From:	Claire Downey <Claire@crni.ie>
Sent:	Friday 11 June 2021 15:53
To:	circulareconomy
Subject:	CRNI response to Public Consultation on the Proposed Publication of the Circular Economy Strategy
Attachments:	CRNI_All of Government Circular Economy Strategy.docx.pdf; CRNI_National Waste Management Plan for a Circular Economy.docx.pdf; CRNI_EPA Circular Economy Programme consultation.docx.pdf
Follow Up Flag:	Follow up
Flag Status:	Completed

Dear Circular Economy team,

Please find attached our response on behalf of our members to the Public Consultation on the Proposed Publication of the Circular Economy Strategy.

We look forward to supporting the Department, EPA and Regional Authorities in implementing and informing these policies and measures and welcome any opportunity to discuss these further.

Attached also for reference are our submissions to the National Waste Management Plan for a Circular Economy and EPA Circular Economy Programme.

Kind regards

Claire Downey

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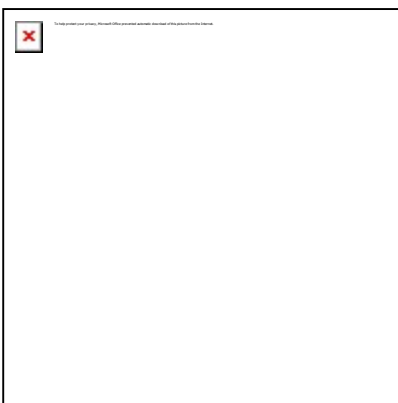
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CRNI RESPONSE TO PRE-CONSULTATION ON ALL OF GOVERNMENT CIRCULAR ECONOMY STRATEGY

1.0 OVERVIEW

This last year has seen momentum significantly build behind the community reuse, repair and recycling sector. The European Circular Economy Action Plan 2.0, Waste Action Plan for a Circular Economy and cross sectoral developments like the Climate Plan Interim Actions and Rural Development Policy 2021-2025 all show real ambition and signal a pivotal time for the circular and social economy.

CRNI welcomes this momentum and growing ambition, which puts prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning.

To realise this ambition in practical terms, we ask that the framework of the All of Government Circular Economy Strategy connects and aligns the various national plans, policies and programmes for a circular economy, **providing a strategic mix of policy action and financial incentives that ensures:**

- **products are better designed**

... by backing a strong sustainable product policy at EU level, the extension of ecodesign regulations to non energy products and facilitating the right to repair for all consumers, and

... by supporting European Commission efforts to develop consumer labelling

- **and prevention and preparation for reuse are more attractive,**

... by creating a framework in the upcoming Circular Economy Bill for targets, coordinating with other plans, tracking progress and taking corrective actions to ensure they are met,

... by including a minimum target for procurement of used goods, monitoring circular procurement in the <€25,000 threshold tenders and supporting efforts to build the local supplier base for circular goods and service

- **... more viable**

... by requiring EPR schemes to focus to a much greater extent on prevention and preparation for reuse and supporting an EPR scheme for mattresses

... by introducing measures to improve access to goods for preparation for reuse operators and at Civic Amenity Sites

... by ensuring end of waste considerations give priority to products that have been or are being prepared for reuse

... by investing in the CSP to create a dedicated fund for circular and climate friendly community services

... by availing of the multitude of European and national funds to back jobs and skills development and facilitating a coordinated approach to jobs and skills

... by assessing the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste

- **... more accessible**

... by prioritising and supporting investment in significant infrastructure for larger scale projects driving prevention and preparation for reuse

... by incorporating and prioritising prevention and preparation for reuse in infrastructure planning and exploring the potential for a shared island approach

.., by continuing to expand and grow grant schemes and research funding in this area

- **... and more affordable than the alternative and become mainstream**.

... by introducing financial measures such as a 0% VAT rate for prevention and preparation for reuse, a tax incentive encouraging businesses to donate surplus goods, a transport subsidy scheme to better support the flow of donations, a limit on commercial rates for prevention or preparation for reuse centres

... by reviewing and moderating all forms of subsidies at national level on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse

We believe this framework should include concrete action with set timeframes and a commitment to tracking progress. These recommendations are described in more detail below.

2.0 CONSULTATION QUESTIONS

2.1 DO YOU AGREE WITH THE DRAFT STRATEGY'S PROPOSED KEY OBJECTIVES? IN YOUR VIEW, ARE THERE FURTHER OR ALTERNATIVE OBJECTIVES THAT SHOULD BE INCLUDED?

TO PROVIDE A NATIONAL POLICY FRAMEWORK FOR IRELAND'S TRANSITION TO A CIRCULAR ECONOMY AND TO PROMOTE PUBLIC SECTOR LEADERSHIP IN ADOPTING CIRCULAR POLICIES AND PRACTICES

We welcome a new dedicated national policy framework and promotion of public sector leadership.

For this broad reaching and complex area, a framework will be important in coordinating interventions across the supply chain and across all sectors necessary for the circular transition. A framework is also required to connect and align the various national plans, policies and programmes for a circular economy.

In this regard, further clarity is sought on how measures, targets and ambition in the All of Government Circular Economy Strategy (AGCES) will align with measures, targets and ambition in the Waste Action Plan for a Circular Economy (WAPCE), National Waste Management Plan for a Circular Economy (NWMPCE), the EPA Circular Economy Programme (CEP).

In addition to setting the scene and creating a framework, we believe that this first AGCES should include more concrete actions and timeframes. We are facing a global climate crisis for which we have a window of less than 10 years to act.

This sense of urgency should be reflected in the AGCES. Ranges should be set for the potential improvements by 2030 and clear policy actions are needed, as proposed in the *Circular Economy Report for the Joint Committee on Environment and Climate Action*.

We have summarised our recommended policy actions in Section 1.0.

We welcome the proposal to regularly update the strategy, which is necessary for this quickly evolving sector.

In addition, we would like to see commitment to producing progress reports and an outline of strong and corrective measures that will be taken where progress is not being made.

In the absence of progress reports, policy ambition is weakened due to a lack of information or repercussions for failure to make progress. A strong precedent has been set recently in relation to progress updates in Ireland's *Rural Development Policy 2021-2025*, which commits to committee oversight and biannual progress updates on the implementation of the policy.

To support and implement measures that significantly reduce Ireland's circularity gap, in both absolute terms and in comparison with other EU Member States, so that Ireland's rate is above the EU average by 2030

CRNI welcomes this key objective to introduce a target for resource efficiency and we have been advocating for targets for reuse, food waste prevention and preparation for reuse for some time.

However, it is not clear to us how the circularity gap measure will support progress in the areas of prevention, reuse and preparation for reuse. Given the circularity material use rate is a measure of secondary material (rather than product) use, we are concerned that this could downplay the role of prevention and preparation for reuse and lend more focus to recycling.

For example, the EU Waste Framework Directive sets a combined target for preparation for reuse and recycling. However, very little preparation for reuse has counted towards this target, possibly because recycling is easier to achieve within current systems and structures. Therefore, while the overall target in theory supports preparation for reuse it is primarily met through recycling. RREUSE[1] has been calling for a separate target (or a target within a target) for preparation for reuse but to date, only Spain has seen the introduction of preparation for reuse targets.

As flagged, there are already ambitious targets set for recycling through the Waste Framework Directive.

Targets to support prevention and preparation for reuse activities should be the priority in delivering a more circular economy.

We also seek clarity on how targets proposed in various Government plans and policies will be implemented and how they will align. This includes:

- targets for reuse, repair, resource consumption and reduction of contamination levels anticipated in the upcoming NWMPCE (as flagged in the WAPCE), to be implemented by the Regional Waste Authorities. CRNI included in its recent consultation response[2] to this plan a detailed outline of the opportunity for and potential design of such targets.
- targets for material circular use rate targets and priority waste prevention targets in Circular Economy Sectoral Roadmaps flagged for the AGCES, to be implemented by the Department
- quantitative targets that will integrate with monitoring frameworks being developed to capture and report circularity, and support Circular Economy Package reporting requirements flagged in the CEP, to be implemented or supported by the EPA.

It is essential for any clear, effective strategy to drive prevention and preparation for reuse that any and all new targets are accompanied by:

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[1] https://www.rreuse.org/
[2] https://crni.ie/content/uploads/2021/05/CRNI_National-Waste-Management-Plan-for-a-Circular-Economy.docx.pdf

- clear linkages with other targets (are complementary and coordinated)
- clear lines of responsibility and accountability
- clear review periods, corrective measures and consequences for failure to meet targets

A clear plan showing the connection between all proposed targets is required, with lines of responsibility, accountability and measures to be taken following regular reviews of progress.

TO RAISE AWARENESS AMONGST HOUSEHOLDS, BUSINESS AND INDIVIDUALS ABOUT THE CIRCULAR ECONOMY AND HOW IT CAN IMPROVE THEIR LIVES

Raising awareness is complex and involves both providing information (to raise awareness), encouraging behavioural change and providing an opportunity to take action, which is the desired outcome of awareness raising.

This requires an understanding of behavioural science and marketing as well as providing a mix of infrastructure and services on the ground that make it easy for people to make the right choices. Measures that can help address these challenges are outlined in Sections 2.5, 2.8, and 2.9 below.

TO SUPPORT AND PROMOTE INCREASED INVESTMENT IN THE CIRCULAR ECONOMY IN IRELAND, WITH A VIEW TO DELIVERING SUSTAINABLE, REGIONALLY BALANCED ECONOMIC GROWTH AND EMPLOYMENT

We welcome greater investment and support for prevention and preparation for reuse activities to help level the playing field and ensure they are the most accessible, affordable, viable and attractive options and become mainstream.

Current levels of reuse and repair in Ireland are estimated from CRNI member **environmental, social and economic** impact data compiled each year. The impact of their work in 2020[3] is shown below.

18,160t reuse, 33t repair, 1,911t recycling

116,300t carbon saved through reuse

727 full time + 62 part time jobs

817 training positions

8,646 volunteers

€39,634,840 turnover

€48,010,000 value of social impact

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[3] which was significantly affected by closures due to Covid-19 restrictions

Of these figures:

- Approximately 12,000 tonnes relates to **textile reuse** through the extensive charity shop network within the Irish Charity Shop Association (ICSA) and other actors. Over half of this is reused locally, which is high compared with other Member States.

- The next largest product groups included in the reuse figure are **food** redistributed (approx 3,000 tonnes)

- Other materials included in this reuse figure are IT and other equipment, furniture, paint, bicycles, wood and surplus packaging and other stock

- The recycling figure reflects Ireland's network of social **mattress recyclers**, WEEE recycling and other streams that cannot be reused.

This compares with member impacts in 2019 as shown below.
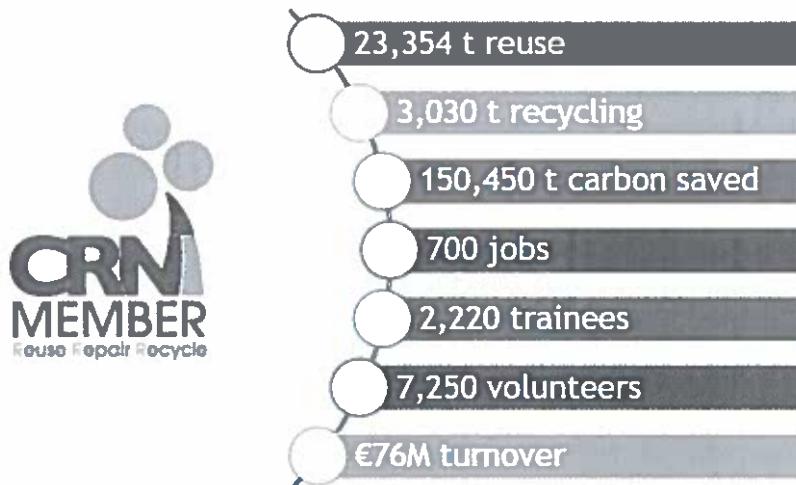
A directory of members is provided on our website[4] and in Annex 1 below.

Overall, this level of reuse represents less than 1% of all goods discarded[5]. Taking into account reuse operators not included in our membership, we estimate reuse is no greater than 2%[6] of all goods discarded overall. Reuse and repair clearly remain far from mainstream in Ireland.

We have described in Section 2.8.1 how targets could be introduced to help address this market failure, but without investment or other support measures, such targets will not be realised. This is because, in the absence of a level playing field, the cost of prevention or preparation for reuse activities can be higher than the alternative (e.g. buying new, single use). In particular, the cost of labour associated with sorting, checking, cleaning, repairing, upcycling and retailing

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[4] crni.ie/directory

[5] It is noted that an EPA funded research project Q2Reuse will clarify the scope and scale of reuse activities.

[6] Based on an initial estimate from the Q2Reuse project, overall reuse levels appear to be no more than double CRNI estimates

goods can outweigh the cost of cheap new goods that do not reflect environmental externalities.

> Investment and other financial support are required to ensure that prevention and preparation for reuse are always the most accessible, affordable, viable and more attractive than the alternative and become mainstream.

We have outlined a number of measures we believe are needed to rebalance the playing field in Section 2.9 below.

TO IDENTIFY AND ADDRESS THE ECONOMIC, REGULATORY AND SOCIAL BARRIERS TO IRELAND'S TRANSITION TO A MORE CIRCULAR ECONOMY

We support putting prevention, preparation for reuse and social actors at the heart of the strategy. We have identified a number of barriers and possible measures to address these in Sections 2.8 and 2.9 below.

2.2 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?

We believe the level of ambition in the AGCES could be further strengthened through:

- providing more measurable outcomes
- focusing more on prevention and preparation for reuse
- providing clarity as to how the ambition in the AGCES aligns with the NWMPCE and EPA's CEP

For example, many current actors in the sector carry out awareness raising measures to promote circular economy activities. To what extent will this strategy support or go beyond these actions? What represents increased investment in the circular economy? At what point is this objective considered sufficiently addressed?

> To achieve a systemically circular economy, involving change at so many levels, a clearer set of outcomes is required. More data collection is required to provide a baseline from which we can develop, but also to inform the level of ambition that can be achieved.

Some practical examples of making prevention and preparation for reuse more accessible, more affordable, more viable and more attractive than the alternative and become mainstream are outlined in Sections 2.5, 2.8 and 2.9.

We also believe there are areas where further ambition is needed.

> Specifically, the opportunity for an all island approach to resource efficiency should be addressed in the AGCES.

The Department of the Economy in Northern Ireland is currently working to benchmark Northern Ireland's circularity gap and has established a Circular Economy coalition, which involves the Northern Ireland Resources Network[7], to help drive progress to create a more CE in Northern Ireland. This presents an opportunity for all island approaches to targets and to developing shared infrastructure, particularly in light of work undertaken by the Department of Taoiseach on our Shared Island[8].

2.3 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?

Showing progress against a target in relation to our European peers can be a good communication tool and helps the population to understand where we are, where we need to go and how. However, we have seen from recycling and other targets that comparisons are often complicated by different reporting methods or completely different approaches to developing a sector.

Oko-Institut and Plan Institut held a webinar in March 2021 on *New Data Streams for Circular Economy Monitoring* to discuss a wide range of potential metrics to measure progress on circular economy. The European Topic Centre will take on the outcome of this workshop to develop concrete monitoring frameworks.

This work toward a Circular Economy monitoring framework may provide a more comprehensive and in depth assessment of Ireland's position in relation to key sections of the circular economy.

2.4 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?

As highlighted in the recent *Circular Economy Report for the Joint Committee on Environment and Climate Action* produced by rapporteur Richard Bruton TD, there is growing concern among consumers about the environmental impact of choices, the ethical means of production and where waste ends up.

The pandemic has seen significant changes to consumer behaviour too with more people shopping locally, which has helped to drive demand for second hand goods particularly in small towns and rural areas. While this may not be specifically linked to an understanding of the circular economy, it is these trends that will ultimately underpin the viability of the sector.

There is general consensus among CRNI members that raising awareness is of crucial importance. However, this area is complex and awareness on its own is not enough to drive progress.

This is further elaborated in Section 2.5.

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[7] Recently established by CRNI with funding from DAERA
[8] https://www.nesc.ie/work-programme/shared-island/

Engaging citizens in a truly circular economy will challenge a system that is designed around consumption, product ownership and growth. It will require transformative changes to the way citizens behave towards goods and services, supported by clear, bold and ambitious communications.

As flagged in Section 2.1, achieving this is complex and involves providing information (to raise awareness), delivering behavioural change and providing an outlet for this behavioural change. For example, even if people are aware of what the circular economy means or like the idea of avoiding waste, it can be challenging and not always more economical to act on this knowledge. Furthermore, as noted in Section 2.4, behavioural change (positive or negative) in relation to prevention is not always linked to awareness raising efforts but other macro trends.

There are a number of barriers currently facing consumers such as low accessibility to goods or services that are circular, a lack of clear information and often ambiguous labelling and low confidence on the safety or quality of second hand goods. Discussion at the recent CRNI conference on jobs and skills[9] highlighted that businesses need to understand circular concepts across the entire value chain and applying knowledge of circular practices often requires a tailored approach.

Therefore, parallel effort is required to support education and communication, alongside addressing cost and other barriers, and providing the infrastructure and services on the ground to support action.

As summarised by behavioural scientist Cass R Sunstein, we need to simplify choices and make the best choice the easiest one.

> It is not enough to simply raise awareness but in parallel we need to see improved accessibility and viability of prevention and preparation for reuse activities. This involves a strategic mix of policy and financial incentives for operations and/or infrastructure that makes prevention and preparation for reuse **better designed, more accessible, more affordable, more viable and more attractive than the alternative and become mainstream..**

Measures to address this are provided in Sections 2.8 and 2.9.

2.5.1 ENSURE A COORDINATED APPROACH

With an increasing number of stakeholders including CRNI members, DECC, the EPA, the Regional Authorities and NGOs involved in the area of prevention and preparation for reuse, it has become more important than ever to ensure campaigns and messaging are coordinated and collaborated on. While CRNI continuously works to connect with others in this space, a centrally coordinated strategy would best facilitate alignment of individual efforts at national

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[9] See crni.ie/presentations for details

level. This would ensure that the limited resources available to the sector can deliver the greatest impact.

> We welcome the proposal to develop a national circular economy online platform, and an overarching national circular economy 'brand' for Ireland.

A similarly coordinated approach to awareness campaigns is required. As recommended in the WAPCE, a centrally coordinated, multi-annual cross-sectoral national communications and education programme should be put in place.

> This should involve coordination of messaging between all relevant stakeholders, connecting various awareness raising efforts and channels, prioritising messaging and providing coherent, clear and simple communications that engage citizens and businesses.

2.5.2 SUPPORT THE NATIONAL ROLL OUT OF A QUALITY MARK

We welcome the proposal in the pre-consultation to expand – in the next iteration of the Strategy – national circular economy branding to non-public sector organisations and private sector circular economy enterprises, products and services, *in a manner analogous to a certification mark.*

Thanks to EPA Green Enterprise funding, ReMark[10], Ireland's Reuse Quality Mark of Excellence has already been developed and piloted by CRNI. This was specifically designed to address negative consumer perceptions about the quality and safety of reused or repaired goods by improving the standard of service and customer experience with reuse organisations, demonstrating to the public the commitment to quality, highlighting the social and environmental benefits of the goods and driving demand.

In the ReMark pilot, surveys conducted before and after accreditation found that ReMark did have a positive impact on customer attitude. Through delivering training and supports, ReMark also helped to build the capacity of participating reuse operators as summarised in the videos[11]. When the ReMark pilot programme finished in March 2019, the report recommended that ReMark be further developed and rolled out throughout Ireland and Northern Ireland.

> We believe that, as it has been for Scotland, ReMark could be a game changer for the sector in Ireland, underpinning measurement and reporting on reuse, Circular Procurement, all island collaboration and national circular economy branding. However, this will require Exchequer support in the near term in order to build and develop the mark before it can support national branding and before the full potential and benefits to the sector are realised.

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[10] https://www.crni.ie/re-mark/
[11] https://www.crni.ie/re-mark/

2.5.3 Avail of Existing Channels

Civic Amenity Sites represent an important existing public interface. These should be used to develop awareness of and a culture for prevention, as further outlined in Section 2.8.

We support the ground-up approach proposed in the WAPCE involving community-based networks and will be happy to support this. There are many CRNI members focusing on awareness raising and prevention through creative or practical means, including the Cloth Nappy Library Ireland, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green and Native Events. We would welcome efforts to involve and build on the expertise in such organisations when developing awareness campaigns.

Community development is also an extremely important area for promoting awareness on the circular economy. This is because community development projects can provide education through practical learning and training.

Finally, raising awareness through the education sector can be challenging. Teachers and students are becoming increasingly aware of the concept of sustainability but circular economy awareness lags behind. However, changes to the national curriculum can be very slow.

> Building on existing channels through support of and funding for Civic Amenity Sites, community based organisations and development projects (see also section 2.9), programmes such as Green Schools and teacher supports would be effective measures to support the national awareness raising effort.

2.5.4 Positive Messaging

Circular economy terminology can be off putting. There is a need to demystify the concept and clarify the link between circular economy actions and well understood concepts such as climate change. We believe that the following messaging can help encourage people to change their behaviour:

- the broad range of benefits of a more circular economy eg training, jobs that can't be easily offshored

- the assets that the circular economy can help to protect, to provoke thought in everyone's mindsets to help inspire change

- information on the sustainability of products both environmentally and in humanitarian terms (see also labelling in Section 2.8.6)

- practical information to help address confusion (as has worked well for the recycling list). For example, a campaign to highlight that compostable packaging is only suitable for in vessel composting or AD, and that in all cases reusable packaging is easier and better.

We would like to highlight the important role that the social economy can and will play in delivering circular objectives and ensure this is represented in the new Circular Economy Working Group to be chaired by DECC.

Recent national policy developments have shown that this linkage is being increasingly recognised and supported and this is very welcome. The European network RREUSE found that Ireland was the only Member State to make a connection between social economy and sustainability in its national reform programme, through the framework of the social enterprise strategy. The DRCD recently launched a €3 million Pilot Bike and E-Bike Upcycling Initiative through the Community Services Programme. Social enterprises and social impact are acknowledged in the WAPCE and the Pre-consultation on the AGCES includes a paragraph dedicated to the social benefits of transitioning to a circular economy, including a description of the role of social enterprise.

Explicitly recognising and supporting the role of social economy actors in the circular economy at local and national level is an effective way to make the circular economy more just and inclusive.

We therefore see a valuable role for the DRCD in the CE Working group to further this opportunity.

The environmental, economic and social benefits of prevention and preparation for reuse are significant:

- ENVIRONMENTAL: These activities have global **environmental and climate benefits**, reducing the consumption of new goods.

A 2020 report by Circularity Gap Reporting Initiative highlights that switching to a circular economy could **reduce global greenhouse gas emissions by 39%**[12]. The European RREUSE[13] network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO2 emissions by 5% while supporting around 400,000 jobs[14]. A WRAP UK study has also shown that by increasing the reuse of key household products

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[12] https://www.circularity-gap.world/2020

[13] CRNI is a member of RREUSE, an international network representing social enterprises active in re-use, repair and recycling. RREUSE members divert approx 1 million tonnes of goods and materials annually from landfill through re-use, repair and recycling, generating a combined turnover of 1,2 billion EUR .

[14] See https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/

such as textiles, appliances and electrical equipment, UK GHG emissions could be reduced by 4 million tonnes CO2 eq per annum between 2009 and 2020.

These savings relate to avoided emissions associated with upstream material extraction, manufacturing and transport and end of life management. As much of this takes place abroad, it is difficult to account for the savings within national emissions reporting. However, not only do we need to collectively acknowledge our global responsibility for the global carbon footprint of our goods but we also stand to gain significantly from the economic and social impacts of doing so at national level as shown below.

- ECONOMIC: By keeping goods within the economy for longer, prevention, reuse and repair can support **resilience in communities** through localising supply chains.

Prevention and preparation for reuse are localised activities that can be widely distributed across rural, urban and manufacturing landscapes[15]. As highlighted in the AGCES pre-consultation, local repair hubs have the potential to support the economic and social renewal of town and village centres, which is an important part of balanced regional development and rural renewal and is also a Programme for Government commitment. The shift during the pandemic toward shopping locally has also highlighted the value of keeping goods recirculating locally, as second hand retail can sometimes be the only available outlet for certain goods in small towns and villages. Covid-19 also had a significant impact on global supply chains and impacted the supply of new goods as well as international outlets for reuse (e.g. exports of used textiles effectively ceased) and recycling (e.g. collapse in material value).

This clearly demonstrates the potential benefits of a more localised approach and local investment in Circular Economy activities.

- SOCIAL: The EU acknowledges that prevention, reuse and repair have potential to provide **social and economic benefits** 'including jobs and growth, the investment agenda ... the social agenda and industrial innovation.'

As highlighted in the pre-consultation, the EU Commission estimates a circular transition could deliver an additional 700,000 EU jobs across all skill levels by 2030. Social enterprises are ideally positioned to deliver these jobs because of the level of manual labour and diversity of skills types and levels involved in recovering products and materials and returning them to the economy. As highlighted in the AGCES pre-consultation, social enterprises have long been associated with reuse and refurbishment in Ireland, tapping the value of unwanted materials to build social capital in communities through training, retail and capacity building. The valuable role of social enterprise in the circular transition is further described in Section 2.12.

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[15] See full Green Alliance presentation to CRNI "Future Jobs and Skills for a Circular Economy" event at crni.ie/presentations

2.8   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

2.8.1   LACK OF TARGETS

In our submission to the WAPCE and more recently to the NWMPCE consultation (attached - see Section 3.1) we made a detailed case for the immediate introduction of targets for:

- reuse - in the form of kg reuse/inhabitant, preferably linked to job creation
- preparation for reuse - 3% of IT equipment and LHA
- food waste prevention - of 50% by 2030 along with an interim target to drive progress

The *Circular Economy Report for the Joint Committee on Environment and Climate Action* recommends a target to double the size of the Reuse Sector 2026. We strongly welcome and support this ambition and believe it is ultimately achievable. It also recommends reducing food waste by half by 2026, as well as other overarching targets such as halving extracted raw materials, residual waste and reducing pollution and plastics to incineration or landfill.

Ireland is currently leading the way in developing a methodology for measuring reuse through the EPA funded Q2Reuse project[16], which is led by the Clean Technology Centre Cork alongside the Rediscovery Centre and CRNI. This tailored methodology can facilitate the immediate introduction of targets and help realise the ambition in the WAPCE to introduce a reuse target in advance of any EU targets. We submit that a reuse target should be **introduced within the next 2 to 3 years.**

Qualifying & Quantifying the Reuse Sector

> We note that the AGCES does not refer to creating a framework in the Circular Economy Bill for the introduction of such targets. We believe this would be a missed opportunity, does not reflect the urgency of required action and should be addressed.

Urgent measures are also required to address the **total absence of preparation for reuse activity,** which is a major gap in Ireland's Circular Economy journey. CRNI has strongly advocated[17] targets for preparation for reuse in line with recommendations in the EPA research report[18] by University of Limerick, with a focus on IT equipment and large Household Appliances (LHA)[19].

> Preparation for reuse targets should be introduced on a phased basis starting with 1% up to 3% within 3 years.

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[16] See http://www.rediscoverycentre.ie/research/q2reuse/ for more information

[17] See also our submission to the Waste Action Plan for a Circular Economy at https://crni.ie/key-policy-areas/

[18] Report prepared for the EPA by Johnson, M., McMahon, K, Fitzpatrick, C. *Research of Upcycling Supports to Increase Re-use, with a Focus on Waste Electrical and Electronic Equipment (UpWEEE)*, REF 2015-SE-DS-5, published 2018

[19] LHAs and IT were identified as the main product categories with potential for re-use. Further consideration and feasibility studies for alternative WEEE product categories and the introduction of preparation for re-use is necessary before increasing the number of product categories that preparation for re-use will apply to.

