

Colm Lambert (DECC)

From: [REDACTED]
Sent: Friday 7 May 2021 17:15
To: wastecomments
Subject: Deposit Return Scheme
Attachments: DFOE Letter Submission - Deposit Return Scheme May 2021.pdf

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Good afternoon,

please find attached our comments in relation to the Deposit Return Scheme Consultation Document on a Legislative Framework, April 2021.

Regards,
Steering Committee

Dublin Friends of the Earth

c/o Friends of the Earth Ireland, 9 Upper Mount Street, Dublin 2

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7 May 2021

Re: Deposit Return Scheme Public Consultation May 2021

Dear Sir/Madam,

Dublin Friends of the Earth welcomes the future introduction of a deposit return scheme in Ireland as it will certainly be a good start in terms of waste reduction, reuse of materials and a visible example of the circular economy in action. We concur with many of the elements of the proposed DRS regulatory framework in terms of producer responsibility and retailer's role in the sale and collection and reimbursement of the deposit for drinks containers. But a few issues need further consideration.

Materials to be part of the DRS

We call for a 3-year review on how the DRS is operating in terms of producers moving to non plastic and non aluminium containers i.e. glass, steel, tetrapak, pouches, cardboard, HDPE or other plastic polymers etc. Then we would like to see this container type added to the DRS.

Set targets

By setting targets of what percentage of plastic bottles and cans collected are recycled, we will be able to see how the DRS is progressing and help ensure that percentages increase, not decrease year on year.

Start up monitoring

We believe the scheme should be monitored very closely in the first 12 to 24 months to identify and resolve any unforeseen problems that would negatively impact the scheme - from those who deposit containers, to the retailers, producers and waste companies.

Citizen Engagement

It is critical that the public is fully aware of this scheme, how it works and most importantly, why it has been put in place. Adequate funding for public education must be an essential part of this scheme to ensure its success. We expect that a fully thought out citizen engagement and awareness campaign will be rolled out as part of the DRS.

Compliance and enforcement

It is not clear how the local authorities and the EPA will work together to ensure the DRS regulation is enforced if there is non compliance from producers, retailers, organisations or individuals.

We wish you well with this endeavour, thank you for the opportunity to contribute our views and look forward to seeing the DRS introduced in due course.

Yours faithfully,

Dublin Friends of the Earth
Steering Committee