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From: [Redacted]
Sent: 12 November 2020 14:46
To: wastecomments
Subject: Deposit Refund Scheme - CRNI
Attachments: CRNI_DRS Consultation Submission.pdf

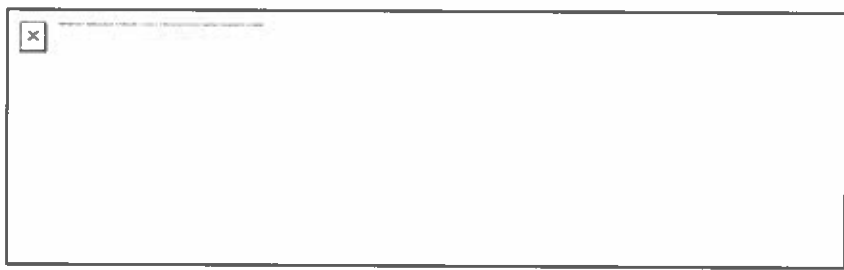
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Dear Sir/Madam,

Please find attached our submission to this DRS consultation.

Kind regards

[Redacted]



CRNI Executive
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CRNI Submission to Deposit Refund Scheme Consultation

1.0 Background

The Community Resources Network Ireland (CRNI) welcomes the opportunity to make a submission on the DECC consultation on a *Deposit Return Scheme*.

CRNI is the all-Island representative body for community-based reuse, repair, recycling and waste prevention organisations. Our vision is for an Ireland where the word 'waste' doesn't exist and where our entire community benefits from the social, environmental and economic value of all reusable resources. We work towards this vision by supporting our members and mainstreaming community resources and are funded by the EPA under the National Waste Prevention Programme.

CRNI represents a diverse range of 32 social enterprises, funded projects and others in reuse, repair and recycling including four organisations **directly or indirectly involved in the prevention or reuse of packaging materials** as follows:



Refill Ireland, a voluntary social enterprise that provides the public with information on where to find free water refill points when on the go in public areas through their national TAP MAP to encourage re-use instead of recycling. Refill also installs new Community Refill Hub points which are free to use self serve drinking water taps in local community businesses.



Conscious Cup Campaign, whose aim is to increase reuse within the sector and to support its move towards a Circular Economy. For consumers, that may mean cups and containers and for Cafes that involves looking at the supply chain and the food preparation area to reduce consumption of single use packaging.



The Rediscovery Centre, whose mission is to lead change from waste to resource through Reuse, Redesign, Research and Education. The Centre delivers educational modules on waste prevention and recycling, focusing on plastics for primary, secondary and third level.



They host public workshops on waste prevention nationally and have plastics exhibits and interactive tools at the centre that encourage positive behavioral change. They are also a signatory to the EMF New Plastics Economy - Global Commitment. Their operations, projects and programmes reflect this commitment and promote and support waste prevention and development of circular solutions for the replacement of non-recyclable plastics.



ReCreate Ireland, whose mission is to be an inclusive and successful social enterprise inspiring curiosity, creativity and care for the environment through providing accessible and affordable art materials and educational supplies including clean packaging materials to all sectors of the community across Ireland and diverting materials from landfill.

2.0 Emphasis on Prevention

The Waste Framework Directive requires that waste legislation and policy of the EU Member States shall apply as a **priority order** the waste management hierarchy, where prevention is the top tier of that hierarchy. 'Prevention' refers to measures taken before a substance, material or product has become waste. It forms the top tier of the waste hierarchy because it has the greatest potential to generate carbon savings as well as supporting job creation.

While public awareness is high regarding the need for urgent climate action and to reduce single use plastics, there remain considerable barriers to prevention activities such as convenience, competition with cheap new products and a lack of investment or financial support. To become a truly Circular Economy, and realise important carbon savings, considerable effort toward and investment in prevention measures is required.

Prevention measures should be prioritised in all policy actions and investment strategies including in the design and implementation of this DRS.

With the introduction of a DRS we will see focus on and investment in a highly visible, public facing measure to boost recycling rates for bottles and cans. As highlighted in the report, it is another form of EPR scheme, which to date in Ireland have strongly supported recycling but provided limited support to prevention or preparation for reuse activities.



In the design of the DRS, greater consideration should therefore be given supporting prevention to align with the waste hierarchy. It is noted the Waste Planning Offices also highlighted the opportunity to look at the impact of introducing prevention projects prior to any DRS in Table 1-2 of the Eunomia report *Summary of Stakeholder Views on Potential Alternative Models* but no further consideration appears to be given in the report or the consultation.

Highlighting prevention is necessary to combat any perception that the scheme is “a solution to the waste problem”, and to avoid perverse incentives such as a greater willingness to purchase single use bottles given that they will be recycled or to recover the value afterwards. It would also help improve the % of recycling (by decreasing the volume placed on the market) and tackle unnecessary waste in the first place.

We submit the DRS design should embed the following measures:

1. Funding prevention projects and infrastructure

To some extent, a deposit on single use items would make reuse options more financially attractive. However, the alternatives are not yet widely available or convenient. Additional and dedicated funding and investment is needed to make it as accessible and affordable as possible for citizens and businesses to avoid or reuse beverage and other containers.

This involves, for example, the funding of campaigns such as Refill Ireland and Conscious Cup Campaign which engage with key stakeholders, as well as investment in infrastructure such as (per Refill Ireland’s submission to this consultation) Publicly Accessible Water Dispensers on a free to use model, grant-aid and subsidies for repair and restoration services and reuse hubs.

Unredeemed deposits may be a long term funding source for such investment. However, in the short term such funds may be counterbalanced by the cost of implementing the system and in any case will not be immediately available. Prevention measures should be a priority and require upfront investment.

2. Raising awareness about the importance of prevention and what practical measures that can be taken, as a priority ahead of recycling in line with the waste hierarchy

Once alternatives are supported, citizens and businesses can be informed and engaged in switching to prevention measures. In this regard, CRNI welcomes the Waste Action Plan for a Circular Economy objectives to:



- promote plastic and packaging as an urgent public issue (how to prevent it e.g. by choosing packaging free products) and how to handle the packaging waste that arises; and
- to raise consumer awareness on the benefits of use of reusable containers and work with retailers to encourage the provision of refill option

There are numerous organisations including CRNI members Refill Ireland, Conscious Cup Campaign, the Rediscovery Centre and ReCreate currently working to promote and engage the public on packaging waste prevention. We would encourage the Department to coordinate with these actors in building a packaging prevention theme into the new national communications and education programme.

As part of any such communications and education programme, we believe workshops and events are highly effective methods of citizens and community engagement. Therefore, we recommend continued support for and investment in community based workshops and events such as those delivered by our members, for high impact behavioural change and a diverse approach to social media or advertising campaigns.

3. Explore measures that encourage reuse

Finally, as highlighted by VOICE Ireland, including a wider range of containers such as glass may facilitate bottle reuse, which is a more environmentally sound use of materials. Research work may also reveal opportunities to develop reusable packaging materials. These options should be carefully considered in the design of the scheme.

Overall, CRNI would strongly encourage the Department to place greater emphasis on waste prevention in the design of the DRS. We would welcome any opportunity to work through our members with the Department in realising this and supporting any actions in this area.