

From: Conor Walsh <cwash@slrconsulting.com>
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To: circulareconomy
Subject: Submission from IWMA
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Hi,

Please find attached IWMA submission on your Circular Economy consultation.

Regards,

Conor Walsh
IWMA Secretary

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Circular Economy Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford
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By email only to circulareconomy@decc.gov.ie

10th June 2021

**Re: Ireland's First Whole-of-Government Circular Economy Strategy
Public Consultation on the Proposed Publication of the Strategy**

Dear Sir/Madam,

Further to your call for consultation on the above-referenced subject, we offer the following responses and comments on behalf of the Irish waste Management Association (IWMA). The IWMA is comprised of 42 members that operate roughly 50 waste companies, as shown below:



Our website, www.iwma.ie, provides details of our members. Note that some members have acquired other companies in recent years and therefore trade under several brand names.

Our members handle household, commercial, C&D, liquid and hazardous wastes and are involved in the following waste management activities:

- Waste Collection
- Waste Transfer
- Recycling Operations
- Composting
- Anaerobic Digestion
- Hazardous Waste Management
- Specialist Treatments (such as Sterilisation)
- Soil Treatment and Recovery
- Waste to Energy
- SRF Production
- Landfill Operations
- Export of Waste for Treatment Abroad

It is clear that the IWMA represents a broad spectrum of waste management activities, so we have no inherent bias towards or against any particular waste management options. Our main goals are to raise standards in the industry, to promote compliance with all legislation and to assist Ireland in meeting the targets set by the EU in a variety of Directives. All our submissions are available publicly on our website.

Opening Comments

The waste industry plays a pivotal role in Ireland becoming a more circular economy. Traditionally the sector's function was the removal of discarded material for disposal, however that function has changed dramatically from this historic function to the current scenario where our sector is a key stakeholder working with our client base to find better reuse, recycling and recovery options with disposal now being the least used option.

Primary drivers to this change have been driven by legislative changes e.g. EU directives, fiscal drivers such as the cost of virgin materials and also the critical need to achieve environmental sustainability. The interdependence between waste / by-product producers and the waste management sector has become more symbiotic. Increasingly the waste sector has gained expertise in the reworking of waste materials into reusable raw materials. Private investment by our members continues to build services and capability here in Ireland but we are also acutely aware that while we establish expanded facilities in Ireland the export of partially worked or segregated materials to specialist facilities outside of Ireland is key to the delivery of sustainability.

The IWMA supports the existing privatised waste management market in Ireland and we believe that it offers the best opportunity to develop sustainable best practice in the sector. We recognise that the Irish State has obligations to meet EU targets and together with our sector it must influence the behaviour of consumers, business and industry to meet those targets. We agree in principle with using fiscal measures to achieve those ends.

We also recognise that the State needs funding to support public awareness initiatives, waste enforcement, waste planning and the provision of civic amenity sites / bring banks. We accept that levies can be a useful source of such funding and we recommend that the Environment Fund is ring-fenced for these purposes and is used effectively to assist Ireland with meeting the new challenging targets.

Under the provisions of polluter pays principles, we acknowledge the benefits around Extended Producer Responsibility (EPR) and we see that as a significant contributor to funding waste prevention, reuse and recycling activities in Ireland in future years.

Specific Questions

1.0 DO YOU AGREE WITH THE DRAFT STRATEGY'S PROPOSED KEY OBJECTIVES? IN YOUR VIEW, ARE THERE FURTHER OR ALTERNATIVE OBJECTIVES THAT SHOULD BE INCLUDED?

