

**From:** [REDACTED]  
**Sent:** 11 November 2020 22:47  
**To:** wastecomments  
**Subject:** Submission on Deposit Return Scheme  
**Categories:** Consultation Submission

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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? We assume they will still be collecting some bottles and cans in kerbside collections and that these should feed then into the DRS - with the waste collectors getting the deposit?***

• ***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 seems very low, Would this level lead to a change in behaviour? We might suggest a slightly higher charge and also a sliding scale increasing 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?*** By building awareness in national and local media and through all local government networks. It is our view that there needs to be a lot more reporting generally on issues like this and in relation to climate breakdown. The general public seem to be poorly informed with most believing that the Covid crisis is the worst shock we are likely to receive to our way of life whereas in actual fact our way of life has to change completely if we are to continue to survive and adapt to the breakdown which is occurring. In addition we believe that the government should be calling on our retailers and wholesalers to take more action - despite actions in communities like Plastic Free July etc. they have mostly done very little in comparison to the direction this sector is moving in other countries in the EU where bulk buy and zero waste initiatives are becoming common in the supermarkets. Collaboration by the government with this sector is key. Signage in supermarkets and all points of sale saying that this scheme is coming would be good.

• ***What enforcement measures should be considered in parallel with the introduction of a DRS? We believe the fines for littering are not significant enough to deter offenders. If it is not possible to immediately increase them we believe this should be planned for. Publication of fines and charges for littering would act as deterrence also.***

***How should cross-border issues be treated to ensure producers are not at a***

***competitive disadvantage relative to producers in Northern Ireland?*** A quick google search showed us that the UK appears to be also considering a DRS for England, Wales and Northern Ireland, If this is the case then there should not be any competitive disadvantage?

**Additional comments:**

We would advocate as fast a transition to the DRS as possible. the timeline seems very long. For this and all measures we have no time to lose.

We would like to see reflected in the DRS much more of a focus on the principle -"the polluter pays". The producer of the beverage containers should have to pay a fee for every unit they produce, because otherwise they have no incentive to innovate new products or to move away from this kind of packaging altogether, or indeed this kind of beverage sales.

We made a submission to Kildare county Council Draft Litter Plan where we called for much more action on minimisation of waste. These comments may be relevant here also, "We welcome the inclusion of the waste hierarchy infographic in your plan which acknowledges that minimisation and prevention are by far the most effective strategies. We firmly believe that waste and litter management are ultimately never going to work. We need to tackle the problem at source, change our way of living to reduce our reliance on packaging, plastic and all single use items. We would therefore like to see goals and target in the plan in relation to this. Some measures from the Draft Waste Action Plan might be of use for this area. KCC support of other initiatives in this area would be helpful. Even if the completion of the initiative is not fully within the remit of, or the work of the council, we think it should still be included as a goal with specific steps to be undertaken by KCC. An example might illustrate this point better.

Example: In order to minimise food waste, use of single use items and plastic packaging KCC have the following goals:

- a) Community Supported Agriculture farms appropriate to population in every MD
  - b) Allotments in every town
  - c) Grow Your Own initiative in every community (growing your own food promotes a deep understanding of and appreciation for food production, thereby reducing food waste)
  - d) a Zero Waste initiative in every town/community
  - e) Zero waste / bulk buy stores in every town
  - f) Neighbourhood markets in every town (<https://www.neighbourfood.ie/>) to encourage local production and distribution of food. Locally distributed food requires less packaging.
  - f) Plastic Free initiatives throughout the county
- etc. etc.

In order to achieve these goals KCC will undertake the following steps (which will all have measurable targets and be realistic)

1. Identify land in every MD to be made available for Community Supported Agriculture
  2. Identify land in every town that can be made available for allotments
  3. Engage with GYI and other initiatives to promote growing food
- Etc. etc."

#### *'Take away not throw away'*

We welcome the 'Take not Throw away' campaign in relation to fast food outlets as these outlets produce a lot of the litter we see in our area. In relation to this we would however also like to see incentives and encouragement goals in the plan aimed at the owners and staff in these outlets and indeed in all retail establishments. The mindset in all retail and food services seems to be the provision of lots of packaging as a standard and normalised, things that are already packaged being put into another bag etc. In fact if you don't want the packaging or bags you have to ask specifically, often several times. We would like to turn this on its head and make it the exception rather than the rule to be offered bags, single use packaging, single use cups and bottles. So some goals around education on this area in the plan would be appreciated.

#### *Water Bottles*

We suggest inclusion of goals and targets around water fountains in towns be included in the plan.

We hope that our comments are useful and will be taken into account.

yours sincerely

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