



**Ireland's New
Deposit
Return
Scheme**

Distributor/Wholesaler Webinar

10th April 2024



AGENDA

Welcome & Introduction

Progress, Successes & Trends To Date

Registration Requirements & the New Distributor Category

Export Stock Guidance

Deposit Refunds

The Transition Period

Enforcement

Helpful information

Q&A

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Alan Pearson, CIO

Sara Alexander, Distributor Lead

Welcome and Introduction

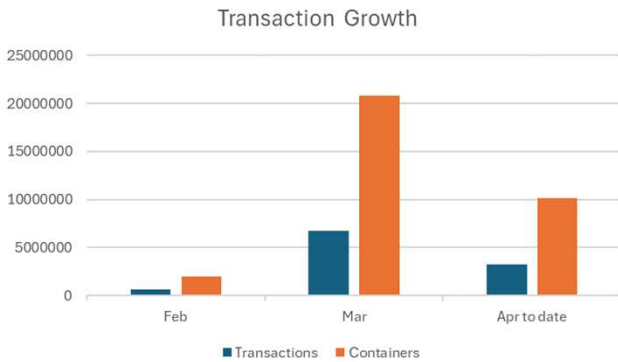
Our Strategies for Future Success:

- Customer centricity
- Positive engagement
- Ensuring reliability and efficiency of the Re-turn scheme
- Empowering Distributors
- Commitment to continuous improvement
- Pledge to maintain open communication.

Re-turn Dashboard

Collections Cumulative Since Go-Live

- This chart illustrates the total number of transactions since Go-Live.
- The total number of containers accepted is 33M to a deposit value of €5.79M.
- 10.7M transactions have been made from 1588 separate premises and 2238 individual RVMs.
- The total number of separate barcodes returned is 3168.
- Over 10M containers were collected in the first week of April.



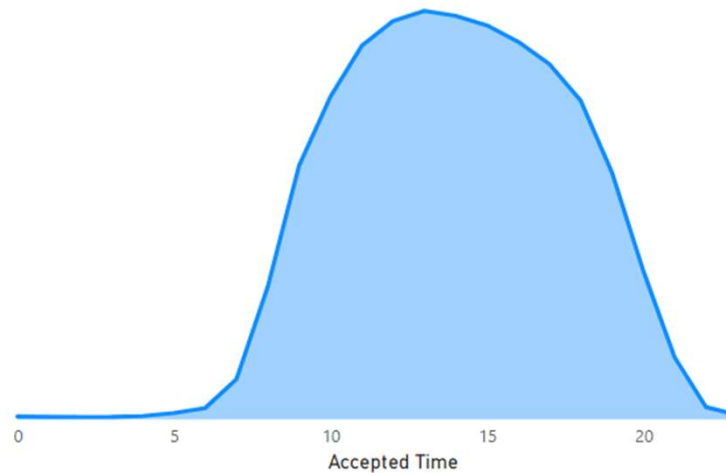
Re-turn

Accepted Collections Overview

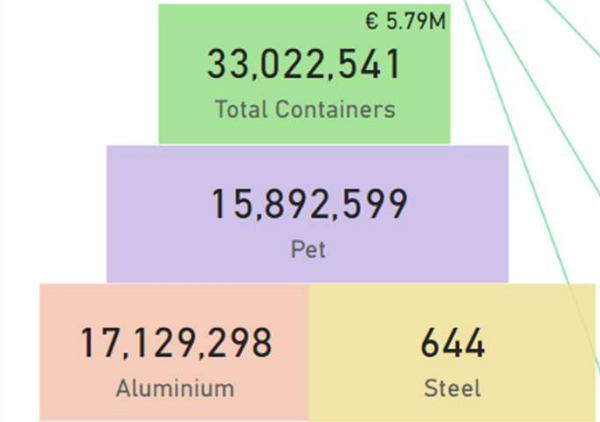
Year, Month, Day, Time | RVM Supplier | RVM Serial Number | Retailer Name | City/Town
 Multiple selections | All | All | All | All

