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Sent: Tuesday 8 June 2021 12:22
To: circulareconomy
Subject: Submission
Attachments: Circular Economy Strategy Submission_Final.pdf

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Dear sir/madam,

Please find a attached a submission from Cré.

Kind Regards

Percy

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Composting & Anaerobic Digestion
Association of Ireland

Submission to the

Department of Environment, Climate and Communications

On

Draft Circular Economy Strategy

From:

**Cré – Composting and Anaerobic Digestion
Association of Ireland**

June 8th, 2021

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1. Introduction

Cré welcomes the opportunity to comment on the public consultation on the draft Circular Economy Strategy.

About

Established in 2001, Cré is the Composting and Anaerobic Digestion Association of Ireland. Cré (which is the Irish word for 'soil'), is a non-profit association of public and private organisations, dedicated to growing the biological treatment sector. Cré supports the production of high-quality outputs, assists the delivery of Government waste diversion and bioenergy targets and promotes the creation of sustainable indigenous jobs.

Cré has a broad membership base ranging from compost and anaerobic digestion facilities to waste companies, local authorities, technology providers, local authorities, consultants and third level colleges. Cré is recognised by Government and agencies as the voice of the industry in Ireland and Northern Ireland. It is frequently called upon to give the industry view on future policy and legislation. Cré is a member of the European Compost Network, the European Biogas Association and the Biobased Industries Consortium. Cré has a Board of Directors, a Carbon Committee, a Technical Committee, a Public Relations Committee and an Anaerobic Digestion Committee. See www.cre.ie

In 2019, Cré CLG established a wholly owned subsidiary Cré Certification Ireland DAC to provide certification services for the Cré Compostable Certification Scheme.

Focus of the Cré Submission

Cré's submission is not responding to all the questions in the consultation, but is responding to sections, which are relevant to the collection of food and garden waste, the local processing of food and garden waste and the use of the end products- compost and digestate.

Contribution of Composting and Anaerobic Digestion Sector

The composting and anaerobic digestion sector in Ireland have the potential to deliver a significant portion of the new EU Circular Economy recycling target by processing food and garden waste.

There is significant scope for an increase in the amount of food and garden waste captured through the brown bin collections from households and businesses in Ireland. This requires both increasing the participation of householders and businesses in the scheme and increasing capture rates for those already participating. Increasing participation and capture rates have the potential to unlock more than 100,000's of tonnes being separately collected for treatment by 2030.

Developing the anaerobic digestion and composting sector further will enable organic materials to be managed in a more environmentally sound manner, in line with circular economy principles. The anaerobic digestion and composting sectors, if adequately supported, can play an important role in helping Ireland meet its carbon targets. Carbon sequestration in soils is increasingly recognised as a relevant measure to combat climate change. One way to increase carbon uptake in soils is the application of stable compost and digestate, as it contains a high percentage of stable organic matter.

2. Consultation Questions & Cré's Responses

1. Do you agree with the draft Strategy's proposed key objectives? In your view, are there further or alternative objectives that should be included?

Cré Comments:

Yes, we agree with the objectives. We suggest the addition of another objective to establish and promote quality standards for various materials.

2. Do you agree with the overall level of ambition set out in the draft Strategy? If not, is further ambition needed or is the draft Strategy overly ambitious?

Cré Comments:

We agree with the ambition but would suggest an independent organisation is established which would have the similar remit of WRAP in the UK. This organisation could coordinate demonstration projects, help setup standards and facilitate market development. This organisation could attract public, private and EU funding for various initiatives. Would suggest an overarching circular economy body, however, already existing circular agencies exist for sectoral materials (circuleire, CRNI, ReDiscovery, BiOrbic, BioEire) this foundation should not be weakened as these groups already have experience which should be built upon, and rep bodies for other sectors need to be at the table.

3. Should Ireland measure its progress in achieving a more circular economy relative to its European Union peers? If not, what alternative benchmark should Ireland adopt and why?

Cré Comments:

Ireland should measure its progress to best practice worldwide and not be limited to the European Union. For example, when it comes to food waste prevention, South Korea is the world leader.

