

Rosemary Gail

From: [Redacted]
Sent: 12 November 2020 16:44
To: wastecomments
Subject: DRS Public Consultation response from Zero Waste Alliance Ireland.
Attachments: ZWAI-DRS Submission to the DECC 12 November 2020.pdf

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Deposit Return Scheme Consultation,
Department of Environment, Climate and Communications,
29-31 Adelaide Road,
Dublin 2,
D02 X285.

Dear Sir / Madam,
Observations on the Proposed Introduction of a Deposit Return Scheme for Ireland

Submission by Zero Waste Alliance Ireland to the Department of Environment, Climate and Communications

On behalf of Zero Waste Alliance Ireland (ZWAI), we attach our observations in response to the Public Consultation issued by the Department of Environment, Climate and Communications for a Deposit and Return Scheme (DRS) for plastic bottles and aluminium cans.

Our submission provides observations on some potential DRS models that could be appropriate for Ireland, while at the same time we set out our views on Deposit and Return Schemes generally, with particular reference to the role of such schemes in assisting Ireland's transition to a more resource efficient "Circular Economy", and eventually to achieving the target of "Zero Waste", within the over-arching aim of becoming fully "climate neutral".

Yours sincerely,

[Redacted Signature]



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 Ireland.



ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management



Submission to the Department of Environment, Climate and Communications on the Proposed Introduction of a Deposit and Return Scheme (DRS) for Beverage Containers

12 November 2020

Zero Waste Alliance Ireland is a member of



and



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ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management

**An Tinteán Nua,
Ballymanus,
Castlepollard,
County Westmeath**

12 November 2020

Deposit Return Scheme Consultation,
Department of Environment, Climate and Communications,
29-31 Adelaide Road,
Dublin 2,
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BY EMAIL TO:
Wastecomments@DCCAIE.gov.ie

Dear Sir / Madam,

Observations on the Proposed Introduction of a Deposit Return Scheme for Ireland

Submission by Zero Waste Alliance Ireland to the Department of Environment, Climate and Communications

On behalf of Zero Waste Alliance Ireland (ZWA), we attach our observations in response to the Public Consultation issued by the Department of Environment, Climate and Communications for a Deposit and Return Scheme (DRS) for plastic bottles and aluminium cans. As stated in the Consultation document dated 02 October 2020, this public consultation is intended to obtain views of stakeholders and members of the public on design options for the proposed DRS.

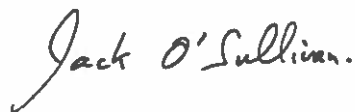
Our submission provides observations on some potential DRS models that could be appropriate for Ireland, while at the same time we set out our views on Deposit and Return Schemes generally, with particular reference to the role of such schemes in assisting Ireland's transition to a more resource efficient "Circular Economy", and eventually to achieving the target of "Zero Waste", within the over-arching aim of becoming fully "climate neutral".

In our observations, ZWA expresses the hope that the introduction of a DRS in Ireland will be accompanied and supported by economic instruments and legislation to enable the proposed DRS to operate effectively so that the material resources required to produce beverage containers will be kept in use for as long as possible, extracting the maximum value from them while in use,

and then recovering and regenerating similar quality materials, at least cost to the environment and to users and consumers.

We hope that the attached submission will help the Department of Communications, Climate Action and Environment to select and implement without further delay a suitable Deposit and Return Scheme. In expressing this hope, ZWAI is conscious that if any further delays are contemplated by the Department, Ireland could be one of the last EU Member States to introduce a DRS.

Yours sincerely,

A handwritten signature in black ink that reads "Jack O'Sullivan." The signature is written in a cursive, flowing style.

Jack O'Sullivan

On behalf of Zero Waste Alliance Ireland.

ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management

Submission to the Department of Environment, Climate and Communications on the Proposed Introduction of a Deposit and Return Scheme (DRS) for Beverage Containers

12 November 2020

1. INTRODUCTION

On 02 October 2020, the Department of Environment, Climate and Communications issued a public consultation on potential models for a Deposit and Return Scheme (DRS) for beverage containers, specifically plastic bottles and aluminium cans. The consultation is stated to be the first of two public consultations, described as:

1. Public consultation on design options (this consultation); and,
2. Public consultation on the preferred DRS model and draft regulations (during the first quarter of 2021);

These consultations are intended to be followed by the commencement of underpinning legislation (during the third quarter of 2021), and by the introduction of the proposed DRS (during the third quarter of 2022).

The Department's consultation paper includes a number of questions intended to guide responders; and we will take these into account while also raising other issues which we consider to be important and relevant. Included among the issues on which Zero Waste Alliance Ireland will provide observations are:

- i) the delay in considering the adoption of a DRS, and the further lengthy delay envisaged by the Department before the preferred scheme would be implemented;
- ii) the proposed restriction of the proposed DRS to plastic bottles and aluminium cans, and not to include, for example, glass bottles; and,
- iii) the environmental and social benefits of a DRS.

2. ZERO WASTE ALLIANCE IRELAND (ZWAI)

At this point we consider that it is appropriate to mention the background to our submission, especially the policy and strategy of ZWAI.

2.1 Origin and Early Activities of ZWAI

Zero Waste Alliance Ireland (ZWAI), established in 1999, is a Non-Government Environmental Organisation (eNGO). ZWAI has prepared and submitted to the Irish Government and to State Agencies many policy documents on waste management, and continues to lobby Government on the issue of using resources more sustainably, and on the implementation of the Circular Economy.

Our principal objectives are:

- i) sharing information, ideas and contacts,
- ii) finding and recommending environmentally sustainable and practical solutions for domestic, municipal, industrial and agricultural waste management in Ireland;
- iii) lobbying Government and local authorities to implement environmentally sustainable waste management practices, including clean production, elimination of toxic substances from products, re-use, recycling, segregation of discarded materials at source, and other beneficial practices;
- iv) lobbying Government to follow the best international practice (for example, the policies and practices of countries, regions and cities which have adopted Zero Waste) and EU recommendations by introducing fiscal and economic measures designed to penalise the manufacturers of products which cannot be re-used, recycled or composted at the end of their useful lives, and to financially support companies making products which can be re-used, recycled or are made from recycled materials;
- v) raising public awareness about the long-term damaging human and animal health and economic consequences of landfilling and of the destruction of potentially recyclable materials by incineration and burning in cement manufacturing plants; and,
- vi) maintaining contact and exchanging information with similar national networks in other countries, and with international zero waste organisations.

2.2 Our Basic Principles

One of the most basic principles which informs our policies and strategies is that human communities must behave like natural ones, living comfortably within the natural flow of energy from the sun and plants, producing no wastes which cannot

be recycled back into the earth's systems, and guided by new economic values which are in harmony with personal and ecological values.

In nature, the waste products of every living organism serve as raw materials to be transformed by other living creatures, or benefit the planet in other ways. Instead of organising systems that efficiently dispose of or recycle our waste, we need to design systems of production that have little or no waste to begin with.

There are no technical barriers to achieving a “*zero waste society*” and a truly “*Circular Economy*”, only our habits, our greed as a society, and the current economic structures and policies which have led to the present environmental, social and economic difficulties, and to the current climate and biodiversity crises.

“*Zero Waste*” is a realistic whole-system approach to addressing the problem of society's unsustainable resource flows – it encompasses waste elimination at source through product design and producer responsibility, together with waste reduction strategies further down the supply chain, such as cleaner production, product repairing, dismantling, recycling, re-use and composting.

