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From: [Redacted]
Sent: 11 November 2020 21:26
To: wastecomments
Subject: Comments on your DRS scheme
Attachments: Rethink DRS Submission .pdf
Categories: Consultation Submission

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Dear DCCAE
Please find our submission comments attached. Can you let us know you have received our submission by return email please?

Thank You
[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

Date: 11th November 2020

Re: DRS Submission

Dear DDCAE

Our response is layed out with your questions each followed by our answers.

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

Answer: Yes

Question: If not, do you favour a:

a) decentralised / financial DRS; or, b) hybrid.

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

Answer: Centralised operational model is fine.

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

Answer: Collection from retailers as per normal. Retailers could receive a tax or a rates incentive.

Question: The DRS study proposes a deposit per container of €0.20.

Answer: After the millennium the plastic bag tax had to be increased by close to 50% and this amongst other things was due to its initial low cost. The initial 15c cost would be worth about 21c now. Given what happened the bottle/can levy should be 40c minimum, we need to motivate the young to collect and cash these in and the proposed 20c has little value.

Deposit roughly based on volume of material to be recycled. Bulky items are more difficult to transport and so should have corresponding value, this will be more relevant for RVMs.

A brief search shows no complications with HDPE milk containers being unsuitable for recycling due to contamination. The most prominent study of HDPE dairy contamination showed "Based on the fact that the contamination levels of post-consumer flake samples are similar to virgin HDPE and on the high cleaning efficiency of the super-clean recycling process especially for highly volatile compounds, the recycling process investigated is suitable for recycled post-consumer HDPE bottles for direct food-contact applications" Welle F. Post-consumer contamination in high-density polyethylene (HDPE) milk bottles and the design of a bottle-to-bottle recycling process. Food Addit Contam. 2005 Oct;22(10):999-1011. doi: 10.1080/02652030500157742. PMID: 16312023.

Plastic milk containers should also be used in large quantities in Ireland and are recycled in other countries, as such they should be included in order to divert them from landfill.

Question: 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?

Answer: Using the PPNs, sparkchange.ie, other networks like green schools and tidy towns and conventional media.

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

Answer: Tax incentive for the producer based on their initial donation to a bottle fund. There will be a tax disincentive as their turnover will increase so it is wise to look at a tax incentive to mitigate this.

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

Answer: Difficult to operate in 2 joined but different jurisdictions. The bottles/cans will be the same. Unless different labels are a prerequisite and then perhaps the bottle fund down south could support a smaller refund from the bottles from up north.

Yours sincerely,

[Redacted signature]

[Redacted name]

Rethink Coordinator