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From: [REDACTED]
Sent: Friday 7 May 2021 16:53
To: wastecomments
Subject: ACE Ireland response to DECC's consultation on legislative framework and scope of the DRS
Attachments: ACE Ireland response to DECC consultation on the framework scope of the DRS 07.05.21.pdf

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To whom it concerns,

Please find attached the response document from the [Alliance for Beverage Cartons and the Environment, ACE Ireland](#) to the Department of the Environment, Climate and Communications' consultation on legislative framework and scope of the Deposit Return Scheme. If you have any queries in relation to the content contained within the attached response please feel free to get in touch.

Many thanks for your consideration in advance and have a nice weekend.

Best Regards,



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Response by ACE Ireland to the Department of Environment, Climate and Communications (DECC) consultation on the legislative framework and scope of the proposed Deposit Return Scheme (DRS)

Friday, 7 May 2021

1.0 Introduction

The Alliance for Beverage Cartons and the Environment Ireland (ACE Ireland) represents Tetra Pak, Elopak and SIG Combibloc, the leading manufacturers of beverage cartons for the Irish and European markets.

ACE delivers sector-wide environmental initiatives on behalf of its members. Our objective is to provide a platform in Ireland to benchmark and profile beverage cartons as a circular, recyclable and sustainable packaging solution with low carbon benefits.

2.0 Response to the preferred model for a DRS in Ireland

ACE Ireland supports the preferred producer owned and led, centralised model proposed by DECC for the Scheme. We believe that a DRS owned and operated by industry will help deliver DECC's objective of a circular economy and will help achieve recycling targets as referenced in the Waste Action Plan for a Circular Economy. We would also strongly recommend that the DRS is designed to take advantage of the digital monitoring and collection technologies now being developed, to increase the quantity and quality of materials collected and to improve convenience and ease of use for citizens.

ACE Ireland's call for an 'all-in' model

We recognise that the initial scope of the DRS will be limited to the inclusion of Polyethylene Terephthalate (PET) bottles up to three litres in size and aluminium beverage cans to allow DECC prioritise delivery of obligations under EU legislation. However, we reiterate that we would support a comprehensive, 'all-in' model that considers all materials and products for inclusion, including packaging formats such as beverage cartons that are currently out of scope. This would provide a level playing field for all packaging materials and would help avoid unintended consequences.

ACE Ireland's position on an 'all-in' model aligns with environmental groups such as VOICE Ireland and Friends of the Earth. Results from a consumer survey run by VOICE Ireland in October 2020 also supports this position with 88% of respondents indicating that they are in favour of an 'all-in' model. With opinion relatively consistent across age ranges of those polled, the results echo growing consumer trends to prioritise sustainability.

Why DECC should consider a digital DRS

To achieve an 'all-in' model quickly and inexpensively, ACE Ireland believes that the DECC should consider a digital or smart DRS rather than the conventional 'return to retail' scheme. A digital DRS would ultimately provide a more flexible and adaptable system for accepting additional materials such as beverage cartons.

We believe the adoption of a digital DRS would result in a more user-friendly system, where consumers could access the scheme through placing materials in their mixed dry recycling (MDR) bins collected at kerbside. A digital DRS would remove the burden on consumers to store used packaging materials in their homes and having to return them in bulk to the shop or supermarket during their next visit. We suggest that this system would secure greater consumer buy-in and in turn would increase presentation rates in the MDR kerbside system

with the potential to drive up recycling rates across multiple materials including beverage cartons as listed on the MyWaste.ie household recycling list rather than just two material types as proposed in the current scheme.

While we acknowledge that digital DRS is a relatively new concept, we have seen this trialled in Northern Ireland and in North Wales using smartphone technology and applications. We believe this is the natural progression from the traditional manual and relatively low-tech systems and it offers exciting potential for future upgrading, which would otherwise prove very expensive to implement, for example if the scope of materials in the scheme was to be extended.

Why beverage cartons should be included in the DRS

Life cycle analysis by the Heidelberg Institute for Energy and Environmental Research shows that beverage cartons are among the best environmental performers of all drinks packaging formats; fully recyclable, low carbon and primarily made from wood fibre – a renewable, bio-based material. The inclusion of beverage cartons within the DRS would support and reward their strong life-cycle performance, thus helping Ireland to meet its objective of building a circular economy.

In summary we welcome DECC's intention to consider options to incorporate other materials in the Scheme later, following a period of successful operation of the DRS focusing on plastic bottles and aluminium cans. However, as outlined above we believe due consideration should be given to the introduction of a digital DRS which could include a wider range of drinks packaging. Additionally, as part of the legislative framework around the Scheme, there should be a commitment to set specific timelines and frequencies for reviewing the Scheme and a commitment to actively consider additional materials.

3.0 Response to details of the Scheme to be set in regulations

Producer responsibility

The DRS will be a mechanism for producers to comply with the overall Extended Producer Responsibility (EPR) legislation. Therefore, producers whose packaging is in scope of the deposit system should be subject to the same requirements as producers whose packaging is not in scope of the deposit system.

DRS system operators

ACE Ireland supports the proposed DRS operator framework, consisting of relevant producers, or a corporate body acting on their behalf. This approach has worked well in terms of other EPR systems in operation in Ireland and will help ensure transparency and accountability for the implementation of a DRS system. We do not believe the responsibility of operating the Scheme should fall to the retailer, but retailers and producers should be involved through representation on the board of the designated operator.

Retailer obligations

The retailer obligations as set out in the framework align with what ACE Ireland envisages for the DRS. To achieve full support and engagement, it is important that the designated operator ensures the DRS works for smaller retailers as well as larger retailers, and that participation in the DRS does not impact on their overall business operations, for example because of having less floor space in store.

The deposit

While ACE Ireland does not have a specific view on the deposit rate, we would encourage the Minister, DECC and the DRS operator to ensure a balance is struck in setting an appropriate

rate which provides an incentive for citizens to use the scheme but not one that adversely impacts on sales.

We support the preferred option, arising from the previous consultation, to have variable deposits based on volume of the product, and we welcome the commitment to provide for this in the regulations. In this regard, ACE Ireland believes specific provision needs to be given for setting rates for multi-packs. Failure to address this will result in significant price increases for products in multi-packs compared to – for example – those in large plastic bottles.

Citizen / consumer role

For a DRS to work effectively it must be accessible and enable easy use for citizens. The opportunities offered by digital DRS systems – which can also be integrated into existing kerbside collections – should be explored.

An extensive citizen information campaign should also be activated by the designated operator to align with the launch of the DRS. The campaign should be driven by clear and concise messaging on how the DRS works and how citizens should use it.

ENDS