



28th June 2018

Comments and recommendations with regards to the Beverage Container Refund Scheme (BCRS)

Friends of the Earth Malta (FoE Malta) supports the introduction of the Beverage Container Refund Scheme (BCRS) and is pleased that a deposit scheme will be implemented by the end of 2019. Upon reading the proposal document that has been put forward by the Ministry for the Environment, Sustainable Development and Climate Change (MESDC), FoE Malta would like to contribute the following comments and recommendations.

The BCRS will be introduced as a measure to reach recycling targets by capturing containers that are classified as being recyclable but are currently escaping this waste stream. We believe that to achieve this goal it is important to **make the BCRS more comprehensive and extending it to other packaging** that were not mentioned in the BCRS proposal. This will not only increase recycling rates, but also increase consumer awareness of the importance of recycling, while not discriminating against specific businesses.

1. The **scheme should tackle all beverage containers** including wine, spirits and liquors bottles. This would encourage the reach of higher recycling targets and also does not introduce a disadvantage towards producers of certain beverages.
2. The **scheme should be widened to the plastic packaging of other products** that have a relatively low viscosity but are not beverages, such as food items (eg. Syrups, vinegar, dressings), and hygiene products (laundry liquid, liquid soap, household cleaning liquid products).
3. The **scheme should include other packaging** (not plastic) that contain other food items, such as jars for pickles, etc.
4. We agree with making no distinction between size of bottle for the scope of the BCRS; this links to points proposed above on broadening the scope of the return scheme.

Since the return scheme will operate by charging a deposit, this deposit fee is important as an incentive for consumers to return the containers. The following are recommendations with regards to the deposit fee and also our views on enforcement to ensure that no party takes advantage of the scheme.

5. **Deposit for each bottle should be more than 10c. A rate of 25c per container, or higher**, is more adequate since it will increase return rates of containers. This is especially true when considering tourists and visitors in Malta who would need a further incentive to trade their time for a deposit return. Having a higher deposit charge will also introduce a value for material resources that go into the production of

the container. This in term may lead to higher recycling rates in the future, if this scheme is paired with an educational campaign.

6. Further **monetary incentive should be given to people who opt for refillable containers**. For example, a consumer who is using a reusable container can pay a deposit of 20c and get a return of 25c. The cost of such a measure can come out of the money collected through the Beverage Containers Refund Fund.
7. **Important to ensure that hotels, restaurants and cafes do not take advantage of this scheme**. Enforcement and monitoring should be put in place to check that these businesses are not charging clients the deposit fee if the consumer is having the beverage on the premises.
8. **Criminal offence fines proposed (especially those on the lower spectrum) may not be sufficient** to prevent businesses not placing beverage without the barcode, on the market. To ensure that they are effective, fines should be coupled with the number of beverage containers placed on the market. More rigorous actions must be taken if an offender commits the same criminal offence more than once.

Accessibility of the Reverse Vending Machines (RVMs) is crucial for the BCRS to be effective. Ensuring that they are available where necessary to capture the containers is crucial, and hence we have the following recommendations:

9. **Reverse Vending Machines (RVMs) should be introduced in every locality to ensure accessibility for people with limited mobility** (such as the elderly, those with physical mobility disadvantages, children, etc.) who may find it difficult to access RVMs in larger retail shops. An alternative for introducing RVMs in every locality in Malta is considering the use of public sites such as school, local councils or other government premises.
10. **RVMs should be introduced at a higher density in localities in Malta where there is a more tourist activity**. RVMs should be introduced at the airport to ensure that facilities are available prior to people leaving Malta.
11. All **places that do have RVMs should also have a recycling bin next to the machines** to ensure that containers brought by consumers that are not eligible for the return scheme, will still end up in the intended waste stream.

We look forward to the uptake of these recommendations and the initiation of the BCRS.

Sincerely,



Anastasia Caruana Finkel

Friends of the Earth Malta