ZWAI strongly believes that Ireland should have a policy of not sending to other countries our discarded materials for further treatment or recycling, particularly to developing countries where local populations are being exposed to dioxins and other very toxic persistent organic pollutants (POPs). Relying on other countries' infrastructure to achieve our “recycling” targets is not acceptable from a global ecological and societal perspective. Relying on the next generation to clean up and remove from the environment millions of tonnes of discarded materials, the production of which has contributed to global warming and the biodiversity and climate crises, is neither environmentally sustainable nor ethically acceptable.

2.3 What is Zero Waste Alliance Ireland Doing

Zero Waste Alliance Ireland has prepared many policy documents on waste management, we continue to lobby Government on the issue of sustainable resource and materials management, and to express our concern at the failure to address Ireland's “waste” problems at a fundamental level.

In recent decades, as many older landfills in Ireland were closed or became better managed (primarily as a consequence of the implementation of European Directives, Irish legislation transposing these Directives, the development of a waste licensing regime by the Environmental Protection Agency, and the establishment of the Office of Environmental Enforcement in 2003), concern about the adverse environmental and public health effects of landfills decreased considerably. ZWAI therefore concentrated more on the objectives of ensuring that Ireland's government agencies, local authorities and other organisations will develop and implement environmentally sustainable resources and waste management policies, especially resource efficiency, waste reduction and

elimination, the promotion of re-use, repair and recycling, and the development and implementation of the **Circular Economy**.

As an environmental NGO, and a not-for-profit company with charitable status since 2005, ZWAI also campaigns for the implementation of the **UN Sustainable Development Goals**, including (but not limited to) Goal 12, Responsible Consumption and Production, and Goal 6, Clean Water and Sanitation (having particular regard to the need to avoid wasting water).

Zero Waste Alliance Ireland has made the following submissions in response to public consultations:

- a) in September 2011, to the Department of the Environment, Community and Local Government, on waste policy;
- b) in September 2012, to the Environmental Protection Agency, on the Agency's draft National Implementation Plan (NIP) for the Stockholm Convention;
- c) in December 2013, to Dublin City Council Regional Waste Coordinator in response to a notice of intention to commence preparation of regional waste management plans;
- d) in January and February 2014, to the Department of the Environment, Community and Local Government, on proposals for the regulation of household waste collection and for dealing with used or end-of-life tyres (unfortunately the valuable resources which could be obtained from the recycling of end-of-life tyres are being lost by burning the tyres in cement kilns and incinerators);
- e) in January 2015, to the Eastern & Midlands Regional Waste Coordinator, Dublin, on the Eastern and Midlands Draft Regional Waste Management Plan 2015 – 2021;
- f) in March 2015, to the Environmental Protection Agency in response to the Agency's public consultation on the National Inspection Plan 2015-2017 for Domestic Wastewater Treatment Systems;
- g) in April 2015, to Irish Water, on the Draft Water Services Strategic Plan;
- h) in February 2016, a submission proposing significant amendments to the Building Regulations;
- i) in March 2016, to An Bord Pleanála, detailed observations on a planning application by Indaver Ireland Ltd for a proposed incinerator at Ringaskiddy, County Cork;
- j) during 2016, undertaking a research project on the Circular Economy;

- k) in October 2017, to An Bord Pleanála, observations in response to the planning application by Irish Cement Ltd for permission to burn or utilise a greatly increased annual tonnage of non-hazardous and hazardous wastes as alternative fuels and raw materials in the company's cement production plant at Platin, County Meath;
- l) in April 2018, to the Department of Planning, Housing and Local Government, giving our observations on the Department's draft Water Services Policy statement, in which we advocated the separation of nutrients such as N, P and K from wastewater, and proposed that wastewater treatment should have as one of its principal aims the recovery and recycling of water and nutrients;
- m) in March 2019, to the Environmental Protection Agency in response to the Agency's public consultation on the draft Code of Practice for Wastewater Treatment and Disposal Systems Serving Single Houses; and,
- n) in December 2019, to the Department of Planning, Housing and Local Government, in response to the Department's public consultation on new environmental levies;
- o) in February 2020, to the Department of Communication, Climate Action and Environment on a Proposed New Waste Action Plan for a Circular Economy; and,
- p) in October 2020, a submission to the European Commission's public consultation on the proposed Revision of the Regulation on the European Pollutant Release and Transfer Register (E-PRTR).

