



# Re-turn

## **EXPORT, AIRPORT AND MARITIME STOCK GUIDANCE**

FOR PRODUCERS AND  
WHOLESALEERS/DISTRIBUTORS

# **Table of contents**

- 1. Scope**
- 2. Products Sold for Export Only**
- 3. Products Sold to In Port Duty Free Shops**
- 4. Products Sold to In Port Non-Duty Free Business Customers**
- 5. Document Version History**

## 1. Scope

The purpose of this document is to provide guidance for producers and wholesalers/distributors around the sale of in-scope stock to travel ports, such as airport and maritime customers.

Re-turn understands it can be difficult to determine how to treat sales of stock to business located in/departing from travel ports in the Republic of Ireland(ROI). We are committed to providing clarity around these sales so that producers and wholesalers/distributors can be confident they are acting in a compliant manner.

## 2. Products Sold for Export Only

If the producer/wholesaler is producing/selling goods for export only and consumption outside of the Republic of Ireland(ROI), then those goods are not within the scope of the Re-turn scheme.

Products sold for in-flight/on-board catering on airlines or ships departing the Republic of Ireland(ROI) are classed as exports, as they are not for sale on the market in ROI.

These products do not need to be registered with Re-turn and can be produced/sold without a Re-turn logo, Re-turn barcode or deposit charge.

Out-of-scope, non-Re-turn barcode stock should be used for export sales wherever possible. Where out-of-scope stock does not exist, it is acceptable for the producer/wholesaler to sell products registered with Re-turn with an international barcode only. ROI specific barcodes may never be sold for export purposes.

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. Any products sold exclusively for export purposes with an international Re-turn barcode where no deposit has been charged should not be submitted as part of the producer's monthly sales volumes to Re-turn as these products have never been placed on the market in ROI.

**Please Note-** "placed on the market" refers to when a product is sold/supplied for distribution, consumption or use in the State (i.e. intended for sale/supply on the ROI market) for the first time. Products which will not be sold/supplied on the ROI market do not fall into this definition, even if those products are otherwise handled in the State.

Placed on the market refers to individual products and the burden of proof rests with the relevant producer or wholesaler/distributor to verify 'placed on the market' for each product it supplies.

Enforcement authorities may seek documentation from producers and/or wholesalers/distributors which provides evidence that a product was not placed on the market in the State (e.g. invoices, sales agreements, delivery documents etc).

### 3. Products Sold to In Port Duty Free Shops

#### Sales of Alcoholic Products to Duty Free Shops:

If the producer/wholesaler is selling alcoholic products to a duty free shop, a deposit should not be charged. These products are not intended to be consumed in the airport/seaport and are effectively exported outside of ROI. As sales of alcoholic products to a duty free shop are considered export sales, please see Section 2 of this document- "Products Sold for Export Only".

A duty free shop selling alcoholic products to the consumer should not charge a deposit on these products as these are not intended to be consumed in the airport and are effectively exported outside of ROI.

#### Sales of Non-Alcoholic Products to Duty Free Shops:

If the producer/wholesaler is selling soft drinks or other non-alcoholic in-scope products to the duty free shop, a deposit must be charged as this is considered a standard domestic sale. These products must be registered with Re-turn and include a Re-turn logo and Re-turn barcode(ROI specific or international).

A duty free shop selling soft drinks or other non-alcoholic products to the consumer must charge a deposit on these products as this is considered a standard domestic sale. These products must be registered with Re-turn and include a Re-turn logo and Re-turn barcode(ROI specific or international).

### 4. Products Sold to In Port Non-Duty Free Customers

If the producer/wholesaler is producing/selling goods to non-duty free business customers in the airport/seaport (airside or landside) and these products can be consumed in the airport/seaport or brought on a plane/ship, a deposit must be charged as this is considered a standard domestic sale. These products must be registered with Re-turn and include a Re-turn logo and Re-turn barcode(ROI specific or international).

To facilitate returns of these in-scope products and refunding of the deposit to consumers, WH Smith & Boots have agreed to operate manual return points in major Irish airports.

### 5. Document Version History

This document may be updated from time to time as required. For an overview of relevant updates to this document, please refer to the table below:

Section	Update	Date
Full	Version 1.0 Issued	Feb-2024