



**Presentation by Tara Buckley, Director General, RGDATA to the Joint Oireachtas Committee on Communications, Climate Action and Environment on the Waste Reduction Bill 2017**

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Chairperson, Deputies and Senators,

Thank you for the opportunity to present to the Committee on the Waste Reduction Bill 2017.

I am here to represent the owners of 3,500 local independent, family owned shops, convenience stores, forecourt stores and supermarkets. RGDATA members are community based retailers who share the concerns that this Bill seeks to address about the need for waste reduction, increased recycling and reduction in single use plastic packaging, food and beverage containers and utensils.

The local independent retailers that RGDATA represents have played a significant role to date in the dramatic increase in Ireland's recycling rates from 15% in 1997 to 90% in 2016. Our members pay significant fees to Repak to fulfill their waste management and recycling objectives and to comply with Irish and EU regulations. We are also active in our communities encouraging reuse and recycling with many RGDATA members hosting recycling centres on their sites and proactively working in their stores to follow best practice guidelines,

providing staff training on waste management, appointing green champions in their stores and adopting initiatives to reduce the amount of waste going to landfill and to be more efficient in our use of natural resources.

Many of our members are already trialling initiatives to encourage their customers to use reusable beverage containers.

The shop owners that RGDATA represents are genuine “green grocers” and take their responsibilities in this area very seriously.

In principle, RGDATA members welcome any initiative which helps to reduce waste and contributes to consumers and retailers having more sustainable choices concerning packaging of food products. Accordingly we are supportive of the general aims and objectives of this Bill. However we do have concerns about aspects of this Bill which we feel need to be addressed to ensure that any new legislative measures achieve their objectives without unintended consequences. We also believe that any new proposals should be rigorously tested to ensure they will deliver value for money and that they will actually deliver on their objectives.

There are two elements to the Bill – the banning of non-compostable disposable beverage containers and tableware from 2020 and the introduction of deposit and return schemes for sealed beverage containers from July 2019.

In relation to the first provision of the Bill, banning non compostable containers and tableware, it is important that consumers and retailers have ready access to affordable substitutes to the products currently being used typically for food to go in shops and other outlets.

There are concerns within the Trade at both the cost and availability of substitutable alternatives which will be available in the numbers likely to meet the anticipated demand.

Unlike the plastic bag levy, where people could bring their own bags to a shop and customers adapted very quickly to this, there are concerns within the sector that a significant proportion of consumers will be less inclined to bring their own coffee cups, containers or glasses to shops and will be reliant on the food or beverages continuing to be supplied in containers and with utensils from the shop.

Consequently it is important that there are cost effective and substitutable alternatives available to both retailers and consumers before any ban on the existing implements is introduced. And retailers have shown that once alternatives are available they will fully embrace any initiative designed to reduce unnecessary or unsustainable waste.

On the bring back scheme proposals in the Bill we have serious reservations about how this scheme will operate and about the impact the new scheme will have on the existing producer compliance scheme to which retailers contribute. As I have pointed out RGDATA members currently pay annual fees ranging from

around €1,000 to €3,500, depending on the size of their store and the amount of packaging they put on the market, to REPAK, which in turn makes a significant contribution to the cost of recycling packaging waste in Ireland.

There is concern that a new deposit and return scheme for beverage containers would undermine the rationale and justification for supporting REPAK by my members and amount to a form of double compliance with regulatory obligations with significant extra costs for the smaller retailer.

There are also concerns that such a scheme would be very expensive to set up and that the design of the scheme would need to take account of the place of sale for particular beverage products. For example if a larger retailer is putting beverage containers out into the market place, then that retailer should have a commensurate responsibility to take back those products in proportion to the volumes put onto the market. It would be an unfair system if smaller retailers found themselves inundated with beverage containers which had been purchased at larger outlets, in circumstances where they would need to install the relevant infrastructure to manage, store and fund a deposit and return scheme for products that they did not directly put on the market.

The scope of the deposit and return scheme also needs to be clarified – is it intended to refer to all beverage containers – or just to plastic containers? I am not aware of any specific challenges concerning glass bottles, which do tend to have relatively high recycling rates. This would need to be clarified.

So in general we are very supportive of the principle of reducing packaging waste, but believe that the design of any legislative measure needs to take due regard of the practical consequences of enactment on both consumers and retailers. There is no point in bringing in new restrictions where easily substitutable alternatives are not available or which serve to undermine existing producer responsibility schemes which are working well.

It is also important that they do not place a disproportionate burden on smaller retailers, by making them accountable for the sale practices and trading volumes of larger retailers. This would fly in the face of the polluter pays principle if the larger retailers are effectively able to pass their collection obligations onto smaller and more dispersed retailers. We are also concerned that this new scheme would not provide value for money – it could put a considerable cost burden on struggling local shops without delivering any significant benefits.

I would be happy to answer any questions from Committee members.