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**From:** [REDACTED]  
**Sent:** 11 November 2020 22:03  
**To:** wastecomments  
**Subject:** Feedback on DRS Consultation  
**Attachments:** DRS Consultation.docx

**Categories:** Consultation Submission

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Dear Sir or Madam,  
Please find attached our submission from Kildare Communities 4 Climate Action group.  
We are a group of 134 members representing most communities in Kildare.  
We welcome the DRS scheme and the ability to be able to make a submission regarding the proposals.

Many thanks

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**Consultation questions:**

- ☑ *The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation? Yes*
- ☑ *If not, do you favour a:*
- a) decentralised / financial DRS; or,*
- b) hybrid.*
- ☑ *Are there other models you believe could work in an Irish context?*
- ☑ *What role should waste collectors play in the operation of a DRS? None, other than separating any containers received and feeding them into the DRS*
- ☑ *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? €0.20 may be too low to encourage a behaviour change, we would recommend a higher deposit. Higher charges should apply for larger containers.*
- ☑ *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? Kildare Communities 4 climate Action have been advocating for the Climate and Biodiversity Crisis to be given the reporting in the media that these issues need and the public deserve. The daily coverage of Covid has been critical to saving lives. We would like to see Covid style climate and biodiversity reporting. It could have solutions based sections and this DRS scheme would be an ideal fit.*
- ☑ *What enforcement measures should be considered in parallel with the introduction of a DRS? We note that the scheme recommended in the Eunomia report (Nov 2019) mentions a ‘producer fee’ in addition to the deposit. This seems to have been translated in the DRS consultation paper as an ‘admin fee’. We would like to see the producers have to pay a significant producer fee per unit produced. This could help incentivise producers towards moving away from single use packaging solutions. While it is admirable to increase our return rate to 90% and beyond, this does not address the underlying problem. Production of these single use packaging items in the first place is a major problem. The production of plastic amounts to about 5% of the world’s annual production of oil (The Plastic Soup Foundation, 2018).*
- ☑ *How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland? The UK are introducing a DRS for England, Wales and Northern Ireland, so any competitive disadvantage is likely to be short-lived. Labelling and awareness building may help customers seek out producers that are involved in the DRS in the border areas.*

***Additional comments:***

We appreciate that setting up the infrastructure including the necessary legislation will take time, however we would really like to see this implemented before Q3 2022, we need to move much more quickly on these and other initiatives.

The Plastic Soup Foundation. (2018). *Plastic Waste Releases Greenhouse Gases*. Available: <https://www.plasticsoupfoundation.org/en/2018/08/plastic-waste-releases-greenhouse-gases/>. Last accessed 11/11/2020.