In addition to our responses to these public consultations, members of ZWAI have given presentations on:

- i) *"How the European Union has addressed the problem of plastic waste"* (at a conference organised by the European Union Office to Hong Kong and Macao, and the Business Environment Council of Hong Kong, in March 2019);
- ii) *"Single-use plastic packaging by the food industry – drivers and solutions"* (at a conference organised by the Food Safety Authority of Ireland, Dublin, November 2019); and,
- iii) Annual presentations to the Sustainability Summit and the Construction Industry, Dublin, on waste-related issues, including the Circular Economy, the relationship between waste and climate change, and *"How the Construction Industry can Survive in a World of Zero Waste and Climate Change"*.

It will be clear that ZWAI is primarily concerned with the very serious issue of discarded materials and goods, whether from domestic, commercial or industrial sources, how these become “waste”, and how such “waste” may be prevented by re-design along ecological principles. These same ecological principles can be applied to the many ways in which we extract raw materials from the Earth, transform these materials into usable products, and then re-use, repair or recycle instead of disposing of them as “waste”.

ZWAI is represented on the Government’s Waste Forum and Water Forum (An Fóram Uisce), is a member of the Irish Environmental Network and the Environmental Pillar, and is funded by the Department of Environment, Climate and Communications (and previously by the Department of the Environment, Community and Local Government) through the **Irish Environmental Network**.

In 2019 ZWAI became a full member of the **European Environment Bureau** (EEB); and we continue to participate (as far as our resources will allow) in the development of European Union policy on waste and the Circular Economy.

ZWAI continues to maintain working relationships with Zero Waste Scotland, with the Grass Roots Recycling Network in the United States, with the Global Anti-Incinerator Alliance (Global Alliance for Incinerator Alternatives – GAIA), and other similar international environmental organisations.

Other ZWAI activities include an active web page (<http://zerowasteireland.com/>), a Twitter account (<https://twitter.com/zerowaster>) and a much-visited Facebook page (<https://www.facebook.com/ZeroWasteAllianceIreland/>), with the intention of raising public awareness of the Zero Waste approach, providing Zero Waste news and activities, and reaching out to supporters and members of the public.

ZWAI is involved in three pilot-scale projects: (i) conversion of discarded food items (“food waste”) into a usable and safe compost for horticultural use; (ii) recycling of used metallised plastic film crisp packets (in association with Terracycle); and (iii) recovery of phosphorus from wastewater, and using it for plant growth.

3. REPLIES TO QUESTIONS IN SECTION 8 OF THE CONSULTATION DOCUMENT

3.1 A Centralised or Decentralised DRS for Ireland

The Department's public consultation document recommended a centralised, operational model for Ireland, and respondents are asked to either agree with this recommendation; or, alternatively, to prefer a decentralised DRS or a hybrid combination of both models of DRS.

Zero Waste Alliance Ireland (ZWA) considers that a hybrid approach would be preferable, allowing local communities to establish and operate Deposit and Return Schemes for community benefit. This would accord with several of our basic principles, which ZWA has promoted over several decades, that:

- i) Discarded materials or "waste" should be considered as a community resource, and not as a bulk commodity to be removed by private commercial operators as a profitable activity, with resulting loss of income and materials to the community;
- ii) Communities should be encouraged to handle their discarded materials responsibly;
- iii) Sustainable waste management, or "Zero Waste", combines community practices such as reuse, repair, recycling, toxic removal and composting, with industrial practices such as eliminating toxics and re-designing packaging and products for the environmental and ecological demands of the twenty first century;
- iv) Sustainable waste management, or "Zero Waste", brings together the need to develop sustainable communities, and sustainable industry and business;
- v) Sustainable waste management combines ethical practice with a solid economic vision, both for local communities and for local and national businesses, creating local jobs and small scale enterprises, which collect and process secondary materials into new products,