The key objectives are described as follows in the draft strategy:

1. *This strategy's first key objective is to provide the initial framework for the actions to enable the realisation of that policy, and to promote public sector leadership in adopting circular policies and practices.*
2. *Specifically, by 2030 Ireland's ambition is to significantly improve its circular material use rate (in both absolute terms and in comparison with other EU Member States) so that our national rate is above the EU average by the end of this decade. Achieving this improvement in the circularity gap is the second key objective of this Strategy.*
3. *To raise awareness amongst households, businesses, communities and individuals about the Circular Economy and how it can improve their lives.*
4. *To support and promote increased investment in the Circular Economy in Ireland, with a view to delivering sustainable, regionally balanced economic growth and employment.*
5. *Identifying the economic, regulatory and social barriers to the development of the circular economy in Ireland, and the development of solutions, will be an ongoing priority and is the fifth strategic objective of this Strategy.*

The IWMA generally agrees with these key objectives. However, Objective 1 should extend to private sector leadership also.

2.0 DO YOU AGREE WITH THE OVERALL LEVEL OF AMBITION SET OUT IN THE DRAFT STRATEGY? IF NOT, IS FURTHER AMBITION NEEDED OR IS THE DRAFT STRATEGY OVERLY AMBITIOUS?

The IWMA suggests that the level of ambition is good. However, we are of the opinion that the ambitious targets that are set, will be impossible to achieve without all stakeholders being fully committed.

3.0 SHOULD IRELAND MEASURE ITS PROGRESS IN ACHIEVING A MORE CIRCULAR ECONOMY RELATIVE TO ITS EUROPEAN UNION PEERS? IF NOT, WHAT ALTERNATIVE BENCHMARK SHOULD IRELAND ADOPT AND WHY?

Yes, this appears to be the most relevant benchmark.

4.0 WOULD YOU RATE IRISH PUBLIC AWARENESS OF THE CIRCULAR ECONOMY AS HIGH, MEDIUM OR LOW? AND HOW IMPORTANT DO YOU THINK RAISING PUBLIC AWARENESS IS TO FURTHER DEVELOPING THE CIRCULAR ECONOMY?

Low. We suggest that it is very important to raise public awareness of the Circular Economy. We currently believe that the standard consumer has little knowledge on what exactly the circular economy is, how it operates and how they can impact it. The public generally supports recycling efforts and most people are aware of the problem of plastic pollution in the oceans and are concerned about the likely future impacts of climate change. However, the concept of the circular economy is new to the Irish Public and it will take time and effort to explain and develop the concept in the public arena.

5.0 WHAT ARE THE MOST EFFECTIVE AWARENESS RAISING MEASURES THAT COULD BE TAKEN UNDER THE STRATEGY?

We suggest that interactive engagement is necessary to raise awareness. One-way communication is ineffective for the majority of people. Incentivised charging for waste collection, which is a form of Pay As You Throw (PAYT) is somewhat effective in raising awareness of the value of waste and the need to prevent, reuse and recycle materials. The IWMA is working on other awareness raising measures such as a recycling rewards trial and a digital Deposit Return System (DRS) trial. We are also committed to engaging further with the public on better participation in the brown bin scheme for biodegradable wastes and this includes giving starter packs to new customers and offering them to existing customers.

We suggest that digital technology, including the use of smartphone Apps, should be considered to engage the public in a more interactive way.

We also suggest that labelling of products is critical. This should be visible instructions on end of use recycling, recovery or disposal, but should also include a Quick Response (QR) Code or other form of unique identifier that gives information, instructions and/or deposit returns via a smartphone.

Social media feeds and media information provision are key to delivering elements of the overall message but this must be done in a cohesive and non-ambiguous fashion. The waste sector can play a role in this by providing Irish content from local industry real life impacts. E.g. the background stories for various Pakman awards, etc.

6.0 ARE YOU SATISFIED WITH THE PROPOSED STAKEHOLDER ENGAGEMENT ARRANGEMENTS IN THE DRAFT STRATEGY? WHICH ADDITIONAL STAKEHOLDERS (IF ANY), NOT ALREADY PART OF THE WASTE ACTION GROUP, DO YOU THINK SHOULD BE INCLUDED IN THE STRATEGY'S IMPLEMENTATION?

