

**From:** [REDACTED] <[REDACTED]@epa.ie>  
**Sent:** Friday 25 November 2022 17:02  
**To:** SingleUse  
**Cc:** [REDACTED]  
**Subject:** Submission on public consultation - Environmental Levy Single-Use Cup Regulations  
**Attachments:** Consultation on draft regs to introduce levy on single-use cups\_Nov22.pdf

Please find attached a submission from the EPA's Circular Economy Programme in relation to the public consultation on the Circular Economy (Environmental Levy)(Single-Use Cup) Regulations.

Kind regards

[REDACTED]

[REDACTED]

Senior Manager, Circular Economy Programme | Clár an Gheilleagair Chiorclaigh  
Office of Environmental Sustainability, Wexford | An Oifig um Inmharthanacht Comhshaoil, Loch Garman



Via email only to: [SingleUse@decc.gov.ie](mailto:SingleUse@decc.gov.ie)



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25<sup>th</sup> November 2022

**Public consultation on draft regulations to introduce an environmental levy on single-use disposable cups**

Dear Bernie,

Thank you for the opportunity to comment on the draft regulations to introduce an environmental levy on single-use disposable cups.

The EPA welcomes the progression of these regulations. The levy will be a driver in the prevention of single-use disposable cup waste, raise awareness of reuse as a practical circular economy action, and encourage the growth of circular economy reusable cup businesses including deposit and return schemes.

Developing the single-use disposable cup levy in a similar model to the plastic bag levy is also welcomed, given the familiarity of retailers in implementing the plastic bag levy obligations, and the overlap of retailers providing plastic bags and providing hot drink services. Alignment of the reporting activities (such as return dates) may be beneficial to retailers, and this feedback may come through from submissions from the retail sector.

The Circular Economy Programme has a role in supporting implementation of the regulations and below are highlighted some specific aspects for your consideration.

**Behavioural Insights**

The EPA published a report on *Plastics: Attitudes and behaviours in Ireland 2019 – 2021* earlier this year. From this market research, there was evidence of strong support for policy incentives relating to the reduction of single use plastic products, with 64 per cent supporting the introduction of a levy at the point of purchase. It was also reported that in 2019 nearly 7 in 10 (69%) had a reusable coffee cup with females under 35 (74%) and the middle class (75%) more likely to use it. Data on frequency of use was also captured, and in 2019 nearly half (47%) stated that they used their reusable cup at least two to three times a week.

The EPA has contracted a market research company to carry out behavioural insight studies to support circular economy evidence and data. There is potential to use this contract for services to monitor behaviours & attitudes regarding single-use disposable cups and use of reusable cups over time, repeating questions asked in the original surveys, but also identifying specific aspects the Department would find useful to assess the impact of the regulations.

The Circular Economy Programme is supporting an eight-week behavioural trial intervention linked to reusable coffee cup behaviours in UCD in January 2023. The trial will track usage and changes in behaviours and is being carried out as part of the Campus Living Labs project. This intervention has been designed and will be monitored by behavioural science experts, contracted through an EPA framework for behavioural science expertise.

### **National reuse repair partnership**

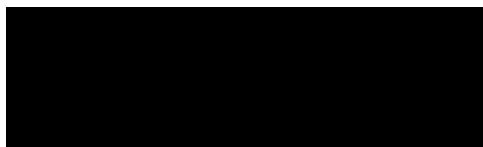
One of the ways that the Circular Economy Programme works is delivering through partnerships. We are developing a national partnership on reuse and repair to come into effect in 2023, with the aim of promoting a national reuse & repair culture in Ireland. This partnership can support the ambition of the regulations to change behaviours, and “choose to reuse”. Activities could include coordinated awareness and communication campaigns (national or for specific sectors such as for example third level campuses), funding deposit return business models, or other activities.

### **National waste characterisation**

The circular economy and waste statistics team lead on conducting national waste characterisation studies, with household and non-household municipal waste studies currently underway. Disposable coffee cups are included as categories in these studies. They were also included in the 2018 non-household characterisation (and will be into the future) so it will be possible to monitor the effectiveness of the proposed levy over time.

I am happy to discuss any aspects of this submission and look forward to supporting you in the implementation of the regulations through the work of the Circular Economy Programme.

Yours sincerely,



**Programme Manager**  
**Circular Economy Programme**