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From: [REDACTED]
Sent: 05 October 2020 15:59
To: wastecomments
Subject: Deposit & Refund Scheme Public Consultation

Categories: Consultation Submission [REDACTED]

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Dear Sir/Madam,

The Refill Ireland Project (www.refill.ie) wishes to make the following comment.

- Single use drinking water bottles make up a significant and rising portion of all plastic bottles generated in Ireland today. The deposit and refund initiative is commendable, but unfortunately could easily be mistook by the general public as the only solution to plastic bottle waste as it will be highly visible.

The plan does not address or encourage the prevention of the need for the creation of the waste bottle stream in the first instance by the general public, and so consideration should be given to:

a) Ensuring the public are aware that prevention of the plastic waste comes well before recycling in the EPA waste management hierarchy (ie this scheme when in place is not a reason to buy lots more as it will be 'recycled') - For example a practical part of this may be images/information on the machines about waste prevention in the first instance not just 'recycling'.

b) Funding prevention projects in this waste stream area eg Publically Accessible Water Dispensers (on a free to use model) so plastic water bottles are discouraged from a point of purchase as easily accessible alternatives are available through refill points nationally.

In addition, we are extremely concerned that Ireland's current recyclate is not actually getting 'recycled' and that this is an open secret in the waste management community in Ireland which remains unchallenged. It is our understanding that Ireland publishes its 'recycling' figures as that waste which has left the country but not the waste that is actually 'recycled' and there are considerable volumes of published information showing 'recyclable' waste is not getting 'recycled' and when it is that the its done under extremely onerous working conditions in standards that would be unacceptable by a regulator in Ireland. We should emphasise no Irish Waste company will provide ANY clarity into this situation which we deem a major red flag, which is not getting adequately investigated by any government department currently. **Before we encourage the public to wholesale embrace recycling, there may be a large shock in store for them when they realise their considerable efforts may not be coming to the end they believe.** If large volumes of money are to be invested in the Deposit and Return scheme to encourage more recycling, we believe this problem should be adequately understood firstly

We note the focus is on improving capture rate in Ireland but no consideration is given to if the recyclables to be collected under this scheme will actually be recycled or simply termed and calculated in our national figures as recycled as they have left Irish shores. Otherwise, we are simply contributing further to waste pollution outside our island by our policies in this area and consideration to waste to energy would be preferable in that instance.

About the Refill Ireland Project: We are a voluntary social enterprise that provide the public with information through our national TAP MAP on where to find free water refill points where [redacted] public areas to encourage ease of use of refills, and also installs new Community Refill Hub points which are free to use self serve drinking water taps into local communities [redacted]

Thank you for giving consideration to our points in this consultation period.

Regards,

[redacted]
[redacted]



Refill Ireland Project
Phone: [redacted]

