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Please find attached our submission to the Strategy. Please acknowledge receipt.

Kind Regards,

Mindy

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Submission on the Proposed Circular Economy Strategy 11th June 2021

VOICE welcomes the proposed legislation as a step towards the promotion of the wise use of natural resources and the creation of a robust circular economy. VOICE concurs with many of the elements of this approach, however, there are a few areas where we need more transparency, clarification and ambition.

Questions

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?

We agree with the key objectives, but we call for an additional objective to adhere to the eco-design principal. We must move towards a circular economy, and one of the easiest ways to do this is to design products to be easily repairable, reusable and recyclable. Here is our proposed objective 6:

- To adhere to eco-design principals for products to design out waste and hazardous substances to create products that are easily repairable, reusable and recyclable, creating a clean and sustainable feedstock for future use;

Objective three about public awareness should be amended and strengthened. Awareness of a programme or objective is not enough without effective action to turn awareness into action. For example, everyone knows that we shouldn't drink and drive and there have been and still are many public awareness campaigns about the possible outcomes from drunk driving. However, awareness didn't turn into action until there were strict laws and enforcement supported by an effective campaign that made it a social taboo to drink and drive. Slowly social norms are shifting. Here is our suggested change for Objective three:

- To raise awareness amongst households, business and individuals about the circular economy and how it can improve their lives and to implement actions that support and lead to effective, ambitious and long lasting behaviour change;

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?

Reuse/Refill

The strategy has lofty goals, but the government must set mandatory reuse/refill targets and enforce these targets to fulfil the objectives set out. For example, in the Circular Economy legislation which is currently being drafted within the department, there must be ambitious packaging reuse/refill targets set out on a scheduled ramped up basis for different business sectors. Additionally, the legislation must define 'reuse' to specify the minimum number of rotations a container must be reused, varying on the type of container specified. "Reuse Metrics" could be developed to be based on the number of rotations of the product, not on the number of times the packaging was sold to a retailer. Currently some companies selling reusables state they have sold a certain number of containers rather than tracking the number of times the container has been used. Without this tracking, we may be supporting a very expensive single-use item that is not being reused.

Such sectors should include:

- Drinks industry (reusable bottles)
- Take-away food and drink (reusable food/drink containers)
- Food retail (food containers in supermarkets)
- Bags
- E-Commerce

We need binding targets for reusable/refillable packaging, which other countries have adopted. For instance, France passed an anti-waste law February¹ 2020 which set a national target of 5% refillables packaging units in 2023 and 10% refillables packaging units in 2027 on the total number of packaging units placed on the national market. The law also creates a national observatory for reuse which will collect data and monitor progress. They are currently in the process of introducing legislation requiring that, by 2030, 20% of the floor surface of shops larger than 400 square metres must be fitted with refill systems.

In Romania, as of 1 January 2020, market operators who place packaged products on the Romanian market are required to sell a minimum of 5 percent of their goods in reusable packaging, but not less than the average percentage achieved between 2018 and 2019, with an annual increase by 5 percent until 2025. Consequently, by 2025, at least 30 percent of consumer packaging on the Romanian market will be reusable. Retailers (with the exclusion

¹ [LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire \(1\) - Légifrance \(legifrance.gouv.fr\)](#)

of retailers with a small sales area) will be required to give consumers the opportunity to choose reusable packaging and return it to the point of sale.²

Germany has a beverage container refill target of 70%. According to a German study, “For beverage packaging, setting ambitious European reuse targets of at least 70 percent by 2030 offers great potential for waste prevention, since it accounts for 10 percent of overall packaging waste. Many countries already have a small percentage of refillable beverage packaging on the market, with the necessary infrastructure in place. The mere need to expand these existing systems makes beverage packaging a truly low hanging fruit. Beyond beverage packaging, a reuse target of 25 percent by 2025 and 40 percent by 2030 should be set for sales packaging. For transport packaging, a reuse rate of 70 percent should apply from 2025. These targets should be attributed to all market participants along the entire value chain (producers and retailers) as it has been the case in Romania since 1 January 2020 and member states should be obligated to link them to effective sanctioning mechanisms in case of non-compliance.”³

We need to create a consumer’s ‘Right to Reuse’ and remove any liability associated with reusable packaging, which will require engagement with the Food Safety Authority of Ireland.

