

Colm Lambert (DECC)

From: [REDACTED]
Sent: Friday 7 May 2021 12:41
To: wastecomments
Subject: [Sensi] DRS Consultation Submission.docx
Attachments: 6655932906605719272_sensi_drs_consultation_submission.docx

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Hi there,

PFA the DRS submission on behalf of Sensi (trading name for Sensibin Limited).

Please confirm receipt of this email.

Best Regards,

[REDACTED]

Date: May 7th 2021

Submission in relation to:

**Consultation Document on a Legislative Framework
for Deposit Return Scheme (April 2021)**

Dear Sir/Madam,

I write on behalf of Sensibin Limited (trading as “Sensi”) in relation to the Consultation Document on a Legislative Framework for Ireland’s Deposit Return Scheme (the “Document”).

Sensi strongly supports the proposed Deposit Return Scheme planned as part of the Irish Government's Waste Action Plan for a Circular Economy. Sensi offers the following constructive comments in relation to preferred model and legislative framework for the delivery of the DRS, as set out in the Document.

Materials covered by the scheme

Sensi agrees with the initial focus on plastic PET bottles and aluminium cans, as well as the options to incorporate other materials at a later date. We support the later inclusion of items such as composite beverage containers (e.g. Tetra Pak containers).

Return Points

The System Operator should set out a plan to specifically address the challenges associated with collection locations other than retail outlets, such as;

- ***Hospitality Venues***
Cafés, Coffee Shops & Restaurants/Bars serving beverage drinks in containers covered by the DRS.
- ***Online Sales***
The provision for beverage containers bought online.
- ***Smaller Retail Outlets***
Size, space and cost constraints with conventional RVMs in these settings.

Deposit Refunds

1. We believe that priority and preference should be given to **digital refunds** and **digital reporting**. Excessive generation of paper refund vouchers, paperwork and other paper trails would needlessly bring the sustainability credentials of the scheme into disrepute.
2. We note that the preferred option (on balance) is to have variable deposits. We believe that this will unnecessarily complicate the initial rollout of the scheme (particularly for manual returns) and this option for variable deposits should be held back until the scheme is bedded down and operating successfully.
3. We strongly believe eligibility to reclaim the deposit should not be solely limited to Retailers and Waste collectors, but instead should also be open to additional registered organisations, such as; charities, churches, sports stadia, offices, schools etc. so long as they meet the same requirements that apply to retailers, including separation of material at source.

Alternative Collection Methods

We note the options for retailers to use alternative collection methods. This will be particularly important for smaller retail outlets. The CSO should explore new novel solutions that are coming to market that provide conventional RVM functionality in a much more cost-effective manner as an option to replace manual collection.

Material Quality

We note the desirability to achieve food grade PET recyclate. This is best achieved by ensuring material separation.

We question how this can be achieved with recycling that gets directed to MRF for sorting.

Sincerely yours,

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