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From: [REDACTED]
Sent: Friday 7 May 2021 15:55
To: wastecomments
Subject: Response to Consultation on Deposit Return Scheme Legislative Framework

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The consultation is presented without questions upon which consultation is sought.

We would comment as follows:

We are a provider of digital solutions for many situations in the circular economy, We have a solution for digitising DRS which has been successfully piloted in Northern Ireland. Clearly we have an interest in countries moving to modern technologies for DRS. It appears from the consultation document and reported statements in the press that the Irish Government has made a final decision already to exclude digital or other modern technologies in favour of a traditional RVM based scheme.

There are a number of issues that we believe are worthy of consideration in finalising legislation for the scheme:

- Unlike other schemes there appears to be no flexibility to allow digital and other modern systems to come in to play at a later date. Scotland for example specified a traditional scheme but have drawn the legislation widely enough to allow new technologies to come in in the future. DEFRA in their latest consultation have included consultation on digital DRS without committing to it. We would respectfully suggest that the Irish Government affords itself this flexibility to take advantage of future positive developments.
- It is unclear how cross-border issues are to be dealt with. Even without a fluid border most schemes estimate fraud of 1.5-2.0% per annum (compared to digital DRS estimates of less than 0.1%). With a fluid border that figure is likely to be much higher as items from the North or the UK are deposited in Ireland. Adding most RVM security measures is relatively straightforward and cheap for determined criminals as is seen by the experience in other European countries. With digital DRS the container cannot be claimed for deposit more than once and as every item is unique cannot be replicated. Digital is border agnostic allowing only the deposit paid to be claimed in whatever currency it was originally paid. We believe that more can and should be done to prevent fraud and to discourage criminality.
- Supply chains are complex. Items can be made in one country, stored and distributed in another or others, sold anywhere and consumed anywhere. The challenge for these supply chains in ensuring that deposit items are kept separate from other goods will be difficult and expensive. Needless to say digital DRS solves this issue as the unique code need only become live for deposit purposes at point of sale.

Whilst the Government's approach appears to be already set in stone for the early introduction of DRS we would once again urge that flexibility is drafted into the regulations to allow newer and better technologies to be introduced by the scheme administrator as and when it is appropriate.

Yours faithfully

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