

Colm Lambert (DECC)

From: [REDACTED]
Sent: Friday 7 May 2021 10:54
To: wastecomments
Subject: RVM Systems submission - Deposit Return Scheme - Consultation on legislative framework and scope of the scheme
Attachments: IRELAND - RVM Systems response to the consultation - 7th May 2021.pdf

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Dear DECC,

Please find attached RVM Systems submission to the DRS consultation in Ireland.

RVM Systems is a main supplier of reverse vending machines and high-speed counting solutions to DRS markets as well as other markets across the world. We operate under the brands "RVM Systems" and "Anker Andersen". We are a Swedish and privately owned company with R&D in Norway and Denmark, and production in Estonia and Denmark. Our machines can accept all kinds of beverage containers. Last year they collected 11.5 billion used beverage containers globally.

Could you please send a read receipt as a confirmation you have received this submission?

We look forward to collaborating with DECC and the appointed DRS operator.

Many thanks!

Best regards,

[REDACTED]



www.rvmsystems.com

[REDACTED]
[REDACTED]

RVM Systems submission to the Ireland DRS consultation

Introduction:

RVM Systems is a main supplier of reverse vending machines and high-speed counting solutions to DRS markets as well as other markets across the world. We operate under the brands “RVM Systems” and “Anker Andersen”.

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Our recommendation

RVM Systems agree and favour the concepts and the draft framework outlined in the consultation document and look forward to engaging with the appointed DRS operator. We would like to make the following additions and statements.

1. Incentivise investments in automatic return points

In Sweden, a store that invests in an approved reverse vending machine gets 2000 € yearly in subsidy form the DRS operator. For smaller stores, this amount covers the yearly depreciation and financing costs of a machine. It could also be good to offer tax incentives for companies that invest in reverse vending machines and counting solutions.

2. Obligation is a good thing

For the sake of clarity consumers should be able to return containers where they bought them – a system being used in Norway and Finland. This obligates all stores to be return points.

To offer a cost efficient solution to retailers not willing to invest in reverse vending machines, RVM Systems would like to propose and market bag drop points at these locations. The individual customer receives plastic bags along with individual identification tags at the store. When the bag is full, the customer takes the bag to the store and drops it at the drop station and receives the deposits via digital transfer after the containers are verified and counted. The operator retrieves the full bags on a regular basis and bring them to their material recovery facility, where the content of each bag is registered, counted, and sorted by means of our sorting and counting systems. Our customer Clynk is a good reference (clynk.com).

3. DRS is more than reverse vending machines

Not all used drink containers in scope will be returned to retail. Investments into counting centres have to be made to enable the collection and counting of containers that have been returned through the hospitality sector.

4 Ownership of reverse vending machines

Retailers should be able to choose and own reverse vending machines. The experience shows that retailers take better care of machines they have invested in. In addition, this encourages a good competition among machine suppliers keeping prices at a fair level and nurtures innovation.

5. Take reasonable risk measures

The DRS systems implemented in Sweden and Norway are efficient with a high level of fraud prevention recognition measures at the point of collection and validation. The measures are based on reading the barcode, shape, weight and material type. The customer understands the container is part of the national DRS by the DRS mark on the container. Extended measures such as including a security mark to be read by the reverse vending machine and counting centres are costly and not worth the investment.

6 Handling fee

The handling fees should be reviewed every year to be able to adjust to the cost of capital and operations.

7. The scheme should be limited to PET bottles and cans from the start

PET plastic bottles (up to 3 litres) and aluminium cans up to 1 litre should be included in the scheme. The recommended lower size limit should be 150 ml. Other materials may be included at a later date. We agree with DECC to exclude glass as it has challenges such as:

- Reverse vending machines which can accommodate glass are more expensive
- Glass is labour intensive inside stores as bins will fill up quickly and have to be emptied more frequently compared to PET bottles and cans.
- There are health and safety risks for in-store personnel. Glass is heavy and risky to deal with when broken. If glass is included, we strongly recommend that it is dropped into the reverse vending machine and not broken.

8. Keep the PET at food grade level

A DRS using existing kerbside bin infrastructure coupled with digital solutions is often favoured by incumbent waste operators. But, when people sort out their recycling at home and put all their cans and plastic bottles into their kerbside recycling bins, they are often unaware that the PET plastic is mixed with yogurt pots, cooking oil bottles, shampoo bottles and other types of plastic. This results in the PET being contaminated which means it is not suitable food grade quality and cannot be made into rPET to close the loop. Reverse vending machines ensure that the single-use

drinks containers are cleaned and can be recycled. The PET bottles are not contaminated so they are food grade quality and can be made into new bottles.

9. Co-mingle cans and PET bottles after compaction for increased efficiency

We strongly suggest co-mingling cans and PET bottles in reverse vending machines after compaction since it will fit more containers into the bins and bags. This means less time for changing bins and more material in each pick-up at the store. This results in less work for the store and efficient logistics from cost and environment point of view.

10. Level of deposit

Deposits should be set at 10 and 15 cents (higher for larger containers). Starting at this lower level enable an increase in case return rates are low. A too high deposit could invite for fraud attempts. Counting centres and reverse vending machines are compatible with variable deposit value drink containers or flat rate deposit value containers. Our technology will work seamlessly with either a flat rate deposit value or a variable deposit value.

11 Collection targets

The DRS Operator will be responsible for collecting the producers' empty bottles and cans from return points. The regulations should set out legally binding collection targets and Ireland's obligations to achieve a 90% separate collection rate for plastic PET bottles and also to meet EU targets for aluminium can recycling for the bottles and cans in the scheme.