The waste industry has a wealth of experience in managing waste efficiently and in direct engagement with customers (the public). Our members' combined experience is an important resource that should be harnessed by the decision-makers. Our ambitions are consistent with the Government's ambitions with regard to the Circular Economy and we believe that we can help achieve those goals. With this in mind we would reiterate the inputs that we provided in the consultation on the Waste Action Plan should be revisited.

7.0 WHAT DO YOU SEE AS THE MAJOR ECONOMIC AND/OR SOCIAL CO-BENEFITS OF MOVING TOWARDS A MORE CIRCULAR ECONOMY IN IRELAND, SO THAT ENVIRONMENTAL IMPROVEMENTS ALSO PROVIDE ECONOMIC AND SOCIAL OPPORTUNITIES, AND VICE VERSA?

We suggest that the major benefits of the Circular Economy for Ireland are as follows:

- Our natural resources, such as aggregates and peat, can have their life extended by use of alternative materials sourced from the recycling industry.
- A reduction in carbon emissions and the associated impact on climate change, which in turn protects our existing resources such as biodiversity, agriculture, water supplies, etc.
- Meeting EU waste management, energy and environmental targets – a failure to do this would lead to significant financial penalties that would be harmful to our economy. It is better to invest in a successful future than to pay fines for failure to meet those targets.
- Greater self-sufficiency with less reliance on imported fuels, raw materials and products.
- Employment opportunities in re-using, recycling, re-processing and using materials derived from wastes sourced in Ireland.
- Socially, we expect that people get satisfaction from engaging in sustainable circular practices and moving away from the ‘throwaway’ society that has developed and accelerated in the last few decades.
- In the longer timeline a sustainable industrial output will yield financial savings for Ireland Inc. which in turn will yield greater prosperity for its people and future generations

8.0 WHAT DO YOU SEE AS THE MAJOR REGULATORY BARRIERS TO THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY IN IRELAND? IN ANSWERING THIS QUESTION PLEASE FEEL FREE TO ADDRESS ECONOMY-WIDE ISSUES OR THOSE AFFECTING YOUR SECTOR IN PARTICULAR.

In general, we see that Ireland has informed regulatory frameworks in place to achieve the desired goals. However, we feel that implementation and interpretation of these regulations (and legislation) by enforcement / competent authorities does require urgent review.

A first-hand example encompasses the area of End of Waste (EoW) status for reprocessed waste streams. The actual time frames currently in place to achieve this status for materials is excessive and thus financially prohibitive in terms of achieving this status for valuable resources. The competent authority in this area needs to significantly increase resources to this area and make decisions in a shorter timeframe as these decisions are essential to Ireland’s Circular Economy efforts.

A National End of Waste framework for Incinerator Bottom Ash (IBA), Recycled Aggregates and other waste streams is urgently needed to encourage reuse as seen throughout the EU. Our members have also advised that there are other secondary raw materials that could also benefit if resourcing was increased and time frames reduced in this area.

Presently there is a disconnect between Local Authority’s stance on EoW from county to county and between some Local Authorities and the EPA. For example holders of Waste Facility Permits in some counties are being permitted to operate a local EoW permission written in their permit but do not hold an EPA EoW decision. Clarity on regulation and enforcement is required to enable fair competition and to develop the national market for high quality compliant recycled materials.

Similarly, in the area of Waste Licensing the decision time line is inordinately too slow. The EPA needs to significantly reduce the delays that are currently in play in this area, e.g. members have advised that 2 year time lines are the norm here when trying to make changes or increase capacities for regular arisings. Our members feel that this problem stems from a lack of experienced resources available to the agency to progress these applications in a timely manner. At present delayed responses and delayed requests for additional information are typically utilised to postpone decisions. This is unacceptable if we are to adapt and change to the needs of a circular economy.

We suggest that all licences should be issued in less than 12 months and amendments to licences should be facilitated in a process that takes a few months rather than several years. By comparison, statutory timelines for waste and industrial licences and permits are 13 weeks in England and Wales.

We suggest that the legislation surrounding Strategic Infrastructure Developments (SID) should be reviewed and revised. The 6-month timeline for processing a SID application by An Bord Pleanála is not being applied as the Board does not accept an application until it deems that it is ready. There is no time limit on the pre-application process and we can see that this can be problematic.

