

From: [Redacted]
Sent: 12 November 2020 16:23
To: wastecomments
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Attachments: Dodder Action - DRS Consultation 12_11_2020.docx

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To whom it may concern

Firstly, thanks for getting this off the ground and for opening the discussion to wider contributions. Attached is the contribution of Dodder Action. We hope to be able to engage in this process as much as possible.

Best regards

[Redacted signature block]

[Redacted] organisation dedicated to cleaning the [Redacted] its tributaries and improving facilities and amenities along its length.

web: [Redacted]
facebook: Dodder Action
twitter: [Redacted]
instagram: [Redacted]

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Dodder Action is an organisation set up to clean the Dodder and its tributaries, improve facilities and amenities along its length and fulfil the potential of this fabulous natural resource.

We organise several clean-ups each month by ourselves and in co-operation with other community, sports and active groups.

We also organise 'Dodder Day', the largest annual river clean-up in Ireland.

Dodder Action has been collecting rubbish on the Dodder river in Dublin since 2009. In that time, we have collected over 80 tonnes of rubbish, consisting of approximately 5,000 bags. The largest single category of waste that we collect are cans and bottles. As an example, on a survey in 2016 we picked up 4,500 cans over 8 km of the river. From talking to other clean-up groups such as Tidy Towns, the issue of cans and bottles being discarded is probably their number one issue.

Discarded cans and bottles are visual waste, they encourage more waste ('broken window syndrome'), they take decades and centuries to decompose and manufacturers and vendors need to take their share of responsibility in producing this waste.

We believe that a properly implemented deposit scheme would reduce this waste enormously and while we welcome this consultation there are a number of points that we would like to raise.

1. **Section 5** We believe that a deposit of 20c will not work. Germany currently has 25c -50c on cans and bottles. We recommend 25c on non-alcoholic and 50c on containers with alcoholic beverages.

It is quite common in our clean-ups to find 24, 48, 72 cans in one place, which is typical of groups purchasing 'slabs' or 'boxes' of beer, containing 24 cans/bottles. A 20c deposit would give a €4.80 incentive to return 24 cans, but a 50c deposit makes €12.00.

We believe that this difference is substantial enough to ensure that a far higher number of cans and bottles will be returned.

2. **Section 6** The definition of a container needs to be changed to prevent drinks producers from switching to one-way glass and to prevent them from exploiting the rules on 'tetra packs' and other containers.

We already find a substantial number of bottles in our clean-ups, usually sold in boxes of 24 at a similar price to cans. An incentive needs to be introduced to stop manufacturers simply switching over to bottles rather than cans.

When a DRS system for cans was introduced in Germany in 2003, sparkling wine was excluded from the DRS scheme. Producers then started to sell sparkling wine in cans to exploit a loophole and this led to more people drinking them to avoid the charge.

We recommend that the wording is changed to ensure that these loopholes cannot be exploited, i.e. 'all containers containing water, soft drinks or alcoholic drinks' (dairy excepted). Also need to look at definition of 'dairy' in this case.

8 Consultation questions:

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

Yes, we agree this is the best system as it operates very well in other countries.

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?

We recommend 25c for non-alcoholic and 50c for alcoholic beverages. We also need to be prepared to change legislation quickly to introduce rates for containers over 3l. Supermarkets in Germany started to sell soft drinks in 3001ml sizes to get past the 3l deposit. We personally recommend all containers up to 6l, as this would also include 5l 'party kegs' of beer.

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?

Spread news via usual channels, media, social media. Targeted sympathetic campaign showing the present plight of discarded drinks containers. Use schools and Tidy Towns groups etc to get the message across. Schools/clubs etc. could be used for deposit collections and gain from the money.

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

Independent government assessment and control. No self-control or self-regulation.

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

We could look at an all-Ireland strategy and system. If not, then cans to be clearly embossed in the top with a die to indicate it is a ROI container. Bottles to be embossed on the side (not on cap).



Piles of burnt cans, plastic bottles and glass bottles in a park along the Dodder.



'Bottle Swamp' on the Dodder River, Dublin



Some of the 4,500 cans and bottles picked along an 8 km stretch of the Dodder river during one survey in April 2017..