These must be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014.

> Finally in relation to food waste prevention we recommended a mandatory food waste prevention target of 50% by 2030 along with an interim target to drive progress.

An interim target will place Ireland on the correct pathway in the near term. For example, an interim target for 2025 of 30% food waste prevention was set in Scotland. This was measured against the baseline year being discussed at EU level of 2017/18.

As for a general reuse target outlined above, any food waste prevention target must be supported by data, policy drivers and underpinned by clear lines of accountability and penalties for failure to meet targets. While a commercial food waste measurement methodology has been developed[20], it has not been widely adopted to date across the supply chain. However, a baseline year should be selected now for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

2.8.2 Poor Design

Consumer goods are now less durable and repairable than in the past. The increasing difficulties associated with attempting to repair modern electronic equipment including lack of access to and high costs of spare parts, lack of appropriate repair information, as well as product design preventing repair is a serious environmental issue that puts at risk the economic viability of re-use and repair organisations[21].

Design for durability, repairability, reusability and modularity is essential to improve the quality of products, and will also support the development of the second hand market. Measures that can be taken at national level to address these challenges are outlined below.

- **Support EU measures through Sustainable Product Policy**

As highlighted by RREUSE, one of the CEAP's most promising measures is the legislative proposal for a sustainable product policy initiative. To counter premature obsolescence, resource efficiency requirements for electronic products already developed by the Commission should be implemented more widely to ensure durable, re-usable, upgradable and repairable products.

> We strongly encourage the Government to ensure the proposed initiative sets an ambitious policy framework to increase the potential of products to be reused, repaired and recycled, all while ensuring that consumers are provided with relevant, accurate and comparable information about the sustainability performance of their products.

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[20] Available for download at https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/

[21] RREUSE (2019), Easy product repair (available at https://www.rreuse.org/improving-product-design/)

A few more specific asks are outlined in this article by ECOS, which describe the need for greater alignment with the hierarchy in value retention from

- prioritising sharing, better durability and quality in products;
- followed by ensuring devices are easy to repair, maintain and refurbish;
- only where this is not possible, ensuring products can be upgraded or repurposed;
- in the worst case scenario, ensuring products are easy to disassemble or dismantle
- and as a last resort, components should be recyclable, separable or suitable for reuse as a secondary raw material.

The European network RREUSE recommends a cautious approach to product-as-service models, which are mentioned throughout the CEAP as a solution to encourage producers to manufacture longer lasting products. In these models, producers keep the ownership of the product or the responsibility for its performance throughout its lifecycle. Though promising, these models can potentially backfire in a context where cheap virgin materials and low labour costs remain a reality in manufacturing countries. This makes it more cost effective to bypass repair and replace products once they are not functioning anymore.

These models could also be used by manufacturers and retailers to develop monopolies on repair activities, posing severe risks on the independent repair sector. Retailers may end up competing with subscription models providing the widest choice of products and the most flexible services, exerting even more pressure on resources. Safeguards will have to be developed to ensure that product-as-service models favour the use of durable goods that, if broken or damaged, will eventually be repaired, including by independent repairers.

- **Help strengthen and broaden the Ecodesign Regulations**

CRNI is a member of the Right to Repair campaign, a coalition of European organisations pushing for system change around repair and of ECOS, the Environmental Coalition on Standards. As shared in a recent presentation to the EPA, DECC and other stakeholders, product requirements related to circularity (e.g. repairability, availability of spare parts and repair information to professional repairers) have been incorporated in ecodesign regulations adopted by the Commission on 1 October 2019 concerning electronic displays, washing machines, dishwashers and refrigerators.

These regulations will be extremely important in facilitating repair in Ireland. Many of the common barriers facing the repair sector, some of which are highlighted in a University of Limerick report on *A Preparation for Reuse Trial of Washing Machines in Ireland*[22], will be addressed through ecodesign measures including the relatively short lifespan of goods, the difficulty of disassembly for repair, the availability of spare parts and provision of repair and maintenance information.

The Ecodesign regulations also require that producers make most spare parts and repair manuals available to professional repairers for 7 to 10 years after retiring the product from the

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[22] Available at https://crni.ie/content/uploads/2021/05/UL_REhab-trial-writeup.pdf

market, depending on the product. However, the definition of "professional repairer" is lacking, though it is suggested that they are either included in an official national registration system as a professional repairer (where such a system exists) or is determined by the manufacturers. CRNI and the Right to Repair campaign are concerned that this latter option effectively allows manufacturers to decide who qualifies as a professional repairer or not.

> We encourage the Government to support the right to repair by ensuring access to repair for all consumers. It is important to note that, if producers are prevented from developing monopolies on product repair, consumers will have more choice and therefore, better access to repair services.

It is noted that the repairmystuff.ie directory is currently open and free for any repair centre or activity to register, which does support the right to repair. We would be happy to see this directory being used in its current form as an official register to avoid any limitation on access to spare parts or information.

Through the CEAP, Ecodesign regulations will also apply to non-energy products in future, providing a valuable opportunity to extend the lifetime of goods such as construction, textiles and furniture. Such policies will greatly help the reuse and repair sectors that have suffered from the decreasing quality of products put on the EU market in recent years.

> We recommend that the Government supports European efforts to extend Ecodesign regulations beyond energy related devices, prioritising those with the highest environmental impact including construction products[23], textiles[24], furniture and plastics[25]. We also ask that the Government backs robust rules and strong legislative measures, rather than voluntary measures which do not work, to make sustainable products the norm and effectively take us closer to a circular economic model.

For example, printers are one of the most iconic examples of premature obsolescence and some of the least repairable products brought to community repair events. According to data from the Open Repair Alliance, only 37% of printers get repaired at events, while 33% are deemed end of life. At present the Commission is exploring a voluntary agreement as a way to engage the sector in improving repairability. Unfortunately this has not proven effective, and the Right to Repair campaign is now seeking a commitment to strong regulatory action. Read more about this campaign here.

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[23] See also: ECOS conference on circular construction & ECOS report: From barrier to enabler – towards a greener EU construction products policy
[24] See also: ECOS webinar on ecodesign for circular textiles & ECOS report: Durable repairable and mainstream – how ecodesign can make our textiles circular
[25] See also: ECOS conference on plastic in a circular economy & ECOS report: For better not worse – applying ecodesign principles to plastics in the circular economy

2.8.3 LACK OF SUPPORT FROM EXTENDED PRODUCER RESPONSIBILITY SCHEMES

As submitted in our response to the WAPCE, Irish EPR schemes to date have historically strongly supported recycling but provided only very limited support[26] to prevention or preparation for reuse activities. As a result, recycling (through subsidies) has become more viable than prevention or preparation for reuse, going against the waste hierarchy.

> All EPR schemes should be required to focus to a much greater extent on prevention and preparation for reuse, through financial supports as well as effective eco-modulation fee structures and more in line with the waste hierarchy.

This historical misalignment of support has led to a degree of caution as regards supporting any new EPR scheme. RREUSE has flagged from European experience that EPR schemes can lead to unintended consequences particularly when introduced into an already well established reuse sector.

As previously highlighted in our submission to the WAPCE, a number of Member States are reviewing the option of EPR schemes for textiles in view of the mandatory separate collection requirement set out in the Waste Framework Directive. Should EPR schemes be implemented, they must be designed to help reuse operators finance their textile management operations, in particular the cost for the ever-growing portion of textiles that is not reuseable. However, if not designed properly, EPR schemes may streamline the focus and financing to recycling rather than prevention.

Therefore, while CRNI supports EPR schemes in principle, it is not clear that the existing networks of second hand outlets, dominated by social enterprises / charities in the textiles sector would be best supported by an EPR scheme at this stage.

> On the other hand, we support and are contributing to a review of EPR schemes for mattresses through our EPA work plan. Similarly, EPR schemes could work for furniture or paint if well designed and if the focus is on prioritising and financially contributing to existing and prevention and preparation for reuse activity.

2.8.4 LIMITED ACCESS TO REUSABLE GOODS

Improving the collection and treatment of WEEE is a key step in preserving the reuse potential of unwanted yet reuseable electrical goods. Legislation can support priority access to waste collected through EPR schemes for preparation for reuse operators from the social economy. Although this is currently an underdeveloped sector in Ireland, a lack of access to goods as early as possible in the collection system was identified as a key challenge in the report *A Preparation for Reuse Trial of Washing Machines in Ireland*[27]. All too often, WEEE is collected with the sole objective of being recycled using techniques that automatically damage the product.

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[26] REPAK's "prevent and save" scheme; WEEE Ireland's support to EPA research
[27] University of Limerick, *A Preparation for Reuse Trial of Washing Machines in Ireland*, available at https://crni.ie/content/uploads/2021/05/UL_REhab-trial-writeup.pdf

A study carried out in Bavaria[28], Germany demonstrated that weatherproof storage for WEEE at collection points could prevent up to 86% of damage to collected items and found that between 13% and 16% of the waste streams considered (WEEE, used furniture and leisure goods) could immediately be prepared for reuse. A further potential of 13% – 29% could be unlocked through changes to the mode of collection, storage and the overall treatment of wastes at Bavaria collection points.

This would mean that of the appliances recycled in 2017 in Ireland, **approx. 2,325,000 appliances may have been perfectly functional** and potentially reusable[29].

> Measures are required to provide preparation for reuse operators with direct access to material at collection points and that collection and transport of WEEE meets minimum technical recommendations that ensure the quality of goods is preserved for preparation of reuse.

In parallel, stronger action is required to promote reuse at Civic Amenity Sites. While the former Regional Waste Management Plans set an objective to reuse or prepare for reuse of up to 10% of non residual waste at local authority CAS, there has been little progress in this area.

> Stronger incentives or requirements for Local Authorities to both record reuse and meet performance targets for reuse at CAS should be set in place.

An example of regulation in this area is the obligation in the Spanish waste management plan 2016–2022 that social enterprises handling second-hand goods have priority access to municipal waste collection points in order to acquire goods for repair and reuse.

2.8.5 Low Uptake of Green Public Procurement

This is discussed in further detail in Section 2.10.

2.8.6 Poor Labelling

Labelling can help communicate and engage consumers in the circular economy, where there is some awareness already of the value of the information and where there is consumer choice.

One excellent and recent example is the new labelling requirements for product repairability in France. Applicable to electrical and electronic equipment, this lets the consumer know whether their product is repairable, difficult to repair or not repairable. This is implemented through legislation[30] as an obligation on producers, importers and distributors to communicate to the sellers of their products (and any person who requests it) the index of the repairability for electrical and electronic equipment placed on the market.

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[28] Messman, L. et al, *Potentials of preparation for reuse: A case study at collection points in the German state of Bavaria*, Journal of Cleaner Production, 2019, available at
https://www.sciencedirect.com/science/article/abs/pii/S0959652618336679
[29] Based on collected data from https://www.weeeireland.ie/, and calculations in Section 3.4 of our response to the NWMPCE
[30] Article 16 of the law related to anti-waste and the circular economy (No 2020-105)

Labelling can also support transparency and traceability in relation to the social impact of production of products, as has proven successful for the FairTrade mark.

> We recommend the Department reviews the opportunity to replicate repairability labelling, supports transparency on social impacts, and supports European Commission efforts to develop consumer labelling showcasing the durability and repairability of products including non-energy products.

2.8.7 END OF WASTE

- **Preparation for reuse**

While prevention is outside of the waste regime, the question of waste designation and end of waste does arise in the case of preparation for reuse where, for example, goods are collected as waste that may be perfectly reusable (see above) through channels such as take back schemes (in the case of WEEE) or at Civic Amenity Sites.

The current end of waste regime in Ireland does not sufficiently recognise this potential and is largely focussed on recycling.

> We believe that greater consideration and priority must be given to products that have been or are being prepared for reuse to address this potential barrier.

Furthermore, we believe that products that have been prepared for reuse should not have to comply with the same legislation as new products.

While legislation is updated regularly, this does not render a product already in circulation unusable or unsafe. To enable the continuous circulation of goods as part of a circular economy, it should only be necessary for second-hand products to meet the requirements that were existing when they were first placed on the EU market. A CE marking (for products to which the CE marking applies) should be enough for a second-hand product to be considered as compliant with legislation (for further details see here).

These and other comments were also submitted in our consultation response here to the EPA in the review of End of Waste guidelines.

- **Recycling**

Many of our members working in recycling (e.g. mattress dismantling) wish to explore opportunities to recycle or repurpose the materials recovered.

Some opportunities, such as the reuse of foam or felt may require little further processing but would require end of waste status before local outlets can be developed. Therefore, end of waste criteria for these materials will be important to enable more waste to be moved up the waste hierarchy and recycled.

> We believe representatives from the community reuse and recycling sector should be included in any group to review national End of Waste decisions.

2.9 WHAT DO YOU SEE AS THE MAJOR NONREGULATORY BARRIERS TO THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY IN IRELAND? IN ANSWERING THIS QUESTION PLEASE FEEL FREE TO ADDRESS ECONOMYWIDE ISSUES OR THOSE AFFECTING YOUR SECTOR IN PARTICULAR?

As highlighted above, we need a strategic mix of policy and financial incentives for operations and/or infrastructure that ensures prevention and preparation for reuse are **better designed, more accessible, more affordable, more viable and more attractive than the alternative and become mainstream**. Some non regulatory opportunities are outlined below.

2.9.1 LACK OF LEVEL PLAYING FIELD AFFECTING AFFORDABILITY AND VIABILITY

The *Circular Economy Report for the Joint Committee on Environment and Climate Action* correctly points out that there is currently a market failure in terms of the circular economy, with cost constraints at each of the rungs of the hierarchy ladder.

To address the cost to the consumer of prevention or preparation for reuse, and the viability for the operator of these activities, we propose a range of fiscal incentives including:

- **Subsidised labour costs through existing labour activation schemes or an extension of the Wage Subsidy Scheme for climate related projects.**

One key programme that has enabled many social enterprises in the circular economy to grow, build capacity and become resilient has been the Community Services Programme. This supports community-based organisations to deliver social, economic and environmental services that tackle disadvantage. For many of our members, the scheme underpins employment, training and wider social impacts in disadvantaged communities as well as climate action through reuse and repair activities.

Since 2014, funding for this programme has not changed by more than 5% which has limited access for emerging reuse and repair projects, though it it acknowledged the programme is currently under review[31].

> We propose that additional investment in the CSP should be made to create a dedicated fund for green, circular and climate friendly community services. This has the potential to deliver significant impact in supporting green employment opportunities and driving the climate agenda.

One recent example of how this could work was the launch of €3 million Pilot Bike and E-Bike Upcycling Initiative, delivered through the CSP programme. While this was limited to existing CSP organisations only, it showed the potential for circular activities to address multiple objectives such as sustainable transport, social inclusion and reuse.

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[31] CRNI has been involved in this review process with the DRCD

Alternatively, current mechanisms such as the wage subsidy scheme could be extended for social enterprises that deliver both employment opportunities and climate action for a green recovery.

The Flemish Government provides an excellent example of how reuse and labour activation have been linked through policy instruments. A social and environmental target was developed through waste legislation in a collaboration between the Environmental Agency OVAM and the Ministry of Employment. This required that 5kg/inhabitant goods were reused and 3,000 jobs were created by 2015. The target applied exclusively to activities under the social enterprise reuse network Kringwinkeloop operating in Flanders and is an excellent example of joined up thinking. With buy-in from both Agencies, the target was achieved.

A combined social and circular support scheme could be particularly timely in helping Ireland to meet the WAPCE commitment to introducing national reuse targets ahead of the introduction of EU targets as well as supporting the viability of operations.

- **Invest in Prevention and Preparation for Reuse infrastructure**

The growth of prevention and preparation for reuse activities will require the development of physical infrastructure as well as investment in equipment and operations. Examples of reuse and repair infrastructure are sorting centres, storage hubs, state of the art reuse parks, refill systems[32], reverse logistics systems[33], exchange platforms, redistribution centres, repair / upcycling workshops, surplus food transformation centres and retail spaces. Such infrastructure is currently underdeveloped in Ireland and where it does exist, is under-resourced.

Investment in significant infrastructure for larger scale projects driving prevention and preparation for reuse needs to be prioritised and supported through grants, low interest loans or other mechanisms. The opportunity to support this investment across emerging funds at EU and national level should be explored.

This is a time of great opportunity for the circular economy, with significant European funding going into a green and inclusive recovery. Further details of these funds is provided in Section 2.9.3 below, but of note is the €1 trillion Sustainable Europe Investment Plan. This provides a unique opportunity to source the necessary finance for investment. Other policies, such as *Our Rural Future*[34], also support access to community spaces throughout rural Ireland and should be explored at local level as a way to provide workshop and retail spaces for circular activities.

Infrastructure planning is further elaborated in Section 2.9.2 below.

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[32] For example Loop, an innovative waste-free shopping and delivery model for reusable packaging innovations and refillable product formats, the result of a coalition of large companies including other manufacturers, as well as the retailer Carrefour, courier UPS and resource management company SUEZ, along with TerraCycle. See https://www.unilever.com/sustainable-living/reducing-environmental-impact/waste-and-packaging/rethinking-plastic-packaging/

[33] For example Zeronet's reverse logistics system, run by one of Ireland's first CE100 companies in the Ellen MacArthur Foundation, https://www.thezeronet.com/how-does-it-work

[34] https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

● **Support repair through 0% VAT and/or a national repair grant scheme**

A European Commission Eurobarometer report[35] has found that 77% of European citizens would be willing to have their goods repaired but hardly ever do because it is too expensive.

Under the current VAT Directive, reduced VAT rates may be applied to the *'supply of goods and services by organisations recognised as being devoted to social wellbeing by Member States and engaged in welfare or social security work'*. Several Member States have granted social enterprises the opportunity to offer reduced VAT rates for their services or the sale of their goods where their activities contribute to social welfare, social inclusion and the move towards a circular economy. The Directive also allows for reduced VAT on small repairs of product groups clothing, shoes and bicycles.

> We recommend a reduced or 0% VAT rate for prevention and preparation for reuse, a reduced VAT for recycling activities carried out by social enterprises in Ireland and a reduced or 0% VAT on small repairs.

By way of international example, Belgium has introduced a reduced VAT rate of 6% for goods and services[36] provided by social reuse/repair enterprises if they are engaged in the social development of disadvantaged groups. The VAT rate has also been reduced in Austria for small repairs from 20% to 10%.

Another measure to incentivise repair that has been highly successful in Austria is the "repair bonus". This scheme, implemented in several Austrian federal states and due to be rolled out nation-wide, funds up to 50% of the total cost of a repair, up to a maximum of €100. This only applies to large and small electrical appliances from commercial establishments. Consumers must apply to be reimbursed once the repair is done and an invoice has been paid. This model directly incentivises consumers who otherwise face cost barriers for repair.

> We recommend the Austrian model of giving a "repair bonus" to consumers is explored for Ireland.

● **Phase out subsidies that are inconsistent with the hierarchy**

As submitted in our WAPCE consultation response, economic Instrument #8 of Annex IVa of the revised Waste Framework Directive is *"Phasing out of subsidies which are not consistent with the waste hierarchy"*. Subsidies and other support for recycling and recovery often have unintended consequences that can seriously hamper prevention or preparation for reuse.

Some areas where there is currently an imbalance of subsidies are:

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[35] Flash Eurobarometer 388, ATTITUDES OF EUROPEANS TOWARDS WASTE MANAGEMENT AND RESOURCE EFFICIENCY, https://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf

[36]

https://mk0eeborgicuvpctuf7e.kinstacdn.com/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

- Irish EPR schemes, which have subsidised recycling but provided only very limited support[37] to prevention or preparation for reuse activities. See above for recommendations on this.

- waste-to-energy, which is subsidised for its renewable energy output. This ultimately brings down the gate fee for waste-to-energy and thereby undermines prevention, preparation for reuse and recycling. For this reason, CRNI also supports the introduction of the levies on waste-to-energy.

- funding toward litter and anti dumping. Although essential in maintaining a clean environment, supporting tourism and healthy communities this also represents a subsidy for single use products, where the clean up cost of those products is covered by the State. At least equal if not superior investment should be made in prevention measures such as supporting refill of cups, containers or bottles to rebalance the hierarchy.

- subsidies toward Anaerobic Digestion where this hampers efforts to prevent or redistribute surplus food. Substantial investment in and support for Anaerobic Digestion (AD) in the UK made it cheaper to divert surplus food suitable for human consumption to AD, thereby cannibalising food redistribution. Although AD generates renewable energy, the energy and resources embedded in edible food that are lost in the digestion process far outweigh any benefits of renewable energy production.

A review of all forms of subsidies at national level is required to ensure that activities lower in the waste hierarchy are not impeding prevention and preparation for reuse.

- **Introduce tax rebates on donated goods**

One difficulty many business-to-business operators in prevention (reuse) experience is encouraging businesses to pass on unwanted items for reuse. In the absence of any incentives, businesses are more likely to discard than reuse due to the low cost of disposal in skips and short term inconveniences such as limited storage. Worse still, the accounting system may actively discourage such donations as goods cannot be written off if they are donated for reuse.

A tax incentive encouraging businesses to donate surplus goods or food would divert unwanted materials into the reuse sector.

Examples of products that this incentive may encourage the donation of are:

- end of line, remaindered, surplus and unwanted materials and items with potential from local businesses as handled by ReCreate
- DIY equipment and home improvement materials as handled by Habitat for Humanity
- surplus IT equipment as handled by Rehab Recycle, Camara Education and Tech2Students

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[37] REPAK's "prevent and save" scheme; WEEE Ireland's support to EPA research

- surplus food as handled by FoodCloud for redistribution
- other items including furniture, bicycles, paint donated by businesses to upcycling enterprises

It would also support the introduction of EPOS (Electronic Point of Sale) systems that track and measure sales, which would contribute to the quantification of reuse as identified in the Q2Reuse project. Similar tax incentives have been very effectively implemented in the UK and Northern Ireland for donations from individuals. In Milan[38], Italy, businesses that donate their food losses to charities (supermarkets, restaurants, canteens, producers, etc.) can avail of a discounted Waste Tax.

A new research project being carried out by FoodCloud will also provide a blueprint for a fund or initiative to help companies offset the costs involved in diverting edible surplus food to FoodCloud that otherwise may not have been sent for human consumption. This project, inspired by a project in the UK, Fareshare's 'Surplus with Purpose' fund, aims to shed light on the situation in an Irish context and trial innovative solutions to facilitate the redistribution of surplus food from the horticulture sector to the charity sector, thereby reducing food waste and addressing food insecurity in Ireland. Outputs will include a detailed waste profile report on the produce sector, as well as trialled and tested solutions that reduce edible waste and increase the ability of the sector to redistribute edible waste.

- **Support Business donation transport costs**

A key barrier in food surplus redistribution is the cost of delivery of surplus food to redistribution hubs. In 2018, the UK Government launched a pilot scheme to subsidize transport for retail and manufacturing companies donating food[39]. While this was a one-off provision, it worked well at engaging businesses and demonstrating the viability of passing on surplus edible food for redistribution.

A similar transport subsidy scheme should be piloted in Ireland.

- **Reduce rates for prevention and preparation for reuse centres**

CRNI supports a nation-wide policy of reduced "commercial" rates for prevention and preparation for reuse activities. Currently these rates are varied due to the different approaches by Local Authorities to commercial activities. In some areas, for example, charity shops pay full commercial rates for their retail premises. As a result, charity shops in Ireland are spending approximately €2 million total or between ⅙ and ⅕ of their store income on rates in areas where they are deemed to be commercial operators. This approach diminishes their potential for social impact e.g. providing essential health and disability services that supplement State services.

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[38] See EEB paper
https://mk0eeborgicuvpctuf7e.kinstacdn.com/wp-content/uploads/2020/05/NoTimeToWaste_Annex-IVa_web.pdf
[39] See details here: https://fareshare.org.uk/giving-food/about-the-fareshare-surplus-with-purpose-fund/

By contrast, charity shops in Northern Ireland are exempt from commercial rates and in the UK pay approx. 20% full commercial rates.

> We recommend providing nation-wide guidance to local authorities asking them to support the circular economy by limiting "commercial" rates for prevention or preparation for reuse centres to a maximum of 50% and minimum of 0% rates.

- **Levies on Single Use Products**

We support the upcoming environmental levies on single use products including the increase in plastic bag tax, and levies on single use cups and take away containers.

We also welcome longer term measures set out in the WAPCE to encourage retailers to address excessive packaging and to work toward an EU-wide plastic packaging tax.

- **Continued support for grant funds and research**

We welcome the new Circular Economy Innovation Grant Scheme which provides opportunities for social enterprises in particular to explore new business areas or expand their activities. The annual nature of this scheme is particularly welcome and, alongside the excellent EPA Green Enterprise programme, provides a predictable funding pipeline for innovation and growth.

Other community based funds such as the EPA supported Community Foundation circular economy fund are also welcome to help support grassroots activities.

> We believe these funds should all continue to expand and grow, by connecting to funding streams for climate action.

For example, the Climate Challenge Fund (CCF) in Scotland provides grants and support for community-led organisations to tackle climate change by running projects that reduce local carbon emissions that reduce over-consumption, encourage the reuse of items, extend the life of everyday items through repair and maintenance and promote the recycling of materials. For examples of Circular Economy projects currently live under this programme please see here.

2.9.2 Poor Accessibility to Prevention and Preparation for Reuse

As highlighted above, if prevention or preparation for reuse is not accessible then people cannot act on the information they have about circular economy.

> In the context of the Circular Economy it is crucial that infrastructure planning now incorporates and prioritises infrastructure for prevention (avoidance, reuse and repair) and preparation for reuse and supports this as described in Section 2.9.1.

We propose ambitious goals that set out minimum infrastructure requirements within the community.

For example, the proposed transposition of the Waste Framework Directive in Greece includes a requirement to **develop and operate at least one "Centers for Creative Reuse of Materials" in all municipalities with over 20.000 inhabitants** by the end of 2023. For municipalities with less than 20.000 inhabitants, the local Solid Waste Management Bodies are obliged to create and operate CCRMs through inter-municipal collaborations.

These "CCRMs" are defined as appropriately demarcated and landscaped areas, where every kind of used objects, such as electrical and electronic equipment, furniture, toys, bicycles, books and textiles may be deposited by citizens for reuse.

> We ask for similar ambition to establish reuse centres facilitating sorting and storage of resources to facilitate a much greater level of reuse.

Opportunities also exist in collaborating further with Northern Ireland.

> The potential for a shared island approach to prevention or preparation for reuse infrastructure storage should be explored. This would offer economies of scale and/or a buffer to localised capacity shortages.

One barrier that arises in addressing prevention infrastructure can be liability. Public bodies may be reluctant to invest in infrastructure, such as public water refill stations, where they perceive a future cost liability associated with maintenance or repair.

> Here, as for other investments above, there is a need for an assessment of the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste.

2.9.3   LACK OF FOCUS ON JOBS & SKILLS DEVELOPMENT FOR CIRCULAR ECONOMY

A coordinated approach to training and jobs growth for this sector is required.

CRNI held its biennial conference on 2 and 3 June (recordings here) with a focus on growth of jobs and skills for the circular economy. This brought together over 190 stakeholders from industry, business, social enterprise, education and environment at European and national level.

It highlighted the wide diversity of skills required to support the circular transition from communications to repair, engineering design and more and the current skills shortage in areas of reuse and repair. For example, bike mechanics, upholsterers and upcycling tutors have all proven extremely difficult to source in order to train up a new team of reuse and repair specialists. Some of the skills required are bespoke to prevention activities e.g. textile deconstruction and upcycling, or knowledge of materials.

> The expert group on Future Skills Needs through the Department of Further Education should be asked to consider the circular skills gap and how to fill it.