Also, the threshold for waste facilities under the Strategic Infrastructure Act is too low and should be reconsidered. A 100,000 t/a waste facility is relatively modest in the current context and we are aware of several facilities that have been designed to be less than the threshold to avoid the Strategic Infrastructure process. That is not in the spirit of the process that was designed to fast-track and streamline the development of strategically important infrastructure. We suggest that the applicant should have the option of going down the standard planning route with their local authority, regardless of the size of the development.

We also need the development of technical standards for EoW materials to allow their use in construction, manufacturing and elsewhere.

Social enterprises, such as the community resource sector, repair shops, charity outlets, etc., play a key role in the circular economy in Ireland. They have enormous potential to develop further. We suggest that current regulations are amended to facilitate and enhance the role of such social enterprises. We propose that, subject to a social enterprise meeting a number of simple governance and environmental criteria, then NWCPO-permitted collectors should be allowed use them as outlets for bulky items.

9.0 WHAT DO YOU SEE AS THE MAJOR NON-REGULATORY BARRIERS TO THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY IN IRELAND? IN ANSWERING THIS QUESTION PLEASE FEEL FREE TO ADDRESS ECONOMY-WIDE ISSUES OR THOSE AFFECTING YOUR SECTOR IN PARTICULAR.

To achieve better circulatory goals requires change at many levels. This means investment in a range of items – equipment, people and education and encompasses all steps in the chain.

- Fiscal stimulus measures should be in place to help support measurable reductions in energy and virgin raw material consumption. Where industry can prove these improvements measures such as tax breaks or reduced VAT charges etc. may be useful drivers to assist in achieving these investments.
- The role of the producer is critical. It is clear to our members that too much non-recyclable plastic is used in packaging and there is too little information provided on recyclability of packaging. We urgently need to remove non-recyclable packaging from the marketplace and we need consistent labelling on packaging that makes it easier for the consumer to decide what to do with the package after the product has been consumed. In the case of packaging, the process of Eco-modulation is a very useful tool in changing industries attitude about using non-recyclable materials.
- Producer responsibility also plays a role in the generation of construction waste. There is no requirement for the producers of large volumes of construction waste to make their material available for recycling e.g. through pre-demolition audits, selective demolition, project waste tracking, project recycling targets, etc. These measures could be implemented through planning conditions.

- The public need to be properly informed and have access to factually correct information so that those that wish to inform themselves can do so. Inclusion of elements of circular economy plan in the national curriculum will yield benefits in the long-term.
- Balanced success stories from all sectors of the economy should be rewarded for achieving positive outcomes. The various compliance schemes such as Repak, WEEE Ireland, ERP and Repak ELT have an important role to play in this sphere.
- There is a significant over reliance on backfilling of wastes, particularly construction wastes such as concrete, rubble, bitumen etc. Backfilling of these materials occurs at local waste permitted sites across the country and results in valuable materials being taken out of circulation. The materials embodied carbons are lost and if they are placed in environmental sensitive areas pollution can occur. These materials can be readily recycled however backfill is typically cheaper than recycling when the low value of recycled materials is factored in.

10.0 HOW IMPORTANT DO YOU CONSIDER GREEN PUBLIC PROCUREMENT IS IN SUPPORTING THE DEVELOPMENT OF NEW CIRCULAR GOODS AND SERVICES?

Very important. There has been very few real examples in this area to date, despite its inclusion in waste policy documents for several decades. The IWMA recently pointed to the lack of green requirements in the Government procurement of waste services. We can also see issues with procurement of textile banks by some local authorities, where the end destination and treatment of the textiles has not been a significant factor in the procurement of that service.

This is an area which could develop further if End of Waste criteria could be fast tracked. See point 8.

11.0 WHAT WOULD BE THE MOST EFFECTIVE ACTION GOVERNMENT COULD TAKE TO PROMOTE/SUPPORT AND INCENTIVISE THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY?

