From:

Sent:

12 November 2020 17:01

To:

wastecomments

Subject:

Deposit and Return Scheme

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## A chairde,

I welcome the proposed Deposit and Return Scheme (DRS). It will make a major contribution to addressing the problem of beverage container litter which affects land and sea and is an important element of achieving circularity in production and consumption systems.

Glass litter is a particular problem on land and on beaches, because broken glass is dangerous. It causes particular problems for volunteer and professional litter clean-ups, safety risks for children playing on beaches and puncture risks for vehicles, especially bicycles. The external costs of glass litter including dealing with it are likely to be similar to that of other beverage containers.

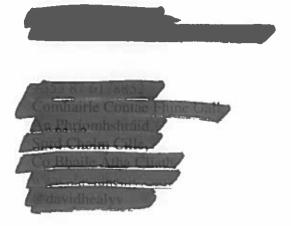
The consultation document says it's not proposed to include glass containers in the scope of the DRS. The Eunomia study seems to be on the basis that a decision has already been taken not to include glass. However it points out that the introduction of a tax to drive the introduction of the DRS would also "[help] to level the playing field so that producers of containers not included in the DRS (such as cartons, pouches and glass bottles) are not deriving a financial and competitive advantage."

I urge you to explain why it isn't proposed to include glass bottles and to reconsider their inclusion, especially smaller bottles which are the dominant form of glass litter.

If it is nonetheless decided not to include glass, I suggest you ensure that

- a) whether by means of tax provisions or otherwise, the overall impact of the system leads to a significant reduction in glass litter.
- b) the system can easily be amended to cover glass containers in the future.

Best regards,





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