The event also highlighted the significant funding and policy evolution from the €30 million allocated to Ireland via the European Just Transition Fund, the €1 trillion Sustainable Europe Investment Plan (see above), the €95 billion Horizon Europe research fund, the ESF+ fund for investment in education and training and the €900 million being sought by Government through the EU's recovery and resilience fund[40] including support for a "green skills" training programme.

> These funds can and should be sought after to back jobs and skills development to support a circular transition as a cross Departmental collaborative effort.

Some CRNI members have pioneered community education approaches such as developing new QQI training qualifications[41] and this is to be applauded and supported. Initiatives such as the aforementioned DRCD Pilot Bike and E-Bike Upcycling Initiative, which supports mechanic training, are also welcome in this regard.

> Innovations such as those being pioneered by CRNI members need to be embraced at local level by ETBs and funding is required to support them and similar social and community projects. This also helps to build awareness of the circular economy as highlighted in Section 2.5 above.

This work would be supported by improved data on the number and types of jobs currently in the sector and the potential for jobs creation. Work being undertaken through the Q2Reuse project funded by the EPA on measuring reuse will help create a basis for improved data collection in the long term. In the short term, the Circle Economy's *Circular Economy Jobs monitor*, or other studies, would be worth exploring to create a better understanding of the current situation, and whether there is decoupling of jobs growth and resource use[42].

The CRNI conference also highlighted the importance of the growing ties between circular and social policy and the opportunities this can present. As shown above, CRNI members currently provide over 820 training positions for people through labour activation schemes who would not otherwise have access to the labour market, and this support is particularly important in times of recession. On the flipside, volunteers and labour activation schemes are key to making many reuse and repair activities possible. The role of social economy is elaborated in Section 2.12.

> As the economy reopens and the Departments of Social Welfare and Rural and Community Development expand labour activation schemes[43], it will be important to tie in circular economy goals. Support from all Departments is also needed to address challenges such as the stigma attached to labour activation schemes.

As set out in the *Circular Economy Report for the Joint Committee on Environment and Climate Action*, the circular economy transition represents a (re)training and upskilling opportunity for both young and older workers across all regions of the country, and is therefore also well aligned with the national Just Transition effort.

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[40] See also CRNI submission to this programme at https://crni.ie/key-policy-areas/
[41] See Lightning Talks session from conference here.
[42] where Nevin Economic Research Institute has identified a decoupling of jobs growth and carbon emissions
[43] As proposed in *Our Rural Future* https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

> Just as Ireland has embraced just transition planning for the energy sector, we believe that this same approach is now required for the circular economy.

2.9.5 Liability

As highlighted in our submission to the WAPCE, the issues arising from "duty of care" in Irish tort law are an ongoing concern for the sector. The reuse or repair of a range of items from take out containers to repaired electrical and electronic equipment is restricted by liability concerns.

> We recommend engaging with key authorities such as the FSAI and others to ensure simple guidance is provided for retailers and citizens that protects business but also facilitates reusable containers (and other items as arising) on the journey to a more Circular Economy.

The AGCES pre-consultation rightly raises the issue of liability concerns presenting important barriers to repair. It is extremely difficult to find any insurance company that will provide cover for repair cafes[44]. Although there are over 2,000 repair cafes worldwide, in Ireland these events have been stymied by insurance concerns.

In addition to repair and reuse liability concerns, specialist recycling operators in our membership are experiencing significant increases in insurance premiums. Social enterprises operating in this area are directly impacted by such increases, which hamper their ability to provide people from marginalised backgrounds with jobs and skills through training and placements.

To help tackle these issues, CRNI has joined the Alliance for Insurance reform[45] and supports its work to deliver reforms to the insurance sector. We are pleased to see progress being made in this area in 2021 with new judicial guidelines on personal injuries expected to bring public liability premiums down by over 50%. However this still does not address the issue of liability for repair.

> We would welcome efforts to identify barriers and address this issue and are keen to support this based on the experience of our members.

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

GPP can play an important role in stimulating the market for new circular goods and services and in demonstrating leadership.

The WAPCE proposed to expand the public sector and public bodies' role in reuse via Green Public Procurement and Circular Public Procurement setting **a minimum target for procurement of used goods**.

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[44] See https://repaircafe.org/en/
[45] https://insurancereform.ie/

> We strongly welcome a minimum target for procurement of used goods and submit that it should be included as a goal, with further action being taken to implement this (including in legislation if required) through the AGCES.

We also welcome the initiative to introduce a GPP monitoring and reporting template, capturing the frequency and value of green criteria in public procurements over €25,000. However, it is noted that suppliers in prevention activities are typically small and would respond to tenders below this threshold.

> Therefore, monitoring of circular procurement in the <€25,000 threshold tenders is also required.

The focus in the pre consultation document is on opportunities to participate in and/or lead multinational green procurement initiatives. While this would support circular design at scale in product procurement, we would welcome parallel efforts to build the local supplier base for circular goods and service through the aforementioned target for procurement of used goods, and other measures such as:

- ensuring the appropriate design of grants and funding to support circular and social procurement. Organisations are often required to provide quotes for new items to satisfy funding requirements and demonstrate value for money. This precludes second hand goods even though these may provide the best value.

- requiring public bodies to incorporate reuse policies into asset management and procurement and to adopt a life cycle cost methodology to procurement. This means calculating the cost of an asset or service during its entire life-cycle, not just the cost at the time the contract is awarded to allow the social and environmental costs of the use, repair, recycling and disposal of a product or service to be included.

- requiring public bodies to address circular and social concerns at pre-tender stage and design tenders that facilitate the small scale of actors in prevention and preparation for reuse sector (e.g. through lots, consortium approaches)

- supporting weighted targets for Social Enterprise in public procurement and/or encouraging reserve contracts and/or providing social economy actors active in environmental services to have preferred access to public procurement contracts, notably through the implementation of the most economically advantageous tender (MEAT) criterion (Article 67 of the Directive on Public Procurement).

For example, in Italy all public authorities are required to apply waste prevention criteria into calls for tenders and contracts. The Italian Code for Public Contracts (Legislative Decree 50/2016, as modified by legislative decree n. 57/2017) in Article 34, sets mandatory environmental sustainability criteria that must be applied by public authorities in public procurement.

Actions that Government could take to address the current barriers facing the sector and enable the further development of the circular economy are elaborated in detail in Sections 2.8 and 2.9. They include:

- Creating a framework in the upcoming Circular Economy Bill for targets, coordinating with other plans and policies and tracking progress and taking corrective actions to ensure targets are met.

- Backing a strong sustainable product policy at EU level, the extension of ecodesign regulations to non energy products, prioritise legislative measures over voluntary measures for ecodesign regulations, ensuring ecodesign regulations facilitate the right to repair for all consumers and a cautious approach to product-as-service models

- Requiring EPR schemes to focus to a much greater extent on prevention and preparation for reuse, through financial support as well as effective eco-modulation fee structures and other supports in line with the waste hierarchy. Supporting an EPR scheme for mattresses and reviewing opportunities for EPR schemes for paint and furniture.

- Introducing measures to improve access to goods including:

    o   providing preparation for reuse operators with direct access to material at collection points

    o   requiring that collection and transport agents meet minimum technical recommendations that ensure the quality of waste goods is preserved for preparation of reuse

    o   introducing stronger incentives or requirements for Local Authorities to both record reuse and meet performance targets for reuse at CAS

- Supporting European Commission efforts to develop consumer labelling showcasing the durability and repairability of products including non-energy products and review local opportunities for the same.

- Ensuring end of waste considerations give priority to products that have been or are being prepared for reuse and involve representatives from the community reuse and recycling sector in any group to review national End of Waste decisions.

- Supporting additional investment in the CSP to create a dedicated fund for green, circular and climate friendly community services and/or introduce a new and tailored social and circular support scheme

- Incorporating and prioritising prevention and preparation for reuse in infrastructure planning and supporting investment in this infrastructure through grants, low interest loans or other mechanisms, and exploring opportunities in existing EU and national funds to back this

- Setting minimum infrastructure requirements within the community e.g. a minimum number of reuse centres per rural or urban area.

- Introducing a 0% VAT rate for prevention and preparation for reuse, a reduced VAT for recycling activities carried out by social enterprises in Ireland and a 0% VAT on small repairs and / or a "repair bonus" scheme for consumers

- Reviewing all forms of subsidies at national level on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse

- Introducing a tax incentive encouraging businesses to donate surplus goods or food to the reuse sector and piloting a transport subsidy scheme for food donations

- Providing nation-wide guidance to local authorities asking them to limit "commercial" rates for prevention or preparation for reuse centres to a maximum of 50% and minimum of 0% rates.

- Continuing to expand and grow grant schemes and research funding in this area

- Exploring the potential for a shared island approach to prevention or preparation for reuse infrastructure storage

- Assessing the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste

- Availing of the multitude of European and national funds to back jobs and skills development to support a circular transition as a cross Departmental collaborative effort.

- Facilitating a coordinated approach to jobs and skills, involving the expert group on Future Skills Needs, supporting innovations in community education, tying circular economy goals into any growth in labour activation schemes[46] and embracing opportunities for circular activities through just transition planning

- Engaging with key authorities such as the FSAI and others to ensure simple guidance is provided for retailers and citizens that protects business

- Including a minimum target for procurement of used goods, with further action being taken to implement this, in the AGCES.

- Monitoring circular procurement in the <€25,000 threshold tenders

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[46] As proposed in *Our Rural Future* https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

- Supporting efforts to build the local supplier base for circular goods and service through the appropriate design of grants and funding, requiring public bodies to incorporate reuse policies into asset management and procurement and to adopt a life cycle cost methodology to procurement, requiring public bodies to address circular and social concerns at pre-tender stage and design tenders that facilitate the small scale of actors in prevention and preparation for reuse (lots, consortium approaches), and introducing weighted targets for Social Enterprise in public procurement and/or encouraging reserve contracts and/or providing social economy actors active in environmental services to have preferred access to public procurement contracts

2.12 WHICH SECTORS DO YOU THINK CAN MAKE THE BIGGEST CONTRIBUTION TO MAKING IRELAND'S ECONOMY MORE CIRCULAR?

In Ireland as elsewhere in Europe, social enterprise plays a pivotal role in the circular economy as practitioners and as innovators in driving the circular agenda.

Through the Q2Reuse research project funded by the EPA the research team mapped out reuse operators involved in second hand goods and found that the majority of those identified, just under 50%, were not for profit entities or social enterprises.

The reason why reuse, repair and recycling are so suited to social enterprise model is:

- They are labour intensive, because a range of different products are handled that may need fixing up or cataloging, cleaning, repairing, retail or tech solutions.

- This also means it's suited to a very broad range of skills and training potential, affording marginalised people an opportunity to participate in society through skills training and entry to the jobs market. For example, CRNI members work with individuals or groups that are long-term unemployed, have disabilities, are ex-offenders, come from drug rehabilitation or are part of disadvantaged communities—such as members of the Traveller and Roma community— through employment schemes, such as CSP, Tús, RSS, CE and others. This has knock on social impacts including improved self-esteem and well-being, increased engagement with the community and reduced social exclusion.

- Reuse and repair are highly localised because it involves keeping goods in local circulation so can support the local economy and communities.

- They support a broad range of social aims in addition to creating jobs and training for people at distance from the labour market, supporting low income families and individuals by making available low cost household goods, food, laptops to bridge digital divide or other services

Social enterprises are also pioneers and drivers of research and development. For example, FoodCloud is hugely successful with its tech solution to food redistribution and food waste prevention and has expanded across Europe and the globe. The Rediscovery Centre or National Centre for a Circular Economy is pioneering many areas from research to paint reuse and the

roll out of this nationally. Bounceback Recycling has carried out research into applications for materials recovered from mattresses. Recreate has looked into the impact of creative reuse on mental health. An Mheitheal Rothar is researching the remanufacture of old and damaged bicycles and Roscommon Women's Network is developing a training programme to develop sewing and textile upcycling capabilities – both projects funded through the EPA Green Enterprise programme. There are many other examples besides.

Overall this highlights the important influence of social enterprise operators in waste prevention.

2.13   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?

As highlighted in Section 2.2, we would like to see a clearer set of outcomes or actions in this AGCES. Many of the actions required for the further development of these policy areas are already outlined in the WAPCE, so the reason for delay is unclear.

One benefit of sectoral roadmaps is it facilitates a systems approach to a particular problem. This is going to be essential in understanding where the gaps are in moving to a more circular economy. For example, mapping out the pathways for a particular product group and identifying where there is leakage from prevention into recycling or disposal would help formulate policy measures and better plan infrastructure to address this (see also Section 2.9). Investment is needed upfront to bring prevention into the mainstream.

- **Construction and Demolition**

We agree this is an important area with huge untapped potential for prevention (reuse, repair) through building modification or deconstruction.

CRNI members in the area of construction include Rediscovery Centre, through the reuse and redevelopment of the Ballymun boilerhouse and Habitat for Humanity, which plans to develop a Restore in Ireland this year to facilitate the reuse of DIY and building materials.

We would like to see the support for dismantling for reuse of building products (in addition to secondary construction materials) included in the potential actions listed in Annex 3.

An excellent example of this in Austria is the passing of a Recycled Construction Materials Regulation. The regulation sets an obligation to carry out a pre demolition audit for potentially reusable or hazardous construction components and selective demolition requirements. This prevents overall generation of waste and reduces hazardous waste, thus enabling reuse of construction and demolition materials. If there is a demand for reusable construction parts/materials, they **have to be dismantled in a way that enables reuse**, e.g. bricks, stoneware, roof tiles, doors, windows, sanitary objects, radiators and wooden parquets, etc.

This concept has been brought to full implementation with the innovative Baukarussel "Social Urban Mining" project[47].

- **Textiles**

We fully support the development of a cohesive textiles strategy at national level. CRNI members involved in textile reuse, upcycling or education include the Irish Charity Shops Association, the Rediscovery Centre, Roscommon Women's Network, ReCreate Ireland and affiliate members Attention Attire, the Cloth Nappy Library Ireland, the Upcycle Movement and the Useless Project.

From work on the Nature and Extent of Post Consumer Textiles (NATEX)[48] project supported by the EPA and further work on *Circular Textiles*[49] Green Enterprise project funded by the EPA, there is now improved information on the textiles sector in Ireland, including textile flows and key challenges. It is estimated that over 100,000 tonnes of used textiles are recovered or sent to landfill each year from household, commercial and industrial sources. This compares with approx. 10,000 tonnes being reused locally and roughly 40,000 tonnes being exported for reuse.

From this, the need for additional infrastructure can be considered. For example, if separate collection led to the diversion of 10% more textiles away from household bins, a further 7,000 tonnes would require collection, sorting, retail and/or export, upcycling or downcycling. This represents the total amount currently sold through the network of over 450 charity shops in Ireland. If just 50% of this amount were diverted to reuse[50], it would save 33,250 tonnes carbon[51].

The EPA Green Enterprise Circular Textiles project led by CRNI, commenced in February 2021, aims to inform the design of separate collection schemes and identify ways to expand or develop local capacity for managing the textiles collected. It will help inform the conversation about infrastructure needs for used textile management. Through this work, we look forward to informing the reuse infrastructure requirements for the textile sector.

Although highlighted as an area for further development, we note that Annex 3 does not include specific policy actions for textiles. CRNI also included in the submission to the WAPCE consultation specific recommendations for actions to advance textile circularity as summarised below.

- Recognise that the backdrop is very different to many other EU member states and ensure local second hand clothing retailers (like charity shops) are central to any future separate collection scheme to ensure maximum local reuse.

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[47] https://www.baukarussell.at/

[48] Due for publication shortly. Figures provided can be determined from data in the public domain.

[49] See https://crni.ie/circular-textiles/ for details

[50] Approx. reuse rate at charity shops based on stakeholder interviews through Q2Reuse

[51] Based on KPI of 9.5t CO2/t clothing (based on t-shirt) from report: Miller, S. & Purcell, F., 2017, *Key Performance Indicators for the Reuse sector*, Project Ref 51, available here

- Carry out an awareness campaign coordinated through the national communications strategy on textiles, covering their impact on global systems and encouraging consumers to reduce consumption, buy better quality and use available channels to borrow, swap, or pass them on for reuse rather than placing them in the bin.

- Support investment in local infrastructure and operations (e.g. sorting capacity) supporting textile reuse as a way to ensure that textiles arising from any new separate collection system will find an outlet.

- Encourage better design through European developments (see Section 2.8.2) to address the issue of poor quality textiles which are unsuitable for reuse.

- Encourage Local Authorities to prioritise textile banks that direct textiles to local second hand retailers (e.g. charity shops) when procuring for Civic Amenity Sites ("Resource Parks") or on public land.

- Introduce regulations providing greater control over all textile collection banks (in public or private spaces), requiring clear information to be provided on each bank about the beneficiary of the textile donations and the identity and contact details of the textile bank operators.

We would like to see support for these and other actions for textiles included in Annex 3.

- **Repair and Reuse**

As discussed throughout this document reuse and repair sit on the top tier of the waste hierarchy and are at the heart of a circular economy. It is essential that greater focus is placed on these key areas and specific measures are implemented. Although targets are referred to in this context, we note that no reference is made regarding the Circular Economy Bill including a framework for targets. There is also an urgent need to coordinate and align targets between various Government bodies.

Annex 3 includes measures to promote design for reuse and repair, increase remanufacturing, extend the use of EPRs, support new business models, provide for incentivised take-back and refurbishment for large household goods and address product liability for repaired and re-used goods.

We have addressed many of these as well as a suite of other measures in this response that should also be included in any reuse and repair strategy.

3.0 COMMUNITY RESOURCES NETWORK IRELAND

CRNI's vision is an Ireland where the word waste doesn't exist and the entire community benefits from the environmental, social and economic benefits of reuse. We work towards this vision by supporting our members, mainstreaming community resources and developing our capacity and are funded by the EPA under the National Waste Prevention Programme.

This submission is informed by our 38 members working in reuse, repair and recycling, the majority of which are social enterprises. Our members are leaders and innovators in the circular economy. They are often the main or only organisations handling certain goods or materials, diverting them from the waste stream while providing quality training and job opportunities. They also help to support communities by providing low-cost goods to families in need or by helping to address the digital divide. These members are shown below.

This submission is also informed by our European and national policy and research work. In 2020, CRNI made or contributed to 18 policy consultations at European and national level involving over 180 recommendations. CRNI is a member of the European network RREUSE, sitting on the board, executive committee and holding the Vice Presidency position and is a member of the European campaign Right to Repair and ECOS, the international NGO advocating for environmentally friendly technical standards, policies and laws. In Ireland, CRNI sits on the EPA's National Waste Prevention Committee, the Department of Environment, Climate and Communications' Waste Action Plan Advisory Group, and the EPA's mattress working group. The network also recently contributed to the Department of Rural and Community Development's Awareness Strategy Sub-Group for the National Social Enterprise Policy, the Community Services Programme Review Consultative Forum and the Circuleire Green Procurement working group.

As highlighted above, the network is currently leading research on *Developing a Circular Textiles System for Ireland* through the EPA Green Enterprise programme, and on establishing a network in Northern Ireland for prevention, reuse and repair (*Northern Ireland Resources Network*) supported by DAERA. CRNI is also a partner on research on the *Qualification and Quantification of Reuse*, funded by the EPA through the STRIVE research programme.

For further information on our activities in 2020 please see here.

4.0   CALL FOR CASE STUDIES

4.1   REPAIR HUBS / SCHEMES

Many of CRNI's members operate repair schemes/hubs, providing repair as a service on bicycles, furniture, small engines and tools. The following provides examples of how our Members are engaged in repair schemes/hubs on the island of Ireland.

AN MHEITHEAL ROTHAR

An Mheitheal Rothar offers a full set of bicycle repair and service options, undertaken by our team of experienced mechanics. Their award winning ReCycle Your Cycle initiative takes bikes sent for scrap to Galway City Council Civic Amenities Centre and repairs them, and concurrently teaches valuable cycle mechanic skills to their trainees. This saves carbon emissions and reduces pollution from transporting, smelting down and recasting scrap metal. At the same time it provides skilled jobs, training opportunities and an affordable, fossil fuel free means of transport. An Mheitheal Rothar is based in Galway City. Visit bikeworkshops.ie.

CORK COMMUNITY BIKES

Cork Community Bikes opened a do-it-yourself bicycle workshop in Summer 2007 at Cork Foyer for the community to use. This is open for public sessions where people can bring their bike into the workshop and where there are a good range of tools, new and second-hand parts for use. There are set prices for parts and a donation is requested to cover the costs of running the workshop and buying tools. They also offer bike repair skill workshops, such as bike maintenance, with tools and guidance if needed. Donated bikes are accepted and are repaired and resold. Cork Community Bikes is based in Blackpool, Co Cork. Visit corkcommunitybikes.com.

CYCLESENSE

CycleSense is a social enterprise based in Skibbereen Co. Cork makes it easier for people to cycle by sharing the many benefits of bikes from their reuse centre, where they operate cycle training, advocacy, eco delivery, upcycling and upskilling. They sell affordable secondhand bikes and provide cycle trainers, bike maintenance, community cycle bus and training and upskilling opportunities. CycleSense is based in Skibbereen Co. Cork. Visit cyclesense.ie.

DEAF ENTERPRISES

Deaf Enterprises restores furniture with repair, reupholstery or French-polishing for private individuals as well as upholstery work for bars, hotels, nursing homes, schools, barbers, and playschools. They also sell

quality refurbished goods. Their activities provide employment, training and work experience to the deaf community in Cork. Visit deafenterprises.ie

IRD Duhallow Furniture Revamp

IRD Duhallow Furniture Revamp contributes to the reduction of waste in the region. From its establishment in 2016, IRD Duhallow Furniture Revamp has collected in excess of 4500 items of furniture, diverting a net weight of over 110 tons from potentially ending up in landfills. Of this, over 103 tonnes have been redistributed in the community. IRD Duhallow Furniture Revamp also provides a refurbishment service for those who wish to have their old pieces upcycled and revived. IRD Duhallow Furniture Revamp has a strict target of using no more than 10% new materials versus recycled material. To date, on average, less than 5% of the total net weight constitutes new material, including fabric for upholstery, new paints and varnishes, etc. These figures are carefully calculated and compiled each month to monitor Revamp's environmental performances. IRD Duhallow Furniture Revamp is based in Newmarket, Co Cork. Visit facebook.com/DuhallowFurnitureRevamp.

Renew Enterprises

Renew Enterprises repairs and services bicycles, tools and small engines and upcycles wood garden furniture. They remain mindful of the need to price their products and services in a manner that makes them affordable. They create full-time employment for people who are most distant from the labour market to learn, train and practice new skills and to experience working in a real time working environment and also offer accredited courses. Renew Enterprises is based in Kilbarry, Co Waterford. Visit renewenterprises.ie

Revamp 3Rs

Revamp 3R combines environmental, social and economic factors, by recycling unwanted household furniture for the disadvantaged with training and the provision of employment opportunities for long-term unemployed young people. They collect furniture and household goods that are suitable for reuse, carry out repairs and refurbishment work in their workshop, with steam cleaning and basic repair work adding value and usefulness to the many items currently disposed of. The high quality low cost household furniture is then made available for sale in the showroom. In doing so they provide a variety of training experiences. Through their training programme, they aim to raise the skills, self-esteem, aspirations and achievements of the participants through high quality training within a professional, caring, communicative environment. Revamp 3R is based in Longford. Visit revamplongford.ie.

Reuse Schemes

All CRNI Members are involved in carrying out or supporting reuse, other than our recycling Members. The following provides examples of how our Members are engaged in reuse on the island of Ireland, including second hand retail, repair of donated items in preparation for resale, IT asset management, paint reuse and education or awareness raising.

Back2New

Back2New Community Upcycling builds local awareness of environmental sustainability through upcycling. Their services include furniture upcycling, fabric upcycling along with an upcycling design service. The initiative provides opportunities for work experience and skills development for long term unemployed individuals. Back2New Community Upcycling is based in Newcastle West, Co Limerick. Visit facebook.com/Back2Newupcycling

Camara Education

Camara Education Ireland provides highly secure and efficient solutions for IT equipment. Operating since 2005, they have securely erased over 100,000 hard drives for businesses, government agencies, and private individuals. Camara reuses technology to enhance education of disadvantaged students around the world. Any IT equipment which cannot be reused is recycled at an authorised WEEE facility. Camara Education Ireland is based in Dublin. Visit camaraireland.ie

Diversion Green

Diversion Green shows households, community groups, schools how to make compost with their unavoidable food waste, to see it as a resource not a waste. They offer food waste audits, food waste prevention plans, workshops, challenges, talks to open the conversation around food waste and work with clients to educate them and to show people how to prevent food waste, make compost and how to brown bin successfully as a last resort. Diversion Green is based in Co Wicklow. Visit diversiongreen.ie

East Belfast Mission

East Belfast Mission repairs bikes and refurbishes and upcycles furniture. They sell these plus other secondhand items in their Restore shops, which raise vital funds to support those in need in one of the most deprived areas of Northern Ireland. Visit ebm.org.uk/retail

Gateway to Education Limerick

Gateway to Education Limerick provides secondhand school essentials, such as school books, reading books, clothing, and uniforms, at a nominal fee to support parents with the cost of sending their children to school and children who struggle with homework activities. To date, they have helped over 4000 families keep school cost to a minimum. Gateway to Education Limerick is based in Limerick City. Visit gatewaytoeducation.ie.

IRISH CHARITY SHOPS ASSOCIATION

Irish Charity Shops Association (ICSA) is the nationwide umbrella organisation for charities who operate shops to fundraise for their causes. Textile reuse is the largest re-use activity in Ireland. Charity shops are the main drivers of this re-use activity and have been operating in this space for the past 25 years. They estimate that in total 21,420 tonnes per year textiles is handled by all of their members of which 3,525 tons are reused through sale in their shops and the remainder sold to textile merchants for reuse. A further 2,758 tonnes of books, furniture and bric a brac are reused through sale in their shops annually. Visit icsa.ie

NORTHSIDE COMMUNITY ENTERPRISES

Northside Community Enterprises launched an environmentally friendly paint re-use service in late 2020. The project is in partnership with Cork City Council and allows unused paint that is brought to civic amenity sites to be remixed and sold at their shop and customers will be able to purchase this paint at a fraction of the cost of new. This project comes as part of NCE's commitment to being community leaders in eco-friendly initiatives. Northside Community Enterprises is based in Farranferris, Co Cork. Visit nce.ie

THE REDISCOVERY CENTRE

The Rediscovery Centre is the National Centre for a Circular Economy in Ireland. It is a creative movement connecting people, ideas and resources to support greener low-carbon living. At their headquarters in Ballymun, the Centre supports four reuse social enterprises: Rediscover Furniture, Rediscover Fashion, Rediscover Paint and Rediscover Cycling. These social enterprises use unwanted materials donated for reuse to create new upcycled products and designs. At the same time, they create training opportunities for the long term unemployed and all revenue generated from its activities are reinvested in the enterprise.

In addition to their Dublin based activities, they also run a national education programme delivering environmental workshops and programmes to students at all levels of the formal education system and also to teachers, community groups and the general public. Through their strategic partnership with the EPA they also facilitate the Circular Economy Academy, offering

mentoring and support to individuals and organisations in the early stages of their circular economy journey. Visit rediscoverycentre.ie

Rehab Recycle

Rehab Recycle facilitates secure donations of IT equipment to schools, charities and community groups through their Promise IT programme. They take surplus or unused IT equipment from companies who are no longer using it, securely and certifiably wipe all the data from the hard drives, rebuild the equipment, clean it, repair where necessary, polish it and deliver it to its new home so it can begin its second life. They process and remarket thousands of assets, including computers, laptops, servers, networking equipment, TFT screens, communications systems across Europe on a weekly basis. They also support the sustainable employment of people with disabilities. Rehab Recycle is based in Dublin. Visit promiseit.ie

Rethink Ireland

Rethink inspires others to action, and to support their resilience and sustainability through demonstration and education (at all levels). They inspire conversations through workshops, encouraging reflection and action that will help people rethink their consumption, their connection with nature and demonstrate sustainability. This is to enable and foster prevention of waste, through reuse as much as possible. They offer a workshop and education series and also collaborate with research institutions. Visit facebook.com/RethinkIreland.

