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Denis Dunne, Higher Executive Officer
Waste – Policy & Enforcement Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford Y35 AP90

16th November 2020

Re: EPA Response to 'Deposit Return Scheme Consultation Document on Potential Models for Ireland'

Dear Denis,

I write further to the above public consultation. EPA welcomes the opportunity to provide input to national policy-making on this important topic and in the following pages makes some specific comments with regard to the specific discussion points presented.

The comments made in this document are intended to complement previous EPA observations in this area – including that made by the Agency for the public consultation on the Waste Action Plan for a Circular Economy.

EPA broadly welcomes the introduction of measures to reduce consumption of single-use plastics; to enhance waste prevention; and to tackle littering. International experience indicates that Deposit Return Schemes are effective in raising recycling rates and can be operated efficiently & effectively in association with producers, retailers and collectors.

The following pages provide our responses on the specific discussion points raised in the paper. Please do not hesitate to come back to the Agency if further detail or clarification is required on any aspect of this submission.

With best regards,

Mary Frances Rochford

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Programme Manager, Climate Change & Circular Economy

- The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?

EPA considers that the recommendation for a centralised, operational model is appropriate, due to the enhanced control offered by the scheme operator. This approach has worked well in other Irish PRIs. The Agency notes there is a risk with the other models that responsibilities could be shared across many organisations, which would make enforcement and reporting on target attainment difficult to monitor/audit.

It is important that the regulations for this initiative obligate the scheme operators to provide high quality data on plastic bottles and aluminium cans with respect to numbers placed on the market, recycled, and reused.

- If not, do you favour a: a) decentralised / financial DRS; or, b) hybrid.

n/a

- Are there other models you believe could work in an Irish context?

n/a

- What role should waste collectors play in the operation of a DRS?

The Agency recommends that the approach for the DRS is informed by what has worked for other PRIs. For this new waste collection infrastructure, the most efficient collection approaches should be examined, given existing collection systems (including both cost and carbon considerations). Ireland's waste collection system includes operators with suitable infrastructure and systems to service the collection requirements of this DRS. Experience should be sought from other countries about how often reverse vending machines have to be emptied, and the processes involved for retailers with regard to the storage and collection of containers.

- The DRS study proposes a deposit per container of €0.20. Do you think this is appropriate? If not should it be higher or lower or should different deposit rates apply depending on container size?

The Agency notes that there are challenging targets to attain for the target materials of this scheme (plastic and metal packaging recycling targets and a target for separate collection of PET bottles), and so there is a strong need to incentivise consumers to use return beverage containers. The deposit fee needs to be set at a level that consumers feel there is a value in returning them, for those that won't be swayed by the environmental reasons.

The specific amount for Ireland has been identified through an evidence-based process; and is in-line with other similar schemes across Europe. It is noted that the plastic bag levy is currently 22c per bag. On this basis, the proposed deposit per container of 20c seems appropriate.

- Consumers need to know about a DRS long before it becomes operational – do you have any suggestions as to how best the introduction of a DRS can be communicated to the public?

Communication to the public on the introduction of a DRS, will have to be on different levels and platforms, tailored to specific audiences. Print media suits some age groups/demographics, social media for others. It is likely that there will be a large portion of the public open to the introduction of DRS and it should be communicated as a positive story for Ireland's evolution of waste management – moving forward in terms of better segregation and increasing our recycling. The Agency is aware that Wales have built a very strong brand/marketing around pride in the Welsh recycling rates that should be examined.

Communications on the introduction of this DRS should be based on clear and aligned messaging from trusted sources including the government and the EPA. Core messaging should be based on the importance of capturing resources for recycling and reducing litter. The MyWaste.ie website could be used to support messaging on this initiative.

A critical aspect of engaging the public on this initiative would be to build trust that the collected containers are actually being recycled – ideally within Ireland. Testimonials from end-users of recyclates (for example Irish plastics recycling companies) would help to strengthen this message and assure the public that their effort is worthwhile.

- What enforcement measures should be considered in parallel with the introduction of a DRS?

Experience from other PRI schemes should inform the appropriate enforcement for this initiative, with local authorities well-placed to undertake enforcement with retailers and collectors; and a complementary producer-level enforcement operation. Enforcement measures to be considered for the DRS should include fixed penalty notices for administrative and low level offences, including late data reporting.

- How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland?

The DRS should not allow return of containers on which no deposit has been paid. Labelling/tagging approaches should be examined to allow identification and rejection of non-scheme containers either by reverse vending machines or manual receivers.

- Other relevant observations

The DRS is focussed towards recycling rather than reuse. Consideration should be given to how this national scheme might also promote/support reuse initiatives.

It is not clear eco-fee modulation also applies to packaging placed on the market by the DRS producers, but if this is the case, consideration should be given to using this to support the reuse part of a DRS.