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From: [Redacted]
Sent: 12 November 2020 17:29
To: wastecomments
Subject: DRS Consultation Retail Ireland Response
Attachments: Retail Ireland Response to Deposit Return Scheme Consultation.pdf

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Dear Sir/Madam.

Please find attached Retail Ireland's response to DRS consultation.

Kind regards
Stephen

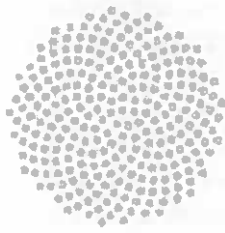
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Retail Ireland Response to Deposit Return Scheme Consultation

Introduction

The Single-use Plastics Directive introduces the requirement for 77% segregated collection of plastic beverage containers by 2025, increasing to 90% by 2029, alongside the need to achieve at least 30% recyclable content by 2030.

Retail Ireland and its members are committed to the principles of the Circular Economy. A clean environment, and resilient and resource efficient economy are vital for continued sustainable development of Irish society. The circular economy transition can be a key element in ensuring this and the sector will play its part in the delivery of the targets set out.

Retail Ireland members are continually working to address issues of plastic waste across the supply chain – to reduce, reuse and recycle as we continue to progress towards a closed loop recycling system in Ireland. Our members note the intended introduction of a DRS in Ireland as a Programme for Government commitment and its potential role in responding to the environmental challenges we face.

We are pleased therefore to share our perspective in relation to the potential proposed model for a Deposit Return Scheme (hereafter DRS) system in Ireland, through this consultation response.

It is important to note that that if it is to be a success, there are significant concerns which will need to be addressed in considering the preferred model for a DRS scheme in terms of its design and operation. These relate particularly to the significant direct and indirect costs, planning, and collection infrastructure, of establishing and operating such a scheme, as well as the practical impacts for the retail sector– including space constraints, additional resource and training required to operate such a scheme, public education and so on.

The burden in relation to these and other issues, should not fall to the retail sector alone, and should not unduly impact the consumer. In order to be successful, the introduction of a DRS scheme must take into account the perspective of the retail sector, as well as other sectors involved. We also need to ensure that the investment and ongoing management of the scheme is proportionate to the any measurable gain from it.

Apart from set-up and operating costs, a mandatory DRS would require the installation of Reverse Vending Machines (RVMs) at retail and other key locations across the state and/or the establishment of alternative collection mechanisms and EPOS systems to enable consumers to return containers and recoup their deposits.

These requirements would place additional costs and operational burdens on all retailers, including at smaller/convenience stores, where retail and storage space are restricted and staff resources are limited.

There needs to be absolute clarity as to proposed operation of any DRS including how stores of all sizes and formats might be required to participate. We would propose that well-located municipal RVMs or segregated collection facilities would provide an alternative solution that would avoid the need for staff at retail stores to have to handle used beverage containers, with the attendant hygiene, health and safety risks.

Consideration must also be given to the risk that DRS could undermine the stability or sustainability of existing Producer Responsibility Initiatives, such as Repak - which many retailers are a member of - or the viability of current domestic kerb-side recyclables collection systems, which work effectively as a collection method for PET bottles - Ireland has consistently exceeded the current EU plastic recycling target of 22.5%.

DRS is being proposed as a litter abatement mechanism, however, research has shown that DRS would have limited impact on litter reduction, since drinks containers are estimated to represent less than 5% of total litter arisings.

The ongoing under-provision of on-street and outdoor segregated litter infrastructure along with the practice among many local authorities of disposing of litter arisings and unsegregated litter bin contents to landfill continues to result in a loss of potentially recyclable material. The solution to littering lies in a systemic approach that includes increasing (segregated) on-street infrastructure, better public information and awareness programmes and robust enforcement targeted towards anti-social behaviour.

Given the scale of potential risks, it is essential in our and our members' view that if a decision is made to introduce a DRS that it should be operated on a not-for-profit basis and with rigorous oversight and input from key sectoral stakeholders.

Retail Ireland looks forward to participating positively and constructively in the DRS consultation process with a view to identifying a viable system that achieves the environmental objectives, and does not place a disproportionate burden on the retail sector.

Key Questions

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

Retail Ireland would be in favour generally of a centralised model for the management of this scheme. By having one central operator for deposit returns would allow the scheme to build up the economy of scale needed to effectively operate. This would need oversight from key sectoral stakeholders and run on a not for profit basis.

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

We believe that the remaining two models as set out by the Department could work also in an Irish context with a preference for the hybrid model. For this scheme we believe that while there may be some significant cost overheads that should not be borne by retailers.

It would be prudent of the Department to do a cost benefit and comparison analysis on what works in other jurisdictions and how they would work if transposed in an Irish context, in order to determine the appropriate model.

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

Waste collection companies will need to be a significant stakeholder in the proper operation of a fully functional and efficient DRS. We would propose that the most efficient model would be that one operator per region would carry out the collection, aggregation, and processing of deposits. This would allow the growing of economies of scale, and efficacy to avoid duplication of roles in every local authority.

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?

There needs to be uniformity in relation to both pricing and pricing per size in this space to ensure that the scheme works as efficiently as possible. We feel that €0.20 per return is a reasonable price to set for any sizing and if prices vary per size it could create snag issues. It would be preferable that a minimum and maximum size limit be placed on containers and that certain lines such as glass and dairy be excluded altogether.

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?

It is vital for the initial success of any DRS that there is full public understanding any buy in. This can be achieved by utilising not only traditional media outlets but needs to have significant investment, by the centralised operator, on social media platforms, for example. There are examples of successful media campaigns in the sustainability space such as Team Green by Repak.

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

Effective enforcement is achieved by a successful information campaign to the public on the dos and don'ts in relation to DRS. But littering will occur to some extent and the active enforcement of the current littering regulations are key in this regard.

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

Unless a twin track approach is taken with the authorities in Northern Ireland there will be significant structural issues in the management and operation of any Scheme in this jurisdiction. One

of the main pinch points will be that fraud could occur as barcodes on many products are the same in NI as in the Republic of Ireland.

Contact:


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