Tech2Students

Tech2Students is a nationwide initiative that bridges the digital divide by providing refurbished devices and providing them to students in need. The campaign was developed in April 2020 by Trinity Access and Camara Ireland and in Phase 1, they delivered over 1,000 laptops to students in the Dublin area. Covid 19 showed that the digital divide is real and remains a huge problem for second-level students, those in direct provision and adult learners in marginalised communities. For example, between 50-70% of students in DEIS schools experience a lack of access to broadband or a suitable learning device. They now aim to deliver 5,000 devices to students in need all over Ireland. Visit tcd.ie/trinityaccess/tech2students.

The Useless Project

The Useless Project helps people take steps toward more sustainable living through tutorials, workshops, tips on food waste prevention, reuse, secondhand and upcycled fashion for individuals, schools or businesses. Visit theuselessproject.com.

A Sharing Platform is a circular business model in which collaboration is promoted among users to increase the usage and value of underutilised assets including skills, products, or spaces, for monetary or non-monetary benefits. One CRNI member operates this business model as outlined below.

WESHARE

WeShare is a Gift Economy Community that shares skills, knowledge, practical support, ideas, stuff and time, and all for free. WeShare was founded by volunteers, for volunteers and is run by volunteers. All WeShare activities are conceived, designed, implemented, and administered by people who give their time so that we can all benefit from a more caring society and live a more sustainable life. They give, swap, lend, teach and learn from and with each other – for free. Their website provides the platform for sharing for all groups within the WeShare collective. They are a community of people aiming to reduce the environmental impact of consumption by sharing the things we only use occasionally. WeShare inspires, connects, supports and equips members to create local initiatives that strengthen ourselves and community. They link with other groups for a more sustainable and caring world. WeShare is based in Dublin. Visit weshare.ie.

LIBRARIES OF THINGS

A Library of Things is any collection of objects loaned, and any organization that practices such loaning. The following provides examples of how our Members are engaged in Libraries of Things for toys and nappies.

CARRICKMACROSS TOY LIBRARY

Carrickmacross Toy Library promotes play for children aged 0-6 by enabling families to borrow, not buy quality, sustainably sourced toys. 80% of children's toys end up in landfill or in the sea after being used for an average of six months. Toys are difficult to recycle as they can contain materials that cannot be easily separated. Carrickmacross Toy Library aims to address this environmental challenge through a sustainable toy lending service. Users can borrow up to four toys, puzzles or games for up to three weeks at a time. Parents pay a small membership fee that goes towards repairing or replacing broken toys. Carrickmacross Toy Library is based in Carrickmacross, Co Monaghan. Visit carrickmacrosstoylibrary.lend-engine-app.com/products.

CLOTH NAPPY LIBRARY IRELAND

Cloth Nappy Library Ireland is a nationwide non-profit that provides cloth nappy loans and local support. Disposable nappies take 200-500 years to decompose in landfills: using even just one cloth nappy a day

reduces that number by almost 1,000. Five nappies a day 365 day a year for 2.5 years totals up to almost 4500 nappies. Local libraries do a monthly nappuccino where parents can see various cloth nappies, ask questions and borrow a kit to try at home. Their postal loans cater for newborns, right up to toddlerhood and beyond. Visit clothnappylibrary.ie

CIRCULAR DESIGN

Design is key to the first principle of circular economy, "design out waste and pollution." The following provides examples of how our Members are engaged in the area of design and upcycling of second hand goods and materials.

ATTENTION ATTIRE

Attention Attire was created as a response to Irish festival campsite waste. Every year, hundreds of weekend camping festivals across Ireland generate tonnes of camping waste that is extremely difficult to recycle. Items at the epicentre of this waste crisis are tents, sleeping bags and other material based camping gear which is near impossible to salvage sustainably. They create limited edition, handmade outerwear and accessories from upcycled camping gear left behind at Ireland's music festivals. Each piece is crafted with recycled materials that would otherwise end up in landfill. They use everything – zips, toggles and velcro – ensuring nothing goes to waste. Attention Attire is based in Dublin. Visit attentionattire.ie

NATIVE EVENTS

Native Events produces sustainable events, including shows and markets, demonstrating Irish innovations in crafts and sustainability. They supply trained and skilled crew to events, who follow our ethos of efficiency and sustainability. They hire bespoke, ecodesign, upcycled furniture and decor, and temporary solar power installations for events, shows and activations. Native Events is based in Dublin. Visit nativeevents.ie

THE REDISCOVERY CENTRE

The Rediscovery Centre is the National Centre for a Circular Economy in Ireland. It is a creative movement connecting people, ideas and resources to support greener low-carbon living. Their four social enterprises bring circular design to life through training, lectures and by developing innovative products that highlight circular design principles. Their products are then sold in their Eco Store along with other sustainably designed brands. The Rediscovery Centre is based in Dublin. Visit rediscoverycentre.ie.

ROSCOMMON WOMEN'S NETWORK

Roscommon Women's Network is a local community project and charity based in Roscommon that is piloting a Textile Upcycling Training Project through EPA Green Enterprise funding. They are hoping to reduce the unsold textiles that are generated by their charity shop by upcycling these textile items into different products for sale under their CycleUp brand. They empower women to achieve sustainable development and to achieve individual or common goals. Their work with individual women benefits the women themselves, their families and their communities. Visit rwn.ie

THE UPCYCLE MOVEMENT

The Upcycle Movement is a creative design studio specialising in transforming waste into worth. Neo Collection is their debut design collection, which are bags and accessories made from upcycled wetsuits for everyday adventures. They are home to 'Re Source' – a platform for sourcing waste streams (resources) and connecting these with designers who can repurpose them. They also facilitate talks and workshops which focus on upcycling and finding a business opportunity in locally sourced waste materials. Visit theupcyclemovement.com

CIRCULAR BUSINESS MODELS

A circular business model ensures that materials are retained within productive use, in a high value state, for as long as possible. In addition to reuse, repair, sharing and library of things approaches, we have outlined some examples of how our Members are engaged in circular business models with a focus on refill, rescue, online sales and redistribution.

CONSCIOUS CUP CAMPAIGN

Conscious Cup Campaign works with the industry, consumer and government bodies to communicate and promote waste prevention through reuse. They ask participating cafes to incentivise customers who bring reusables and in turn they promote those Conscious Cafes. They provide support, information and toolkits to all types of community groups, organisations and educational facilities who want to reduce single use food to go packaging. They assist Cafes in reducing their waste, advise them on policy in relation to single use plastics and also provide solutions to participate in the circular economy so they can be both profitable and sustainable. Visit consciouscup.ie

FOODCLOUD

FoodCloud enables the redistribution of surplus food from the food industry to the charity sector through two solutions – the FoodCloud Technology platform and FoodCloud Hubs. Over 12,800 tonnes of food has been received

by over 7,500 charitable groups across Ireland and the UK, with over 28 million meals equivalent helping charities save money on their food bills. FoodCloud exists first and foremost to reduce the environmental, social and economic impact of waste in the food supply chain. In the first instance they focus on redirecting surplus food in the food supply chain from disposal to consumption by people. They work with the food industry to help partners reduce their production of surplus food in the first place. Visit food.cloud

Habitat for Humanity Restore

Habitat for Humanity works beside families to build, renovate or repair their home. Through their ReStores, Habitat provides access to low cost home improvement materials, delivers skills based employability and learning programmes and diverts tons of material from landfill. In addition, their Kitchen Rescue programme gives a new home to old kitchens. By working alongside local companies, Kitchen Rescue reaches out to customers who would consider donating their good quality, used kitchen to the Habitat ReStore. Habitat provides a service to kitchen donors and, by removing kitchens carefully, will rescue them for resale. Through this and their shops, Habitat for Humanity raises funds to support long-term partner programmes in some of our world's poorest communities. Habitat for Humanity is due to open a store in Ireland in the coming year. Visit habitatireland.ie

ReCreate Ireland

ReCreate Ireland makes art materials and educational supplies affordable and accessible to every sector of the community for all kinds of creative purposes, achieved by salvaging clean, reusable materials from business and distributing to members for free in unlimited quantities. The project is based around the concept known as Creative Reuse which encourages the public to reuse materials that would normally be thrown away in all kinds of creative and inventive ways.reuses unwanted materials as art & educational supplies. They source clean, end of line, surplus and unwanted materials and items from business all over Ireland. Then they collect, sort and supply these materials as arts and crafts materials and educational play resources for early years, primary/secondary schools, individual artists and students, families, community and special needs groups. Membership is open to anyone and gives unlimited access to materials. ReCreate Ireland is based in Dublin. Visit recreate.ie

Refill Ireland

Refill Ireland is an environmental project aiming to make Irish towns and cities tap water refill friendly for everyone while on the go. They locate and encourage the creation of locations where filling a reusable water bottle for free from an increasing number of refill stations becomes an easy to do everyday habit helping hydration and ultimately protecting our environment from bottle waste. Their aim is to substantially reduce the amount of, and dependence on, consuming our drinking water in single use plastic bottles. Their "tap map" on

their website or app helps people find over 1300 local businesses where they can refill their own water bottle for free. Visit refill.ie

THRIFTIFY

thriftify **thriftify** connects charity shops with consumers who care, helping to bring about a sustainable fashion movement while growing funding for great causes. They are an online double-sided marketplace that helps charities realise the true value of unsold donated stock, including books, CDs, console games and fashion. They have taken all of the complexities and challenges of selling online and combined them to create the charity retail platform, which is available to charity retailers and other ethical enterprises who want to sell online. The software makes it simple for volunteers working in charity shops to decide whether the item could get a better value on the thriftify platform and to upload it. Visit thriftify.ie

CIRCULAR INNOVATION

As highlighted in Section 2.12, our members are pioneers and drivers of research and innovation. Many of our members already listed above are innovating in, for example, new tech solutions, new material reuse (e.g. paint through the Rediscovery Centre) or upcycling (tent and festival materials with Attention Attire, wetsuits with the Upcycle Movement), or are carrying out important research into circular practices (business models, reuse measurement and much more via the Rediscovery Centre), remanufacturing (An Mheitheal Rothar) or upcycling and training (Roscommon Women's Network). Below are some additional examples of how our Members are engaged in innovation through recycling.

BOUNCEBACK RECYCLING

Bounce Back Recycling is a recycling company whose aim is to divert mattresses and furniture away from landfill. They provide a quality service for companies, councils & householders to recycle their unwanted waste rather than send it to landfill. They work with a number of local authorities across the country, and many retail outlets to improve the recycling rates across the west of Ireland. With the lack of mattress recycling alternatives in the west Ireland, they have established themselves as a leader in the field and have carried out research into applications for materials recovered from mattresses. They reclaim and recycle; cottons, polyester, woven pad, metal and foam. Each material has its own varying commercial use. All recycled mattresses benefit various industries e.g. steel manufacturing, textile manufacturing and carpet manufacturing. This in turn creates gainful employment and reduces high dependency on landfill. After running several successful mattress amnesty events together, they approached Roscommon County Council about providing bulky waste containers at four of their Civic Amenity Sites. Since launching in 2020, and despite successive Covid-19 lockdowns, 400 bulky items have been diverted to recycling this way. Bounce Back Recycling is located in Galway City. Visit bouncebackrecycling.ie

Bryson Recycling delivers high quality, efficient and cost effective recycling services across the UK and Ireland. At the core of everything they do is the triple bottom line; social responsibility, environmental sustainability and economic viability. They are continually looking for ways to improve our recycling services and focus on ensuring that the materials they collect for recycling are of a high quality to be recycled locally. They use this approach as it benefits the local environment and economy and helps to support local jobs. They provide a kerbside box collection service to more than 170,000 households in Northern Ireland and commercial collection service to more than 440 businesses and schools. This is facilitated by innovative collection trucks, which contain multiple separate compartments to allow for more efficient separation of recyclable materials at the point of collection and a clean recyclate stream. Their state of the art MRF (Materials Recovery Facility) plant in Mallusk is used to sort mixed materials collected in wheeled bins from 278,000 homes in Northern Ireland. 35 percent of their materials are recycled in Northern Ireland with over 80 percent staying in the UK. Visit brysonrecycling.org

ECOMATTRESS RECYCLING

Eco Mattress Recycling was set up as the first mattress recycler in Ireland and also as a Social Economy Enterprise. Their mattress recycling processes provide valuable hands-on work experience to people on back to work training programs. They employ a deconstruction process that separates all the materials contained in mattresses and bed bases. They are left with steel springs, foam, cloth and wood and develop markets for the waste derived from deconstructed mattresses. The wood is cut and packed as kindling and the springs, foam, cloth are baled and sent to companies who are fully permitted and specialise in the further processing of these materials. Visit ecomattressrecyclingireland.com

RECYCLEIT

Recycle IT was set up as the first social enterprise in WEEE recycling in Ireland. They are the only Community Electronic Recycling Social Enterprise in Dublin, Kildare and Wicklow providing a neighbourhood, community and business collection and drop off service for all types of waste electrical and electronic equipment. Recycle IT endeavours to support people living and working in communities including householders and place an emphasis on individual needs. The service reduces the volume of electrical and electronic waste going to landfill and helps increase environmental awareness amongst householders, community groups, schools and businesses. Recycle IT will take any electrical items with a plug or a battery. This includes dual purpose business and household appliances like computers, monitors, printers, TV's, washing machines and dishwashers. Recycle IT will also recycle small battery-operated devices like electric toothbrushes, mobile phones and pocket radios. Each year collection services are

offered to approx. 100,000 homes and organisations in Dublin and the surrounding areas. Recycle IT work in partnership with WEEE Ireland and in association with South Dublin County Council. Visit recycleit.ie.

USEL

Usel operates a Circular Economy business model that contributes to the wider Circular Economy through the recycling of mattresses, carpet, furniture, plastic, cardboard and waste electrical items. Usel is Northern Ireland's only mattress recycling provider diverting over 1000 tonnes of waste from landfill every year. They collect mattresses from council recycling centres, bed retailers and hoteliers across the province and bring them back to our licenced facility. 96% of each mattress is recycled, the remaining 4% is sent to energy from waste. In addition, Usel is creating employment opportunities for people with disabilities and health related conditions within its recycling operation. Visit usel.co.uk/u-recycle

Please contact Claire Downey at info@crni.ie for any additional details to facilitate case studies on our Members' work.

CRNI Response to pre-consultation on National Waste Plan for a Circular Economy

1.0	Overview

This last year has seen momentum significantly build behind the community reuse, repair and recycling sector. The European Circular Economy Action Plan 2.0, Waste Action Plan for a Circular Economy and cross sectoral developments like the [Climate Plan Interim Actions](#) and [Rural Development Policy 2021-2025](#) all show real ambition and signal a pivotal time for the circular and social economy.

CRNI welcomes this new ambition, which puts prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning. We hope the same ambition will be included in this National Waste Management Plan for a Circular Economy (NWMPCE), backed by coordinated measures that will drive growth in community based reuse, repair and recycling.

Specifically, we recommend for the NWMPCE:

- introducing a kg/inhabitant reuse target in the next 2 to 3 years
- introducing targets for repair including preparation for reuse of WEEE
- introducing resource efficiency targets and bringing Ireland's circular material use rate above the EU average by the end of this decade
- introducing a mandatory food waste prevention target of 50% by 2030
- exploring the possibility of all island targets for reuse and/or circular material use rates
- treating prevention and preparation for reuse infrastructure as critical waste infrastructure and prioritising this for investment and supports
- supporting indigenous recycling infrastructure to reprocess mattress components and supporting market development for the end products
- developing guidance on limiting "commercial" rates for prevention and preparation for reuse centres to a maximum of 50% and minimum of 0% rates
- the continuation and ongoing development of Reuse Month October
- increasing support for existing national waste prevention campaigns and support for new pilot projects or replication of existing pilots
- supporting ReMark in developing to the next phase and delivering an all island roll out
- exploring the potential for a shared island approach to prevention or preparation for reuse infrastructure

- providing more widespread and appropriate reception facilities that preserve reuse potential at civic amenity sites, including requirements for reception and screening in tender clauses and encouraging operators to partner with or provide priority access to social enterprises
- providing ongoing recognition and continued commitment to collaborate with CRNI and our members
- supporting increased uptake of criteria or tender design and grant or funding design supporting circular and social procurement

We believe annual updates on progress against targets and objectives for the NWMPCE should be embedded in the plan to help track the successes or where remedial action is required.

CRNI is committed to taking action that will support these recommendations, in line with our strategic objectives to support our members and help mainstream community resources. In some cases, we are already working on measures - for example, we are involved in research to develop a methodology for measuring reuse[1], which would underpin a reuse target. We work closely with the Regional Authorities every year on the Reuse Month October campaign and collaborate together on research (including a new EPA Green Enterprise *Circular Textiles* project). CRNI is also involved in setting up a reuse and repair network in Northern Ireland (NI-RN) on behalf of DAERA, and through this work we have included all island insights in this response.

We look forward to working with the Regional authorities and other key stakeholders in the sector as part of a coordinated approach under the NWMPCE to transition to a more Circular Economy.

2.0 BACKGROUND

2.1 PREVENTION, REUSE AND REPAIR IN THE CIRCULAR ECONOMY

When the Regional Waste Management Plans were published in 2015, they provided for the first time concrete measures to support prevention including reuse and repair. This was an important signal for the prevention, reuse and repair sector.

Since then, there have been significant further developments in relation to the vision, policy and legislation for a circular economy. These have been underpinned by the European Commission's Circular Economy Action Plans 1.0 and 2.0 and related legislation (e.g. the revised Waste Framework Directive), developments in climate policy and action plans (which cross reference circular economy[2]) and social economy policy and action plans (which also cross reference circular economy[3]), a general growth in consumer awareness and engagement with suppliers on the sustainability of supply chains and of course the global pandemic Covid-19.

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[1] See http://www.rediscoverycentre.ie/research/g2reuse/
[2] See for example Interim Climate Actions 2021 available at
https://www.gov.ie/en/publication/ccb2e0-the-climate-action-plan-2019/
[3] See for example Our Rural Future: Development Policy 2021-2025 available at
https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

These changes have brought even greater focus on and support for community prevention, reuse and repair activities. Reuse and recycling are at the heart of the Circular Economy and Ireland's new Waste Action Plan for a Circular Economy. The economic, social and environmental benefits of these activities are significant:

- Firstly, the EU acknowledges that prevention, reuse and repair have potential to provide **social and economic benefits** 'including jobs and growth, the investment agenda … the social agenda and industrial innovation.' Social enterprises are ideally positioned to deliver these jobs because of the level of manual labour and diversity of skills types and levels involved in recovering products and materials and returning them to the economy. As highlighted in the *Whole of Government Circular Economy Strategy 2021 - 2022 Pre-consultation*, social enterprises have long been associated with reuse and refurbishment in Ireland, tapping the value of unwanted materials to build social capital in communities through training, retail and capacity building.

- Secondly, by keeping goods within the economy for longer, prevention, reuse and repair can support **resilience in communities** through localising supply chains. Covid-19 has had a significant impact on global supply chains and impacted the supply of new goods as well as international outlets for reuse (e.g. exports of used textiles effectively ceased) and recycling (e.g. collapse in material value). As highlighted in the *Whole of Government Circular Economy Strategy 2021 - 2022 Pre-consultation*, local repair hubs have the potential to support the economic and social renewal of town and village centres, which is an important part of balanced regional development and rural renewal and is also a Programme for Government commitment. This clearly demonstrates the potential benefits of a more localised approach and local investment in Circular Economy activities.

- Thirdly, these activities have significant **environmental and climate benefits**, reducing the consumption of new goods (which reduces the impact of upstream extraction, manufacturing and transport - a 2020 report by Circularity Gap Reporting Initiative highlights that switching to a CE could **reduce global greenhouse gas emissions by 39%**[4]. These savings relate to avoided emissions associated with upstream material extraction, manufacturing and transport and end of life management. More specifically, the European RREUSE[5] network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO2 emissions by 5% while supporting around 400,000 jobs[6].

To move toward a more climate-neutral circular economy that reaps these benefits , the NWMPCE should build on the leadership and ambition shown in 2015 **by putting prevention (including**

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[4] https://www.circularity-gap.world/2020

[5] CRNI is a member of RREUSE, an international network representing social enterprises active in re-use, repair and recycling. RREUSE members divert approx 1 million tonnes of goods and materials annually from landfill through re-use, repair and recycling, generating a combined turnover of 1,2 billion EUR .

[6] See https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/

avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of the plan.

2.2	COMMUNITY RESOURCES NETWORK IRELAND

CRNI's vision is an Ireland where the word waste doesn't exist and the entire community benefits from the environmental, social and economic benefits of reuse. We work towards this vision by supporting our members, mainstreaming community resources and developing our capacity and are funded by the EPA under the National Waste Prevention Programme.

This submission is informed by our 38 members working in reuse, repair and recycling, the majority of which are social enterprises. Our members are leaders and innovators in the circular economy. They are often the main or only organisations handling certain goods or materials, diverting them from the waste stream while providing quality training and job opportunities. They also help to support communities by providing low-cost goods to families in need or by helping to address the digital divide. These members are shown below.

This submission is also informed by our European and national policy and research work. In 2020, CRNI made or contributed to 18 policy consultations at European and national level involving over 180 recommendations. CRNI is a member of the European network RREUSE, sitting on the board, executive committee and holding the Vice Presidency position and is a member of the European campaign Right to Repair. In Ireland, CRNI sits on the EPA's National Waste Prevention Committee, the Department of Environment, Climate and Communications' Waste Action Plan Advisory Group, and the EPA's mattress working group. The network also recently contributed to the Department of Rural and Community Development's Awareness Strategy Sub-Group for the National Social

Enterprise Policy, the Community Services Programme Review Consultative Forum and the Circuleire Green Procurement working group.

As highlighted above, the network is currently leading research on *Developing a Circular Textiles System for Ireland* through the EPA Green Enterprise programme, and on establishing a network in Northern Ireland for prevention, reuse and repair (*Northern Ireland Resources Network*) supported by DAERA. CRNI is also a partner on research on the *Qualification and Quantification of Reuse*, funded by the EPA through the STRIVE research programme.

For further information on our activities in 2020 please see here.

3.0 EXISTING SITUATION AND RECOMMENDATIONS

3.1 PREVENTION, REUSE AND RECYCLING TARGETS

The aim of the 2015 Regional Waste Management Plans (RWMPs) was to underpin European and national mandatory targets and, in doing so, ensure the health of communities in the region, its people and the environment are not compromised. The three common targets set out in the three Regional Waste Plans were:

- 1% reduction per annum in the quantity of household waste per capita over the period of the plan
- achieve a recycling rate of 50% of managed MSW by 2020
- reduce to 0% the unprocessed residual MSW to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices

Of most relevance to CRNI members activities is the first goal to reduce household waste arising per capita, as prevention, reuse and repair would all contribute to meeting this target. Our social recycling members working with a range of materials including specialist recycling of mattresses and WEEE also contribute to recycling targets.

EXISTING SITUATION: PREVENTION AND REUSE

While the data is difficult to obtain, our understanding is that household waste per capita has increased, rather than decreased, since 2015. Although this shows that the Regional Plans objective to reduce household waste per capita by 1% was not achieved, we support the ambition it represents.

Current levels of reuse and repair in Ireland are estimated from CRNI member **environmental, social and economic** impact data compiled each year. In 2020, our members had the following estimated impact:
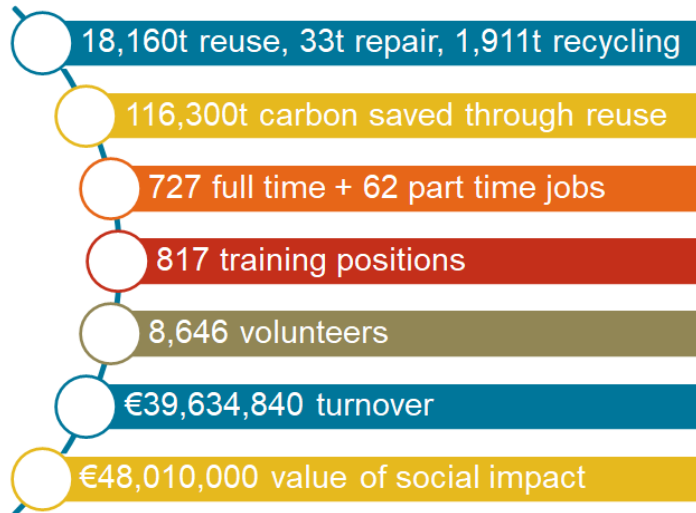
Of these figures:

- Approximately 12,000 tonnes relates to **textile reuse** through the extensive charity shop network within the Irish Charity Shop Association (ICSA) and other actors. Over half of this is reused locally, which is high compared with other Member States and likely due to the quality of goods collected in-store.

- The next largest product groups included in the reuse figure are **food** redistributed (approx 3,000 tonnes)

- Other materials included in this reuse figure are IT and other equipment, furniture, paint, bicycles, wood and surplus packaging and other stock

- The recycling figure reflects Ireland's network of social **mattress recyclers**, WEEE recycling and other streams that cannot be reused.

The number of jobs and training positions created by our members demonstrates the strong social impact of this work. It highlights the potential impact that investment in the sector could have on jobs growth as well as environmental gain, in moving Ireland toward a more climate-neutral, circular economy as outlined above.

However overall, this level of reuse represents less than 1% of all goods discarded[7]. Taking into account reuse operators not included in our membership, we estimate reuse is no greater than 3 - 5%[8] of all goods discarded overall. Ireland's material consumption also remains above the EU average and continues to rise as the economy grows. As highlighted in the Whole of Government Circular

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[7] It is noted that an EPA funded research project Q2Reuse will clarify the scope and scale of reuse activities.
[8] Our membership base is broadly representative of the reuse sector in Ireland, including over 460 retail outlets under the umbrella of the Irish Charity Shop Association. The reuse estimate from members at 23,200 tonnes represents less than 1% of all goods discarded. Based on a conservative estimate of non-member reuse including second hand retail and online exchanges we do not estimate the overall figure to be greater than 3 - 5%.

Economy Strategy 2021 - 2022 pre-consultation document, Ireland's circular material use rate was the second worst in the EU in Ireland in 2019.

Reuse and repair clearly remain far from mainstream in Ireland.

EXISTING SITUATION: REPAIR

Many CRNI members undertake repair activities, with a particular focus on furniture, IT asset management and bicycles. However, certain types of repair - and especially community based repair such as repair cafes or repair of other EEE - remains hampered by liability and administrative barriers in Ireland.

The world-wide repair cafe movement[9] aims to engage more people in repair through community events where volunteers provide free repair advice and show visitors how to repair. Although there are over 2,000 repair cafes worldwide, in Ireland these events have been stymied by insurance concerns. It is now extremely difficult to find any insurance company that will provide product liability cover for repair cafes.

CRNI, as a member of the [Right to Repair](#) campaign, is working at European level to address other barriers to repair including design factors and access to spare parts and repair manuals.

RECOMMENDATIONS: PREVENTION, REUSE AND REPAIR TARGETS

Progress against prevention targets can be difficult to interpret as population changes or consumption patterns can affect them as much as actions that directly reduce household waste arising. Furthermore, the absence of any repercussions for failure to meet the 1% household waste reduction has weakened the case for support and investment in waste prevention including reuse and repair.

In the revised NWMPCE, we support the introduction of targets for reuse, repair and resource consumption as committed to in the Waste Action Plan for a Circular Economy. The case for introducing reuse targets in particular is strong.

Targets play an essential role where the markets fail to ensure the right environmental or social outcome, due to a failure to recognise externalities. For example, renewable energy and recycling have been widely subsidised through different schemes to ensure that Ireland meets its respective targets and as a result, both activities could now be considered mainstream. As flagged above, reuse and repair remain far from mainstream in Ireland and a target is needed to help address this market failure.