4. Would you rate Irish public awareness of the circular economy as high, medium or low? And how important do you think raising public awareness is to further developing the circular economy?

Cré Comments:

The awareness of the public is probably zero. At best they would think that this is something to do with recycling. It might be easier for the public to understand key messages on reuse and recycling explain the overall benefits. Not all actors understand the principles of the circular economy. The provision of a central website with sources on the topic with the provision of examples in each waste stream would be beneficial.

The circular economy could be integrated into a general messaging on mywaste.ie to inform the general public. Not sure Circular Economy should be linked to waste at all. Possibly messaging should be linked to Climate Change Solutions.

5. What are the most effective awareness raising measures that could be taken under the Strategy?

Cré Comments:

The most effective awareness raising measures previously in Ireland was the national PR measure on TV 'Race Against Waste' and the introduction of economic levies such as the plastic bag tax. Economic measures are a key tool in behavioural change of the public.

- 6. Are you satisfied with the proposed stakeholder engagement arrangements in the draft Strategy? Which additional stakeholders (if any), not already part of the Waste Action Group, do you think should be included in the Strategy's implementation?**

Cré Comments:

Yes. Cré is already part of the waste action group and we presume we are a key stakeholder on the circular economy strategy. If not included already there should be Social Inclusion Groups – such as CRNI/ReDiscovery/Textile Collectors.

- 7. What do you see as the major economic and/or social co-benefits of moving towards a more circular economy in Ireland, so that environmental improvements also provide economic and social opportunities, and vice versa?**

Cré Comments:

Some of main benefits will be establishment of ancillary businesses in repair or new recycling products. If there is scale, there might be new processing plants built for recycling of some waste streams locally in ROI. Skills - many hand skills have been lost with automation and the make-use-dispose economy. The circular economy will regenerate local economies and re-introduce traditional skill sets

- 8. What do you see as the major regulatory barriers to the further development of the circular economy in Ireland? In answering this question please feel free to address economy-wide issues or those affecting your sector in particular.**

Cré Comments:

Regulatory barriers are usually related to risk. This is one area where the drive to fill the circularity gap and become leaders must not be at the expense of increasing risk and negative environmental impact

- 9. What do you see as the major non-regulatory barriers to the further development of the circular economy in Ireland? In answering this question please feel free to address economy-wide issues or those affecting your sector in particular?**

Cré Comments:

When it comes to municipal waste, contamination is an issue for dry recyclables and biowaste. Contamination levels are very high in dry recyclables which prevents the material from being recycled. If there was better education of businesses and the public on how to recycle, we would see high quality waste streams which could be recycled.

The European Environmental Agency published a report on the potential opportunities with biowaste across Europe. The report warned one of the barriers to exploiting the benefits is contamination in biowaste. When putting compost and digestate on the market, several countries mention plastics as a key contaminant to be addressed (Environment Agency, 2020)¹.

Additional measures and policies are required to reduce contamination of biowaste with plastics during collection. Avoiding contamination with plastics at source is the most effective and efficient approach, as removing plastic contamination from biowaste during treatment is both expensive and limited in its effect (Kehres, 2017)². Overall, more attention needs to be given to avoiding contamination of biowaste with plastics.

The prevention of impurities in the untreated biowaste is the most effective way to prevent impurities in compost and digestate. The key to addressing the issue of contamination is the

¹ Environmental Agency (2020) Biowaste in Europe turning challenges into opportunities.

² Kehres, B. (2017) Problem Fremdstoffe/Kunststoffe in Bioabfall und Kompost. Conference paper presented at 11 Bad Hersfelder Biomasseforum- Neue Herausforderungen für die Bioabfallwirtschaft Bad Hersfeld, 2017

establishment of the Contamination Working Group with key stakeholders which will work to solve the problem. The group could look at all waste streams, not just food waste. The recommended activity of the group is to:

- Review best practice from other countries on how to reduce contamination by the waste generator through education, rejections of waste and fines for contamination;
- Examine how to enforce contamination control on waste generators;
- Examine technologies which could remove contamination; and
- Agree and implement a coordinated national plan to solve the issue of contamination.