1,588 Premises
2,237 Connected RVMs
10.74M Transactions

Transactions Timeline



Material Accepted



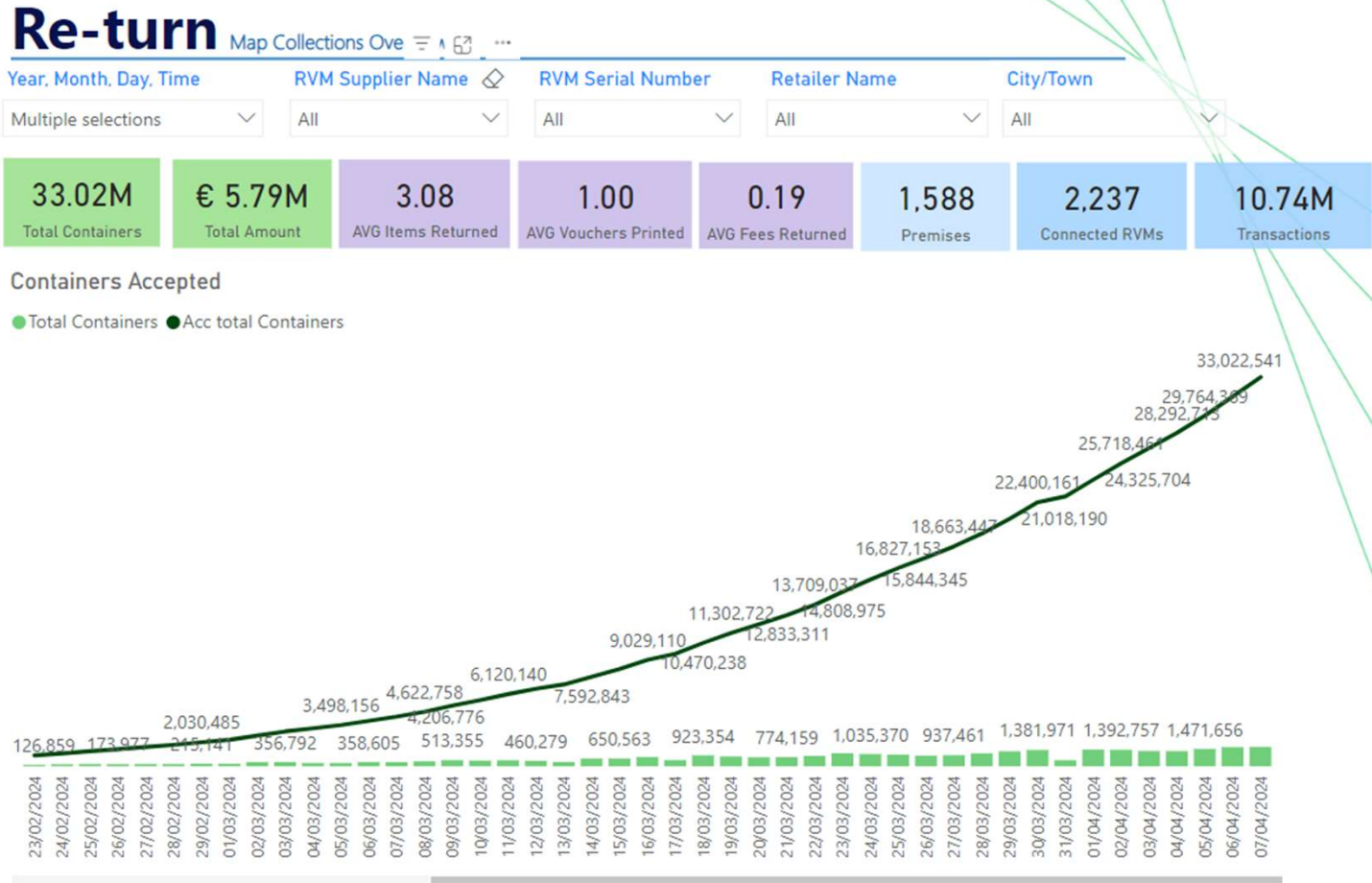
Containers Type



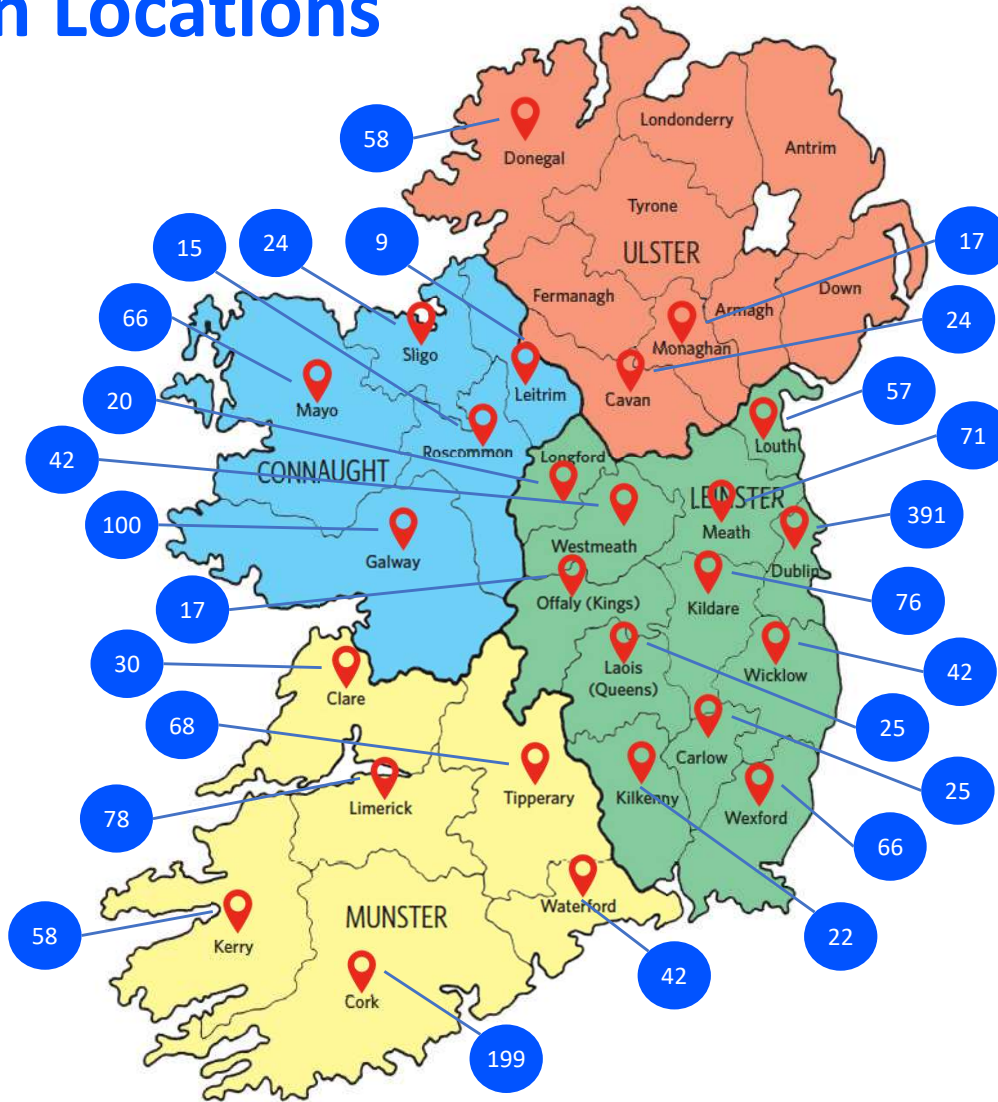
Re-turn Dashboard

Cumulative Since Go Live

- This demonstrates the cumulative growth in containers returns since Go Live.
- Collection performance continues to increase week on week.



Re-turn Locations



Total Number of RVMs online 2348

Total Number of Return Locations Mapped 1642

- The volume of containers returned in March peaked at 20M and the volumes have increased with 10M containers returned in the first week of April and this growth is expected to continue.
- The availability of the RVM estate is critical to manage the increasing volumes.
- We are working with Retailers and RVM vendors to drive up the availability.
- This include ensuring that staff are trained on the maintenance of the RVM and any issues are escalated to the RVM vendor support team for resolution.



Registration Requirements

Up until recently 2 categories were **included** in the regulations:

Producers

Businesses that produce or import in-scope products and are the first to place them on the ROI market.

Retailers

Businesses that sell/supply in-scope products to the final consumer.

Registration Requirements

It was quickly identified that the definition of Retailer did not apply to wholesalers because wholesalers sell/supply to other businesses rather than the final consumer.

Many of the regulatory obligations for retailers are related to their sales to the final consumer, including takeback requirements.

As wholesalers do not sell to the final consumer, it was clear that their obligations should not include obligations related to consumer sales.

While a solution was created, qualifying wholesalers needed to register as Retailers.

Registration Requirements

Depending on their business, wholesalers may need to register as:

- ✓ Producer Only
- ✓ Retailer Only
- ✓ Retailer and Producer

Registration Requirements

Producer Category

Do you import or produce in-scope products for the ROI market?