Extended Producer Responsibility – Polluter Pays

One sure way to push businesses to adopt circular economy principals is to tax the bads and incentivise the good. For instance, Italy has placed a tax on virgin plastic resins used for packaging and other items to encourage the take up of recycled plastic. On the other hand, Ireland could also offer VAT relief and tax credits for the purchase and use of refurbished items or items made from recycled material.

Under the EU Single Use Plastic Directive (SUP), EPR schemes, such as REPAK, in Member States must adopt an eco-modulation approach when assessing fees on packaging materials with producers placing easy to recycle packaging on the marketplace paying a much lower rate than those placing hard to recycle packaging on the market. This will hopefully put economic pressure on producers to change to more sustainable packaging. We anticipate that this will also bring in more money to REPAK which should be invested in promoting and helping businesses to adopt reusable/refillable packaging systems.

The SUP also calls for enhanced EPR so that producers placing plastic packaging onto the market must pay for the associated costs of litter picking, street sweeping and street bin collection.

² Government of Romania: “Government Emergency Ordinance no. 74/2018”

³ [200107 DUH Policy Paper Reuse of Packaging.pdf](#)

We call for:

- **VAT relief and tax credits for refurbished/repairs items** – to encourage the take up of repaired items. According to a European Commission Eurobarometer report⁴, 77% of European citizens would be willing to have their goods repaired but hardly ever do because it is too expensive for them to do so. Re-use and repair activities need to be made cheaper in order for Europe to keep the value of products and prevent wasting resources.
- **Tax on virgin plastic**
- **A Required 2% investment into Reuse Packaging initiatives and infrastructure development** – We call for the investment of 2% of REPAK's annual turnover to be invested in reuse systems each year to assist its members to shift from single use packaging to reuse/refill options. France adopted this level of investment in their waste law passed in February 2020.⁵ Some of this money should be invested in developing reuse infrastructure, including regional container washing facilities (for reusable food and drink containers) and logistics development.
- **Expanded EPR clean-up requirement** – We call for the responsibility for financing the clean-up of litter and managing street bins to fall not only on producers/food services using plastic packaging, but also on other disposable on the go packaging. We are seeing a wholesale switch from single use plastic to single use compostable packaging, which is just as damaging to the environment if not collected in the proper organic bins for treatment in an industrial composting facility. Additionally, some of this packaging looks like it can be composted or recycled, but there is no labelling. This is very confusing for the consumer. As we have seen over the last few weeks, litter has increased exponentially with the opening up of the economy and businesses offering food in single use, disposable take-away containers/cups must be responsible for the clean-up and street bin collection costs.

In Howth, during our Return for Change campaign launch, we noted that most of the generated waste came from single-use cardboard packaging and paper bags, which were collected in residual waste bins. We must encourage businesses to change their business model towards a reuse/refill system.



⁴ Flash Eurobarometer 388, ATTITUDES OF EUROPEANS TOWARDS WASTE MANAGEMENT AND RESOURCE EFFICIENCY, https://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf

⁵ [LOI n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire \(1\) - Légifrance \(legifrance.gouv.fr\)](https://www.legifrance.gouv.fr/eli/loi/2020/2/10/2020-105)

- **Economic Incentives** – We call for the imposition of levies on disposable on-the-go packaging (including the latte levy) and expanding the plastic bag levy to encompass all single use bags to discourage the switch from plastic to paper bags, which have significant environmental implications and are a waste of natural resources.

Material Transparency

The consultation document declares that it wants to ‘design out waste’. We also must ensure that in addition to moving towards more repair and reuse, that whatever material used in a product must also be easily recyclable at the end of life and that producers design out hazardous materials to ensure a clean material stream for future use.

We must design out waste and hazardous substances to make circularity easier and more transparent. For instance, it has come to our attention that some of our paper/card/compostable packaging is imbued with PFAS (Forever Chemicals) to create a waterproof and greaseproof barrier. The presence of these chemicals will affect the safe and effective compostability and recyclability of such products.

We call for a ban of PFAS use in food containers. This was done in Denmark and can be done here to protect public health without compromising the effectiveness of food packaging.⁶

Tackle Green Washing Claims and Labelling Practices

When then Minister Naughton announced the adoption of a latte levy a few years ago, many cafes and coffee shops panicked and raced to buy compostable or recyclable coffee cups to avoid the levy. As we know, this levy was never implemented, but the impact was fully felt. Now cafes and shops believe that they are doing the best thing environmentally by investing in biodegradable, degradable, compostable or recyclable packaging. These businesses are being misled by the packaging industry, not knowing that they might be buying packaging that doesn’t meet the EU EN13432 standard or not knowing that these items must be disposed of properly in order to compost.