A summary of key non-regulatory barriers are:

- public awareness of circularity non-existent
- credibility - there has to be a belief that circularity is not just an extension to the linear economy. i.e. giving a second life to a materially degraded product for it to eventually be landfilled/ incinerated anyway
- quality assurance and risk assessment for envisaged circular products are non-existent, without Q assurance and risk assessment, end of waste designation must remain on a per product basis to ensure products pose no health/environmental risk
- concrete targets are missing as part of the strategy to go from second last to leader in the Circularity Gap!

10. How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?

Cré Comments:

Setting specific targets for green public procurement is very important for any recycled products in development sustainable markets. There are some examples around the world to examine how they create markets such as the the *USA model of preferential purchasing for bio-based products in Government sourcing*. With bio-preferred programme in USA since 2002 bio-based production has boomed (and this excludes energy) – around 20,000 products are listed. In June, 2015 Biobased Products Contributed \$369bn to US Economy.

Another example of green procurement of compost in America is Model Water Efficient Landscape Ordinance - using compost on new landscape construction over 500 square feet. Model Water Efficient Landscape Ordinance

Another example is in Illinois: Illinois: A new law, the Compost-Amended Soil Construction Act (HB4790), requires that any state agency undertaking a construction project that incorporates use of offsite soil – and that is located within 20 miles of any Illinois Environmental Protection Agency-permitted composting facility – must request a separate bid for compost-amended soil for that project. “Compost-amended soil” is defined as soil that has been mixed with source separated landscape waste or a mixture of both source separated landscape waste and source separated food scraps to meet an organic matter content of not less than 25 percent, and where the compost component meets the certification requirements of the US Composting Council’s Seal of Testing Assurance (STA) program or any other equivalent, nationally recognized program.

California: CalRecycle regulations for SB 1383 starting January 1st, 2022, each jurisdiction in California must procure products generated from recovered organic waste.

11. What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?

Cré Comments:

- Reduced VAT rate on reuse and recycled products
- Annual well funded PR campaign to reduce contamination in waste to educate the public on how to manage waste correctly
- A target for a % tonne inclusion of compost/digestate in peat products

A coordinated national brown bin awareness campaign is required to be developed with input from collectors, processors and regulators. Once developed all stakeholders should support the campaign in order for it to be a success. This multi-million national awareness campaign is funded by Department of Communications, Climate Action and Environment (DCCAE) sustained over a five year period should result in the consumer being educated on their right to a brown bin and how to use it properly. Consumers in turn request the bin from their waste collector and use it correctly, promoting low contamination of the bin for the processor, enabling the production of quality compost/digestate.

12. Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?

Cré Comments:

The recycling of biowaste has many benefits in terms of higher recycling rate to meet EU recycling targets, the local processing and end products such as compost and digestate. But also there the recycling of food waste leads to food waste prevention as demonstrated by WRAP.

WRAP published a report³ in February 2020 which shows significant association between food waste collection schemes and lower food waste arisings

WRAP regularly calculates the amount of food waste produced in the UK and identifies any factors that might increase it. The new report, looks at household food waste collections by local authorities to try and determine whether targeted collection schemes can reduce food waste arisings.

Food waste arisings were compared among local authorities with and without a separate food waste collection, whilst controlling for other factors that are also known to affect food waste arisings (and which might otherwise mask or exaggerate the effect of food waste scheme type). The study covered a five-year period from 2012/2013 to 2016/2017 and included data from 107 local authorities, covering three nations (England, Scotland and Wales).

After taking into account social deprivation, time, and other factors previously reported to influence household food waste arisings, separate food waste collections were significantly associated with lower total food waste arisings.

13. Do you broadly agree with the policy areas listed for future development in the draft Strategy? If not, which areas would you remove/add to the list?

Cré Comments:

Food waste recycling not listed.

14. Any other comments

No Comment.

³ https://wrap.org.uk/content/impact-food-waste-collections-household-food-waste-arisings?goal=0_b554dd0387-4262bd5a5c-5043289