of a Central System Operator would help ensure greater transparency and accountability for the implementation of a DRS system which via underpinning legislation can be mandated by Government to achieve performance targets, particularly in the context of ambitions targets set out in the *Waste Action Plan for a Circular Economy*.

As referenced in the consultation document, a centralised approach has worked well in terms of other extended producer responsibility models such as Repak and WEEE Ireland. As this DRS will be a relatively new approach to recycling in Ireland, ACE Ireland believes that centralised model is will be the most effective means to drive public awareness and educate Irish citizens with regards to how the DRS works and why they should engage with it.

If not, do you favour a) decentralised / financial DRS; or, b) hybrid?

n/a

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

While ACE Ireland welcomes the proposed introduction of a DRS scheme and supports a centralised model for the introduction of the scheme, we do believe there is room to significantly broaden the scheme to include a wider selection of materials. In a Red C poll of over 1,006 Irish adults aged 18 or over, environment charity Voice Ireland revealed that 88 per cent of people surveyed 'support an expansive DRS system taking in as many drink containers as possible'. The poll conducted from 1st – 5th October 2020, showed that most Irish people support the inclusion of metal cans, plastic water bottles, plastic milk bottles, glass bottles, coffee cups and drink cartons and pouches.

As noted in Section 6 of the Consultation Document on Potential Models for Ireland, the scheme will '*not apply to glass bottles or composite beverage containers such as Tetrapak/Elopak*'. However, there is a strong rationale for considering the inclusion of beverage cartons within the DRS, particularly in the context of the Government's commitment to set specific recycling targets for packaging formats such as beverage and food cartons, as set out in the *Waste Action Plan for a Circular Economy*.

It is worth noting that life cycle analysis undertaken by the Heidelberg Institute for Energy and Environmental Research shows that beverage cartons are among the best environmental performers of all drinks packaging formats. They are also fully recyclable and primarily made from renewable, low-carbon paperboard. It is crucial, therefore, that systems which seek to

drive greater circularity in the economy also support such low-impact packaging, thereby helping to achieve the Irish Government's objectives outlined in the *Waste Action Plan*.

The results in the VOICE Ireland, Red C poll highlights the public appetite to see an expanded range of materials for inclusion in the DRS. We therefore recommend that there should be a deposit return trial of all materials to provide the evidence needed for a well-informed decision on materials which could be included in the DRS further down the line. Such a trial should include beverage cartons which can be recycled into a range of high-quality products.

Furthermore, if beverage cartons continue to remain excluded from the initial list of materials in-scope, we would strongly advocate the inclusion of a formal mechanism in the legislation underpinning the scheme to require the regular review of materials included. This mechanism would place the responsibility upon the DRS operator, in consultation with relevant stakeholders, to provide recommendations to the DCCAE for additional materials to be incorporated into the Scheme.

Incorporating such a mechanism will provide a way for new materials to be considered, helping to futureproof the Scheme, embedding flexibility and responsiveness, and enabling it to adapt to new materials and innovations in the packaging market.

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

We do not have a view on the role the waste collectors should play in the operation of the DRS, but it is critically important that existing kerbside collections must not be undermined by high-value materials being diverted away by the DRS. Many packaging formats will remain out of scope of the DRS – both beverage and non-beverage – and they will continue to rely on existing systems for collection. It will be important to ensure that a well-designed EPR system maintains the viability of high-quality kerbside collections, otherwise recycling performance overall could decrease.

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?

It is too early to put a figure on the optimum deposit level but understanding the experience of other similar countries would be useful. There are many factors that will determine optimum deposit level, and these will vary by country. However, the deposit would need to be high enough to incentivise consumers to return the container, but not so high as to distort the market and encourage fraud.

We note that some 78 per cent of people who responded to a VOICE Ireland Red C poll in October 2020 said they backed the introduction of a variable deposit fee, where consumers pay a deposit that varies based on the size and material of the container.

While a flat fee would seem to be the simplest approach and would not discriminate, further information is required to determine whether a flat rate or variable rate is appropriate or a composite of both. It must be considered that the purpose of the DRS is to incentivise consumers to return their package for recycling, irrespective of size or type, rather than encourage the use of one package over another. However, the principle should be that all containers carry a deposit, including those sold in multi-packs.

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?

Ensure comprehensive national consumer outreach using all available channels.

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

Consider financial penalties for non-compliance.

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

A simple and clear visible marking should be mandatory for all in-scope materials so that consumers can easily identify whether they have paid a deposit reducing the risk of fraud. It would be useful to learn from the experience of other countries with regard to this issue.

ENDS.