Yes

No

You are a Producer.
You must complete producer registration

Not a Producer
No requirement to register as producer



Wholesalers

Retailer Category

Do you sell/supply in-scope products registered under other Re-turn producers?

Yes

No

You are a Retailer.
You must complete retailer registration

Not a Retailer
No requirement to register as retailer

The Current Wholesaler Registration Journey

Registration Requirements

Wholesaler Transaction Type	Current Registration Requirements	
	Retailer	Producer
Only sells in-scope products <u>they import or produce themselves</u>		✓
Only sells in-scope products registered <u>under other Re-turn Producers</u>	✓	
Sells in-scope products they import or produce as well as products registered under other Re-turn producers	✓	✓

Registration Requirements

New “Distributor” Category

The Regulations have now been updated to include a separate stakeholder category in addition to Producer and Retailer, the Distributor category.

The Distributor category was created to replace the Retailer category for wholesalers/distributors that sell/supply products registered under other Re-turn producers.

The new distributor category has no impact on the Producer obligations for wholesalers.

Distributor Definition:

“distributor” means a person who sells or supplies an in-scope product by wholesale, and “distribute” shall be construed accordingly;

Registration Requirements

Producer Category

Do you import or produce in-scope products for the ROI market?

Yes

No

You are a Producer.
You must complete producer registration

Not a Producer
No requirement to register as producer



Wholesalers

Retailer Distributor Category

Do you sell/supply in-scope products registered under other Re-turn producers?

Yes

No

You are a Retailer, Distributor
You must complete distributor registration

Not a Retailer, Distributor
No requirement to register as distributor

The **Current New** Wholesaler Registration Journey

Registration Requirements

Wholesaler Transaction Type	New Registration Requirements	
	Retailer Distributor	Producer
Only sells in-scope products <u>they import or produce themselves</u>		✓
Only sells in-scope products registered <u>under other Re-turn Producers</u>	✓	
Sells in-scope products they import or produce themselves as well as products registered under other Re-turn producers	✓	✓

Registration Requirements

What does this mean for you?

We don't expect the new Distributor registration to be live on the portal until late Aug/Sep.

If you have already completed registration, expect minimal to no interruption.

We expect to migrate existing registration data so that those wholesalers that fall under the Retailer category will be moved to the Distributor category.

This process does not apply to Producer only Distributors. Your registration requirements remain unchanged.

Our goal is to make this category transition as smooth and easy as possible for you.

Note- If your business includes distribution sites as well as retail sites, you will need to be registered as both Distributor and Retailer. Vending machine operations fall into the Retailer category.

Registration Requirements

Please ensure you are registered correctly

If, after reviewing the registration requirements, you believe you may not have registered under the correct category or need to add the Producer or Retailer category, please do so immediately.

Please contact us at wholesalers@re-turn.ie if you have any questions or concerns regarding your registration.

Export Stock Guidance

Wherever possible, out-of-scope, non-Re-turn barcode stock should be used for export sales

- These non-Re-turn products do not include a logo or deposit and cannot be placed for sale on the ROI market
- Out-of-scope, non-Re-turn products may be sold by/purchased from ROI producers/wholesalers exclusively for the purpose of export sales
- This presents the lowest risk to the scheme and is the preferred option

Export Stock Guidance

International Re-turn barcode stock may be used for export sales where there is no alternative

- If stock with an international Re-turn barcode is being sold exclusively for the purposes of export and there was never an intention for that stock to be placed on the ROI market, the producer/wholesaler is not required to charge a deposit.
- The producer has the right to charge a deposit on any international barcode stock as they determine necessary. Wholesalers/distributors are obliged to pay a deposit on international barcode stock if the producer charges a deposit at the point of purchase.
- If there is any chance products may be placed on the market in ROI, a deposit must always be charged.

Export Stock Guidance



Is the product being sold or intended to be placed on the consumer market in ROI?

Yes

Is it Export or Domestic?

This is considered a domestic sale

Not Sure

This must be treated as a domestic sale.

No

This is considered an export sale

Which Barcodes are acceptable?

