

## Colm Lambert (DECC)

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**From:** [REDACTED]  
**Sent:** Friday 7 May 2021 17:28  
**To:** wastecomments  
**Subject:** Environmental Pillar Submission on DRS  
**Attachments:** EP Deposit Return Scheme Consultation Submission.docx

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To whom it may concern,

Please find attached the response of the Environmental Pillar to the consultation on the Deposit Return Scheme.  
Kind Regards

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Working for a sustainable future

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7 May 2021

**RE: Deposit Return Scheme - Consultation on legislative framework and scope of the scheme**

To whom it may concern,

The Environmental Pillar appreciates the opportunity to make a submission to the Consultation on the Legislative Framework and Scope of the Deposit Return Scheme (DRS). The Environmental Pillar, an advocacy coalition of over 30 environmental NGOs, published a Manifesto for Biodiversity in advance of the 2020 General election in which it called for, among other things, the bringing forward of “a deposit and refund scheme for plastic bottles and cans, as well as push forward with levies on disposable, single use items.”<sup>1</sup> The Pillar therefore welcomes the proposed legislation which if part of an ambitious circular economy strategy, will help put Ireland on the path to more sustainable resource use.

The Pillar is generally supportive of the regulatory framework set out in the consultation document, covering the producer responsibilities, retailer obligations and deposit system. However there are a number of aspects which the Pillar feels could be strengthened. There are also some specifics of the operation of the scheme which require greater detail and/or clarification from the department.

**Targets**

To ensure maximum efficacy of the scheme, time-bound targets for collection and recycling and penalties for failure to meet these targets should be set out in legislation. Ireland should

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<sup>1</sup> <https://environmentalpillar.ie/wp/wp-content/uploads/2020/06/Environmental-Pillar-GE2020-Manifesto-FINAL.pdf>

Environmental Pillar Members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coastwatch. Coomhola Salmon Trust. Cultivate. ECO-UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Hedge Laying Association of Ireland. Irish Peatland Conservation Council. Irish Seed Savers Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. Leave No Trace Ireland. Native Woodland Trust. The Organic Centre. The Rediscovery Centre Ireland. Sonairte. Sustainable Projects Ireland, Vincent Wildlife Trust. VOICE. Wildlife Rehabilitation Ireland. Zero Waste Alliance Ireland.

demonstrate high ambition by going beyond the EU targets of 60% aluminium packaging by 2030 and 75% aluminium cans by 2030. The experience of many other EU member states which have a DRS in place show that recycling rates of 85-99% for aluminium cans (for example) can be achieved.<sup>2</sup> The Environmental Pillar supports the proposal by Pillar member VOICE of a recycling target of 90% by 2029 for both aluminium cans and plastic bottles.

### **Monitoring and Review**

The Pillar supports the call by VOICE for a performance review 2-3 years from the initiation of the scheme in order to ensure that it is working effectively. The Pillar also supports the call for a 3 year review on the impact of the scheme on packaging shifting decisions. If producers move from plastic and aluminium towards other materials such as glass, or materials which are hard to reuse or recycle, then the scheme should be expanded to include these materials in order to ensure that producers are not incentivised to use less sustainable material in their packaging. In addition, Voice recommends that should glass collection levels drop below 78% for two years in a row, it would automatically trigger the inclusion of glass containers in the scheme.

### **Penalties and Enforcement**

The success of the DRS will be judged on whether Ireland meets its collection and recycling targets. To ensure that these targets are met, penalties should be set out in legislation. Effective enforcement of the regulations will also be critical to achieving the desired positive outcome. The consultation document does not outline in sufficient detail the obligations for the local authorities or the EPA in the enforcement of the regulations. The Pillar requests that this is clarified as soon as possible.

### **Potential to Expand the Scheme**

The potential for the scheme to be expanded to include other materials (e.g. reusable drinks containers) is welcome and the Pillar is broadly supportive of allowing the DRS operator to market test and pilot how an expansion to include these materials would work. However, it believes that the language set out in the consultation should be strengthened to ensure that there is “obligation” on the operator to explore and develop the expansion of the scheme rather than an “undertaking to explore”.<sup>3</sup>

### **Public Awareness**

In seeking approval from the Minister, the operator of the DRS must also outline a public awareness campaign plan. As the success of the scheme will require the buy-in of the general public, strong public engagement and education will be crucial. The regulations should ensure that the DRS operator adequately funds public awareness programmes and activities, for example, by specifying a level of spend on public awareness at a percentage of the annual turnover of the operator as is the case in Lithuania.

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<sup>2</sup> Germany, Norway, Denmark, Finland and Sweden

<sup>3</sup> Page 7 Consultation Document



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If the Department wishes to discuss these points in greater detail we would be delighted to meet with you.

Yours sincerely,

[Redacted signature]

[Redacted name]

[Redacted contact information]