The Government could introduce mandatory recycled content for certain materials used for construction and/or in the manufacturing sector. This could be accompanied by standards set for secondary raw materials.

The Government could also consider an aggregate tax to assist with the development of recycled aggregate as a more circular alternative or supplement to extracted virgin products. The aggregate sector has opposed this suggestion in the past, as the volume of recycled aggregate is small compared with virgin aggregate. However, that sector has not advanced alternative ways to encourage the use of recycled aggregate or to establish markets for that recycled material. It appears that some form of Government intervention is necessary in this area as 100% reliance on virgin materials is clearly not sustainable and not circular.

Also, Ireland needs more re-processing infrastructure to turn recycled materials into products. There is scope for supporting a paper pulper/mill and for re-processing of other materials such as plastics, wood, glass, etc.

12.0 WHICH SECTORS DO YOU THINK CAN MAKE THE BIGGEST CONTRIBUTION TO MAKING IRELAND'S ECONOMY MORE CIRCULAR?

As an entity that represents the Waste management sector we are not in an informed position to consider all sectors of this market. However from our viewpoint, we suggest that the construction sector has the greatest potential as it can use recycled materials such as aggregates, soil, gypsum, woodchip, glass, etc and is a national endeavour rather than an international one, in most cases. We can set rules for construction in Ireland that will not impact on international competitiveness and have national standards to support those rules.

Manufacturing and associated packaging can also make a major contribution through product design and labelling that encourage reuse and recycling.

As many of our members operate logistics systems for collection of materials from our clients, we see merit in greater support for utilisation of electric / hydrogen powered vehicles that would reduce emissions arising from the national fleet. Some members have already embarked in fleet changes but a national policy to support same would be helpful with incentives to do so.

13.0 DO YOU BROADLY AGREE WITH THE POLICY AREAS LISTED FOR FUTURE DEVELOPMENT IN THE DRAFT STRATEGY? IF NOT, WHICH AREAS WOULD YOU REMOVE/ADD TO THE LIST?

Yes, we broadly agree with the areas listed in the Draft Strategy.

14.0 ANY OTHER COMMENTS?

The IWMA is very supportive of the Circular Economy concept and the policies and plans that flow from it both nationally and internationally. Our members are very keen to see the materials that we collect converted back to products.

This requires:

- removal of non-recyclable materials, such as complex laminate plastics, from the marketplace;
- effective labelling of products to aid recycling;
- effort by the consumer to separate materials for recycling (including specified co-mingling of certain materials);
- separate collection, sorting and bulking by the waste industry;
- support from the authorities for End of Waste designations;
- re-processing by the waste industry and others;
- demand from the manufacturers / producers for recycled raw materials; and
- Government measures to encourage all of the above.

It is critically important that recycling is made easy for the consumer, is supported through sorting / processing and is financially attractive for business. The Circular Economy Strategy should encourage measures that address these key elements.

The Strategy should also encourage and support new technologies, as the waste sector is constantly evolving. For example, we support a digital Deposit Return System (DRS) as the best environmental option and the one that is most convenient for consumers. It is a new concept, but so was the plastic bag levy twenty years ago and Ireland was one of the first countries in the world to introduce it. We can and should be a world leader in waste management as Ireland is a very progressive country in many areas including digital technology.

It is clear to the IWMA that the DISRUPT concept is helpful in promoting circular economic thinking. As an example we can consider support for a Digital DRS ahead of the traditional 'return to retail / over the counter' DRS model. This is addressed in greater detail in Appendix 1. In summary, the Digital DRS is clearly the best option for the Circular Economy and we fully expect that an independent comprehensive RIA will confirm that prior to any decision on introducing new legislation associated with DRS.

We also suggest that the Government should financially support the production of biomethane from biowaste at Anaerobic Digestion (AD) plants. This biogas replaces natural gas, which is a fossil fuel and it can be used to fuel waste collection trucks and other vehicles, whilst also recycling nutrients to

land to replace artificial fertilisers. This is an excellent example of a circular economy within the waste sector.