ROI Only

(National)

International

(shared)

Out of Scope
Non-Re-turn

Export Stock Guidance

Transaction Type	International Re-turn Barcodes	
	Deposit Must be Charged	Deposit Not Required*
Producer to Wholesaler		
All stock is intended to be placed on the market in ROI	✓	
All stock is intended to be placed on the market outside of ROI to NI or another jurisdiction		✓
Wholesaler is unsure or cannot demonstrate if stock will be sold in ROI or as export to NI or another jurisdiction	✓	

*- The producer has the right to charge a deposit on any international barcode stock as they determine necessary. Wholesalers/distributors are obliged to pay a deposit on international barcode stock if the producer charges a deposit at the point of purchase.

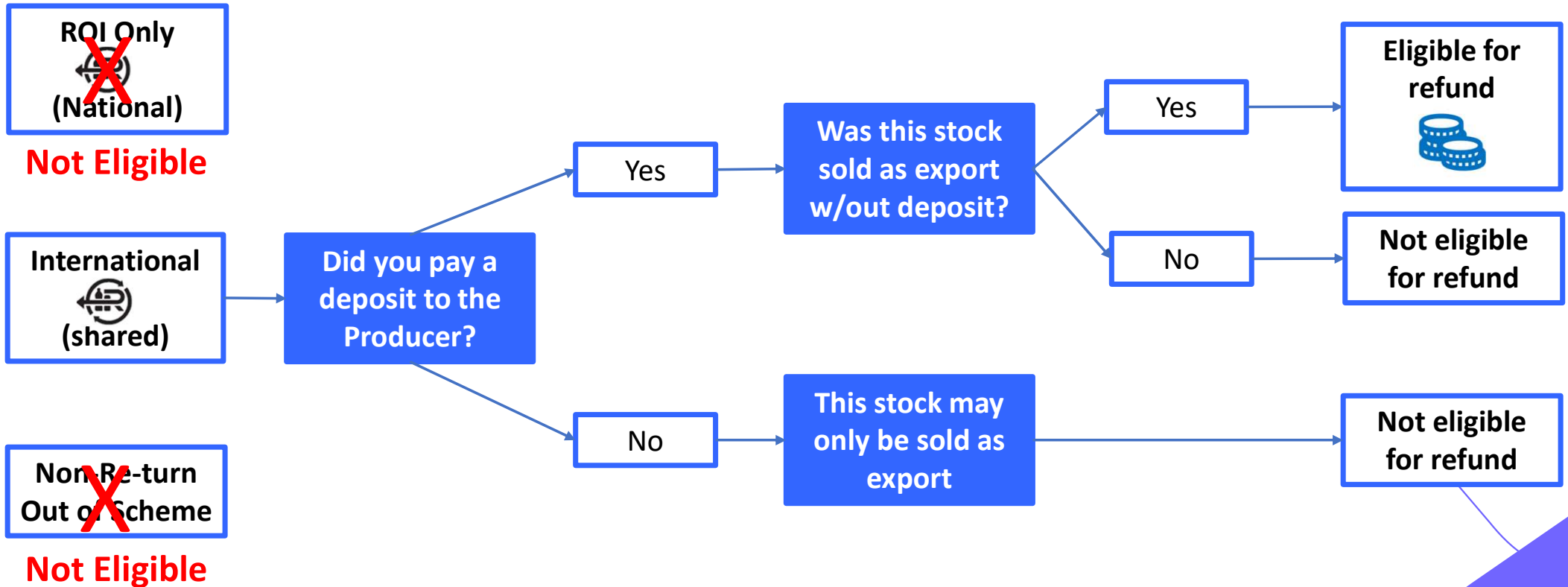
Deposit Refund Process

When is it possible to seek a refund on deposits paid?

- Only applies to Re-turn international barcode stock
- The distributor has paid the producer a deposit on the relevant stock
- The distributor has gone on to sell the international barcode stock outside of ROI to NI or another jurisdiction as export stock and the export customer is not obliged to pay a deposit.

Deposit Refund Process

When can I seek a refund on deposits?



Deposit Refund Process

How do distributors seek a refund where eligible?

We are in the process of developing the deposit refund process for in-scope products with international barcodes which are being exported.