Introducing quantitative targets for reuse would put Ireland in a leadership position and prepare the sector for the introduction of targets under the Waste Framework Directive from 2024. The European Prevent Waste Coalition paper *10 Priorities to transform EU waste policy* called for, as the top

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[9] See https://repaircafe.org/en/

priority, ambitious and binding waste prevention and reuse targets. The CIWM[10] found a key barrier to reuse in the UK and Ireland was a lack of targets or legislation to drive the sector.

> **RECOMMENDATION: A kg/inhabitant reuse target (as per the Flemish target)** that is linked to job creation must be introduced.

This was effectively achieved in Flanders and supports the social economy which is instrumental in delivering reuse.

In addition, any targets that repair[11] and resource efficiency[12] are warmly welcomed. Further clarity on what is envisaged in relation to these would be helpful. Regarding repair, CRNI has been seeking the introduction of targets for preparation for reuse of WEEE (IT equipment and LHA) as outlined below. We also welcome the ambition in the *Whole of Government Circular Economy Strategy 2021 - 2022 pre-consultation* to bring Ireland's circular material use rate above the EU average by the end of this decade.

Setting a target for and measuring reuse in Ireland presents an opportunity to make a crucial link between reuse and emissions reduction under the Climate Action and Low Carbon Development (Amendment) Bill 2021. Already the Climate Interim Actions 2021 clearly demonstrate joined up thinking and a strong commitment from Government to climate action and circular economy. While we acknowledge this is a complex area due to the global nature of manufacturing of consumer goods, providing a link between reuse and manufacturing emissions would highlight the impacts of production and distribution of the goods we use on a daily basis and strengthen links to the Climate Action Plan.

> **RECOMMENDATION:** We propose that the NWPCE should commit to exploring this potential for **reuse to contribute to greenhouse gas emissions reporting.**

As the sector strengthens in Northern Ireland, with the establishment of the Northern Ireland Resources Network, there is also an opportunity for cross border collaboration on a reuse target which could drive a Shared Island approach to reuse and repair. The Department of the Economy in Northern Ireland is currently working to benchmark Northern Ireland's circularity gap and has established a Circular Economy coalition, which involves the [Northern Ireland Resources Network](#)[13], to help drive progress to create a more CE in Northern Ireland.

> **RECOMMENDATION:** The opportunity for all island approaches to targets for both reuse and circular material usage rates and/or circularity gap closure should be explored.

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[10] CIWM report, Reuse in the Uk and Ireland - a "State of the Nations" report for the CIWM, 2016, available at https://www.ciwm.co.uk/ciwm/news-and-insight/reports-and-research.aspx

[11] Noting the scope of the reuse measurement under investigation in Q2Reuse does not include repair where the item is returned to the owner.

[12] Which may be informed by the work of Oeko-Institut and Plan Institut on *New Data Streams for Circular Economy Monitoring* (discussed during a webinar in March 2021) which will be developed into monitoring frameworks by The European Topic Centre.

[13] Recently established by CRNI with funding from DAERA

CRNI would be happy to contribute to further discussions with DAERA on these targets.

The ability to measure reuse is crucial in setting a reuse target. Clear and transparent methods of measurement and close monitoring would be required to prevent any false reporting or out of scope activities being included.

Ireland is currently leading the way in developing a methodology for measuring reuse through the EPA funded Q2Reuse project[14]. Led by the Clean Technology Centre (CTC), in collaboration with the Rediscovery Centre, Community Resources Network and the Eastern Midlands Waste Region, this project aims to develop methodologies for the qualitative and quantitative assessment of the reuse sector that reflects EU guidance but is tailored to the Irish market.

The tailored methodology made available through the Q2Reuse project to measure reuse will facilitate the near term introduction of targets and help realise the ambition in the Waste Action Plan for a Circular Economy to introduce a reuse target in advance of any EU targets.

RECOMMENDATION: The **reuse target should be introduced within the next 2 to 3 years.**

As highlighted above, clear accountability and consequences for failure to meet any target are required for it to be effective. The current "competition in the market" model removes any accountability for waste prevention or reuse from waste collectors, who only focus on recycling or disposal. There is no mechanism for them to support or drive wider prevention or reuse activities. We believe EPR schemes (for relevant product groups) and waste collectors **should be held accountable for waste prevention to a much greater extent** - including for at least part of a reuse target.

Requiring the reuse sector to measure their activities toward a target would add an administrative burden to some already struggling enterprises. Supports will be crucial to underpin a reuse target including financial instruments or grants for data collation. **Further recommendations in relation to supports are provided in Sections 3.2 and 3.4.**

RECOMMENDATION: While we understand that data to support annual reports for regional plans is challenging to obtain, **we propose that annual updates on progress against targets and objectives for the NWPCE should be embedded in the plan.**

This would enable a wider discussion about potential countermeasures that can be taken if required to meet the ambition of the plan. A strong precedent has been set recently in terms of progress updates in Ireland's *Rural Development Policy 2021-2025*, which commits to committee oversight and biannual progress updates on the implementation of the policy.

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[14] See http://www.rediscoverycentre.ie/research/q2reuse/ for more information

Food Waste Prevention Targets

In Ireland, the EPA estimates that one million tonnes of food is wasted every year. At the same time, one in ten people do not have enough food to eat.

CRNI member FoodCloud is a social enterprise prioritising feeding people by redistributing surplus food to charities. In 2020 they redistributed over 3,000 tonnes surplus food.

RECOMMENDATION: For Ireland to make progress in food waste reduction and become a "farm to fork" global leader in this area, **a mandatory food waste prevention target of 50% by 2030** along with an interim target to drive progress must be introduced.

An interim target will place Ireland on the correct pathway in the near term. For example, an interim target for 2025 of 30% food waste prevention was set in Scotland. This was measured against the baseline year being discussed at EU level of 2017/18.

As for a general reuse target outlined above, any food waste prevention target must be supported by data, policy drivers and underpinned by clear lines of accountability and penalties for failure to meet targets. While a commercial food waste measurement methodology has been developed[15], it has not been widely adopted to date across the supply chain. However, a baseline year could be selected now for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

Further data is also being investigated as regards food waste prevention. FoodCloud has just embarked on a project to investigate the potential for increasing surplus food redistribution from the Irish horticulture sector. There is evidence which has been recently studied through Munster Technological University and confirm through the Efficient Food Project that a significant amount of edible food is being 'wasted' (AD, animal feed, in-field) in the sector and that with the correct intervention and financial support for producers, redistribution of edible products could become a more attractive option.

This project, inspired by a project in the UK, Fareshare's 'Surplus with Purpose' fund, aims to shed light on the situation in an Irish context and trial innovative solutions to facilitate the redistribution of surplus food from the horticulture sector to the charity sector, thereby reducing food waste and addressing food insecurity in Ireland. Outputs will include a detailed waste profile report on the produce sector, as well as trialled and tested solutions that reduce edible waste and increase the ability of the sector to redistribute edible waste.

Other support measures would clearly be required to support this target and align investment with the food hierarchy and to raise consumer awareness about the true cost of food waste. For example, the project referred to above will provide a blueprint for a fund or initiative which helps companies

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[15] Available for download at https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/

to offset the costs involved in diverting edible surplus food to FoodCloud that otherwise may not have been sent for human consumption.

EXISTING SITUATION: PREPARATION FOR REUSE

Preparation for reuse refers to the operation on the second tier of the waste hierarchy involving *checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre- processing*. In Ireland, the only activity formally registered as "preparation for reuse" is the refurbishment and sale of Waste Electrical and Electronic Equipment (WEEE) that has been taken back through the EPR schemes as a waste.

There are currently no companies in Ireland registered for preparation for reuse. This means that all of the WEEE collected via take back schemes or at Civic Amenity Sites is recycled.

According to the European Commission, between "*13% and 16% of waste electric and electronic equipment (WEEE), furniture and leisure goods disposed of at household waste collection centres are in excellent working condition and could easily be prepared for re-use*"[16]. This suggests that in Ireland, up to 2,325,000 appliances were lost to recycling in 2017 that may have been perfectly functional and potentially reusable when collected by take back schemes[17].

RECOMMENDATIONS: PREPARATION FOR REUSE TARGETS

Urgent measures are required to address the total absence of preparation for reuse activity, which is a major gap in Ireland's Circular Economy journey.

CRNI has strongly advocated[18] targets for preparation for reuse in line with recommendations in the EPA research report[19] by University of Limerick, with a focus on IT equipment and large Household Appliances (LHA)[20]. These must be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014.

Other measures are also required to underpin a target or generally support preparation for reuse are within the plan's remit. In particular, suitable infrastructure is required in order to underpin a preparation for reuse activity.

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[16] European Commission (2019), *Waste potential: more of our refuse electronics, furniture and leisure goods could be reused, suggests German study*. Available at https://ec.europa.eu/environment/integration/research/newsalert/pdf/waste_reuse_potential_Germany_530na3_en.pdf
[17] Based on collected data from https://www.weeeireland.ie/
[18] See also our submission to the Waste Action Plan for a Circular Economy at https://crni.ie/key-policy-areas/
[19] Report prepared for the EPA by Johnson, M., McMahon, K, Fitzpatrick, C. *Research of Upcycling Supports to Increase Re-use, with a Focus on Waste Electrical and Electronic Equipment (UpWEEE)*, REF 2015-SE-DS-5, published 2018
[20] LHAs and IT were identified as the main product categories with potential for re-use. Further consideration and feasibility studies for alternative WEEE product categories and the introduction of preparation for re-use is necessary before increasing the number of product categories that preparation for re-use will apply to.

> **RECOMMENDATION: Preparation for reuse infrastructure must be viewed as critical waste infrastructure** and prioritised for investment and support in line with the waste hierarchy.

As long as these activities continue to be omitted from the overall landscape of resource management, they will not be brought into the mainstream as is required for an effective circular economy. This is elaborated further in Section 3.4.

Access to sufficient volumes of good-quality material is also cited in the EPA/UL report as a "*block that hinders the success of the Irish system*" in establishing and preparing for re-use for WEEE.

> **RECOMMENDATION:** Recommendations from the EPA/UL report to reduce the damage to the structural integrity of appliances, cosmetic dents, scratches and blemishes, and general transport damage should also be implemented including:
>
> - **improving collection facilities at civic amenity sites** and retailers;
> - providing preparation for reuse operators **with direct with access to material at these facilities;**
> - requiring compliance by collection and transport agents to minimum technical recommendations that ensure the quality of waste goods is preserved for preparation of reuse.

Many of these actions can be supported through transforming Civic Amenity Site services and functions, as part of the current ongoing review. This is further elaborated in Section 3.4.

EXISTING SITUATION: RECYCLING

As noted the former RWMPs included a target of achieving a recycling rate of 50% of managed MSW by 2020. They also included a Policy Action C.3.1 to liaise with & support Economic Development Departments of Local Authorities in the identification of enterprises and potential clusters of enterprises for the development of secondary material markets.

The revised Waste Framework Directive includes more stringent combined preparation for reuse / recycling targets. These are not only more ambitious in the rate that must be achieved, but are also more challenging for Ireland because they now must be measured against the entire MSW stream rather than specific material categories as was previously the case.

While this will make it more difficult to meet the target, it also presents an opportunity to include previously uncounted activities within the target calculation.

For example, approximately 620 tonnes of steel springs were recycled by our social mattress recycling members in 2020. Other materials from dismantling such as fabric covers or "ticking" (mainly polyester), foam padding (polyurethane foam or synthetic latex and felt padding (natural and synthetic fabric scraps) could also contribute to these targets in the future if recycling outlets became available.

However, there is currently a lack of indigenous facilities to deal with these materials. As most of the recycling markets for these products are only available in Britain, their bulky nature and cost of shipping and transportation reduces the margin to recyclers. Outlets are needed within Ireland to close the loop and better facilitate reuse and recycling of these problematic waste streams.

RECOMMENDATIONS: RECYCLING TARGETS

RECOMMENDATION: The full recycling potential for mattresses will only be realised by **supporting indigenous recycling infrastructure** to reprocess mattress components (textiles, foams) in infrastructure planning, and supporting market development for the end products.

Some excellent work has already been carried out in this area e.g. by the former Boomerang Enterprises in partnership with Ventec on the noise barrier properties of materials. However, further research and business supports are required to demonstrate the properties of these materials and bring them to market. If successful, these materials could be marketed under a quality mark such as ReMark[21] as a recognised symbol for consumers for traceable, genuinely repurposed and reused goods.

A shared island approach to mattress recycling infrastructure, including expanded deconstruction capacity and end markets for extracted components (that currently have to be shipped for recycling) also warrants further investigation as a way of providing cost efficiencies in recycling of this difficult waste stream.

Other measures to drive mattress recycling include the introduction of a mandatory EPR scheme, **increased collection of mattresses through Civic Amenity Sites** (see Section 3.4) in partnership with social enterprise and a ban on mattresses going to landfill.

3.2   MAKING AVAILABLE RESOURCES FOR WASTE PREVENTION ACTIVITIES

EXISTING SITUATION: RESOURCES FOR WASTE PREVENTION ACTIVITIES

Policy Action B.1.2 of the former RWMPs is to ensure that an ongoing financial allocation is made in the Local Authority budgets to cover expenditure on waste prevention and related activities over and above staff costs and any grant aid (a minimum of €0.15/inhabitant).

Local and national supports and investment will be crucial in driving the sector in today's linear economy, and ensuring that reuse and repair become the cheapest and/or most convenient options.

CRNI is aware of some excellent examples of Local Authorities supporting new initiatives to get off the ground, for example paint reuse in Waterford and Cork. However, in the absence of any data relating to how this money was spent on prevention and related activities, it is difficult to understand how effective this measure has been.

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[21] See https://crni.ie/re-mark/

As noted in Section 3.1, **more regular reporting on progress against plan objectives** would help clarify how effective the spend has been and generate discussion on how it could be better targeted in the future.

CRNI has been lobbying for the introduction of support measures including a 0% VAT on refurbished goods, a tax incentive encouraging businesses to donate surplus goods or food, reduced "commercial" rates nation-wide for prevention and preparation for reuse activities, investment in infrastructure, a dedicated Community Services Programme or equivalent for green, circular and climate friendly community services and inclusion of second hand bikes in the Cycle to Work Scheme.

At least three of these instruments are within the remit of the National Waste Plan; reduced "commercial" rates, Green Public Procurement and investment in infrastructure.

1. Rates

Currently, rates for reuse and repair centres are varied due to the different approaches by Local Authorities to commercial activities.

In some areas, for example, charity shops pay full commercial rates for their retail premises. As a result, charity shops in Ireland are spending approximately €2 million total or between ⅙ and ⅕ of their store income on rates in areas where they are deemed to be commercial operators. This approach diminishes their potential for social impact e.g. providing essential health and disability services that supplement State services. By contrast, charity shops in Northern Ireland are exempt from commercial rates and in the UK pay approx. 20% full commercial rates.

A uniform reduced rates approach to reuse or repair centres nation-wide is within the scope of the NWMPCE and would help underpin the viability of reuse and repair operations.

> **RECOMMENDATION: Support for waste prevention activities should include rates relief.** This could be delivered through nation-wide guidance to local authorities asking them to support the Circular Economy by limiting "commercial" rates for prevention or preparation for reuse centres to a maximum of 50% and minimum of 0% rates.

2. Green and Social Public Procurement

There is significant potential for Local Authorities and other public bodies to leverage their purchasing requirements to deliver circular and social impacts. **Recommendations on this are elaborated in Section 3.4.**

3. Infrastructure

The growth of prevention activities including reuse, redistribution and repair will require the development of physical infrastructure as well as investment in operational and behavioural change activities. **Recommendations on this are elaborated in Section 3.4.**

EXISTING SITUATION: PROMOTIONAL ACTIVITIES

One of the roles of the Regional Authorities is to provide education and advice to households and communities to empower them to reduce, reuse and recycle. Key policy actions under the former RWMP objective (B.2) include collaboration on prevention initiatives and programmes targeting priority areas, cataloguing and disseminating documents on waste prevention actions and programmes, maintaining effective local awareness and education programmes and maintaining and developing prevention measures and systems in Local Authority offices and operations.

Many excellent initiatives have evolved from this objective including the annual Reuse Month campaign, support for the Conscious Cup campaign, Refill Ireland and the National Centre for a Circular Economy and the development and roll out of the mywaste.ie portal. Reuse month continues to be a valuable platform for promoting reuse and CRNI values the ongoing collaboration with the regional authorities, and support for our members, during these campaigns. Like any campaign, its value continues to grow as it becomes more widely known and can build on past support.

With an increasing number of stakeholders including CRNI members, DECC, NGOs, involved in the area of prevention, reuse, and repair it has become more important to coordinate and collaborate on awareness campaigns and messaging. For example, many CRNI members focusing on awareness raising and promotion of reuse through creative or practical means include the Cloth Nappy Library Ireland, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green and Native Events.

RECOMMENDATIONS: PROMOTIONAL ACTIVITIES

RECOMMENDATION: Alongside our members, we support and look forward to the continuation and ongoing development of Reuse Month October as an important fixture in the calendar.

The role of community action like that fostered during reuse month and other local authority initiatives is very important in raising awareness and reducing waste in key areas. The Local Authorities are in a unique position to support such actions that provide opportunities for experiential learning that have real impact at community scale.

RECOMMENDATION: We would like to see **more support for existing national waste prevention campaigns** such as Conscious Cup Campaign, Refill Ireland and Cloth Nappy Library Ireland - through Local Authority funds, promotional channels and through support from Councillors.

We would also like to encourage more support for pilot projects **or more support to replicate successful pilots** in other areas.

In general, we encourage **greater collaboration** between the Regional Authorities through the NWMPCE, the proposed new DECC national communications and education programme and other stakeholders in relation to the provision of education and advice on reducing, reusing and recycling, including campaigns.

One important tool aimed specifically at promoting behavioural change is "ReMark", a quality mark developed by CRNI through the EPA Green Enterprise programme. ReMark aims to address negative consumer perceptions about the quality and safety of second hand goods. It builds customer experience through improved service and visual merchandising as well as delivering training and additional profile to build the capacity of reuse operators as summarised in the videos here[22].

Three CRNI members were accredited as part of the ReMark pilot programme - Duhallow Revamp, Dublin Simon Communities and Back2New.

According to Zero Waste Scotland, the Scottish quality mark Revolve[23] is **a key part of the reuse development work** being taken forward as part of the Scottish Government's *Making Things Last strategy*[24]. This quality mark has been funded by the Exchequer through the Zero Waste Scotland programme for over 8 years and has accredited over 150 stores. It is used in Scotland to provide training and capacity building as well as transparency and assurance to businesses, public bodies and citizens for procurement of services or goods.

Significant funding has been invested in developing and piloting ReMark in Ireland. We believe, as for Scotland, that it can be a game changer for the sector in Ireland, underpinning Circular Procurement as well as consumer confidence in second hand goods. *Northern Ireland's Waste Prevention Programme 2019: Stopping Waste in its Tracks* commits in Action to establishing a reuse quality mark. We believe an all island approach could bring further momentum and benefits and is worth exploring.

> **RECOMMENDATION: Support is now required to develop it to the next stage,** with the opportunity for roll out on an all-island basis in collaboration with Northern Ireland's DAERA[25].

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[22] https://www.crni.ie/re-mark/

[23] upon which ReMark is based

[24] https://www.letsrecycle.com/news/latest-news/zero-waste-scotland-reports-growth-of-revolve-standard/

[25] DAERA commits through *Delivering Resource Efficiency* to supporting "the development of a certifiable re-use voluntary quality assurance scheme and work with DECLG in assessing the feasibility of introducing a scheme on an all-island basis".

3.4 ESTABLISHING REUSE, REPAIR AND PREPARATION FOR REUSE ACTIVITIES AND NETWORKS TO RECIRCULATE AND EXTEND THE LIFESPAN OF ITEMS

EXISTING SITUATION: ESTABLISHING REUSE, REPAIR AND PREPARATION FOR REUSE ACTIVITIES

One of the roles of the regional authorities is to work with Local Authorities to achieve waste prevention and resource efficiency targets. The former RWMPs Policy Action C.1.1. is to engage with and facilitate enterprises in the development of repair and preparing for reuse activities. The *Waste Action Plan for Circular Economy* also commits to reviewing the role of the State in supporting the development of indigenous recycling infrastructure.

In the absence of any baseline data, it is difficult to measure growth in reuse and repair activities. There have been many positive developments supported through the Regional Plans or Local Authorities - for example, support for educational services via the National Centre for a Circular Economy at the Rediscovery Centre, the repairmystuff.ie platform and the expansion and production of paint reuse (Rediscovery Centre, Northside Community Enterprises, CycleSense, Renew Enterprises).

However, social supports such as the Community Services Programme, Community Employment scheme or TuS, remain fundamental to the development of new enterprises or ongoing viability of existing reuse and repair enterprises in Ireland. Other funding such as the EPA Green Enterprise programme and Rethink Ireland, have also facilitated the development of new activities (e.g. Roscommon Women's Network CycleUp, Tech2Students).

As shown in Section 3.1, there is **significant scope for growth and development of the prevention and preparation for reuse sectors**. This will require the development of and support for new infrastructure to facilitate the handling and management of increasing quantities of product flows.

Examples of reuse and repair infrastructure are repair / upcycling workshops, sorting centres, storage hubs, reuse parks, refill systems[26], reverse logistics systems[27], exchange platforms, redistribution centres, surplus food transformation centres and retail spaces. Such infrastructure is currently underdeveloped or where it does exist, is under-resourced.

RECOMMENDATIONS: GROWTH IN REUSE, REPAIR AND PREPARATION FOR REUSE ACTIVITIES

The growth of prevention activities including reuse, redistribution and repair will require the development of physical infrastructure as well as investment in operational and behavioural change activities.

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[26] For example water refill stations, washing facilities for reusable cup refill, reusable packaging refill stations e.g. Loop
[27] For example Zeronet's reverse logistics system, run by one of Ireland's first CE100 companies in the Ellen MacArthur Foundation, https://www.thezeronet.com/how-does-it-work

One centrally important function of the RWMPs - and now the NWMPCE - is infrastructure planning. Historically this has focused on recycling, recovery and disposal infrastructure.

> **RECOMMENDATION:** In the context of the Circular Economy **it is crucial that infrastructure planning now incorporates and supports infrastructure required for prevention** (avoidance, reuse and repair) **and preparation for reuse**.

In parallel, it is important that the planning process ensures material flows are not "locked in" to established recycling or recovery capacity, to the detriment of prevention and preparation for reuse activities.

> **RECOMMENDATION: Investment in and support for infrastructure driving prevention must be prioritised,** followed by infrastructure for preparation for reuse, through low interest loans, grants, or other mechanisms.

Crucially, the Green Recovery and accompanying funding[28] provides a unique opportunity to make these investments and source the necessary finance for this important work. Other policies, such as *Our Rural Future*, also support access to community spaces throughout rural Ireland and should be explored at local authority level as a way to provide workshop and retail spaces for circular activities.

> **RECOMMENDATION:** The potential for a shared island approach to prevention or preparation for reuse infrastructure storage should also be explored.

This would offer economies of scale and/or a buffer to localised capacity shortages. The small scale of the sector currently means this potential has yet to be widely realised.

CRNI would welcome the opportunity to contribute to prevention and preparation for reuse infrastructure planning, given the knowledge base of our membership and emerging research. Some examples of future infrastructure needs are outlined below.

Textiles

Article 11.1 of the revised EU Waste Framework Directive (WFD) obliges Member States to set up separate collection for textiles from 1 January 2025, which will lead to significant changes in the Irish second hand textiles sector.

A recent study[29] for the EPA on post consumer textile flows found that over 100,000 tonnes of used textiles are recovered or sent to landfill each year from household, commercial and industrial sources. This compares with approx. 10,000 tonnes being reused locally and roughly 40,000 tonnes being exported for reuse.

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[28] e.g. National Recovery and Resilience Plan - see also CRNI submission to this programme at
https://crni.ie/key-policy-areas/
[29] Due for publication shortly. Figures provided can be determined from data in the public domain.

If separate collection led to the diversion of 10% more textiles away from household bins, **a further 7,000 tonnes would require collection, sorting, retail and/or export, upcycling or downcycling**. This represents the total amount currently sold through the network of over 450 charity shops in Ireland. If just 50% of this amount were diverted to reuse[30], it would save 33,250 tonnes carbon[31].

The EPA Green Enterprise *Circular Textiles* project led by CRNI, commenced in February 2021, aims to inform the design of separate collection schemes and identify ways to expand or develop local capacity for managing the textiles collected. It will help inform the conversation about infrastructure needs for used textile management. Through this work, we look forward to supporting the Regional Authorities in informing the reuse infrastructure requirements for the textile sector.

Electrical and Electronic Equipment

As highlighted in Section 3.1 on Preparation for Reuse, **approx. 2,325,000 appliances were recycled in 2017 that may have been perfectly functional** and potentially reusable when collected by take back schemes[32]. However there is a lack of any infrastructure to facilitate the screening, repair and reuse of such equipment.

Significant investment is required to establish systems that can protect the quality of goods (see also Section 3.1 on Preparation for Reuse and below recommendations on Civic Amenity Sites), enable screening, checking and diagnosis, repair, testing and retail of these goods to enable their quality and safety on return to the market.

By way of comparison, a pilot on the preparation for reuse of washing machines[33] in 2017 by Rehab Recycle which ran over the course of one year only handled just over 300 units for reuse out of 23,129 appliances accepted into the trial. While this implied a reuse rate of just 1.5%, (noting the lack of systems for preserving quality of the goods), it does illustrate the scale of the infrastructure challenge i.e. 300 units handled over one year vs. over 2 million units potentially reusable.

EXISTING SITUATION: CIVIC AMENITY SITES

In the former RWMPs, Policy Action C.1.2. is to review and amend (where appropriate) existing and/or condition the award of new Local Authority Civic Amenity Site (CAS) contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations. This included an objective to reuse or prepare for reuse of up to 10% of non residual waste at local authority CAS.

As public facing facilities, we believe that CAS provide an important opportunity to enhance access to reuse (both for donations and claimants) and develop awareness of and a culture for reuse.

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[30] Approx. reuse rate at charity shops based on stakeholder interviews through Q2Reuse

[31] Based on KPI of 9.5t CO2/t clothing (based on t-shirt) from report: Miller, S. & Purcell, F., 2017, *Key Performance Indicators for the Reuse sector*, Project Ref 51, available here

[32] Based on collected data from https://www.weeeireland.ie/

[33] Johnson, M. et al, *A Preparation for Reuse Trial of Washing Machines in Ireland*, 2020, available at https://www.mdpi.com/2071-1050/12/3/1175

The National Review of CAS is a very welcome development and highlights this potential for reuse collaborations. The report found a relatively limited amount of reuse is currently taking place at CAS at present but no clear explanation was given as to why this is the case. This is particularly striking when compared with the levels of reuse realised at CAS in many other Member States, where a wide range of materials are screened and stored (in weather proof containers) for reuse, often in partnership with social enterprises or onsite stores.

Some of the activities identified in the review at Irish CAS were paint, books and bicycle reuse (for the 'School for Africa' initiative on behalf of Rotary Ireland), while a number of once off reuse projects were noted including the reuse of toys, materials for theatre productions and salvaging of equipment parts (e.g. a knob or a handle for a cooker/fridge).

We note that CAS reuse activity delivered by our members was not highlighted through the report most likely due to the outcome of random sampling. Our members are active at CAS, with, for example, the Rediscovery Centre taking paint and bikes from Dublin based CAS for several years and An Mheitheal Rothar also taking bikes from a CAS in Galway.

