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From: [Redacted]
Sent: 12 November 2020 23:20
To: wastecomments
Subject: Submission to CDS consultation
Attachments: CDS submission Ireland 13 Nov 2020.docx

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Department of the Environment, Climate Change and Communication

Re: Response to proposed Container Deposit Scheme Consultation Paper

13 November 2020

By Email : Wastecomments@DCCAE.gov.ie

Dear Sir/Madam,

A Container Deposit Scheme (CDS/DRS) is most successful when it can maximise the number of eligible containers collected and recycled. The key component of this is the provision of a collection network that is convenient and easy to use, so that consumers can readily participate and receive their refunds.

I have been a participant and member of a number of Government Advisory Committees in Australia that have examined the best design elements of a CDS, ahead of its introduction. In this country, where there are now 6 schemes operating, with another 2 under consideration, there are examples of centralised/industry controlled and decentralised governance system operating. This makes it possible to compare their performance from a consumer convenience point of view.

Governance System

In the most recently introduced schemes, New South Wales operates a decentralised system where those who pay for the scheme are a separate entity to those who collect containers. In Queensland and Western Australia, a product stewardship model is used where the producers pay for the scheme and control the collection network.

A recent report by the Total Environment Centre (June 2020), a Sydney-based NGO, compared the collection networks in NSW (separate entities) and QLD (centralised producer model). The report found that there were considerably more refund points in NSW, open for longer hours and with a higher refund point : population ratio.

| Metric | QLD | NSW |
|--|------------|------------|
| Population | 5,071,000 | 7,544,000 |
| Eligible Container Consumption | 38N | 3.318N |
| Contracted minimum number of collection points | 307 | 450 |
| Total number of operational collection points | 194 | 635 |
| Total number of F/T sites (>35h p.w) | 131 | 551 |
| Population to refund point ratio | 26,139 | 12,306 |
| Population to F/T refund point ratio | 38,709 | 13,691 |
| Total open hours per week | 16,065 | 46,405 |
| Recycling Rate (12mth period from March 2019-Feb 2020) | 54% | 71% |

The report concluded that there appeared to a conflict of interest in the QLD model, as producers were more likely to seek to minimise their costs rather than invest in a more effective and convenient collection network. The opposite being the case in a separate entity model, where collectors are more likely to increase collection points as their business is based upon maximising the number of containers collected.

Building Awareness

Information and awareness-raising campaigns are essential ahead of the introduction of a CDS. Whilst there tends to be overwhelming support for a scheme, it does represent a change of practice and behaviour, particularly for the under 40's.

Providing public information, particularly to explain how the scheme works and what containers are eligible is a must. Enlisting the assistance of the retail sector through signage and giving their staff information they can use to explain the scheme also significantly helps.

Engaging the community sector is vital. Community groups should be allowed to participate in collection for fundraising purposes. I, through the organisation I work with, Boomerang Alliance, was engaged by the State Government to run a series of community group forums around the state to explain the scheme and the benefits for local fundraising. This served the purpose of encouraging community participation and acceptance, and, because the many thousands of community representatives who attended became advocates and explainers of the scheme, helps spread the word.

I would encourage you to consider engaging an appropriate community organisation to run a similar forum series in Ireland. I can provide further details if required about this.

I am happy to answer any further questions if that would assist you.

Regards




Campaign Manager
Boomerang Alliance (Australia)