A decentralised hybrid approach or model should favour not-for-profit local enterprises which can provide employment and other community benefits, while retaining a centralised guidance and financial support where necessary. We strongly recommend that this type of hybrid model, in which guidance, standards and financial support are provided centrally; or, if appropriate, through local authorities; while the task of operating DRSs is undertaken by community groups, social enterprises or small businesses, is the best model for Ireland.

We can cite as an example the Sustainable Energy Communities programme, operated by the Sustainable Energy Authority of Ireland. By following the SEAI

model, we could foresee many communities working together to become more sustainable in how they use discarded materials as resources for local production, recycling, employment and awareness raising. Benefits include:

- a) Changing the way we use materials and objects so as to reduce or eliminate the “purchase and discard” linear model, and move towards a local circular economy can make a significantly improve our transition to social and environmental sustainability.
- b) Local recycling projects, including locally operated DRSs, can reduce the costs to the community, householders and businesses of dealing with discarded materials which may be defined as “waste” but which may also be recyclable. At present, these costs are very significant, and include the charges made by waste collecting businesses. Charges paid by householders and business to dispose of recyclable materials eventually find their way as financial returns or profits to operators of landfills and incinerators, or to the exporters of “waste”. The money is therefore lost from the community, and its final destination may be either unknown, or in some financial institution incorporated in another jurisdiction.
- c) Therefore dealing with certain discarded objects and materials locally, or under local control, can reduce waste disposal bills and free up more money to spend in the community in the longer term.
- d) Locally owned or operated DRSs can bring the community together and will contribute to wider goals such as Tidy Towns, community energy projects and green tourism.

As an example of how a local Tidy Towns community has successfully launched its own “return and reward” scheme in Ireland, we need only quote the example of Carrickmacross, County Monaghan. One member of the Tidy Towns committee who had seen reverse vending machines in operation in Germany encouraged the community to get one operational in Carrickmacross to reduce waste and encourage the public to recycle used bottles. After conducting the necessary research, a T-70 Reverse Vending Machine (manufactured by Tomra, a Norwegian company which has supplied over 83,000 machines world-wide) was selected.

Carrickmacross is the first Irish installation of a modern reverse vending machine which can read bar codes and bottle shapes and has the ability to recognise acceptable bottles for re-cycling. The machine, located in Market Square Shopping Centre, is sponsored by Monaghan County Council, Monaghan County Council, Shabra Plastics, Quinn Packaging and O’Gorman’s Supervalu.

It is our recommendation that with the appropriate supports, education and awareness raising, similar locally-based community deposit and return schemes could be rolled out across Ireland.

The focus of the scheme should be on environmental concerns and not on maximising profit, and so the public sector is best placed to deliver this. We would have concerns that a private organisation would run the scheme in a way that maximised profit, and would be tempted to manipulate the scheme for their own advantage. Therefore public ownership is our preference.

3.2 Other DRS Models Which Could be Appropriate for Ireland

The Department's public consultation document asks if there are other DRS models which could work in an Irish context; and it is our submission that the type of schemes which we have described in section 3.1 above would be the best and most appropriate.

3.3 Role of Waste Collectors in the Operation of a DRS

The Department's public consultation document asks what role should waste collectors play in the operation of a DRS.

The public consultation document states that the main route through which plastic bottles and aluminium drinks cans are currently captured is kerbside collection. Most households (approx. 80%) in Ireland are served with kerbside collections in either a two-bin or three-bin service – one bin for mixed dry recycling (MDR), one for mixed residual waste (MRW) and in some areas a third bin for food waste and organics is provided.