For example, anecdotally, we spoke with a café in Dingle who shifted all their packaging to compostable items. When they contacted their waste collection provider where to put this material, they anticipated that the response would be ‘in the organic bin’. However, they

⁶ [Denmark moves ahead with PFAS ban in FCMs | Food Packaging Forum](#)

were directed to place these items in the residual bin because their industrial composting facility did not accept compostable packaging. This café, which believed that it was doing the 'environmentally friendly' thing by investing in compostable packaging found out that this expensive investment didn't work. We need joined up thinking and a push towards truly 'green' options.

We call for a:

- **Ban on confusing claims/labels on packaging** – All packaging should clearly state in what bin it should be placed. Additionally, packaging that meets the EN13432 standard must say that it is compostable and use the symbol agreed to by Cré. No other terminology, such as degradable or biodegradable, should be used as it is too confusing for the consumer and is misleading. Additionally, there are many food on the go containers that look compostable, but have no label. These too must be labelled as to how to dispose such item.
- **Required compostable infrastructure** – If a commercial business opts for compostable packaging, it must provide organic collection infrastructure and clearly visible communications to collect such items.
- **Disposal information on Bioplastic** – some of the packaging states that it is made of bioplastic and is better for the planet..this is a confusing claim. Many consumers believe that bioplastic is compostable and will place this in the compost bin; they do not know that bioplastic is often the same polymer as the fossil-based plastic, only made from plant-based sources. Any label espousing the environmental advantages of using bioplastic must also state in what bin the material should go.

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?

Ireland must measure against its European Union peers, but also look abroad for best practice.

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?

Public awareness of the 'circular economy' is quite low, however, as illustrated in the consultation, many businesses and individuals participate in the circular economy (buying pre-owned items, repairing phones/shoes/cars, taking out a Dublin Bike or sharing a drill with a neighbour), without knowing that these actions are part of a circular economy movement. Creating a central portal highlighting actions around the country will broaden

the message, but key to this is linking local reuse/repair/lease actions with the higher task of increasing participation and closing the circularity gap.

In terms of businesses, which have the most to gain and have the largest impact on resource use, there is a lot of work to do. IBEC conducted a survey of its members to understand how aware they were of the circular economy and only half knew what the 'circular economy' was.⁷ IBEC represents the largest businesses in Ireland, and we would estimate that the knowledge and benefits of the circular economy within the SME sector would be quite low. There is much work to be done in this sector, especially among the HORECA (hotel, retail and catering) sector.

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

More resources must be invested in developing community based programmes on a strategic level.

We call on the government to adopt a Community Based Social Marketing (CBSM) Approach.⁸ We cannot continue the current expensive and ineffective large-scale information campaigns using advertising, social media and other general outlets to encourage individuals to adopt sustainable behaviour. Knowledge and awareness of an issue or behaviour often do not equate to long-standing behaviour change. We need a more active and immersive approach by getting into the community, understanding the barriers and benefits of adopting a certain behaviour and finding a strategy to reduce barriers and enhancing the perceived benefits and then piloting the strategy. This may cost a bit more at the outset and be more time and resource intensive, but the desired outcomes will be achieved at a higher level than that achieved through a pure education/public awareness campaign. The Food Waste Pilot Programme⁹ recently conducted by the Waste Regions, Cré and the Irish Waste Management Association is a great example of this type of work with the potential for a fuller roll out of the findings from the pilot programme. Additionally, the Recycling Ambassadors Programme, conducted by VOICE, is another good example of CBSM where we ran 700 workshops to 25,000 people.

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

⁷ [New Ibec survey shows just half of businesses understand the Circular Economy - IBEC](#)

⁸ [Community-Based Social Marketing : Doug McKenzie-Mohr \(cbsm.com\)](#)

⁹ <https://www.mywaste.ie/wp-content/uploads/2020/09/Food-Waste-Report-3.pdf>

Yes.

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

Adopting a circular economy approach positively impacts all three sustainability pillars: environment, society and economy.

Environment: keeping materials in circulation and in productive use reduces the stress and over-use of Earth's natural resources (renewable and non-renewable). In addition to a reduction in the extraction in virgin resources, processing impacts such as CO2 emissions, go down as does extraction and pollution of scarce water resources.

