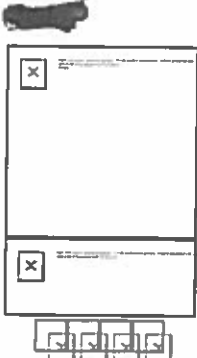


From: [Redacted]
Sent: 12 November 2020 13:42
To: wastecomments
Subject: DRS consultation 2020
Attachments: DCCAE-DRSSubmission121120.pdf

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi there,
 A chara,
 Please accept the attached document containing comments and observations from Zero Waste Alliance Ireland regarding the proposed DRS for Ireland.
 We thank you for the invitation to comment on a matter in which we are very interested.

Best regards,



[Redacted]
 Director
 Zero Waste Alliance Ireland
 Tel: + [Redacted]
 Skype: [Redacted]
www.zerowasteireland.com
 Reg. Charity no. CHY16096
 Join our [#cupforce](#) on facebook

The contents and any attachments of this electronic mail message are confidential and intended only for the named addressee(s). If you receive this in error please delete it and inform the sender.
 Dissemination, forwarding, publication or other use of the message or attachments by any unauthorised person is strictly prohibited. Unless stated to the contrary, any opinions expressed in this message are personal and may not be attributed to any organization or company.
 Internet e-mails are not necessarily secure. ZWAI do not accept responsibility for changes made to this message after it was sent.

Virus-free. www.avg.com

10

11

12

13

14

15

16

17

18



Deposit Return Scheme - Consultation Document on Potential Models for Ireland (DCCAE)

Zero Waste Alliance Ireland makes the following short submission and brief answers to the questions posed in the consultation document.

Zero Waste Alliance Ireland would like to arrange a meeting with the Dept. to further explain and elaborate on our proposals and to capitalise on the opportunity to link the national litter issue with the launch of the DRS.

There are other DRS variants that we would like to outline and discuss with the Dept.

We are disappointed with the length of time envisaged before the DRS becomes operational, which when contrasted with other EU countries is quite tardy. Perhaps a critical review of the timescale is necessary to expedite the implementation.

Table of Contents

| | |
|---|---|
| Survey Answers..... | 2 |
| Pertinent points and other issues..... | 4 |
| Litter issue . How to solve legacy litter with the DRS launch?..... | 4 |
| Regional CSO based on Waste Regions..... | 4 |
| Glass bottles inclusion..... | 4 |
| NGO, Community groups involvement..... | 4 |
| DRS scheme should be evidence-based and more evidence gathered..... | 5 |
| DRS must be accessible and convenient for all users..... | 5 |
| Staged introduction..... | 5 |
| Deposit return locations..... | 6 |
| Finance matters..... | 6 |
| Surplus deposit income use..... | 6 |
| Consumer communication and education..... | 6 |
| Fraud prevention measures..... | 7 |
| The best model for system ownership..... | 7 |
| Take back methods..... | 7 |
| About ZWAI | 7 |

Survey Answers.

The consultation asked 8 questions on its final page. We answer them below in green and provide additional considerations and questions in the following section.

Consultation questions and Answers :

Q 1 The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?

A: Yes but hybrid mode is best with access to community collection nodes.

**Q 2 If not, do you favour a:
a) decentralised / financial DRS; or,
b) hybrid.**

A: Hybrid

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

A: Yes. a registration scheme for community and voluntary sector participation in the collection phases.

Q🕒 What role should waste collectors play in the operation of a DRS?

A: Collect, store, sort and compact.

Q🕒 The DRS study proposes a deposit per container of €0.20. Do you think this is appropriate?

A: Yes. Not a big ask of the consumer. Lower price initially will reduce opposition and allow scope for gradual increases over time.

Q: If not should it be higher or lower or should different deposit rates apply depending on container size?

NO, it would complicate the messages and operation.

Q🕒 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?

A: Print mandatory Labels with information on all Beverage containers 6 months in advance giving info.

Launch TV inf campaign. Enlist celebrities to publicise scheme.

Q🕒 What enforcement measures should be considered in parallel with the introduction of a DRS?

A: Employ inspectors and auditors with ability to issue fines. (may be able to use Local council staff).

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

A: An all Island approach is needed to ensure conformity of labels/codes and to prevent fraud and trafficking in container waste. Same scheme in North and South with identical labels and codes .

Pertinent points and other issues.

Litter issue . How to solve legacy litter with the DRS launch?

We need to address the Litter issue and the DRS introduction offers a great opportunity to launch a blitz on litter, in particular plastic. We would like to propose a Bottle amnesty for legacy containers. More details and how to mobilize a mass campaign for volunteers to be discussed at our DCCAE meeting.

Regional CSO based on Waste Regions.