What the public consultation document does not say is that in many EU Member States the requirement to segregate at source is much better, with householders and businesses separating discarded materials into 4 or 5 categories. For example, waste collection in Ljubljana, Slovenia (managed by the publicly held (100%) company *Snaga*) includes:

- i) door-to-door collection in separate bins for: paper and cardboard, glass, co-mingled collection of packaging waste (99% of households) and bio-waste (82% of households);
- ii) bring points (eco islands) for: paper, glass and packaging waste intended for all users who wish to deposit separately collected waste, not only those living in the vicinity;
- iii) civic amenity sites (collection centres) for paper, glass, packaging, hazardous waste, WEEE, bulky waste, scrap metals, and textiles; and,
- iv) mobile collection points for household and commercial hazardous waste, WEEE, waste batteries, and edible oils.

According to 2014 data, Ljubljana achieved total of 60% (190kg/cap) of separately collected waste out of totally generated municipal waste (320kg/cap);

and we understand that Slovenia is now regarded as a leading member state in recycling and the avoidance of landfilling and incineration.

The public consultation document does not mention that in most EU member states the collection of discarded materials or wastes is the responsibility of local government or municipalities or (in the case of Slovenia quoted above) a publicly owned company; while in Ireland the collection and further use or disposal of discarded materials or wastes has been handed over to privately owned firms.

Therefore, it is the case that Irish Governments have handed control of all our discarded materials to the “waste industry”, with the result that the **State has lost control over waste**, as pointed out in the recent report by the Competition and Consumer Protection Commission (CCPC).¹

The EU countries surveyed by the CCPC have continued to maintain a high level of control by retaining ownership of waste, which the State manages by either collecting the waste directly or by contracting it to the private sector, using a competitive tendering process. These EU countries provide service provision models that combine the benefits of competition with the efficiency of having a single operator on a route.

The relevant key findings of the CCPC report are:

- The market structure and supporting regulatory regime in Ireland is atypical. The approaches adopted by other European countries are more closely aligned to the practical realities, consumer needs and the economics of waste collection.
- Regulatory interventions to achieve environmental objectives by households have been difficult to implement in the current market structure.
- The current regulations that are applicable to household waste collection do not cover economic considerations or any areas that relate to the operation of the market.
- Irish State authorities have very limited enforcement mechanisms to address non-compliance, and the fragmented regulatory regime presents a further challenge in standardising the approach taken by the State.

These findings are a clear indication that the existing waste collection companies should have only a very limited role in any future DRS for beverage containers, and that the operation of DRSs should be undertaken by communities or locally-owned social enterprises, as we have stated in section 3.1 above.

However, when the beverage containers have been collected from RVMs, there could be a specialist role for privately owned industry to process the collected

¹ The Operation of the Household Waste Collection Market, a report by the Competition and Consumer Protection Commission, September 2018.

rPET, aluminium and other materials, e.g., shredding and cleaning, before despatching to a reprocessing plant. These activities require specialist equipment and knowledge, and are best undertaken by one or two operators, appropriately located to serve the needs of many collectors nationwide.

3.4 The Most Appropriate Charge per Container

The DRS study proposes a deposit per container of €0.20; and respondents are asked to consider if this is the most appropriate level of deposit.

Our response is that €0.20 is an appropriate level of deposit, though we note that the deposit per container in Lithuania is €0.10; and this level has been found to be very effective in ensuring a very high level of return. A single rate should be applied to all types of beverage container.

3.5 Communicating the DRS to the Public

The Department's public consultation document states correctly that consumers need to know about a DRS long before it becomes operational; and respondents are asked for suggestions as to how best the introduction of a DRS can be communicated to the public?

Our response is that a number of communication methods should be used simultaneously or sequentially, e.g., mandatory labels on bottles and cans, giving information 6 months in advance on how the container should be returned to a reverse vending machine, and how the DRS operates.