Society: Keeping money within a community through the development of new business models will support not only local jobs, but also local community groups as small and indigenous companies are more likely to help local initiatives.

Economy: Keeping resources in the community and designing for reuse or repair provides new employment opportunities in Ireland. Instead of exporting recyclables to other countries to be reprocessed, investing in new ways of consuming makes Ireland more resilient to international events. In particular, investing in a reuse infrastructure can create local businesses that collect, wash, refill and redistribute products. This way we can create meaningful and well-paid jobs.

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.

We concur with the submission sent in from the Community Reuse Network (CRNI).

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

We concur with the submission sent in from the Community Reuse Network (CRNI)

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

As the government spends around €8 billion annually, both nationally and locally, it has enormous purchasing power and ability to affect market forces. In Europe, public procurement represents 14% of GDP. As such, public procurement has the ability to move business sectors towards more sustainable practices adopting more production circularity.

There is a lack of buy-in from public procurers for the various government departments and agencies and there is a lack of understanding in how GPP works and how GPP factors are incorporated into procurement decisions. GPP must be made simple for procurers with set formulas and policy mandates, such as forbidding the purchase of single-use plastics or other single use items. Additionally, there must be better communication and experience sharing between the procurement officers and the users of the procured item. For instance, we have heard anecdotal information about reusable medical gowns that were commissioned during the pandemic by a clinic in Waterford. They asked sailmakers in Cork, Marshall Textiles, to make reusable gowns. These were hugely popular with the health workers, but the company was unable to secure a CE mark and one official at the HSE believed that these gowns would not be comfortable. Therefore, the company stopped making the reusable gowns and Ireland lost an opportunity to become more resilient, sustainable, support local jobs and shorten the supply chain.

Some simple actions government agencies can take include:

- ban the purchase and use of any disposable single-use cup, plate, cutlery (plastic, recyclable or compostable). Reusable options must be provided.
- Use purchasing power to curtail the use of any disposable single-use cup, plate, cutlery at events sponsored/funded by the government, such as conferences, meetings and events
- Find sustainable reuse container/drinks options for the provision of food in DEIS schools
- Ban the sale of bottled water in government organisations and offer refill options
- Used furniture must be the first choice when kitting out office space...have a platform for intergovernmental exchange of office supplies
- Ban the ripping out of appliances and kitchens in social housing each time a new resident moves in. Replacing items should not be the default option, it should only be done where the condition of the kitchen is uninhabitable or uncleanable.
- Have a set percentage of government procurement going towards repaired or refurbished items.

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

- Adopt ambitious and enforceable reuse/refill targets for each commercial sector
- Invest in reuse infrastructure – reusable containers, easy collection infrastructure, cleaning facilities, logistics and reverse logistics. Cal Poly, a third level institution in the US adopted a reusable container programme with collection bins for reusables,

which were then washed and redistributed.¹⁰ This type of reuse model could be adopted in closed loop systems or small towns.

- Get complete buy-in from government departments for green public procurement. This purchasing power can positively impact the marketplace and move companies to adopt more sustainable products, practices and operations.

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

Textiles: We throw away around 68,000 tonnes of textiles in Ireland each year, according to research done by CTC and CRNI.¹¹ This is a large portion of our waste stream and must be addressed through better management and investment in businesses either reusing such material or finding future use for such.

Packaging: We generate over a million tonnes of packaging each year and while 64% is recycled, the recycling rate has stagnated while the consumption has increased year on year, from 712,654 tonnes in 2013 to 1,008,000 tonnes in 2019¹². Packaging accounts for 1/3 of all waste collected kerbside.¹³ If Ireland were to put in place an ambitious reuse target, we can put a stop to the ever increasing amount of packaging disposed or littered.

Food Waste: Engaging with food processors, supermarkets, restaurants and farmers to change their practices and packaging decisions will go a long way to reduce food waste in the primary, processing and retail sectors. We have a target under the EU Green Deal and the SDGs to reduce our food waste by 50%. The circular economy could be an ideal avenue to reduce such waste and identifying upcycling opportunities to turn unwanted food into value-added products, before it goes to waste.

Additionally, completing the roll out of brown bins throughout the country to all households (including multi-unit dwellings) and businesses and running public awareness campaigns about the importance and ease of using the brown bin will divert organic waste away from the residual waste bin into the organic bin, creating a valuable soil conditioning product. This will have the added benefit of reducing our waste generation, increasing our recycling target, providing local jobs and creating a valuable product.

