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**To:** circulareconomy  
**Cc:** Elizabeth O'Reilly; Leo Donovan  
**Subject:** WEEE Ireland Submission - CE strategy consultation  
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Good afternoon,

Please find attached WEEE Ireland's submission to the DECC Consultation on the proposed Circular Economy Strategy.

The document includes our answers to the questions followed by two case studies from our compliance scheme.

WEEE Ireland would like to thank the DECC for the opportunity to participate in this consultation and looks forward to working with the Department further on the Strategy and its implementation.

Kind regards,

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## WEEE Ireland Submission

### DECC Consultation on the Circular Economy Strategy

### June 2021

WEEE Ireland is a not-for-profit Compliance Scheme owned by its Members – Producers of electrical and electronic equipment (EEE) and batteries. The Scheme has operated under Ministerial approval since 2005 and is currently in its third approval programme 2017-2022. The Scheme works with collection partners and core indigenous recycling facilities in Ireland as well as specialist downstream processors and supports mandated EN WEEE standard through quality recycling to properly manage hazardous waste and recover resources. We estimate over 300 people in Ireland are directly employed in activities relating to the operation of contracts for the WEEE Ireland Scheme.

WEEE Ireland has over 1200 Producer Members, which makes us the largest WEEE and battery compliance scheme in Ireland. Since its creation in 2005, WEEE Ireland has collected over 400,000 tonnes of WEEE and avoided the emission of 2,676,892 tonnes of CO<sub>2</sub> equivalent by diverting this WEEE from landfill.<sup>1</sup> Since 2008, WEEE Ireland has collected and recycled the equivalent of 363 million AA batteries on behalf of our Producer Members. Our report for 2020 will show an average of 84% of all WEEE material received was recycled again for use in manufacturing, rising to 90% including energy recovery.

As a member of EUCOBAT and the WEEE Forum, the compliance scheme actively contributes to the experience and knowledge held by these centres of EPR excellence. Moreover, WEEE Ireland is aligned with a strong network of Producers, Irish Trade Associations including the White Goods Association, Technology Ireland at IBEC and the Lighting Association of Ireland, and supports key positions from the European Trade Associations representing our Members; APPLiA, DIGITALEUROPE and Lighting Europe.

Our compliance scheme also partners with European associations to provide pan-European compliance to its Members via WEEE Europe, PV Cycle and RENE0. As a member of EUCOBAT and the WEEE Forum, the Scheme actively contributes to the experience and knowledge held by these centres of EPR excellence.

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<sup>1</sup> [CO2-eq Calculation Tool | WEEE Forum \(weee-forum.org\)](#)

The WEEE Ireland Board of Directors works under a code of corporate governance which, along with Scheme Approval, requires representation from across the EEE and Battery Sectors : Mr Richard Broderick (Independent -WGA); Mr Leo Donovan (WEEE Ireland); Mr Dermot Deely (Signify Ireland); Mr Johnny Dunne (Glen Dimplex); Mr Brian Flood (Origo Ltd); Mr Fergus Johnston (Whirlpool Ireland Appliances); Ms Niamh Laing (Panasonic Marketing Europe); Ms Brenda McEvoy (Apple Distribution International); Mr David Tyrrell (Independent); Mr Herbert Sharkey (BSH Home Appliances).

WEEE Ireland continues to actively participate in the Waste Action Group coordinated by the Department on behalf of the Minister to engage with a variety of stakeholders during the development of new the Circular Economy Plan and regulatory framework in Ireland.

WEEE Ireland welcomes involvement of all actors and overall collaboration led by the DECC in the development of a more circular economy in Ireland. Our compliance scheme shares the views that EPR has a central role in the development of a circular economy, and that an all-actors approach involving both the public and private sector should be adopted to accelerate achievement of targets and impact .

WEEE Ireland has a diverse and effective communication programme supporting campaigns such as *Small Things Matter*, *Recycle for Good* and the *WEEEPledge* for Schools Blue Battery Box Programme, as well as the industry retailer *We'll Take it Back* Programme.

