

From: [REDACTED]
Sent: 27 October 2020 14:39
To: wastecomments
Subject: TCD Plastic Solutions: DRS Submission

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A chara,

[REDACTED] appreciates the opportunity to make a submission on potential DRS models in Ireland. Our answers to the consultation questions are as follows:

Consultation questions:

- The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?
 - Yes.
- 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?
 - As well as capturing plastic bottles and aluminium beverage containers. The Government should design a scheme that includes all materials and a variable deposit levy, similar to what is found in Scandinavia, i.e. metal cans, plastic water bottles, plastic milk bottles, glass bottles, coffee cups, and drink cartons and pouches. This would encourage sustainable choices by preventing market disruptions that could see producers and consumers substituting less sustainable materials solely because they are not included in the DRS or because the deposit is less expensive.
- What role should waste collectors play in the operation of a DRS?
 - We believe that the concerns expressed by the IWMA are valid - if removing DRS materials from the existing recycling system results in the loss of 1.5 million kerbside collection points, this would pose a critical challenge for domestic recycling rates. So the operation of a DRS must include waste collectors as a key stakeholder to support Ireland's current recycling 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?
 - We support a variable deposit levy based on container size and material.
- 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?
 - This public consultation and the media attention it has already received is a great first step. We would suggest that there be a strategic communications team to coordinate an integrated media campaign across a variety of platforms - whether it be press releases, clear & simple poster campaigns, YouTube ads, or interviews by public representatives on radio shows, TV, etc.

- What enforcement measures should be considered in parallel with the introduction of a DRS?
 - Stricter fines for littering and while this is not strictly an enforcement measure - an increase in on-street recycling bins is also critical to promoting a circular economy.
- How should cross-border issues be treated to ensure producers are not at a competitive disadvantage relative to producers in Northern Ireland?
 - We do not feel qualified to submit an answer to this question.

We look forward to seeing the results of the public consultation.

Le gach dea-ghuif,