C&D Waste: In 2018, just over 6.3 million tonnes of C&D waste was generated in Ireland with only 8.5% recycled. In contrast, the UK recycles over 25% of its C&D waste in housing development because of the aggregates levy in the UK. Because there is no levy in the Republic, there has been a black economy where Irish aggregate has been sold up in the North to avoid the aggregate levy. Adopting a similar levy in the Republic will equalise market factors and reduce the amount of aggregate crossing the border. Additionally, the

¹⁰ [Reusable Container System Optimization for Smart Cities \(calpoly.edu\)](https://calpoly.edu)

¹¹ [Circular Textiles - Community Reuse Network Ireland \(crni.ie\)](https://crni.ie)

¹² REPAK Annual reports, 2014 and 2019

¹³ [ENVIRONMENTAL PROTECTION AGENCY - Packaging Waste in Ireland in 2018 \(epa.ie\)](https://epa.ie)

imposition of this levy will encourage the recycling of construction and demolition waste and reduce the amount of waste being landfilled. Lastly, there are many unregistered quarries extracting aggregate and this levy will bring them into the regulatory regime and tax net.

The levy in the UK has

- Encouraged the recycling of aggregates and construction and demolition (C&D) waste. The UK has the highest percentage of C&D recycling in the EU, with 25% of waste being reused in construction.¹⁴ Not only is this an excellent example of the circular economy, but it also reduces the amount of C&D waste arisings from 18 million tonnes in 2008 to 3 million tonnes in 2012.
- Reduced the CO₂ emissions associated in the manufacturing of new cement.
- Reduced the number of new quarries with their associated traffic movements and emissions. (Typically quarries result in heavy trucks on fragile local road networks not designed for it.)
- Assisted in regulating quarries (i.e., take on illegal operators via the tax net)
- Raised revenue from a very resource-intensive sector and boost the Environment Fund following the 'polluter pays principle.'

County councils, which regulate and oversee quarry activities, have begun to impose development contribution levies on quarries in their planning permission to offset some of the external impacts arising from mining. However, these levies do not impact quarries already under operation. We propose to extend a national levy to address the environmental and society costs incurred from all mining activity. Currently there is legislation moving through the Dail consolidating statutes that [redacted] extraction of minerals in the State. Under this legislation, the State receives royalties for [redacted] valuable minerals. We argue that the same could be true for aggregates, which is a valuable, non-[redacted] resource.

Some may argue that this levy will adversely affect the construction of new houses. As each new house uses, on average, around 300 tonnes of aggregate¹⁵, this levy would cost builders only around €600-750 per house. This is not a big ask seeing that quarrying activities adversely affect the surrounding environment.

Introduction of a levy would also be a financial incentive to use more environmentally friendly timber-frame construction for house building, where aggregates constitute a much smaller part of the raw materials.

We recommend a tax of up to €2.50 that would be levied on each tonne of sand, gravel, crushed stone and other aggregates extracted from the ground or lifted from the surface and

¹⁴ http://ec.europa.eu/environment/enveco/resource_efficiency/pdf/economic_analysis.pdf

¹⁵ Quarries and Ancillary Activities Guidelines for Planning Authorities, April 2004, Department of the Environment, Heritage and Local Government

used in construction. Such material is exempt from any royalties or similar payment structure under the Minerals Act.¹⁶

The way aggregates are produced and consumed have wide ranging negative effects in terms of carbon emissions from extraction, processing and transport. Similarly, there are detrimental effects on water quality through runoff of sediment, on biodiversity and the natural landscape. Lastly, local communities can suffer from noise, dust and particulate matter and through increased number of heavy trucks damaging roads and causing slow traffic. The environmental and societal costs of this industry are externalised with the industry bearing little responsibility for extracting a natural resource in Ireland.

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?

We agree that the department, working with the various stakeholders, must develop sectoral roadmaps that will be supported by policy development in repair and reuse, textiles, circular business model and design, agriculture and C&D waste. We suggest that in the development of the sectoral roadmaps that the consumer goods category be split up into different roadmaps focussing on textiles, plastics, packaging, electronics and electronic waste, fast moving consumer goods and food.

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¹⁶ Note: the rate is based on the £2.00 rate applied in N. Ireland and GB. There the aggregates levy was adopted in 2002.