The WEEE Ireland Blue Battery box campaign supporting LauraLynn, the Irish Children's Hospice Charity and championed by Bosco has been successfully running since 2012 creating awareness around a call to action to keep portable waste batteries out of the bin and instead Recycle for Good. This campaign is aligned with a strong retailer takeback network and supporting education programmes <https://www.weeepledge.ie/>. In recent years times this message was also integrated into the broader *Small Things Matter* campaign encouraging more recycling by households, schools and businesses of waste small appliances, lamps and batteries <https://www.weeeireland.ie/small-things-matter/> . This programme, running since 2011, is a positive example of proving collective social rewards or incentives for individual positive environmental behaviour and has been replicated in Ireland and in other Member States by other operators with similarly positive impact.

WEEE Ireland would like to highlight the importance of having a strong collection system and network, coupled with recycling and recovery as a safety net for the development of a more circular Irish economy. This is especially relevant in relation to legacy WEEE that has not been collected and treated yet. The importance of mandatory handover and resourced enforcement agencies must also be noted here as free riders and unauthorised operators in the system will always challenge the goodwill and co-operations of compliant actors.

Our compliance scheme continues to be involved in R&D work on behalf of its Members, working in partnership with Irish and European stakeholders on a number of research and industry programmes, including EPA STRIVE research projects and the WEEE Forum Task Force on eco-modulation.

WEEE Ireland is also proud to be a founding member of the CIRCULÉIRE platform, the first cross-sectoral industry-led innovation network dedicated to accelerating the net-zero carbon circular economy in Ireland. CIRCULÉIRE is a €4.5m public-private partnership co-created by Irish Manufacturing Research (Secretariat), and three Strategic Partners; the Department of the

Environment, Climate and Communications (DECC), the Environmental Protection Agency (EPA), and EIT Climate-KIC.

WEEE Ireland Board of Directors and Management Team are also currently developing our compliance scheme's own Circular Economy Strategy to meet the requirements of our EPR Scheme Approval, including existing and new CE obligations and to transform the existing successful WEEE and Waste Battery system in Ireland into a more circular model which benefits environment, business and society. We are looking forward to working with the Department on the renewal of our Approval in 2022.

WEEE Ireland invited its Producer Members, Board of Directors and staff to input into this submission to the DECC through an internal form and email contributions and would like to thank everyone who participated.

No	Question	Response
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?	<p>1. WEEE Ireland agrees with the first objective and welcomes leadership from the public sector toward a more Circular Irish Economy. It is important to note that involvement and collaboration with the private sector is also important to support existing and future sustainable business models. EPR Schemes and their Members will play a key role in the development of the Circular Economy in Ireland.</p> <p>2. WEEE Ireland agrees with the second key principle proposed in the draft strategy in relation to supporting and implementing measures that significantly reduce Ireland's circularity gap. Please see our additional comments under Question 3 below.</p> <p>3. As mentioned in WEEE Ireland's previous individual submissions to the Waste Advisory Group and 2020 Waste Policy development, our scheme welcomes DECC leadership in the elaboration of national awareness raising campaigns on the topics of waste and the Circular Economy. However, individual Schemes and other organisations will still need to pursue direct communications to engage with our specific call to actions. Greater coordination is needed to maximise the impact of all our efforts but not cause confusion among public and target audiences, with so many positive environmental messages across different platforms.</p> <p>It has also been highlighted as part of surveys conducted by WEEE Ireland on our Producers Members in partnership with CIRCULEIRE in 2020, and on Irish consumers in 2021, that Producers and consumers are both looking for more information and assistance in relation to what the Circular Economy is, and how it applies to them. Please see our answers to Question 4 and 5 for our views on public awareness of the Circular Economy.</p>