While these members also retain records of products taken from CAS for reuse and in some cases, provide receipts of what was taken, they are the only ones recording or reporting this reuse information. It is our understanding that Local Authorities may report this reuse activity as waste taken offsite by a waste contractor. There is no requirement for records to be kept or reporting on reuse activities that take place and this makes it extremely difficult to identify or measure reuse activities taking place.

As such, there is not sufficient information to determine whether any sites are currently delivering on the 10% target. We are not aware of any tenders that meet the policy action C.1.2 particularly involving partnerships with social enterprises.

RECOMMENDATIONS: CIVIC AMENITY SITES

As a first step, any reuse activities already taking place at CAS should be measured and promoted.

> **RECOMMENDATION:** There should be a requirement by Local Authorities to both record reuse and promote the reuse occurring at CAS more strongly. Incentives for Local Authorities to report on reuse or performance targets for reuse at CAS should be introduced.

We look forward to seeing much greater ambition for and progress on reuse at CAS through the NWPCE. We believe this requires a change in language that signals a shift toward reuse such as **"Recovery Parks"** which would also engage the public and support behavioural change.

> **RECOMMENDATION:** We also strongly advocate for more **widespread and appropriate reception facilities that preserve the reuse potential** of items.

We believe that facilities for the reuse or recycling of a minimum number of product groups should be provided at every CAS in coordination with social enterprises (as a priority) that can handle these products. Other product groups may be more easily coordinated at a regional level. Examples of product groups that could be collected for reuse at CAS include bicycles, paint, bulky goods, EEE, wood and mattresses for recycling.

RECOMMENDATION: The requirement for reception and screening should be included in tender clauses in future. Operators should also be encouraged to partner with or provide priority access to donated materials for social enterprises.

EXISTING SITUATION: ENGAGEMENT WITH CRNI

In the former RWMPs, Policy Action C.1.3 is to engage with CRNI and other similar networks to develop a network of reuse/upcycling activities and promotional events.

This action is important not only in the spirit of collaboration and maximising use of resources, but also in the context of European policy. The revised Waste Framework Directive recognises the importance of national networks in promoting reuse and preparation for reuse and requires Member States "promote reuse including through the establishment & support of reuse and repair networks, such as those run by social enterprises …" and "take measures to promote preparing for reuse activities, notably by encouraging the establishment of and support for preparing for re-use and repair networks …".

RECOMMENDATIONS: ENGAGEMENT WITH CRNI

As the only national network supporting repair, reuse and recycling actors, CRNI is well-positioned to drive growth of the sector in line with national, European and international objectives, such as the United Nations Sustainable Development Goals (SDGs 8, 12, 13) via the implementation of the EC's Circular Economy Package.

RECOMMENDATION: We would welcome in the NWMPCE ongoing recognition and a continued commitment to collaborate on campaigns and research and relevant policy areas with CRNI and our members to promote reuse and preparing for reuse activities.

EXISTING SITUATION: RESOURCE EFFICIENCY CRITERIA IN CONTRACTS

In the former RWMPs, Policy Action C.4.1 is to prepare resource efficiency criteria for Local Authority waste related contracts and Policy Action C.4.2. is to implement a systematic engagement with local / regional Local Authority procurement officers and the Office of Government Procurement (OGP) to ensure the inclusion of resource efficiency criteria in contracts. The *Waste Action Plan for a Circular Economy* also commits to ensuring Green Public Procurement actions feature prominently in the development of future public plans, in particular the National Waste Prevention Plan and the new NWMPCE.

Public authorities have significant potential in driving markets for ethical and sustainable purchases and supporting local job creation. However, approximately 55% of procurement procedures across the EU still use the lowest price as the only award criterion[34], without considering any potential added social or environmental value.

This experience is also reflected in Ireland where engagement with reuse and repair goods and services through public procurement remains low, despite increasing emphasis on the social and environmental accountability of Public Bodies through the Climate Action Plan, Circular 20/2019, Resource Efficiency Action Plans, the Waste Action Plan for a Circular Economy and more.

In 2019, CRNI coordinated a consortium of members and other suppliers in delivering an award winning project[35], which was the first of a kind at scale to support Circular and Social objectives in Ireland. The National Waste Collection Permit Office project involved the delivery, assembly and installation of 100% reused and upcycled furniture for a new office space - in total 97 items of furniture - which saved 2.6t carbon and supported jobs and training in social enterprises. Further information on this project is available here.

There is a very diverse range of reuse, repair and recycling goods and services available that Local Authorities could more actively involve through circular and social procurement as highlighted in our member directory here.

Many opportunities also exist to support more circular and social aims at Civic Amenity Sites. There are currently no charity retailers in the ICSA that have contracts with Local Authorities in Civic Amenity Sites. The textiles collected in banks operated by commercial textile recyclers are typically exported, with a small % of profits passed on to a nominated charity. By contrast, of the textiles collected in banks that are operated by charity retailers, approx 50% are sold locally and 100% of the profits accrue to the charity. Therefore the social and circular gain of supporting charity retailer textile banks is considerably higher than the current alternative. It is also noted that there is an amount of unregulated activity taking place in this sector to the extent that the Charity Regulator has issued guidance on how textile banks should be appropriately labelled[36].

Opportunities to improve circular and social procurement via the appropriate design of grants and other funding also exist. Organisations are often required to provide quotes for new items to satisfy funding requirements and demonstrate value for money. This precludes second hand goods even though these may provide the best value.

In relation to recycling, the last few years have seen the delivery of very successful mattress amnesty events as part of the Anti-Dumping Initiative. These have also seen enhanced collaboration between Local Authorities and social recyclers for one-off events. However, social recyclers struggle to access

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[34] European Commission, Public procurement strategy, available at
https://ec.europa.eu/growth/single-market/public-procurement_en
[35] The project won the Green Procurement category at the National Procurement Awards in 2020
[36] https://www.charitiesregulator.ie/media/2159/clothing-collections-public-notice-final.pdf

mattresses for any longer term arrangements at Civic Amenity Sites as the tendering process is not designed to enable this as a separate service.

Social enterprise dismantling mattresses for recycling in Ireland include Eco-Mattress Recycling (Eastern-Midlands) and BounceBack Recycling (Connaught-Ulster).

RECOMMENDATIONS: RESOURCE EFFICIENCY CRITERIA IN CONTRACTS

We welcome the Waste Action Plan commitment to expanding the public sector and public bodies' role in reuse via Green Public Procurement and Circular Public Procurement setting a minimum target for procurement of used goods. In addition to this, we believe social considerations should be more widely included alongside circular objectives. As highlighted above, the design of regional or local grant schemes and funds should also embed the principles of circular and social procurement through facilitating organisations in purchasing second hand goods.

RECOMMENDATION: This should be reflected in relation to all local / regional Local Authority procurement contracts and grant or funding schemes through the NWMPCE.

The experience in the NWCPO and from Interreg projects working on green and social procurement point to a number of actions that public procurers can take. These include facilitating **market engagement and dialogue**, smaller scale suppliers (e.g. **environmental and social criteria, facilitating lots or consortium responses**) and allowing for some **flexibility in specifications**.

CRNI welcomes the work of The Irish Prison Services (as the contracting authority), in conducting market consultation to introduce social procurement[37], undertaking a pilot and working toward a framework for directed contracts that support collaboration with social recyclers.

RECOMMENDATION: We strongly encourage Public Sector Bodies to review and adopt the Irish Prison Service framework contract model, which is progressing measures to accommodate social enterprises (e.g. **social clauses, reserved contracts**).

We also encourage working across a diverse range of procurement activities to identify the potential for circular and social procurement. For example, Tidy Towns maintenance contracts could tie in with tool repair and maintenance services provided by a social enterprise.

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[37] As highlighted in a recent *Buying for Social Impact Guide* (page 40)
https://op.europa.eu/en/publication-detail/-/publication/3498035f-5137-11ea-aece-01aa75ed71a1

> **RECOMMENDATION:** We would like to see Local Authorities support more circular and social aims at Civic Amenity Sites, including supporting textile banks operated by charity retailers. At minimum, clear labelling should be required on all textile banks (as outlined for charity banks in the guidance) to demonstrate where the textiles are managed and where profits are directed.

For mattress recycling a continuous and longer term relationship with social recyclers for mattress removal through tendering at Civic Amenity Sites would be preferable.

> **RECOMMENDATION:** This could be addressed through, for example, Local Authorities **splitting Civic Amenity Site management contracts into lots or facilitating smaller contracts for specific streams like mattresses and/or by specifying that successful awardees of larger tenders provide social gain through subcontracts**.

Regular reporting on progress against a target for used goods, and/or green and social public procurement, should form part of the reporting for the NWPCE referred to in Section 3.1.

CRNI has developed a webpage on Green and Social procurement here and a members Procurement Directory here to help raise awareness about these and other actions. We also fed extensively into the new Green Public Procurement guidelines due for publication by the EPA shortly.

3.5 PROGRESS ON MANAGEMENT SCHEMES FOR STREAMS INCLUDING (BUT NOT LIMITED TO) PAINT, MEDICINES, MATTRESSES, BULKY WASTES, AGRICULTURAL & HORTICULTURAL CHEMICALS, WASTE OILS

The former RWMPs Policy Action H.2.1. is to investigate the viability of running a pilot scheme for the management of paints. CRNI welcomes the support that has been made available for the expansion of paint reuse schemes, and acknowledges the central role of our member the Rediscovery Centre in making this possible. The success of this targeted action should be applied to other material streams to support reuse and repair initiatives and networks.

3.6 PROGRESS ON ENSURING THE UPPER TIERS OF THE WASTE HIERARCHY ARE FUNDED APPROPRIATELY

Policy Action G.1.1 is to review Local Authority expenditure on disposal / recovery to determine if there is scope to balance expenditure across the hierarchy (e.g. toward prevention, reuse & recycling).

Subsidies and other support for recycling and recovery often have unintended consequences that can seriously hamper prevention or preparation for reuse. Economic Instrument #8 of Annex IVa of the revised Waste Framework Directive is "*Phasing out of subsidies which are not consistent with the waste hierarchy*".

For this reason we believe policy action G.1.1 is a very important exercise and we request access to any report or update on this assessment.

Our recommendations on supports and investment required for the sector to help rebalance expenditure across the hierarchy are provided in Sections 3.2 and 3.4.

CRNI RESPONSE TO EPA CIRCULAR ECONOMY PROGRAMME

CRNI has been working with and supported by the EPA under the National Waste Prevention Programme for approx 8 years and in this period, has grown to represent 38 members with strong membership offerings, a wide communications reach, and delivers annual events as well as biennial conferences, has completed seven research projects and submitted countless policy papers. The network now employs two full time staff.

In this period, but particularly in the last year, there has been a significant build up in momentum putting prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning.

The European Circular Economy Action Plan 2.0, Waste Action Plan for a Circular Economy and cross sectoral developments like the Climate Plan Interim Actions and Rural Development Policy 2021-2025 all show real ambition and signal a pivotal time for the circular and social economy. This programme is therefore particularly timely.

To realise this ambition in practical terms, we believe that a strategic mix of policy and financial incentives are required to ensure prevention and preparation for reuse are **better designed**, **more accessible, more affordable, more viable and more attractive than the alternative**.

We welcome the new expanded role for the EPA in helping to drive Ireland's move to a circular economy. In doing so, we recommend that:

- the top three tiers of the hierarchy are acknowledged and prioritised in line with the waste hierarchy in the CEP overall vision
- measures and campaigns under this CEP are coordinated and aligned with new plans, strategies and policies being developed at national and EU level
- the EPA continues to expand and grow funding to the sector, by connecting to funding streams for climate action
- the value of existing prevention activities providing a diversity of business models, particularly those delivered by social enterprise, be recognised and supported
- bulky goods be included as a priority area for the CEP
- targets to support prevention and preparation for reuse activities are the priority in delivering a more circular economy, specifically

- a kg/inhabitant reuse target that is linked to job creation, introduced within the next 2 to 3 years (potentially on an all island basis), accompanied by supports to the sector e.g. grants for reporting systems, training for the sector, support for the national roll out of ReMark
- a mandatory food waste prevention target of 50% by 2030 along with an interim target to drive progress, with a baseline year that is close enough to the proposed EU baseline year while being of sufficient quality.
- a preparation for reuse targets to be introduced on a phased basis starting with 1% up to 3% within 3 years.

- any and all new targets (e.g. reducing per capita food waste, reuse and repair) are accompanied by clear linkages with other targets (e.g. sectoral targets, circularity ranking), clear lines of responsibility and accountability and clear review periods, corrective measures and consequences for failure to make progress
- ReMark be supported for roll out on a national basis as a potential game changer for the sector in Ireland, underpinning measurement and reporting on reuse, supporting circular procurement, facilitating all island collaboration and underpinning national circular economy branding.
- the potential for reuse to contribute to greenhouse gas emissions reporting should be explored, building on Q2Reuse data or methodologies where possible
- a coordinated approach is taken to national targeted behavioural change campaigns with consistent messaging used by all stakeholders
- a coordinated approach is taken to developing roadmaps between the CEP and the AGCES
- the minimum target for procurement of used goods (as proposed in the WAPCE) be introduced
- an approach that supports local suppliers in engaging in GPP is followed, including identifying and sharing local good practice examples, ensuring grants and funding are appropriately designed to support circular and social procurement, requiring public bodies to incorporate reuse policies into asset management and procurement, encouraging public bodies to address circular and social concerns at pre-tender stage and supporting social criteria e.g. weighted targets for Social Enterprise, reserve contracts
- circular procurement in the <€25,000 threshold tenders is monitored
- greater consideration and priority is given to products that have been or are being prepared for reuse in end of waste criteria
- representatives from the community reuse and recycling sector are included in any group to review national End of Waste decisions.

In relation to partnerships, we believe that **CRNI is in the best position nationally to deliver a partnership to establish Ireland's Reuse & Repair Sector.**

We also believe that the Rediscovery Centre is a leading innovator and knowledge centre in the Circular Economy and ongoing support for their work as a National Centre for a Circular Economy is crucial in underpinning this transition in Ireland.

2.0 FEEDBACK ON PROGRAMME PROPOSAL

2.1 PROGRAMME VISION AND REMIT

We welcome the broadening of the remit in the Circular Economy Programme.

A holistic approach to prevention, preparation for reuse and recycling activities will help connect and coordinate elements of the circular transition. For example, in developing a roadmap for EEE, measures supporting prevention (leasing, second hand sales), preparation for reuse (repair, refurbishment) and recycling (dismantling, recycling) need to be coordinated to ensure that the hierarchy is respected while at the same time the appropriate infrastructure is provided.

We welcome the greater focus on reuse and repair, but would note that, as these areas fall under the prevention tier of the waste hierarchy, they have always played an important role in the NWPP.

> The use of language is important in signalling the correct and necessary focus for any policy or programme and in sharing an understanding of what a more circular economy means.

Throughout this consultation response we refer to activities according to the tier of the waste hierarchy in line with definitions from the Waste Framework Directive (EU) 2018/851.

Prevention is defined as *measures taken before a substance, material or product has become waste, that reduce: (a) the quantity of waste, including through the re-use of products or the extension of the life span of products; (b) the adverse impacts of the generated waste on the environment and human health; or (c) the content of hazardous substances in materials and products;*

This underlineincludes avoidance, reuse and repair activities, where **reuse** refers to *any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.*

Preparation for reuse, the operation on the second tier of the waste hierarchy, is defined as *any operation by which products or components that are not waste are used again for the same purpose for which they were conceived;*

Finally, **recycling** is defined as *any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes.*

> In the proposed vision for the Circular Economy Programme (CEP) we believe that each of the three tiers of the hierarchy should be acknowledged explicitly, and that the strength of wording should reflect the priority order in the hierarchy.

In this respect, we propose the following wording (proposed amendment in red):

> *A driving force for Ireland's move to a circular economy by business, citizens & the public sector, characterised by behaviours and business models that* **firstly** *design-out* **and prevent** *waste;* **then ensure preparation for reuse; followed by** *resource recycling* **as a last resort***; and deliver sustainable economic growth.*

On page 3 of the consultation document, prevention is highlighted as the primary approach "*to be followed by: Re-Use & Repair; Recycling; Recovery (including energy recovery); and finally Disposal*". On page 4 of the consultation document, it is stated that the remit of the programme will expand further <u>down</u> the waste hierarchy to encompass recycling, as well as <u>reuse and repair</u>.

We refer to the definitions above from the Waste Framework Directive which show that prevention as the first tier of the hierarchy includes reuse and repair of non-waste products. Non-waste reuse and repair are currently the only types of operation carried out in Ireland, given that there are no preparation for reuse centres in operation. In this regard, reuse and repair cannot be considered to be further down the waste hierarchy than prevention. On the other hand, preparation for reuse can be considered to be further down the hierarchy but higher in the hierarchy than recycling, and should be explicitly mentioned in relevant statements on pages 3 and 4.

> We ask that language regarding prevention and preparation for reuse be clarified in the final Circular Economy programme.

2.2 PROGRAMME OBJECTIVES

2.2.1 PROVIDE LEADERSHIP ON THE CIRCULAR ECONOMY TO IMPROVE COHERENCE AND ALIGNMENT OF NATIONAL, REGIONAL AND LOCAL ACTIVITIES AND ENSURE MAXIMUM IMPACT

We welcome efforts to better coordinate and align various national, regional and local activities. As highlighted above there has been a significant build up in momentum in the past two years with many new plans, strategies and policies being developed at national and EU level.

> As this evolves, it will be important to ensure policies, strategies and plans align and that measures and goals are coordinated.

As outlined in this response, particular care is needed for example to coordinate targets (see Section 2.4), branding and communications (see Section 2.6) and sectoral roadmaps (see Section 2.8.3) at national level between the proposed All of Government Circular Economy Strategy (AGCES), the Waste Action Plan for a Circular Economy (WAPCE), the National Waste Management Plan for a Circular Economy (NWMPCE) and this Circular Economy Programme (CEP).

It would also be helpful to have a clearer picture of how these important documents will tie together.

2.2.2 MAINTAIN A COMPETITIVE PROGRAMME OF SUPPORTS TO DRIVE THE CIRCULAR ECONOMY THROUGH PROVIDING INNOVATION GRANTS AND SEED-FUNDING TO NATIONALLY-RELEVANT INITIATIVES.

We fully support the current programme of competitive support that drives innovation. The annual nature of the Green Enterprise programme, alongside the new Circular Economy Innovation Grant Scheme, give important opportunities for social enterprises in particular to explore new business areas or expand their activities and provide a predictable funding pipeline for innovation and growth. Other community based funds such as the EPA supported Community Foundation circular economy grant are also very welcome in supporting grassroots activities.

> We believe these funds should all continue to expand and grow, by connecting to funding streams for climate action.

This may facilitate access to larger funding allowances. For example, the Climate Challenge Fund (CCF) in Scotland provides grants and support for community-led organisations to tackle climate change by running projects that reduce local carbon emissions that reduce over-consumption, encourage the reuse of items, extend the life of everyday items through repair and maintenance and promote the recycling of materials. Examples of Circular Economy projects currently live under this programme can be found here.

In addition to grant schemes, we have proposed a suite of financial measures to more broadly support prevention and preparation for reuse in our response to the AGCES (attached) and as summarised in Section 2.10.

2.2.3 IMPLEMENT ACTIONS THAT BUILD KNOWLEDGE AND AN EVIDENCE BASE TO INFORM CIRCULAR ECONOMY DEVELOPMENT IN IRELAND, AND TO REPORT ON PROGRESS TOWARDS GREATER CIRCULARITY.

With policy and funding evolving quickly in this area, it is essential that any measures are backed by knowledge and an evidence base.

CRNI as part of its annual work plan strives to help mainstream community reuse, repair and recycling through policy advocacy and research. As outlined in Section 2.10, through our work at EU level and with our members we are able to identify research or policy needs based on an understanding of the barriers and future trends. Much of this has been facilitated through EPA research funding and we look forward to continuing to work with the EPA to support a knowledge and evidence base for the sector.

One area where further research is required is in mapping the management of particular product groups to identify where there is leakage from prevention into recycling or disposal and help plan infrastructure (see also Section 2.9) or policy measures to address this. Investment can then be made to help bring prevention activities for those products into the mainstream.

The study[1] last year commissioned by the EPA on post consumer textile flows found that over 100,000 tonnes of used textiles are recovered or sent to landfill each year from household, commercial and industrial sources. This compares with approx. 10,000 tonnes being reused locally and roughly 40,000 tonnes being exported for reuse.

This information is essential in determining the need for additional infrastructure. For example, if separate collection led to the diversion of 10% more textiles away from household bins, a further 7,000 tonnes would require collection, sorting, retail and/or export, upcycling or downcycling. This represents the total amount currently sold through the network of over 450 charity shops in Ireland. If just 50% of this amount were diverted to reuse[2], it would save 33,250 tonnes carbon[3].

The EPA Green Enterprise Circular Textiles project led by CRNI, commenced in February 2021, aims to inform the design of separate collection schemes and identify ways to expand or develop local capacity for managing the textiles collected. It will help inform the conversation about infrastructure needs for used textile management. Through this work, we look forward to informing the reuse infrastructure requirements for the textile sector.

Similar mapping exercises would be useful for other product groups such as furniture, EEE and bicycles.

2.2.4 REALISE THE ENTERPRISE OPPORTUNITY BY SUPPORTING NEW BUSINESS MODELS; PROMOTING RESOURCE EFFICIENCY; AND RETAINING MATERIAL VALUE THROUGH ENHANCED USE OF SECONDARY/RECYCLED MATERIALS

Moving toward a more circular economy will require transformative changes to the way citizens and businesses engage with goods and services. This clearly requires an exploration of different approaches to circular business models.

We are pleased to count within our membership a broad range of circular business models including:

- **lending** services (Cloth Nappy Library Ireland, Carrickmacross Toy Library)
- **redistribution** (FoodCloud, ReCreate Ireland)
- **sharing** (WeShare)
- **refill incentive s**chemes (Refill Ireland, Conscious Cup Campaign)
- **digital** (thriftify)
- **educational** (Cloth Nappy Library Ireland, Diversion Green, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green and Native Events)
- **reuse** (Back2New, Camara Education, East Belfast Mission, Gateway to Limerick, Habitat for Humanity, Irish Charity Shops Association, Northside Community Enterprises, the Rediscovery Centre, Rehab Recycling, Tech2Students)

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[1] Due for publication shortly. Figures provided can be determined from data in the public domain.
[2] Approx. reuse rate at charity shops based on stakeholder interviews through Q2Reuse
[3] Based on KPI of 9.5t CO2/t clothing (based on t-shirt) from report: Miller, S. & Purcell, F., 2017, *Key Performance Indicators for the Reuse sector,* Project Ref 51, available here

- **repair** (Cork Community Bikes, CycleSense, Renew Enterprises, An Mheitheal Rothar, the Rediscovery Centre)
- **upcycling** (Attention Attire, Back2New, Deaf Enterprises, Kingdom Furniture Revamp, Revamp 3Rs, IRD Duhallow Furniture Revamp, the Rediscovery Centre, Roscommon Women's Network, the Upcycle Movement) and other services.

These are outlined in further detail in Annex A. We believe that the success of these business models should be recognised and further supported to realise their full potential.

The work of the Rediscovery Centre, in partnership with the EPA, with the Circular Economy Academy has also proven very valuable in supporting emerging circular economy activities. From this work at least four new members have joined CRNI in the last year as established social enterprises in reuse or repair.

It is noted that, through the Q2Reuse research project[4] funded by the EPA, CRNI alongside CTC and the Rediscovery Centre have mapped out all reuse operators involved in second hand goods. This found that the majority (just under 50%) identified as not for profit entities or social enterprises, highlighting the important influence of not for profit operators in the reuse sector.

Social enterprises are also pioneers and drivers of research and development. For example, FoodCloud is hugely successful with its tech solution to food redistribution and food waste prevention and has expanded across Europe and the globe. The Rediscovery Centre and National Centre for a Circular Economy is pioneering many areas from research to the roll out of paint reuse nationally. Bounceback Recycling has carried out research into applications for materials recovered from mattresses. Recreate has looked into the impact of creative reuse on mental health. An Mheitheal Rothar is researching the remanufacture of old and damaged bicycles and Roscommon Women's Network is developing a training programme to develop sewing capabilities – both projects funded through the EPA Green Enterprise programme.

This highlights the value of recognising and supporting the range of business models and innovation already being delivered by the sector, particularly through the social enterprise model.

With each new business model opportunity there can also be challenges or unanticipated consequences. For example, the European network RREUSE also recommends a cautious approach to product-as-service models, "where producers keep the ownership of the product or the responsibility for its performance throughout its lifecycle", which are mentioned throughout the CEAP as a solution to encourage producers to manufacture longer lasting products. Though promising, these models can potentially backfire in a context where cheap virgin materials and low labour costs remain a reality in manufacturing countries. They could also be used by manufacturers and retailers to develop monopolies on repair activities, posing severe risks on the independent repair sector. Retailers may also end up competing with subscription models providing the widest choice of products and the most flexible services, exerting even more pressure on resources.

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[4] http://www.rediscoverycentre.ie/research/q2reuse/

RREUSE proposes that safeguards be developed to ensure that product-as-service models favour the use of durable goods that, if broken or damaged, will eventually be repaired, including by independent repairers.

2.3 PRIORITY AREAS – INCLUSION OF BULKY GOODS

The priority areas proposed for the CEP include packaging, plastics, textiles, food / water / nutrients, construction and buildings, electronics and ICT and batteries and vehicles. We propose that bulky goods should also be included as a priority area on this list for the following reasons:

- **Circular Economy Action Plan**

The EC Circular Economy Action Plan (CEAP) gives priority to product groups including electronics, ICT and textiles **and also to furniture** and high impact intermediary products such as steel, cement and chemicals.

- **Waste Action Plan for a Circular Economy**

Furniture and mattresses are highlighted in the WAPCE under the heading "household bulky goods" in Chapter 5 on Municipal Waste. Key issues arising in the management of bulky goods include illegal dumping and a lack of infrastructure for storage. The commitments in this Chapter related to bulky items include:

- requiring public bodies to incorporate reuse policies into their asset management and procurement plans (also relating to GPP).
- introducing appropriate reception facilities (for bulky goods) at civic amenity sites
- promoting circular economy design principles for the domestic furniture and mattress industry.
- introducing a ban on bulky waste from landfill.

Chapter 16 on Extended Producer Responsibility of the WAPCE also commits to examining the feasibility of introducing further EPR arrangements for bulky waste including mattresses.

- **Mattress Working Group**

The EPA has facilitated a mattress working group since 2017 to exchange information and knowledge on end-of-life mattress waste management and recycling in Ireland, provide evidence for policy and support mattress recycling social enterprises in their circular economy ambitions.

Through this work a comprehensive report on mattress arisings, management and measures needed to overcome key barriers was completed. Although not published, this provided an important evidence base to build on. Following on from this, CRNI is tasked in our 2021 workplan to investigate the opportunity for an EPR scheme for mattresses in Ireland, following the suite of other Member States pursuing this option.

> To assimilate this work, inform policy and align with EU and national priorities, we believe that bulky goods should be included as a priority area for the CEP.

2.4 TARGETS

It is proposed that an early task for Circular Ireland would be the development of quantitative targets, in close collaboration with DECC, to provide direction and allow progress to be tracked.

2.4.1 PROPOSED TARGETS

CRNI welcomes the commitment to introducing targets and has been advocating for targets for reuse, food waste prevention and preparation for reuse for some time as further elaborated below.

> It is essential for a clear, effective approach to driving prevention and preparation for reuse that any and all new targets are accompanied by clear linkages with other targets (are complimentary), clear lines of responsibility and accountability and clear review periods, corrective measures and consequences for failure to meet targets.