To help adoption of the DRS, information at the POS 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, and in order to increase awareness we suggest that companies should be required to put a DRS-related label onto their existing packaging regardless of DRS applicability to it.

Other communications should include an information campaign on television, and enlisting celebrities to publicise the scheme.

3.6 Enforcement Measures and Fraud Prevention

The Department's public consultation document asks what enforcement measures should be considered in parallel with the introduction of a DRS.

Our response is that enforcement should be the responsibility of local authorities, as these organisations have the local knowledge, they employ litter wardens, and are familiar with the problems of waste collection.

In addition, we recommend that the scheme should include fraud prevention measures. For example, 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.

3.7 Cross-Border Issues

The consultation documents asks how should cross-border issues should be treated so as to ensure that *“producers are not at a competitive disadvantage relative to producers in Northern Ireland”*.

It is our submission that this question is incorrectly framed, and reflects an inadequate understanding of the broader aims and benefits of a DRS, and of the extent to which activities of manufacturing, using, distributing and retailing beverages are integrated in an All-Ireland context.

As noted earlier in our submission, the aims of a DRS are not solely economic or related to the ideology of “competition”, but have benefits which are social and environmental, including the encouragement of responsibility among individuals and communities to take care of and manage their discarded materials and objects.

We are also aware that the beverage industry operates on an All-Ireland basis, with containers being imported into one jurisdiction, transported to the other jurisdiction, filled in that jurisdiction, and sold in another jurisdiction. Beverage containers, especially glass bottles collected from licensed premises in one jurisdiction are transported across the border to the other jurisdiction for washing and re-filling.

When DRSs will be operating throughout Ireland, the used containers may be shredded by a processor in, for example, County Cavan; then the rPET could be transported to a company north of the border for manufacturing into food trays, which then travel southwards across the border, to be filled with meat products for sale in shops in both parts of the country.

Addressing this issue at an All-Ireland level is not without precedent. We have organisations such as Waterways Ireland (an agency responsible for the maintenance and regulation of all navigable waterways, North and South, and with two offices, one in each jurisdiction), the Commissioners of Irish Lights, and others; while the Government has recently stated that it will promote an All-Ireland approach to land use planning and river basin management plans.

Compared with deposit and return schemes, this is a much more complex issue, given that:

- The rivers and lakes of Ireland are designated as being within a single eco-region (eco-region 17); and,
- All coastal and transitional waters surrounding the island of Ireland are also included in one eco-region (eco-region 1).²

It is therefore our strong recommendation that a single All-Ireland approach and policy is needed to ensure an efficient system of collection and processing. Labelling must be similar North and South, while RVMs in both parts of the country should be programmed to recognise containers from either jurisdiction.

Programming RVMs to recognise beverage containers from other EU member states, e.g., Danish beer cans, or French water bottles, is a matter best addressed at EU level.

4. ADDITIONAL RESPONSES ON OTHER ISSUES

4.1 Narrow Focus of the Proposed DRS

It is our submission that restricting the acceptable beverage container material to aluminium and PET is too narrow; glass should be included, as it is relatively easy to check the cleanliness of returned bottles; and the collected bottles may be re-used, i.e. washed and re-filled.

4.2 Extended Timescale for Implementation

As noted in our introduction (section 1 above), the time-scale envisaged by the Department includes a second public consultation on the preferred DRS model and draft regulations (during the first quarter of 2021); commencement of legislation during the third quarter of 2021, and the introduction of the proposed DRS during the third quarter of 2022.

By any standards, that is an extraordinarily long time to consider and implement the proposed DRS; even taking into account the time needed to raise awareness, train people, install RVMs and ensure that the necessary infrastructure is available.

