

## Colm Lambert (DECC)

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**From:** [REDACTED]  
**Sent:** Wednesday 7 April 2021 10:00  
**To:** wastecomments  
**Subject:** Submission

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I, [REDACTED]: make the following submission, regarding the DRS (deposit return scheme).

As follows:

### Producers

Producers must be encouraged not to engage in excess packaging, which is the source of many waste problems. This will solve our environmental problems upstream, rather than downstream with return schemes. This should be a cornerstone in reducing waste. And be penalised for excessive packaging.

### **Collection Points**

Collection points for the return of waste containers could also operate at amenity sites. Is there any reason why consumers could not get their deposit returned at amenity sites?

Special bottle banks could also be commissioned to accept beverage containers which print receipts. These receipts could then be brought to the local post office for reimbursement. This would reduce cash handling for retailers. It is worth considering the establishment of an online consumer and retailer accounts for the return of such waste, which lists collection points and other dashboard features. E.G. Pay-in-advance slips with numbers, codes, for use in collecting deposits etc.

### **Retailers**

Retailers may take a very individualistic approach to taking returned containers. What is to stop a retailer from saying they have reached their capacity and shut their system for waste collection down for days. Or, state or technical or logistical difficulty in refusing to accept returned items. Legislation will have to be very strict on this and penalties imposed for obstruction. There will also have to be monitoring and a hotline for those being refused — which will undoubtedly happen at some stage. There will be many retailers saying we are full up and out of hours dumping by consumers in and around collection points, which is already a very big problem with bottle banks, if not under CCTV monitoring. Retailers will be very concerned about this indeed...

There is also the problem for scheme exploitation. People could simply turn up with collected bottles or can and get a payment, irrespective of whether they paid for it or not. I do not see this scheme operating properly without receipts, which could be texted to save on paper. Receipts for purchase of goods could also be on texted on future development. There could be many problems around this area with knowing the origin of material Again, individualistic approaches could be taken by the participant retailers in the scheme and the consumer as well in how they approach the scheme. Even though this is a well-meaning environmental initiative, it could be subject to extensive exploitation. There will have to be serious monitoring of the scheme and enforcement of issues which will arise.

## **Encouragement and take up of the scheme**

It is important that there is a good take-up of the scheme and it works very well. There must be no perception that the DRS is a failure or inefficient. Otherwise a toxic mentality could arise where people start to think that they have paid a charge and because they are too far from a collecting point or other excuse, that they can throw a receptacle whether ever they like. This is a very real danger. The locality of collection points will be crucial and central to the success or not of the scheme.

**You may publish this submission in full.**

[REDACTED]

[REDACTED]

[REDACTED]