



**Chambers
Ireland**
Advancing business together



Review of the WEEE/ Batteries Producer Responsibility Schemes

Submission by Chambers Ireland

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are affiliated Chambers in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Questions

Question 6: Do you think that competition and choice in the number of Producer Responsibility Organisations available for WEEE and Batteries has brought value to the sector and to circularity?

We strongly support the principle of competition and choice within the Producer Responsibility Organisation landscape. The availability of multiple PROs for WEEE and Batteries has demonstrably added value to both the sector and Ireland's broader circular economy goals. Competition fosters innovation, drives service improvements and ensures that producers can access compliance solutions that are tailored to their operational needs and budget constraints.

Cost-effective compliance is essential. In a dual-PRO system, businesses can compare offerings and select the most suitable provider, which then encourages PROs to remain responsive, transparent and effective. This dynamic is especially important in the context of the EU Waste Framework Directive, which mandates that PROs charge only the 'necessary cost' to producers. Without competition, it becomes difficult to benchmark what is truly necessary and producers may face inflated costs without recourse.

Competition between PROs contributes to circularity by encouraging diverse approaches to collection, recycling and public engagement. Different models can coexist and complement national targets¹.

Our submission to the Department on the Waste Action Plan for a Circular Economy² emphasised the need for policies that protect businesses during the transition to circularity. Maintaining a competitive PRO environment aligns with this goal and ensures that producers are not burdened

¹ For example, WEEE Ireland's community-based battery recycling campaigns and ERP Ireland's pan-European compliance innovations. <https://www.weeeireland.ie/battery-recycling-challenge/in-the-community>, <https://erp-recycling.org/ie/who-are-we>

² https://www.chambers.ie/wp-content/uploads/2020/02/Chambers-Ireland-submission-to-the-DCCAE-on-the-development-of-a-Waste-Action-Plan-for-a-Circular-Economy_final-February-2020.pdf

by unnecessary costs or rigid compliance structures. We recommend preserving and strengthening the current model, recognising its role in supporting both environmental and economic resilience.

Question 8: Have you ever switched from one compliance scheme to another? If so, why and were there any barriers to switching?

While we are not providing a submission from the perspective of a singular company, our members note that the primary motivations for companies switching compliance schemes have typically been cost-related, with businesses seeking more competitive pricing structures, as well as improved customer service and administrative support³. In some cases, businesses have moved to schemes that offer clearer guidance, more responsive communication or better alignment with their operational needs.

However, switching is not always straightforward. Members have reported encountering administrative hurdles, such as inconsistent reporting formats, insufficient system compatibility and delays in onboarding. These barriers can be particularly challenging for smaller businesses with limited resources. The absence of a streamlined process for transferring compliance data between schemes can also lead to duplication of effort and increased risk of non-compliance during the transition period.

We believe that these barriers undermine the potential benefits of competition. We have previously emphasised the importance of supporting businesses in their transition to more sustainable practices without compromising competitiveness⁴. This principle applies equally to the operation of Producer Responsibility Organisations. If businesses are to be encouraged to

³ https://erp-recycling.org/wp-content/uploads/2021/07/adelphi_study_Analysis_of_EPR_Schemes_July_2021.pdf

⁴ <https://chambers.ie/the-waste-action-plan-for-a-circular-economy>

engage actively with circular economy goals, they must be able to do so without facing unnecessary administrative burdens.

We recommend that the Department consider introducing a standardised switching protocol across PROs, including harmonised reporting templates and a centralised compliance data portal. This would reduce friction, improve transparency and ensure that producers can make informed choices based on service quality and cost. Ultimately, a competitive and accessible compliance landscape is essential to achieving the dual goals of environmental sustainability and economic resilience.

Question 10: What impact, if any, would a single PRO system model have on your business, i.e. one PRO only?

Consistent with our answer to question 8, while we are not contributing our submission as a singular company, our members are concerned that moving to a single PRO model would reduce competition and increase costs for producers. In a monopolistic system, the absence of market pressure can lead to inefficiencies and diminished responsiveness to producer needs. Without the ability to choose between providers, businesses may be locked into pricing structures and service models that do not reflect their operational realities.

Our members consistently highlight the importance of cost control in compliance. The current dual-PRO system allows producers to compare offerings and select the scheme that best suits their needs. This choice incentivises PROs to remain competitive, transparent and service-oriented. Removing these dynamic risks creates a one-size-fits-all model that may not accommodate the diversity of Ireland's business landscape.

We have consistently called for waste policy reforms that support businesses in their transition to circularity without harming competitiveness. A single PRO model would run counter to this principle. It could also limit the sector's ability to adapt to evolving EU regulations, such as the expansion of Extended Producer Responsibility schemes under the Circular Economy Action Plan.

Additionally, competition between PROs has driven innovation in public engagement, collection logistics and recycling technologies. For example, different schemes have piloted community-based battery recycling initiatives and digital compliance platforms. These innovations are less likely to emerge in a monopolised environment.

We ask the Department to retain a multi-PRO model and to strengthen regulatory oversight to ensure transparency, accountability and fair pricing. We also recommend that any future reforms include mechanisms for benchmarking costs and service quality across PROs, so that producers can make informed decisions. Sustaining choice is not only good for business but also essential for building a responsive circular economy.