4.3 DRSs should not be Planned or Implemented in Isolation

Ireland's DRS should be part of a comprehensive approach to our waste management, recycling and reuse. It should complement, rather than compete

² River Basin Management Plan for Ireland 2018-2021. Department of Housing, Planning and Local Government, Dublin, 2018; section 10.5, page 127.

with, existing 3 bin kerbside schemes, and that it should also take account of other relevant policies and initiatives in Extended Producer Responsibility (EPR) and our proposed tax on single-use plastics and disposable beverage containers.

Furthermore, an All-Ireland approach for a DRS is essential to prevent fraud and would offer benefits in terms of consistency, regulatory coherence, reduced complexity for all parties, and reduced scope for cross-border fraud.

4.4 The DRS Scheme Should be Evidence-Based

We see a need for further analysis on a wide range of issues, including:

1. impact analysis and cost-benefit of each model;
2. analysis for each of the materials proposed for inclusion in the scheme, and glass should be included;
3. assessment of the impacts of different schemes on consumer behaviour;
4. an analysis of the economic impacts on consumers, and on existing collectors; and,
5. lessons learned from other schemes elsewhere.

4.5 Best Practice and Lessons Learned: DRSs In Lithuania

A very recent report (03 November 2020) by the European Environmental Bureau which cites Lithuania as a case study and a good example to follow.

A DRS in Lithuania started in 2006 with reusable packaging (glass) and only for manual collection in shops. Ten years later, the system was expanded to single-use packaging and at present **has a 90% return rate** [our emphasis]. The main legal provisions, such as responsibilities, are set by law; the recycling targets by the Government and other details by the Minister's orders – deposit rates, system organisation plan, financing scheme and the public awareness programme.

The DRS in Lithuania applies to plastic (PET), glass and metal, for containers from 100ml to 3 litres. The system is voluntary for small shops and obligatory for bigger ones (from 300 square metres in urban areas and 50 square metres in rural areas. In order to facilitate the return for customers, the Lithuanian government chose a 'return-to-retail' system, which means stores selling beverage containers must also receive used containers back for recycling. The deposit is applied as a discount in the shop or returned in cash.

According to the Ministry of Environment, the responsibilities are as follows:

1. Producers and importers of beverages:
 - must mark their packaging with a bar code and deposit sign; and,

- must collect and account for the deposit on every unit (0.10 EUR), organise and finance the DRS through the administrator account for and report about packaging they put on the market.
2. Retailers of beverages:
- must collect and account for the deposit paid on every unit (€0.10); and,
 - must inform consumers about the terms under which the packaging can be returned.
3. Administrators and non-profit public entities:
- Can operate only with an agreed organisation plan, financing scheme and public awareness programme and an agreement with beverage producers and importers, and packaging retailers;
 - Must organise the return of packaging and its management;
 - Provide the necessary equipment for collection points at retailers;
 - Select packaging collectors and recyclers by public tender procedures;
 - Must ensure the fulfilment of collection and recycling targets in the name of beverage producers and importers; and,
 - Must organise public awareness programmes (at least 1% of annual turnover).

Relevant facts and figures for Lithuania include:

- Investment in collection infrastructure for DRS – about €30 million with 3,200 collection points;
- New jobs created – about 1,200;
- Number of reverse vending machines (RVMs) installed and operating – about 1,100;
- Return and recycling rate in the first year of operation: 70%; last year: 90%;
- About 90% of packaging returned using RVMs (23,000 tonnes in 2018);
- The system has the support of the population, as 97% of people claim the deposit system is necessary, 97% of customers are satisfied with the system and 93% admitted that the introduction of such a system encouraged them to treat their waste more responsibly

Benefits of the DRS in Lithuania:

- Very significant decrease of beverage packaging waste in public spaces; no beverage containers being deposited in landfills;

- Return on investment after five years;
- About 70% of deposits returned are spent in the same shop, thereby increasing and improving customer loyalty;
- Allows a return of up to 95% of packaging, with better quality of waste materials;
- No public investments, no funds needed; only private investments; and,
- Significant new job creation.

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