We hope that this submission is helpful and we look forward to further positive engagement with the DECC on this and other policy issues.

Yours Sincerely,

A handwritten signature in black ink that reads "Conor Walsh". The signature is written in a cursive style with a large initial 'C'.

Conor Walsh
IWMA Secretary

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Appendix 1

DRS and the DISRUPT Model

We note that the draft strategy document promotes the 'DISRUPT' model, as follows:

D	Design For the Future: Adopt a systemic perspective during the design process, to employ the right materials for appropriate lifetime and extended future use.
I	Incorporate Digital Technology: Track and optimise resource use and strengthen connections between supply-chain actors through digital, online platforms and technologies.
S	Sustain & Preserve What's Already There: Maintain, repair and upgrade resources in use to maximise their lifetime and give them a second life through take-back strategies, where applicable.
R	Rethink the Business Model: Consider opportunities to create greater value and align incentives through business models that build on the interaction between products and services.
U	Use Waste as a Resource: Utilise waste streams as a source of secondary resources and recover waste for reuse and recycling.
P	Prioritise Regenerative Resources: Ensure renewable, reusable, non-toxic resources are utilised as materials and energy in an efficient way.
T	Team Up to Create Joint Value: Work together throughout the supply chain, internally within organisations and with the public sector to increase transparency and create shared value.

Design for Life – There is a very limited future in 'over the counter' returns to reclaim deposits in the same way that there is a limited future for 'over the counter' banking. Electronic transactions using digital media are the future, so the DRS should be digital.

Incorporate Digital Technology – Current consumer testing models we believe will show that this is an easily applicable plan.

Sustain & Preserve What's Already There – Ireland has an existing kerbside recycling system that is sustainable, efficient for waste collection and very convenient for the public. It serves households and business premises well and has helped Ireland to increase municipal waste recycling rates from about 10% at the end of the 20th Century to about 40% now. The best option to support the Circular Economy is to use that system to its fullest, rather than creating a parallel system that does the same thing in a different way with increased carbon impacts. We see such a move as equivalent to building a second railway line from Dublin to Galway parallel to the existing one, but with lower passenger numbers and less stops along the way. That would offer a higher quality service, but it would never happen, as it makes financial and environmental sense to optimise the existing railway line to meet the needs of the passengers. In the same way, we must optimise the existing recycling system to meet the needs

of this Government and EU Legislation. Those needs extend to all recyclable wastes, so our resources should be used wisely to maximise the return on investment.

Rethink the Business Model – We agree that the ‘return to retail / over the counter’ DRS model, does have certain merits primarily because it has worked in the past. But there is now a better and more adaptable model now available with better environmental outcomes and easier public participation. If the Irish Authorities are to convince businesses to rethink their business models to become more circular, they must practice what they preach and fully consider the environmental advantages associated with the Digital DRS model.

Use Waste as a Resource – Either DRS model will result in using waste as a resource as the materials will be recycled. However, the Digital DRS can be extended very easily to a wide range of packaging materials and will allow much greater use of those waste materials as a resource.

Prioritise Regenerative Resources – The Digital DRS uses much less energy and fuel resources than the return to retail DRS model, as it maximises the use of the existing collection and processing system. An SLR Carbon Assessment Report commissioned by the IWMA is available at http://iwma.ie/wp-content/uploads/2021/05/210505-501.181.9_SLR-SmartDRS_CarbonStudy_BriefingNote-for-IWMA_Final.pdf. This expert report provides details of the difference in carbon impacts between the two DRS model, which is estimated at between 13,000 and 30,000 tonnes of CO₂e in favour of a Digital DRS over the traditional model.

Team Up to Create Joint Value – We recommend that the DRS is teamed up with the existing kerbside recycling system and the most obvious way to do that is to introduce a Digital DRS that uses the existing bins, existing collection network and existing sorting network.

This is just one example of how we see that improvements can be made. We anticipate that through a process of guided discussion further benefits can be achieved with other materials.