Currently there are multiple plans and policies in which targets are mentioned, including:

- the Regional Waste Management Plan Lead Authorities NWMPCE, which is due to implement targets for reuse, repair, resource consumption and reduction of contamination levels according to the WAPCE. CRNI included in its recent consultation response[5] to this plan a detailed outline of the opportunity for and potential design of such targets.
- the DECC's AGCES, which proposes material circular use rate targets and priority waste prevention targets for Circular Economy Sectoral Roadmaps
- this CEP, describing quantitative targets as noted above

Of the targets proposed in the CEP we warmly welcome targets for reducing per capita food waste to below EU averages and reuse and repair metrics, in-line with emerging European Commission requirements.

Regarding Ireland's positioning in EU circularity rankings, we would like to flag our concern that this could downplay the role of prevention and preparation for reuse and lend more focus to recycling. This is because the circularity material use rate is a measure of secondary material (rather than product) use and would not explicitly reflect any contribution of prevention or preparation for reuse.

For example, the EU Waste Framework Directive sets a combined target for preparation for reuse and recycling. However, very little preparation for reuse has counted towards this target, possibly because recycling is easier to achieve within current systems and structures. Therefore, while the overall target in theory supports preparation for reuse it is primarily met

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[5] https://crni.ie/content/uploads/2021/05/CRNI_National-Waste-Management-Plan-for-a-Circular-Economy.docx.pdf

through recycling. RREUSE has been calling for a separate target (or target within a target) for preparation for reuse but to date, only Spain has seen the introduction of specific targets in this area.

There are already ambitious targets set for recycling through the Waste Framework Directive.

> Targets to support prevention and preparation for reuse activities should be the priority in delivering a more circular economy.

REUSE TARGET

Targets play an essential role where the markets fail to ensure the right environmental or social outcome, due to a failure to recognise externalities. For example, renewable energy and recycling have been widely subsidised through different schemes to ensure that Ireland meets its respective targets and as a result, both activities could now be considered mainstream. Reuse and repair remain far from mainstream in Ireland and a target is needed to help address this market failure.

The European Prevent Waste Coalition paper *10 Priorities to transform EU waste policy* called for, as the top priority, ambitious and binding waste prevention and reuse[6] targets. The CIWM[7] found a key barrier to reuse in the UK and Ireland was a lack of targets or legislation to drive the sector. Introducing quantitative targets for reuse now would put Ireland in a leadership position and prepare the sector for the introduction of targets under the Waste Framework Directive from 2024.

> A kg/inhabitant reuse target that is linked to job creation should be introduced.

This was effectively achieved in Flanders and supports the social economy which is instrumental in delivering reuse.

REUSE TARGET – MEASUREMENT

The ability to measure reuse is crucial in setting a reuse target. Clear and transparent methods of measurement and close monitoring would be required to prevent any false reporting or out of scope activities being included.

Ireland is currently leading the way in developing a methodology for measuring reuse through the EPA funded Q2Reuse project[8]. Led by the Clean Technology Centre (CTC), in collaboration with the Rediscovery Centre, Community

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[6] Defined as *any operation by which products or components that are not waste are used again for the same purpose for which they were conceived* - and as scoped for Ireland through the Q2Reuse project

[7] CIWM report, Reuse in the Uk and Ireland - a "State of the Nations" report for the CIWM, 2016, available at https://www.ciwm.co.uk/ciwm/news-and-insight/reports-and-research.aspx

[8] See http://www.rediscoverycentre.ie/research/q2reuse/ for more information

Resources Network and the Eastern Midlands Waste Region, this project aims to develop methodologies for the qualitative and quantitative assessment of the reuse sector that reflects EU guidance but is tailored to the Irish market.

The tailored methodology made available through the Q2Reuse project to measure reuse will facilitate the near term introduction of targets and help realise the ambition in the Waste Action Plan for a Circular Economy to introduce a reuse target in advance of any EU targets.

> The reuse target should be introduced within the next 2 to 3 years.

As highlighted above, clear accountability and consequences for failure to meet any target are required for it to be effective. The current "competition in the market" model removes any accountability for waste prevention or reuse from waste collectors, who only focus on recycling or disposal. There is no mechanism for them to support or drive wider prevention or reuse activities. We believe EPR schemes (for relevant product groups) and waste collectors should be held accountable for waste prevention to a much greater extent - including for at least part of a reuse target.

Reuse Target – All Island Opportunity

As the sector strengthens in Northern Ireland, with the establishment of the Northern Ireland Resources Network[9] (NIRN), there is also an opportunity for cross border collaboration on a reuse target which could drive a Shared Island approach to reuse and repair. The Department of the Economy in Northern Ireland is currently working to benchmark Northern Ireland's circularity gap and has established a Circular Economy coalition, which involves NIRN, to help drive progress to create a more circular economy in Northern Ireland.

> The opportunity for all island approaches to targets for reuse should be explored.

Reuse Target – Administrative Burden

Requiring the sector to measure and report reuse activity toward a target would add an administrative burden to some already struggling enterprises. Support will be crucial to underpin a reuse target including financial instruments or grants for data collation.

> Recommended supports include financial support to establish an appropriate reporting system, training for the sector on reporting and supporting the national roll out of ReMark, which requires data reporting in return for credibility, marketing and promotion of participants.

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[9] Recently established by CRNI with funding from DAERA

2.4.2 Food Waste Prevention Targets

CRNI member FoodCloud is a social enterprise prioritising feeding people by redistributing surplus food to charities. In 2020 they redistributed over 3,000 tonnes of surplus food.

> For Ireland to make progress in food waste reduction and become a "farm to fork" global leader in this area, a mandatory food waste prevention target of 50% by 2030 along with an interim target to drive progress must be introduced.

An interim target will place Ireland on the correct pathway in the near term. For example, an interim target for 2025 of 30% food waste prevention was set in Scotland. This was measured against the baseline year being discussed at EU level of 2017/18.

Food Waste Prevention Target – measurement

As for a general reuse target outlined above, any food waste prevention target must be supported by data, policy drivers and underpinned by clear lines of accountability and penalties for failure to meet targets. While a commercial food waste measurement methodology has been developed[10] in Ireland, it has not been widely adopted to date across the supply chain.

> Nonetheless, a baseline year should be selected for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

Further data is also being investigated as regards food waste prevention. FoodCloud has recently embarked on a project to investigate the potential for increasing surplus food redistribution from the Irish horticulture sector. There is evidence which has been recently studied through Munster Technological University and confirm through the Efficient Food Project that a significant amount of edible food is being 'wasted' (AD, animal feed, in-field) in the sector and that with the correct intervention and financial support for producers, redistribution of edible products could become a more attractive option.

This project, inspired by a project in the UK, Fareshare's 'Surplus with Purpose' fund, aims to shed light on the situation in an Irish context and trial innovative solutions to facilitate the redistribution of surplus food from the horticulture sector to the charity sector, thereby reducing food waste and addressing food insecurity in Ireland. Outputs will include a detailed waste profile report on the produce sector, as well as trialled and tested solutions that reduce edible waste and increase the ability of the sector to redistribute edible waste.

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[10] Available for download at https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/

2.4.3 PREPARATION FOR REUSE TARGETS

Urgent measures are required to address the **total absence of preparation for reuse activity**, which is a major gap in Ireland's Circular Economy journey.

CRNI has strongly advocated[11] targets for preparation for reuse in line with recommendations in the EPA research report[12] by University of Limerick, with a focus on IT equipment and large Household Appliances (LHA). These must be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014.

> Preparation for reuse targets should be introduced on a phased basis starting with 1% up to 3% within 3 years.

2.5 BRANDING

It has become more important than ever to ensure a coordinated approach to circular economy communication and awareness building, with the involvement of an increasing number of stakeholders including CRNI members (the Cloth Nappy Library Ireland, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green, Native Events), DECC, the EPA, the Regional Authorities and NGOs including VOICE, the IEN and others.

We welcome a national branding that connects these stakeholder efforts to communicate and showcase the circular economy. Further consideration of how Circular Ireland could provide or complement this overarching national 'brand' - in addition to covering projects and initiatives delivered and funded by the Programme - would be helpful.

The development of a national circular economy online platform, as flagged in the AGCES, will be valuable in connecting nationwide circular economy initiatives. The EPA also proposes in this consultation to host Circular Ireland webpages with programme knowledge outputs and links to other main stakeholders. A close connection between these pages and the national online platform would be valuable. We would also welcome efforts to involve and build on the expertise in organisations like CRNI members when developing the Circular Ireland annual conference and best-practices.

The AGCES refers to expanding national circular economy branding in a manner "analogous to a certification mark" in the next iteration of the Strategy. Thanks to EPA Green Enterprise funding, ReMark[13], Ireland's Reuse Quality Mark of Excellence has already been developed and piloted by CRNI. This was specifically designed to address negative consumer perceptions about the quality and safety of reused or repaired goods by improving the standard of service and customer experience with reuse organisations, demonstrating to the public the commitment to quality, and highlighting the social and environmental benefits of the goods.

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[11] See also our submission to the Waste Action Plan for a Circular Economy at https://crni.ie/key-policy-areas/
[12] Report prepared for the EPA by Johnson, M., McMahon, K, Fitzpatrick, C. *Research of Upcycling Supports to Increase Re-use, with a Focus on Waste Electrical and Electronic Equipment (UpWEEE)*, REF 2015-SE-DS-5, published 2018
[13] https://www.crni.ie/re-mark/

In the ReMark pilot, surveys conducted before and after accreditation found that ReMark did have a positive impact on customer attitude. Through delivering training and supports, ReMark also helped to build the capacity of participating reuse operators as summarised in a series of videos[14]. When the pilot finished in March 2019, the final report recommended that ReMark be further developed and rolled out throughout Ireland and Northern Ireland.

> We believe that ReMark could be a game changer for the sector in Ireland, underpinning measurement and reporting on reuse, supporting circular procurement, facilitating all island collaboration and underpinning national circular economy branding.

This will require Exchequer support in order to build and develop the mark and facilitate its roll out at national or all island level.

2.7   CLIMATE LINKAGES

As highlighted in the CEP consultation, prevention and preparation for reuse have global environmental and climate benefits, reducing the consumption of new goods.

A 2020 report by Circularity Gap Reporting Initiative highlights that switching to a circular economy could reduce global greenhouse gas emissions by 39%[15]. The European RREUSE[16] network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO_2 emissions by 5% while supporting around 400,000 jobs[17]. A WRAP UK study has also also shown that by increasing the reuse of key household products such as textiles, appliances and electrical equipment, UK GHG emissions could be reduced by 4 million tonnes CO_2 eq per annum between 2009 and 2020.

These savings relate to avoided emissions associated with upstream material extraction, manufacturing and transport as well as end of life management.

Accounting for these savings is complex due to the global nature of supply chains in manufacturing and distributing consumer goods and the local nature of carbon accounting. However, strengthening this link would help demonstrate the negative upstream impacts of production and distribution of the goods we use on a daily basis and strengthen the role of the circular economy in the Climate Action Plan. The introduction of a target for reuse in Ireland will provide an opportunity to improve measurement and reporting could be used as a basis for developing carbon reporting on this sector.

> We propose that this potential for reuse to contribute to greenhouse gas emissions reporting should be explored. We are keen to support the EPA in measuring and reporting on this connection, based on findings from Q2Reuse and through RREUSE, to show our global carbon

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[14] https://www.crni.ie/re-mark/
[15] https://www.circularity-gap.world/2020
[16] CRNI is a member of RREUSE, an international network representing social enterprises active in re-use, repair and recycling. RREUSE members divert approx 1 million tonnes of goods and materials annually from landfill through re-use, repair and recycling, generating a combined turnover of 1,2 billion EUR .
[17] See https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/

footprint and connect savings from local action in prevention or preparation for reuse with national carbon accounting.

2.8 OPERATIONAL PILLAR #1 – ADVOCACY, INSIGHTS & COORDINATION

2.8.1 POLICY INSIGHTS

At this time with the pace of policy evolution at national and EU level it is more important than ever to provide an evidence base for policy decisions.

We therefore welcome the policy support function within the national circular economy programme and look forward to contributing to this where possible. CRNI has been active in identifying and carrying out necessary research, through the EPA Green Enterprise and STRIVE programmes, that can provide and support this evidence base. As for above, we believe that key stakeholders, in addition to any specialists involved in commissioned studies, should be involved in developing informed positions particularly given the special nature of the Irish resources sector[18].

As highlighted above, the current research programmes and funds are highly valuable in providing insights in relation to upcoming barriers or policy change.

2.8.2 AWARENESS

Raising awareness is complex and involves both providing information (to raise awareness), delivering behavioural change and providing an outlet for that change, which is the desired outcome of awareness raising. The contribution this programme can make toward behavioural insight will therefore be highly valuable.

We fully support a coordinated approach as proposed in the consultation to national targeted behavioural change campaigns with consistent messaging used by all stakeholders, involving collaboration with the Regional Waste Management Plan Lead Authorities, the programme's strategic partnerships with organisations such as the Rediscovery Centre and the public-facing MyWaste portal.

As highlighted above, we are keen to facilitate the national roll out of ReMark and explore alignment with the national branding effort and would welcome support for this as a potential game changer for the sector in Ireland.

We have also identified in Section 2.2.2 and in more detail in our AGCES submission attached a number of measures we believe are required to complement awareness and behavioral change efforts to improve the accessibility, affordability and viability of prevention and preparation for reuse activities.

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[18] e.g. the majority of actors in second hand goods are non profit, the waste management market is privatised meaning different incentives apply for householders, etc.

2.8.3 Roadmaps and Reporting

We are keen to see target driven and coordinated roadmaps developed to provide certainty around the implementation of new policies, strategies and programmes.

One concern raised in our response to the AGCES consultation is the lack of clear targets or ambition in the proposed first strategy.

> We believe that a sense of urgency is needed in all Government policy and strategy, underpinned by a plan for concrete actions and timeframes.

The AGCES proposes delivering actions through standalone Sectoral Circular Economy Roadmaps, which are set out in Annex 3 of the consultation. This addresses construction, transport, agrifood and consumer goods. However, roadmaps proposed in the CEP are expected to initially focus on food waste and plastics.

> Further clarity is required in relation to how various roadmaps will align.

We welcome the proposal to set timeframes for these roadmaps. In addition, we would like to see commitment to producing progress reports. In the absence of progress reports, policy ambition is weakened due to a lack of information or repercussions for failure to make progress.

> We believe it should be explicitly stated that any roadmaps will be accompanied by a review of progress against the stated aims and that strong and corrective measures will be taken where progress is not being made.

Wider discussion to help inform the corrective measures should be facilitated, if required. A strong precedent has been set recently in terms of progress updates in Ireland's *Rural Development Policy 2021-2025*, which commits to committee oversight and biannual progress updates on the implementation of the policy.

Finally, we would welcome an opportunity to contribute to monitoring and reporting protocols. It would be interesting to also follow European Topic Centre work on monitoring frameworks for a circular economy, building on the Oko-Institut and Plan Institut webinar in March 2021 on *New Data Streams for Circular Economy Monitoring*. This may provide a more comprehensive and in depth assessment of Ireland's position in relation to key sections of the circular economy.

> Based on our experience with the Q2Reuse project and data collection from our membership, we look forward to supporting and contributing to this work.

2.9 OPERATIONAL PILLAR #2 – INNOVATION & DEMONSTRATION

2.9.1 GREEN ENTERPRISE

CRNI has carried out five Green Enterprise projects and is currently involved in a sixth project on *Circular Textiles*.

> As highlighted in Section 2.2.2, we believe this programme is extremely valuable in helping to advance circular activities by facilitating research and practical demonstration.

2.9.2 GREEN PUBLIC PROCUREMENT

We welcome the focus on GPP and the role it can play in stimulating the market for new circular goods and services.

> The WAPCE proposed to set a minimum target for procurement of used goods and we would welcome the implementation of and monitoring of this goal in collaboration with DECC. We also welcome an approach that supports suppliers in engaging in GPP and have been working with our members to facilitate this engagement.

In 2018/9, we supported a consortium of members in a green and social procurement project to furnish a vacant office space (see here for details). The NWCPO issued a request for quotation for the Delivery, Assembly & Installation of Upcycled Furniture to their new office space in Tullamore in April 2019. A consortium of CRNI members was awarded this project including the Rediscovery Centre, ReMark-accredited Back2New and CRNI. Collaboration Ireland assisted with the initial project management.

The project involved fitting out 16 work stations, two meeting rooms, a canteen and chill out room, a lobby and an outdoor seating area with 100% preloved and upcycled furniture. In total, 97 items of furniture were provided, from 10 x different suppliers saving approx 2.6 tonnes CO2.

Findings from the NWCPO project have been developed into an infographic and detailed case study and summarised on a page dedicated to Green and Social Procurement here and a procurement directory here. Along with observations from the Bulky Item Reuse[19] Green Enterprise project, the main challenges identified were issues of scale, negative perceptions about second hand goods, complex logistics, short lead in times and lack of flexibility in specifications.

We have identified the following opportunities to support local suppliers:

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[19] https://crni.ie/bulky-items-reuse/

- identify and share good practice examples to demonstrate the opportunities for prevention and preparation for reuse in procurement and support the roll out of ReMark. CRNI has been working on good practice examples from its membership to complement the EPA roll out of GPP guidance and aims to facilitate market dialogue with member suppliers in the coming months.

- ensure grants and funding are appropriately designed to support circular and social procurement. Organisations are often required to provide quotes for new items to satisfy funding requirements and demonstrate value for money. This precludes second hand goods even though these may provide the best value.

- require public bodies to incorporate reuse policies into asset management and procurement and to adopt a life cycle cost methodology to procurement. This means calculating the cost of an asset or service during its entire life-cycle, not just the cost at the time the contract is awarded. This allows public procurement to include the social and environmental costs of the use, repair, recycling and disposal of a product or service and not only the cost of its acquisition.

- encourage public bodies to address circular and social concerns at pre-tender stage and design tenders that facilitate the small scale of social enterprises and others in the prevention and preparation for reuse sector (lots, consortium approaches)

- encourage social criteria e.g. weighted targets for Social Enterprise in public procurement and/or reserve contracts and/or providing social economy actors active in environmental services with preferred access to public procurement contracts, notably through the implementation of the most economically advantageous tender (MEAT) criterion (Article 67 of the Directive on Public Procurement).

For example, in Italy all public authorities are required to apply waste prevention criteria into calls for tenders and contracts. The Italian Code for Public Contracts (Legislative Decree 50/2016, as modified by legislative decree n. 57/2017) in Article 34, sets mandatory environmental sustainability criteria that must be applied by public authorities in public procurement.

Finally, it is important that, as highlighted in the consultation, the uptake of GPP is monitored. We note the AGCES consultation refers to monitoring the frequency and value of green criteria in public procurements over €25,000. However, it is noted that the capacity of suppliers in the reuse and repair sector is typically small and would be below this threshold.

Monitoring of circular procurement in the <€25,000 threshold tenders is also required.

A common theme throughout this consultation response and our response to the AGCES consultation has been collaboration. This proposed partnership approach in the CEP is therefore crucial in ensuring current plans, strategies and programmes are effective.

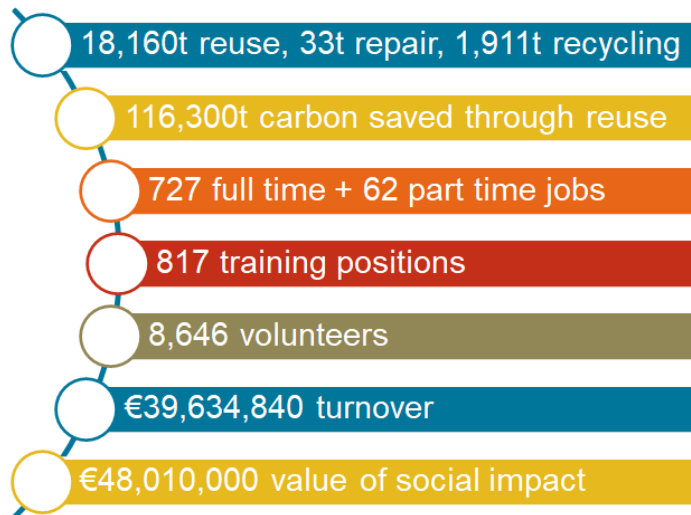### 2.10.1   ESTABLISHING IRELAND'S REUSE AND REPAIR SECTOR

Our network is funded through the current NWPP and we strongly value our long term relationship with the EPA. Our remit is to support Ireland's community reuse, repair and recycling sector through providing knowledge, networking and promotion of our members, and carry out policy advocacy and research to help mainstream the wider sector and overcome barriers. We have recently led the development of a network in Northern Ireland (*Northern Ireland Resources Network*), through DAERA funding, with the purpose of establishing the reuse and repair sector in Northern Ireland.

We believe that CRNI is in the best position nationally to deliver a partnership with the EPA to establish Ireland's Reuse & Repair Sector.
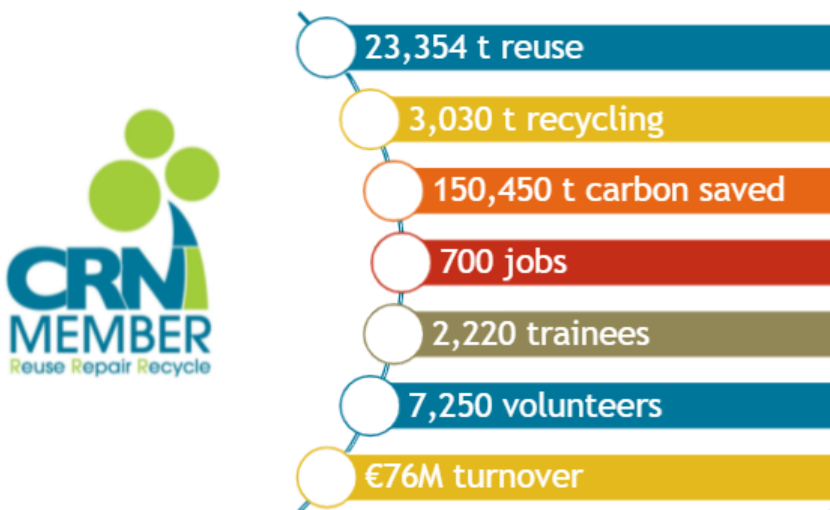
We are the only national network supporting repair, reuse and recycling actors, and therefore are well-positioned to establish the reuse and repair sector in Ireland in line with national, European and international objectives. This includes the Waste Framework Directive objective to "promote reuse including through the establishment & support of reuse and repair networks, such as those run by social enterprises …".

Our **38 members** are leaders and innovators in the circular economy and represent at least 38% of all second hand retail outlets in Ireland as well as other innovative reuse activities per Annex A. They are often the main or only organisations handling certain goods or materials, diverting them from the waste stream while providing quality training and job opportunities. They also help to support communities by providing low-cost goods to families in need or by helping to address the digital divide. The impact of this work in 2020[20] is shown below.

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[20] which was significantly affected by closures due to Covid-19 restrictions

18,160t reuse, 33t repair, 1,911t recycling
116,300t carbon saved through reuse
727 full time + 62 part time jobs
817 training positions
8,646 volunteers
€39,634,840 turnover
€48,010,000 value of social impact

This compares with member impacts in 2019 as shown below.

23,354 t reuse
3,030 t recycling
150,450 t carbon saved
700 jobs
2,220 trainees
7,250 volunteers
€76M turnover

A directory of members is provided on our website[21] and in Annex 1 below.

We understand that developing a national reuse and repair culture and overcoming barriers to the take-up of pre-owned/refurbished goods and product repair will involve a strategic mix of policy and financial incentives that ensures prevention and preparation for reuse **are better designed**, **more accessible, more affordable, more viable and more attractive than the alternative**.

We work extensively with our members, our European networks and policy makers to build our knowledge of the latest trends and innovations, and to identify and recommend pathways to overcome these barriers which are highlighted in our policy consultation responses, and addressed through research and activities within our work plan.

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[21] crni.ie/directory

CRNI is a member of the European network [RREUSE](#), sitting on the board, executive committee and holding the Vice Presidency position and is a member of the European campaign [Right to Repair](#) and [ECOS](#), the international NGO advocating for environmentally friendly technical standards, policies and laws. In Ireland, CRNI sits on the EPA's [National Waste Prevention Committee](#), the Department of Environment, Climate and Communications' [Waste Action Plan Advisory Group](#), and the EPA's mattress working group. The network also contributed to the Department of Rural and Community Development's Awareness Strategy Sub-Group for the [National Social Enterprise Policy](#), the [Community Services Programme Review](#) Consultative Forum and the [Circuleire](#) Green Procurement working group.

Some examples of research that we have identified and carried out to fill knowledge gaps, overcome barriers and anticipate future policy and trends include:

- **Developing a methodology to qualify and quantify reuse** - this topic was proposed to the EPA by CRNI as necessary to help underpin quantitative targets. It was included in a STRIVE research call and became the two year [Q2Reuse](#) project, led by CTC with partners Rediscovery Centre and CRNI. This work is required to both understand the reuse sector in Ireland and support the introduction of a reuse target, which the WAPCE now commits to doing in advance of any EU targets.

- **Developing a quality mark for reuse** - CRNI proposed and led this EPA Green Enterprise project to help overcome negative perceptions of second hand goods. The AGCES now proposes to implement a certification market, which ReMark[22] can deliver, as part of the national branding exercise (see also Section 2.5).

- **Piloting methodologies to separately collect and manage textiles in Ireland** - CRNI proposed and is leading this *[Circular Textiles](#)* EPA Green Enterprise project to identify solutions to the separate collection and local management of textiles. This is designed to inform Irish policy makers on how best to meet the Waste Framework Directive requirement to introduce separate collection systems in 2025.

- **Circular and Social Public Procurement** - CRNI put together a consortium including the Rediscovery Centre and Back2New in response to an RfQ from the National Waste Collection Permit Office to fit out an office space with 100% upcycled furniture. The aim of this was to test a live circular and social public procurement project, and identify barriers and opportunities for the sector in GPP. A comprehensive case study and high level findings are provided on our webpage [here](#). The project won Green Procurement of the Year Award at the National Procurement Awards in 2020.

We have also identified a suite of policy measures necessary to establish Ireland's reuse and repair sector, develop a national reuse and repair culture and overcome barriers.

This consultation response, as well as all of our recent policy work, demonstrates the significant value we place on policy engagement, a keen understanding of the areas of

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[22] https://www.crni.ie/re-mark/

prevention and preparation for reuse as well as a solutions based approach to implementing policy. This year alone we have made submissions to the Recovery and Resilience Facility Plan, EU strategy for Sustainable Textile Roadmap, Shared Island Consultation on Climate and Biodiversity Challenges, and the Pre Consultation for a National Waste Management Plan for a Circular Economy. In 2020, CRNI made or contributed to 18 policy consultations at European and national level involving over 180 recommendations.

Our key policy recommendations to help ensure that prevention and preparation for reuse activities **providing a strategic mix of policy action and financial incentives that ensures:**

- **products are better designed**

… by backing a strong sustainable product policy at EU level, the extension of ecodesign regulations to non energy products and facilitating the right to repair for all consumers, and

… by supporting European Commission efforts to develop consumer labelling

- **and prevention and preparation for reuse are more attractive,**

… by introducing targets for reuse, food waste prevention and preparation for reuse, creating a framework in the upcoming Circular Economy Bill and coordinating with other plans, tracking progress and taking corrective actions to ensure they are met,

… by supporting a minimum target for procurement of used goods, monitoring circular procurement in the <€25,000 threshold tenders and supporting efforts to build the local supplier base for circular goods and service

- **… more viable**

… by requiring EPR schemes to focus to a much greater extent on prevention and preparation for reuse and supporting an EPR scheme for mattresses

… by introducing measures to improve access to goods for preparation for reuse operators and at Civic Amenity Sites

… by ensuring end of waste considerations give priority to products that have been or are being prepared for reuse

… by investing in the CSP to create a dedicated fund for circular and climate friendly community services

… by availing of the multitude of European and national funds to back jobs and skills development and facilitating a coordinated approach to jobs and skills

… by assessing the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste

- **… more accessible**

... by setting ambition to establish a minimum number of reuse centres per head of population throughout Ireland (as recently seen in Greece)

... by prioritising and supporting investment in significant infrastructure for larger scale projects driving prevention and preparation for reuse

... by incorporating and prioritising prevention and preparation for reuse in infrastructure planning and exploring the potential for a shared island approach

.., by continuing to expand and grow grant schemes and research funding in this area

- **... and more affordable than the alternative**.

