

**From:** [Redacted]  
**Sent:** 12 November 2020 09:13  
**To:** wastecomments  
**Subject:** Deposit return consultation

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The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation? **Yes. There needs to also be inclusion of glass bottles in this system. The carbon footprint of single use glass is incredibly high - following a system similar to Germany where glass bottles are refilled will reduce emissions associated with beverage packaging. There is also the potential to collect PET trays - currently in Europe PET trays are seen as a contaminate to PET bottle recycling due to their intrinsic viscosity (IV). We could be the first country who deals with this problem and has a true circular system in place for a set of standard size PET food trays.**

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

What role should waste collectors play in the operation of a DRS? **Waste collectors need to have clearly defined roles by the government with clear rules on what has to be collected in Ireland. The current system where they collect waste themselves and only sort/sell economically viable materials is failing. Government needs to ensure that waste exporting to countries without infrastructure in place is banned.**

**Waste collectors need to look at existing contracts where PET bottles are sold to companies who do not recycle these bottles back to PET bottles. If such contracts exist, there will be a constant leakage of bottles from the system, this therefore needs enforced that while DRS is in operation, a certain % of people will still use their household recycling bins for bottles and these should be collected by waste collectors and fed back into the system.**

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? **20 cent is appropriate for a standard 500ml bottle and a 330ml can. There should be a tiered fee system to ensure consumers bring bottles back. If a 2l bottle is bought, there is less incentive to bring it back as there will be a feeling of content putting it into household recycling as the 20cent is small in proportion to the 2l value.**

What enforcement measures should be considered in parallel with the introduction of a DRS? **Banning of the export of plastic waste to countries without adequate recycling infrastructure. Banning of selling of plastic waste and other waste to cement industry. Setting certain % of plastic waste that has to be recycled in Ireland.**

How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland? **The Taoiseach recently announced a €500 million cross border shared Island fund. There should be cross border co-operation on this issue and we should work with the NI executive to ensure a deposit return system is introduced across the Island of Ireland using some**

of the shared Island fund. The DRS should also work closely with the systems being introduced in Scotland and England to enable large retailers to only manufacture one type of bottle through [REDACTED] schemes.

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