

From: [Redacted]
Sent: 12 November 2020 11:54
To: wastecomments
Subject: DRS Scheme

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

- If not, do you favour a:
 - a) decentralised / financial DRS; or,
 - b) hybrid.

Yes, I agree with centralised as it seems to be the most effective way of giving ownership / responsibility to the producers however it would need independent government led monitoring of the processes and reporting. As this is a pollution based on volume of production, charges should be based on production volumes and not sales volumes.

- Are there other models you believe could work in an Irish context?
Not aware.
- What role should waste collectors play in the operation of a DRS?

Local DRS return banks should be collected and paid for through the scheme by the producers. Payment would be based on scheduled collections and at a fixed rate.

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?

Consideration to the container sizes that contribute most to the volume of waste should be given. Four 500ml bottles would require more PET than a single 2 litre bottle. Therefore a value based on the ratio of PET used to volume contained should be considered. This would increase the price disparity between smaller and larger volume pricing pushing people to use larger, less polluting 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?
Web, Tv and radio with clear messaging. Speak to the long term monetary and environmental benefits.
- What enforcement measures should be considered in parallel with the introduction of a DRS?

Rather than punitive measures perhaps additional rewards based on overall performance by area/County Council such as funding for local projects through the scheme. Producers should deposit more than is charged/returned to the customer and the surplus is distributed. Given volume this could be marginal.

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

competitive disadvantage relative to producers in Northern Ireland? Ensure that Northern Irish producers are billed at source on products to be imported OR Distributors will implement a customer charge similar to plastic bags for non-billed distributors and add an invoice to the distributor based on delivery volumes.