



**THE ALUMINIUM PACKAGING
RECYCLING ORGANISATION**

Minister Eamonn Ryan, TD,

Department of the Environment, Climate and Communications,
29-31 Adelaide Road,
Dublin 2,
D02 X285

23-11-21

Dear Minister,

I write to you again on behalf of Alupro Ireland, the not-for-profit organisation representing Ireland's aluminium packaging industry. I would welcome the opportunity to meet with you as the regulations introducing the Deposit Return Scheme (DRS) in Ireland are set out, to highlight the features that the industry considers to be essential for a world-leading DRS and the [proposals laid out by the department](#) on the 19th of November 2021.

- **A deposit that varies by container size** - As you will be aware, a DRS involves a refundable deposit being applied to beverage containers to incentivise consumers to return their beverage containers for recycling or reuse. We support the government's preferred position, set out in the spring consultations earlier this year, to adopt a variable rate of deposit where the deposit will be varied by container volume. As demonstrated by successful DRS in the Nordics and supported by [Alupro research released in 2021](#), a DRS with a variable rate of deposit will deliver significantly higher return rates in the first two years of operation, whilst minimising any potential distortions of the market, or any unintended consequences such as an increase in fraud if there is a disparity between the schemes run in NI and the Irish Republic.
- **Equal but separate targets for each in-scope material** – Challenging, equivalent and achievable targets will ensure that both aluminium cans and PET bottles receive the required attention from the Scheme Administrator to deliver desirable environmental outcomes.
- **No cross-subsidies between in-scope materials** - Different containers have different costs to recycle and different market values, and each container must pay its own way. To prevent cross-subsidisation within the DRS, each included container should have an independent profit and loss statement to ensure complete transparency.
- **Engaging and sustained consumer education and awareness campaigns** - Significant time, investment and effort should be given by the Scheme Administrator to consumer awareness and engagement campaigns that will maximise participation in the DRS whilst reducing confusion. This will be as important before the launch of the DRS as during its early operational period, and we would encourage the Minister to ensure that applications from potential Scheme Administrators consider this. The aluminium industry's long-running and successful Irish "Every Can Counts" programme is well positioned to help any scheme operator fulfil these obligations.



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Alupro Ireland welcomed the regulations set out by the department last week, as we believe a well-designed DRS has the potential to take beverage recycling in Ireland to the next level. However, we were disappointed with some elements of the proposal, which are outlined below:

- **Schedule 1 does not specify the deposit amount to be charged by container, nor indicate if the deposit will be variable or fixed.** Communications from the department state that the government will be in consultation with the scheme administrator to decide this but does not indicate a timeline of when this will be decided or details of the process.
- **The regulations do not stipulate any specific collection or recycling targets for aluminium cans beyond the EU's target rate for all aluminium packaging of 50% by 2025 and 60% by 2030.** Alupro Ireland's members would welcome a target at least as challenging as that being set for PET (90%). Part 3 of the regulations (Paragraph 5, point 1, section c) could contain a reference to this.
- **The regulations do not stipulate that an "Approved Body" (i.e. System Administrator) must hold separate accounts for each included material type.** Each material will have its own collection and sorting costs and Alupro Ireland strongly believe that each material must pay its own way. This should be included in the regulations, and the Minister should only accept applications from an "Approved Body" if they include provisions that prevent cross-subsidising between in-scope materials.
- **There is not commencement date for the scheme included in the regulations.** To ensure that there is adequate time for obligated producers, and their packaging suppliers, to restock the shelves with DRS-compliant packaging carrying the required labelling, the regulations should allow for a period of at least 12 months before commencement.

We are conscious that time is moving on, and that there is now a limited time available to reiterate these important points before you make a final decision. We would very much welcome the opportunity to discuss this issue with you in more detail, so that we can contribute in a meaningful way to designing a best-in-class DRS for Ireland.

We will follow up with your office to discuss your availability in the coming days, with the hope being that we can schedule a brief meeting on Thursday 2nd or Friday 3rd of December.

Yours sincerely,

A handwritten signature in black ink that reads "Tom Giddings".

Tom Giddings

General Manager, Alupro Ireland

About Alupro Ireland

Alupro Ireland's membership comprises the full spectrum of the aluminium packaging 'loop', including producers and rollers; packaging converters; packer fillers; and re-processors and exporters, so we are uniquely placed to represent the industry to policymakers.

We work to fulfil the aluminium industry's obligations to meet, and exceed, recycling targets for aluminium packaging, and so are supportive of a well-designed DRS system in Ireland. We are fully committed to ensuring that any system, which includes aluminium beverage containers, maximises recycling rates and is fair and equitable to all materials.