



**Chambers
Ireland**
Advancing business together



Chambers Ireland Submission to the Department of the Environment, Climate, and Communications consultation on removing the self-compliance option for packaging producers under the European Union (Packaging) Regulations 2014

October 2022

Chambers Ireland's Perspective:

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce 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.

Our Network has pledged since 2019 to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), advancements in gender equality (SDG 5), viable industries, innovation, and infrastructure (SDG 9) and progress in climate action (SDG 13).¹

We use the SDGs to interpret and prioritise our policy proposals. Sustainability underpins our work and waste management is very important to our network, as it is an integral part of our Circular Economy response. As the voice of the Irish business community, we are uniquely well-placed to contribute to the national conversation on Climate Action and Circular Economy.

¹ The Chambers Ireland SDGs. Available at: <https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/>

Chambers Ireland members are keenly interested in Waste Management, Reusables and Circular Economy leading to our support for these policies. Irish businesses understand the importance of the transition to more sustainable and circular practises and the opportunities that it presents. The transition provides businesses with the chance to reduce costs, make supply chains more robust and increases economic opportunities by allowing businesses to diversify into new models and markets.²

We acknowledge the commitment to strengthen the Extended Producer Responsibility (EPR) through [Programme for Government \(PfG\)](#). The application of Extended Producer Responsibility (EPR) ensures that waste management costs can be minimised where materials and products are managed in an environmentally effective manner throughout their life cycle. The network is supportive of the polluter pays principal whereby those who are involved in the production of pollution also bear the costs of managing and treating it. By ending self-compliance as an option under EPR, it will not only be easier for businesses to comply fully, but it will also incentivise them to reduce packaging waste altogether. Therefore, the effort to end self-compliance as an option under EPR is welcomed.

It is in our view that these draft regulations will assist in the simplification and standardisation of recycling of the packaging waste for businesses. It will help them ensure total compliance, optimise sustainable packaging, and reduce the waste. This in turn will expediate the achievement of Ireland's waste management and recycling goals. Chambers Ireland is in support of the draft regulations.

However, there are evident risks associated with Repak being granted such huge responsibilities. Therefore, we strongly recommend that this area should be closely regulated to reassure businesses that fair practices will be carried out.

We suggest:

1. Formation of a team to ensure that there are no excess profits are made. This team would also formulate price-capping regulations and regulations for quality of service. This team, in collaboration with service provider, and the Environmental Protection Agency should have an education and training

² <https://www.chambers.ie/wp-content/uploads/2021/10/Chambers-Ireland-response-to-the-general-scheme-of-the-Circular-Economy-Bill-2021.pdf>

mandate to help businesses design more sustainable packaging. Packaging should be designed to reduce environmental impact, for reuse, for recycling, and minimisation of waste. The main goal is to incentivise businesses to reduce excess packaging.

2. Price capping – Price capping should be considered to protect the interest of businesses and ensure that prices will not be increased to a point where businesses could become uncompetitive.
3. We have highlighted that waste policy must be designed to support businesses who have already made changes to their supply chains so that they can remain competitive.³
4. It is also important to our network that the transition to a circular economy is done in a way that is cost-efficient for business who are already dealing with rising costs.
5. Regulation of quality of service – Regulations should be put in place so that Repak meets/maintains minimum standards of service. Regulators should examine the quality of service provided to businesses. Checks and balances should include making sure that the collection of waste is carried out in a timely fashion and the sorting of the waste is done correctly.
6. We would further recommend that Repak should investigate and implement more efficient and innovative methods of recycling the packaging waste. This can be done by informing and educating businesses on how to design packaging so that it is easy to treat, reuse and recycle. They should train businesses to track their waste generation. Tracking and adopting sustainable methods of designing packaging will help businesses in their waste reduction goals.

³ <https://www.chambers.ie/the-waste-action-plan-for-a-circular-economy/>