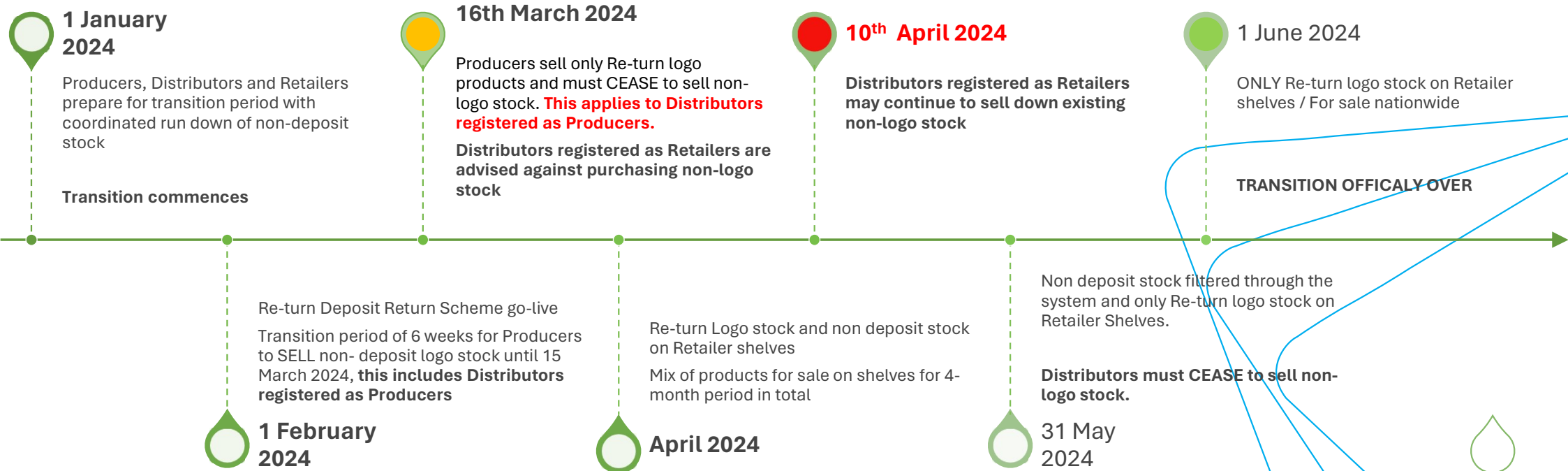
How can distributors eliminate the need to seek a refund?

Distributors can eliminate the need for requesting deposit refunds by purchasing out-of-scope, non-Re-turn barcode stock for export-only sales.

These non-Re-turn products do not include a deposit and cannot be placed on the ROI market.

Non-Re-turn products may be purchased from ROI producers exclusively for export sales

Distributor Transition Timeline



We set a transition timeline for the deposit return scheme to ensure convenience for distributors, clarity for consumers, waste prevention, and to make a clear, direct statement about the shift in policy and a timeline for a bedding down of the scheme for all stakeholders.

Enforcement

The Enforcement of the DRS Regulations will be a national priority in 2024

Regulation 19 of the DRS Regulations outlines the responsibilities of the Local Authorities in this regard:
“Each local authority shall be responsible for the enforcement of the provisions of these Regulations within their functional areas and shall appoint authorised persons to take such steps as are necessary for this purpose.”

Offences, Prosecution and Penalties are set out in Regulations 20 and 21

Re-turn have been supporting the WERLAS (Waste Enforcement Regional Lead Authorities) in the development of their Enforcement Plans for DRS (guidance documents, templates, training materials etc.) & in enabling access to data from the scheme for enforcement

The enforcement authorities will focus on ensuring that all in-scope stakeholders are compliant with the Regulations

- The transition period for Producers ended on 15th March - and only in-scope products which comply with the requirements of the Regulations may now be placed on the market.
- Post 31st May, the focus will be on ensuring correct application of the deposit and that only DRS stock is being sold

All instances of potential fraud will be investigated by the enforcement teams.

Helpful Information

Link to Export, Airport and Maritime Guidance-

Our detailed guidance around treatment of export stock and stock sold to airports and maritime ports:

[Export-Airport-and-Maritime-Stock-Guidance-for-Producers-and-Wholesalers-v1.0-Feb-2024.pdf \(re-turn.ie\)](#)

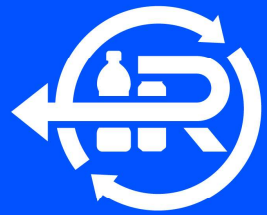
Reporting businesses you suspect may be acting non-compliantly:

- Please report to enforcement@re-turn.ie . We will follow up and share up enforcement authorities.

To request a Compliance Certificate stating that you are not a Takeback Location:

- Please contact us at wholesalers@re-turn.ie

For any other questions, please contact us at wholesalers@re-turn.ie



Re-turn

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Thank you!