Would a regional approach have merit? We need to examine the pros and cons and timescale that might differ to that outlined in the document.

Glass bottles inclusion.

We agree with not having these supported at the launch but they must be added later. We'd like to explain and to plan in advance for adaptation of infrastructure. Make RVM's future proof or modular is essential but there are other considerations to analyse.

NGO, Community groups involvement.

To get mass support requires the population to embrace the DRS. A shortcut to this is to include the Not for Profit charities, local groups, NGOs in the campaign to mobilize our citizens. We see opportunities within the current proposals to get a win-

win for all. This is linked to a litter campaign, incentives and licencing of participants.

DRS scheme should be evidence-based and more evidence gathered

We see a need for further analysis on a wide range of issues.

These are :

1. impact analysis and cost-benefit of each model
2. analysis for each of the materials proposed for inclusion in the scheme, why not glass, when ?
3. assessment of the impacts of different schemes on consumer behaviour
4. an analysis of the economic impacts on consumers, existing collectors
5. lessons learned from other DRS schemes elsewhere

DRS must be accessible and convenient for all users

DRS needs to be:

1. easy to use for consumers, retailers and
2. easy to administer for other key stakeholders (producers, CSO, MRFs , manufacturers)
3. accessible' and convenient for all consumers (e.g.those with disabilities, those using public transport, and rural dwellers
4. simple in design' so that people can understand the scheme and use it appropriately. It must be designer with the consumer experience in mind.

Staged introduction.

Introduce the DRS scheme in its simplest form to start and then widen the range of materials collected. Range of materials will impact the complexity and cost of the DRS:

if the DRS attempts to be too wide from the start by including materials for which there is currently less established recycling capacity this would increase the complexity and cost of the scheme, and the risk that it might fail.

- **Make it easy for people to participate:** examine and remove potential barriers for consumers, retailers and producers – so that they can understand and fully participate in the DRS.
- **Competition with kerbside recycling schemes::** it is important for the DRS scheme to complement and not compete with existing recycling schemes.

Deposit return locations

We want the scheme to allow **either** for a model based on take-back to a place that sells drinks, **or** a mixture of take-back and use a designated drop-off point. (this could involve charities acting as collectors).

Exemptions.

We see four cases for possible exemptions:

1. 'small' retailers eg. small convenience stores', kiosks, food stands, pop ups shops
2. retailers who do not sell food and drink
3. retailers who sell 'food to take away'
4. hospitality premises such as bars and hotels where drinks are mainly consumed on the premises

Online retailers who deliver should not be excluded from the DRS scheme.

Finance matters.

We support an arrangement whereby the DRS administrator (CSO) maintains ownership and income from the sale of materials collected in the scheme. This is essential for the financial viability of the scheme as well as providing an incentive for the administrator to run the scheme efficiently.

The sale of recycle via a single administrator would also be more lucrative, cost-effective, less open to fraud and more accountable than alternative arrangements.

Surplus deposit income use.

We ask that any excess funds and unredeemed deposits should be ring fenced for the continued maintenance, education needs, promotion or improvement of the DRS itself rather than being made available for other purposes.

Consumer communication and education.

To help adoption information at the Point Of Sale is essential. Where better than on the container itself. All producers should be required to put DRS related information on each container, including importers and distributors where the original containers are imported. In addition, in order to increase awareness we suggest that companies

should be required to put a DRS related label onto their existing packaging and containers regardless of DRS applicability to it.

Fraud prevention measures.

Labels or barcodes must

- ensure single-return only,
- support traceability and audit, and
- be tamper proof and difficult to forge.

We suggest two options to consider

1. the use of specific barcodes should be the preferred method. But
2. the use of a high security label might be preferable if costs are not too high.

The best model for system ownership.

The focus of the scheme should be on environmental concern, not on maximising profit, and so the public sector is best placed to deliver this. We have concerns that a private organisation might run the scheme in a way that maximised profit, and would be tempted to manipulate the scheme for their own advantage. So public ownership is our preference. As an alternative we would opt for an industry-operated not-for profit mode along with partnerships with not-for-profit collectors/MRFs and state organizations such as local authorities.

Take back methods.

The system should allow for a combination of manual take-back to retailer, including drop off locations managed by licenced operators and RVMs.

About ZWAI .

ZWAI (Zero Waste Alliance Ireland CLG) is a policy oriented organization, established in 2004, to focus on Zero Waste principles (whole lifecycle approach) where waste is seen as a resource. It is a registered charity, and a member of the Irish Environmental Network (IEN), the Environmental Pillar (EP) and the European Environmental Network (EEN)

ZWAI promotes a rethink of current discard, disposal practices and works towards a circular economy. We are engaged at national and EU level in policy initiatives and information campaigns.