... by introducing financial measures such as a 0% VAT rate for prevention and preparation for reuse, a tax incentive encouraging businesses to donate surplus goods, a transport subsidy scheme to better support the flow of donations, a limit on commercial rates for prevention or preparation for reuse centres

... by reviewing and moderating all forms of subsidies at national level on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse

For further information on our activities in 2020 please see here. Through our 2021 workplan we also:

- have surveyed our membership for impact data and report on overall levels of reuse, repair, recycling, carbon savings, job creation, training supports, social value, customers, turnover and educational reach of our members as shown above. This work is complemented by and builds on findings from the Q2Reuse project.

- are involved in and help to disseminate the Green Enterprise Programme through our past projects, and its benefits to our members

- support awareness through our membership and wider network as highlighted in Section 2.8.2

- support green procurement efforts through engaging our members in procurement, facilitating market dialogue and sharing case studies to build on the pilot project described above.

We look forward to discussing this exciting opportunity with the EPA further.

2.10.2 Supporting the National Centre for a Circular Economy

The Rediscovery Centre is a valued member of the CRNI network and we work in close collaboration with the Centre in research, policy advocacy, events and communications.

We are currently collaborating on the O2reuse, Circular Textiles and recently collaborated on the Nature and Extent of Post-Consumer Textiles. The Rediscovery Centre was also central in delivering the NWCPO Green and Social Procurement project described above.

As described in Section 2.2.4, the Rediscovery Centre's Circular Economy Academy has seen at least four new members join CRNI in the last year as established social enterprises in reuse or repair. The Academy is very important in enabling startup projects to orientate and become viable in this challenging and complex area.

In 2020, we collaborated on two EU-wide campaigns including the Right to Repair "Repair Heroes" campaign in October and RREUSE's "On the Road to Mannheim" campaign about social enterprise resilience in December.

We also collaborated on events, inviting the Rediscovery Centre to participate in a webinar on Reuse and the Circular Economy post-Covid in April and contributing to the webinar on Green Procurement in November coordinated by the Rediscovery Centre for Green Leaf Limerick.

> We believe that the Rediscovery Centre is a leading innovator and knowledge centre in the Circular Economy and ongoing support for their work as a National Centre for a Circular Economy is crucial in underpinning this transition in Ireland.

2.11 Operational Pillar #4 Regulatory Framework for Circularity

2.11.1 End-of-Waste & By-products

While prevention is outside of the waste regime, the question of waste designation and end of waste does arise in the case of preparation for reuse where, for example, goods are collected as waste that may be perfectly reusable (see above) through channels such as take back schemes (in the case of WEEE) or at Civic Amenity Sites. The current end of waste regime in Ireland is largely focussed on recycling.

> We believe that greater consideration and priority must be given to products that have been or are being prepared for reuse.

Furthermore, we believe that products that have been prepared for reuse should not have to comply with the same legislation as new products. While legislation is updated regularly, this does not render a product already in circulation unusable or unsafe. To enable the continuous circulation of goods as part of a circular economy, it should only be necessary for second-hand products to meet the requirements that were existing when they were first placed on the EU market. A CE marking (for products to which the CE marking applies) should be enough for a second-hand product to be considered as compliant with legislation (for further details see here).

These and other comments were also submitted in our consultation response [here](#) to the EPA in the review of End of Waste guidelines.

- **Recycling**

Many of our members working in recycling (e.g. mattress dismantling) wish to explore opportunities to recycle or repurpose the materials recovered.

Some opportunities, such as the reuse of foam, felt or coconut fibres may require little further processing but would require end of waste status before local outlets can be developed. Therefore, end of waste criteria for these materials will be important to enable more waste to be moved up the waste hierarchy and recycled.

> We believe representatives from the community reuse and recycling sector should be included in any group to review national End of Waste decisions.

2.12 Governance

We support efforts to facilitate collaboration with DECC on programme development & delivery and to ensure alignment between programme activities and national circular economy strategy.

We welcome the proposal to review the effectiveness of the programme and assess the value generated by the programme. As highlighted in Section 2.8.3, progress reports are essential to ensure policy implementation is effective.

> We believe that CRNI is well placed to contribute to the Circular Economy Steering Committee through expertise in driving the transition to a Circular economy, for reasons outlined above. We would recommend building on the previous NWPC that increased engagement and collaboration between participants is facilitated between meetings.

While CRNI makes efforts as a network to connect with other stakeholders on the committee and in the wider sector, a centralised portal or communication tool would help to build and strengthen any new committee and ensure that action-focussed sub-groups are effective.

3.1   REPAIR HUBS / SCHEMES

Many of CRNI's members operate repair schemes/hubs, providing repair as a service on bicycles, furniture, small engines and tools. The following provides examples of how our Members are engaged in repair schemes/hubs on the island of Ireland.

AN MHEITHEAL ROTHAR

 An Mheitheal Rothar offers a full set of bicycle repair and service options, undertaken by our team of experienced mechanics. Their award winning ReCycle Your Cycle initiative takes bikes sent for scrap to Galway City Council Civic Amenities Centre and repairs them, and concurrently teaches valuable cycle mechanic skills to their trainees. This saves carbon emissions and reduces pollution from transporting, smelting down and recasting scrap metal. At the same time it provides skilled jobs, training opportunities and an affordable, fossil fuel free means of transport. An Mheitheal Rothar is based in Galway City. Visit bikeworkshops.ie.

CORK COMMUNITY BIKES

 Cork Community Bikes opened a do-it-yourself bicycle workshop in Summer 2007 at Cork Foyer for the community to use. This is open for public sessions where people can bring their bike into the workshop and where there are a good range of tools, new and second-hand parts for use. There are set prices for parts and a donation is requested to cover the costs of running the workshop and buying tools. They also offer bike repair skill workshops, such as bike maintenance, with tools and guidance if needed. Donated bikes are accepted and are repaired and resold. Cork Community Bikes is based in Blackpool, Co Cork. Visit corkcommunitybikes.com.

CYCLESENSE

 CycleSense is a social enterprise based in Skibbereen Co. Cork makes it easier for people to cycle by sharing the many benefits of bikes from their reuse centre, where they operate cycle training, advocacy, eco delivery, upcycling and upskilling. They sell affordable secondhand bikes and provide cycle trainers, bike maintenance, community cycle bus and training and upskilling opportunities. CycleSense is based in Skibbereen Co. Cork. Visit cyclesense.ie.

DEAF ENTERPRISES

 Deaf Enterprises restores furniture with repair, reupholstery or French-polishing for private individuals as well as upholstery work for bars, hotels, nursing homes, schools, barbers, and playschools. They also sell

quality refurbished goods. Their activities provide employment, training and work experience to the deaf community in Cork. Visit deafenterprises.ie

IRD DUHALLOW FURNITURE REVAMP

IRD Duhallow Furniture Revamp contributes to the reduction of waste in the region. From its establishment in 2016, IRD Duhallow Furniture Revamp has collected in excess of 4500 items of furniture, diverting a net weight of over 110 tons from potentially ending up in landfills. Of this, over 103 tonnes have been redistributed in the community. IRD Duhallow Furniture Revamp also provides a refurbishment service for those who wish to have their old pieces upcycled and revived. IRD Duhallow Furniture Revamp has a strict target of using no more than 10% new materials versus recycled material. To date, on average, less than 5% of the total net weight constitutes new material, including fabric for upholstery, new paints and varnishes, etc. These figures are carefully calculated and compiled each month to monitor Revamp's environmental performances. IRD Duhallow Furniture Revamp is based in Newmarket, Co Cork. Visit facebook.com/DuhallowFurnitureRevamp.

RENEW ENTERPRISES

Renew Enterprises repairs and services bicycles, tools and small engines and upcycles wood garden furniture. They remain mindful of the need to price their products and services in a manner that makes them affordable. They create full-time employment for people who are most distant from the labour market to learn, train and practice new skills and to experience working in a real time working environment and also offer accredited courses. Renew Enterprises is based in Kilbarry, Co Waterford. Visit renewenterprises.ie

REVAMP 3RS

Revamp 3R combines environmental, social and economic factors, by recycling unwanted household furniture for the disadvantaged with training and the provision of employment opportunities for long-term unemployed young people. They collect furniture and household goods that are suitable for reuse, carry out repairs and refurbishment work in their workshop, with steam cleaning and basic repair work adding value and usefulness to the many items currently disposed of. The high quality low cost household furniture is then made available for sale in the showroom. In doing so they provide a variety of training experiences. Through their training programme, they aim to raise the skills, self-esteem, aspirations and achievements of the participants through high quality training within a professional, caring, communicative environment. Revamp 3R is based in Longford. Visit revamplongford.ie.

3.2   REUSE SCHEMES

All CRNI Members are involved in carrying out or supporting reuse, other than our recycling Members. The following provides examples of how our Members are engaged in reuse on the island of Ireland, including second hand retail, repair of donated items in preparation for resale, IT asset management, paint reuse and education or awareness raising.

Back2New

Back2New Community Upcycling builds local awareness of environmental sustainability through upcycling. Their services include furniture upcycling, fabric upcycling along with an upcycling design service. The initiative provides opportunities for work experience and skills development for long term unemployed individuals. Back2New Community Upcycling is based in Newcastle West, Co Limerick. Visit facebook.com/Back2Newupcycling

Camara Education

Camara Education Ireland provides highly secure and efficient solutions for IT equipment. Operating since 2005, they have securely erased over 100,000 hard drives for businesses, government agencies, and private individuals. Camara reuses technology to enhance education of disadvantaged students around the world. Any IT equipment which cannot be reused is recycled at an authorised WEEE facility. Camara Education Ireland is based in Dublin. Visit camaraireland.ie

Diversion Green

Diversion Green shows households, community groups, schools how to make compost with their unavoidable food waste, to see it as a resource not a waste. They offer food waste audits, food waste prevention plans, workshops, challenges, talks to open the conversation around food waste and work with clients to educate them and to show people how to prevent food waste, make compost and how to brown bin successfully as a last resort. Diversion Green is based in Co Wicklow. Visit diversiongreen.ie

East Belfast Mission

East Belfast Mission repairs bikes and refurbishes and upcycles furniture. They sell these plus other secondhand items in their Restore shops, which raise vital funds to support those in need in one of the most deprived areas of Northern Ireland. Visit ebm.org.uk/retail

Gateway to Education Limerick

Gateway to Education Limerick provides secondhand school essentials, such as school books, reading books, clothing, and uniforms, at a nominal fee to support parents with the cost of sending their children to school and children who struggle with homework activities. To date, they have helped over 4000 families keep school cost to a minimum. Gateway to Education Limerick is based in Limerick City. Visit gatewaytoeducation.ie.

Irish Charity Shops Association

Irish Charity Shops Association (ICSA) is the nationwide umbrella organisation for charities who operate shops to fundraise for their causes. Textile reuse is the largest re-use activity in Ireland. Charity shops are the main drivers of this re-use activity and have been operating in this space for the past 25 years. They estimate that in total 21,420 tonnes per year textiles is handled by all of their members of which 3,525 tons are reused through sale in their shops and the remainder sold to textile merchants for reuse. A further 2,758 tonnes of books, furniture and bric a brac are reused through sale in their shops annually. Visit icsa.ie

Northside Community Enterprises

Northside Community Enterprises launched an environmentally friendly paint re-use service in late 2020. The project is in partnership with Cork City Council and allows unused paint that is brought to civic amenity sites to be remixed and sold at their shop and customers will be able to purchase this paint at a fraction of the cost of new. This project comes as part of NCE's commitment to being community leaders in eco-friendly initiatives. Northside Community Enterprises is based in Farranferris, Co Cork. Visit nce.ie

The Rediscovery Centre

The Rediscovery Centre is the National Centre for a Circular Economy in Ireland. It is a creative movement connecting people, ideas and resources to support greener low-carbon living. At their headquarters in Ballymun, the Centre supports four reuse social enterprises: Rediscover Furniture, Rediscover Fashion, Rediscover Paint and Rediscover Cycling. These social enterprises use unwanted materials donated for reuse to create new upcycled products and designs. At the same time, they create training opportunities for the long term unemployed and all revenue generated from its activities are reinvested in the enterprise.

In addition to their Dublin based activities, they also run a national education programme delivering environmental workshops and programmes to students at all levels of the formal education system and also to teachers, community groups and the general public. Through their strategic partnership with the EPA they also facilitate the Circular Economy Academy, offering

mentoring and support to individuals and organisations in the early stages of their circular economy journey. Visit rediscoverycentre.ie

Rehab Recycle

Rehab Recycle facilitates secure donations of IT equipment to schools, charities and community groups through their Promise IT programme. They take surplus or unused IT equipment from companies who are no longer using it, securely and certifiably wipe all the data from the hard drives, rebuild the equipment, clean it, repair where necessary, polish it and deliver it to its new home so it can begin its second life. They process and remarket thousands of assets, including computers, laptops, servers, networking equipment, TFT screens, communications systems across Europe on a weekly basis. They also support the sustainable employment of people with disabilities. Rehab Recycle is based in Dublin. Visit promiseit.ie

Rethink Ireland

Rethink inspires others to action, and to support their resilience and sustainability through demonstration and education (at all levels). They inspire conversations through workshops, encouraging reflection and action that will help people rethink their consumption, their connection with nature and demonstrate sustainability. This is to enable and foster prevention of waste, through reuse as much as possible. They offer a workshop and education series and also collaborate with research institutions. Visit facebook.com/RethinkIreland.

Tech2Students

Tech2Students is a nationwide initiative that bridges the digital divide by providing refurbished devices and providing them to students in need. The campaign was developed in April 2020 by Trinity Access and Camara Ireland and in Phase 1, they delivered over 1,000 laptops to students in the Dublin area. Covid 19 showed that the digital divide is real and remains a huge problem for second-level students, those in direct provision and adult learners in marginalised communities. For example, between 50-70% of students in DEIS schools experience a lack of access to broadband or a suitable learning device. They now aim to deliver 5,000 devices to students in need all over Ireland. Visit tcd.ie/trinityaccess/tech2students.

Thriftify

thriftify connects charity shops with consumers who care, helping to bring about a sustainable fashion movement while growing funding for great causes. They are an online double-sided marketplace that helps charities realise the true value of unsold donated stock, including books, CDs, console games and fashion. They have taken all of the complexities and challenges of selling online and combined

them to create the charity retail platform, which is available to charity retailers and other ethical enterprises who want to sell online. The software makes it simple for volunteers working in charity shops to decide whether the item could get a better value on the thriftify platform and to upload it. Visit thriftify.ie

The Useless Project

The Useless Project helps people take steps toward more sustainable living through tutorials, workshops, tips on food waste prevention, reuse, secondhand and upcycled fashion for individuals, schools or businesses. Visit theuselessproject.com.

3.3 Sharing Projects

A Sharing Platform is a circular business model in which collaboration is promoted among users to increase the usage and value of underutilised assets including skills, products, or spaces, for monetary or non-monetary benefits. One CRNI member operates this business model as outlined below.

WeShare

WeShare is a Gift Economy Community that shares skills, knowledge, practical support, ideas, stuff and time, and all for free. WeShare was founded by volunteers, for volunteers and is run by volunteers. All WeShare activities are conceived, designed, implemented, and administered by people who give their time so that we can all benefit from a more caring society and live a more sustainable life. They give, swap, lend, teach and learn from and with each other – for free. Their website provides the platform for sharing for all groups within the WeShare collective. They are a community of people aiming to reduce the environmental impact of consumption by sharing the things we only use occasionally. WeShare inspires, connects, supports and equips members to create local initiatives that strengthen ourselves and community. They link with other groups for a more sustainable and caring world. WeShare is based in Dublin. Visit weshare.ie.

3.4 Libraries of things

A Library of Things is any collection of objects loaned, and any organization that practices such loaning. The following provides examples of how our Members are engaged in Libraries of Things for toys and nappies.

Carrickmacross Toy Library

Carrickmacross Toy Library promotes play for children aged 0-6 by enabling families to borrow, not buy quality, sustainably sourced toys. 80% of children's toys end up in landfill or in the sea after being used for an average of six months. Toys are difficult to recycle as they can contain materials that cannot be easily

separated. Carrickmacross Toy Library aims to address this environmental challenge through a sustainable toy lending service. Users can borrow up to four toys, puzzles or games for up to three weeks at a time. Parents pay a small membership fee that goes towards repairing or replacing broken toys. Carrickmacross Toy Library is based in Carrickmacross, Co Monaghan. Visit carrickmacrosstoylibrary.lend-engine-app.com/products.

Cloth Nappy Library Ireland is a nationwide non-profit that provides cloth nappy loans and local support. Disposable nappies take 200-500 years to decompose in landfills: using even just one cloth nappy a day reduces that number by almost 1,000. Five nappies a day 365 day a year for 2.5 years totals up to almost 4500 nappies. Local libraries do a monthly nappuccino where parents can see various cloth nappies, ask questions and borrow a kit to try at home. Their postal loans cater for newborns, right up to toddlerhood and beyond. Visit clothnappylibrary.ie

3.5 CIRCULAR DESIGN

Design is key to the first principle of circular economy, "design out waste and pollution." The following provides examples of how our Members are engaged in the area of design and upcycling of second hand goods and materials.

ATTENTION ATTIRE

Attention Attire was created as a response to Irish festival campsite waste. Every year, hundreds of weekend camping festivals across Ireland generate tonnes of camping waste that is extremely difficult to recycle. Items at the epicentre of this waste crisis are tents, sleeping bags and other material based camping gear which is near impossible to salvage sustainably. They create limited edition, handmade outerwear and accessories from upcycled camping gear left behind at Ireland's music festivals. Each piece is crafted with recycled materials that would otherwise end up in landfill. They use everything - zips, toggles and velcro - ensuring nothing goes to waste. Attention Attire is based in Dublin. Visit attentionattire.ie

NATIVE EVENTS

Native Events produces sustainable events, including shows and markets, demonstrating Irish innovations in crafts and sustainability. They supply trained and skilled crew to events, who follow our ethos of efficiency and sustainability. They hire bespoke, ecodesign, upcycled furniture and decor, and temporary solar power installations for events, shows and activations. Native Events is based in Dublin. Visit nativeevents.ie

THE REDISCOVERY CENTRE

The Rediscovery Centre is the National Centre for a Circular Economy in Ireland. It is a creative movement connecting people, ideas and resources to support greener low-carbon living. Their four social enterprises bring circular design to life through training, lectures and by developing innovative products that highlight circular design principles. Their products are then sold in their Eco Store along with other sustainably designed brands. The Rediscovery Centre is based in Dublin. Visit rediscoverycentre.ie.

ROSCOMMON WOMEN'S NETWORK

Roscommon Women's Network is a local community project and charity based in Roscommon that is piloting a Textile Upcycling Training Project through EPA Green Enterprise funding. They are hoping to reduce the unsold textiles that are generated by their charity shop by upcycling these textile items into different products for sale under their CycleUp brand. They empower women to achieve sustainable development and to achieve individual or common goals. Their work with individual women benefits the women themselves, their families and their communities. Visit rwn.ie

THE UPCYCLE MOVEMENT

The Upcycle Movement is a creative design studio specialising in transforming waste into worth. Neo Collection is their debut design collection, which are bags and accessories made from upcycled wetsuits for everyday adventures. They are home to 'Re Source' – a platform for sourcing waste streams (resources) and connecting these with designers who can repurpose them. They also facilitate talks and workshops which focus on upcycling and finding a business opportunity in locally sourced waste materials. Visit theupcyclemovement.com

3.6   REFILL, RESCUE AND REDISTRIBUTION

A circular business model ensures that materials are retained within productive use, in a high value state, for as long as possible. In addition to reuse, repair, sharing and library of things approaches, we have outlined some examples of how our Members are engaged in circular business models with a focus on refill, rescue, online sales and redistribution.

CONSCIOUS CUP CAMPAIGN

Conscious Cup Campaign works with the industry, consumer and government bodies to communicate and promote waste prevention through reuse. They ask participating cafes to incentivise customers who bring reusables and in turn they promote those Conscious Cafes. They provide support, information and toolkits to all types of community groups, organisations

and educational facilities who want to reduce single use food to go packaging. They assist Cafes in reducing their waste, advise them on policy in relation to single use plastics and also provide solutions to participate in the circular economy so they can be both profitable and sustainable. Visit consciouscup.ie

FoodCloud

FoodCloud enables the redistribution of surplus food from the food industry to the charity sector through two solutions – the FoodCloud Technology platform and FoodCloud Hubs. Over 12,800 tonnes of food has been received by over 7,500 charitable groups across Ireland and the UK, with over 28 million meals equivalent helping charities save money on their food bills. FoodCloud exists first and foremost to reduce the environmental, social and economic impact of waste in the food supply chain. In the first instance they focus on redirecting surplus food in the food supply chain from disposal to consumption by people. They work with the food industry to help partners reduce their production of surplus food in the first place. Visit food.cloud

Habitat for Humanity Restore

Habitat for Humanity works beside families to build, renovate or repair their home. Through their ReStores, Habitat provides access to low cost home improvement materials, delivers skills based employability and learning programmes and diverts tons of material from landfill. In addition, their Kitchen Rescue programme gives a new home to old kitchens. By working alongside local companies, Kitchen Rescue reaches out to customers who would consider donating their good quality, used kitchen to the Habitat ReStore. Habitat provides a service to kitchen donors and, by removing kitchens carefully, will rescue them for resale. Through this and their shops, Habitat for Humanity raises funds to support long-term partner programmes in some of our world's poorest communities. Habitat for Humanity is due to open a store in Ireland in the coming year. Visit habitatireland.ie

ReCreate Ireland

ReCreate Ireland makes art materials and educational supplies affordable and accessible to every sector of the community for all kinds of creative purposes, achieved by salvaging clean, reusable materials from business and distributing to members for free in unlimited quantities. The project is based around the concept known as Creative Reuse which encourages the public to reuse materials that would normally be thrown away in all kinds of creative and inventive ways.reuses unwanted materials as art & educational supplies. They source clean, end of line, surplus and unwanted materials and items from business all over Ireland. Then they collect, sort and supply these materials as arts and crafts materials and educational play resources for early years, primary/secondary schools, individual artists and students, families, community and special needs groups. Membership is open to anyone and gives unlimited access to materials. ReCreate Ireland is based in Dublin. Visit recreate.ie

Refill Ireland

Refill Ireland is an environmental project aiming to make Irish towns and cities tap water refill friendly for everyone while on the go. They locate and encourage the creation of locations where filling a reusable water bottle for free from an increasing number of refill stations becomes an easy to do everyday habit helping hydration and ultimately protecting our environment from bottle waste. Their aim is to substantially reduce the amount of, and dependence on, consuming our drinking water in single use plastic bottles. Their "tap map" on their website or app helps people find over 1300 local businesses where they can refill their own water bottle for free. Visit refill.ie

3.7 Circular Innovation

As highlighted in Section 2.12, our members are pioneers and drivers of research and innovation. Many of our members already listed above are innovating in, for example, new tech solutions, new material reuse (e.g. paint through the Rediscovery Centre) or upcycling (tent and festival materials with Attention Attire, wetsuits with the Upcycle Movement), or are carrying out important research into circular practices (business models, reuse measurement and much more via the Rediscovery Centre), remanufacturing (An Mheitheal Rothar) or upcycling and training (Roscommon Women's Network). Below are some additional examples of how our Members are engaged in innovation through recycling.

BounceBack Recycling

Bounce Back Recycling is a recycling company whose aim is to divert mattresses and furniture away from landfill. They provide a quality service for companies, councils & householders to recycle their unwanted waste rather than send it to landfill. They work with a number of local authorities across the country, and many retail outlets to improve the recycling rates across the west of Ireland. With the lack of mattress recycling alternatives in the west Ireland, they have established themselves as a leader in the field and have carried out research into applications for materials recovered from mattresses. They reclaim and recycle; cottons, polyester, woven pad, metal and foam. Each material has its own varying commercial use. All recycled mattresses benefit various industries e.g. steel manufacturing, textile manufacturing and carpet manufacturing. This in turn creates gainful employment and reduces high dependency on landfill. After running several successful mattress amnesty events together, they approached Roscommon County Council about providing bulky waste containers at four of their Civic Amenity Sites. Since launching in 2020, and despite successive Covid-19 lockdowns, 400 bulky items have been diverted to recycling this way. Bounce Back Recycling is located in Galway City. Visit bouncebackrecycling.ie

Bryson Recycling

Bryson Recycling delivers high quality, efficient and cost effective recycling services across the UK and Ireland. At the core of everything they do is the triple bottom line; social responsibility, environmental sustainability and economic viability. They are continually looking for ways to improve our recycling services and focus on ensuring that the materials they collect for recycling are of a high quality to be recycled locally. They use this approach as it benefits the local environment and economy and helps to support local jobs. They provide a kerbside box collection service to more than 170,000 households in Northern Ireland and commercial collection service to more than 440 businesses and schools. This is facilitated by innovative collection trucks, which contain multiple separate compartments to allow for more efficient separation of recyclable materials at the point of collection and a clean recyclate stream. Their state of the art MRF (Materials Recovery Facility) plant in Mallusk is used to sort mixed materials collected in wheeled bins from 278,000 homes in Northern Ireland. 35 percent of their materials are recycled in Northern Ireland with over 80 percent staying in the UK. Visit brysonrecycling.org

ECOMATTRESS RECYCLING

Eco Mattress Recycling was set up as the first mattress recycler in Ireland and also as a Social Economy Enterprise. Their mattress recycling processes provide valuable hands-on work experience to people on back to work training programs. They employ a deconstruction process that separates all the materials contained in mattresses and bed bases. They are left with steel springs, foam, cloth and wood and develop markets for the waste derived from deconstructed mattresses. The wood is cut and packed as kindling and the springs, foam, cloth are baled and sent to companies who are fully permitted and specialise in the further processing of these materials. Visit ecomattressrecyclingireland.com

RECYCLEIT

Recycle IT was set up as the first social enterprise in WEEE recycling in Ireland. They are the only Community Electronic Recycling Social Enterprise in Dublin, Kildare and Wicklow providing a neighbourhood, community and business collection and drop off service for all types of waste electrical and electronic equipment. Recycle IT endeavours to support people living and working in communities including householders and place an emphasis on individual needs. The service reduces the volume of electrical and electronic waste going to landfill and helps increase environmental awareness amongst householders, community groups, schools and businesses. Recycle IT will take any electrical items with a plug or a battery. This includes dual purpose business and household appliances like computers, monitors, printers, TV's, washing machines and dishwashers. Recycle IT will also recycle small battery-operated devices like electric toothbrushes, mobile phones and pocket radios. Each year collection services are offered to approx. 100,000 homes and organisations in Dublin and the surrounding areas.

Recycle IT work in partnership with WEEE Ireland and in association with South Dublin County Council. Visit recycleit.ie.

USEL

Usel operates a Circular Economy business model that contributes to the wider Circular Economy through the recycling of mattresses, carpet, furniture, plastic, cardboard and waste electrical items. Usel is Northern Ireland's only mattress recycling provider diverting over 1000 tonnes of waste from landfill every year. They collect mattresses from council recycling centres, bed retailers and hoteliers across the province and bring them back to our licenced facility. 96% of each mattress is recycled, the remaining 4% is sent to energy from waste. In addition, Usel is creating employment opportunities for people with disabilities and health related conditions within its recycling operation. Visit usel.co.uk/u-recycle

Please contact Claire Downey at info@crni.ie for any additional details to facilitate case studies on our Members' work.