		<p>4. WEEE Ireland welcomes further investment in the Circular economy. Continued funding of CIRCULÉIRE as a knowledge, resource and innovation hub for industry circular economy in Ireland, with mandatory partnership of all EPR schemes to the platform under the terms of their Approvals, would be a positive development when the current 3-year programme is complete.</p> <p>Return on investment on circular activities is not often seen in the short-term and it can be difficult for companies to gather the time and resources to apply for funding. Skillset for these applications outside of the academic world is limited and WEEE Ireland would support increased availability and accessibility of more small-scale R&amp;D and CE leverage funding for applicants who do not have research application expertise.</p> <p>Our compliance scheme also supports additional financial incentives to accelerate a move towards a more circular economy, please see answer to Question 11 for further details.</p> <p>5. WEEE Ireland agrees with the final objective of the strategy. Our scheme believes the transition to a circular economy needs to take into account both environmental and social considerations and requires business support. It is crucial to address the barriers that are limiting Irish producers from transitioning to a more circular business model. Please see our answers to questions 8 and 9 for more information on regulatory and non-regulatory barriers, including the administrative burden of compliance for SMEs and challenges from free riders.</p>
2	<p>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?</p>	<p>WEEE Ireland agrees with the overall level of ambition set out in the draft strategy. It is our scheme's view that the strategy should be in line with the national Waste Action Plan for a Circular Economy published last year and the EPA's Circular Economy Programme 2021-2027. To complement the work done through these plans and programmes, WEEE Ireland would also support a national Business &amp; Development Strategy or specific roadmap for industry on the Circular Economy to be developed.</p> <p>Our Producer Members also noted as part of our internal consultation on the Strategy, that the level of ambition must be set to achieve buy-in in a recovering economy and should be increased over time.</p>
3	<p>Should Ireland measure its progress in achieving a more circular economy relative to its European Union peers? If not, what alternative benchmark</p>	<p>WEEE Ireland agrees that Ireland should measure its own progress in relation to other EU Member states and the UK.</p> <p>A more circular Irish economy requires integration with EU circular development and harmonised methodologies for circular metrics and progress reporting will be needed. However, the Irish strategy and associated ambition will need to consider our unique situation and challenges as an island, with limited manufacturing industry and a reliance on imports in certain sectors including EEE and Batteries.</p> <p>Progress measurement should be tangible and based on high quality data</p>

	<p>should Ireland adopt and why?</p>	<p>sets, good examples include collaborative WEEE Forum projects such as ORAMA and PROSUM<sup>2</sup>. National Data must be available to all stakeholders in a reasonable timeline to support planning. We would also support individual set of targets for each sectoral roadmap, with specific timelines developed in collaboration with relevant stakeholders as early as possible.</p> <p>It is our view that existing EPR and future CE target achievement for EEE and Batteries cannot be achieved without the adoption of an all-actors approach<sup>3</sup>. Developing public, business and social enterprise collaboration and awareness will be necessary to achieve these targets across our society.</p>
<p>4</p>	<p>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?</p>	<p>WEEE Ireland would argue that Irish public awareness level of the Circular economy is currently low.</p> <p>This observation was also highlighted in the responses we received as part of our Producer CE Survey in 2020: our Members requested more support, guidance and training in understanding and transitioning to Circular Economy models across their business. Lack of information was cited as one of the main barriers to their company transitioning to a circular economy, before costs and lack of resources.</p> <div data-bbox="523 992 1364 1776"> <p><b>2020 Survey: Circular Economy</b></p> <p><b>BUSINESS TYPE</b></p> <p><b>MEMBERS CATEGORY</b></p> <ul style="list-style-type: none"> <li>Members surveyed: <ul style="list-style-type: none"> <li>July &amp; August 2020</li> </ul> </li> <li>127 Respondents</li> <li>Survey focus areas: <ul style="list-style-type: none"> <li>General Information</li> <li>Understanding the Circular Economy</li> </ul> </li> </ul> <p><b>2020 Survey: Circular Economy Activities in Ireland</b></p> <ul style="list-style-type: none"> <li>40% of Respondents have a dedicated role for Sustainability/Environmental initiatives &amp; dissemination (Director/EHS/Operations)</li> <li>14% of Respondents produce a Sustainability/Environmental Report</li> <li>36% of Respondents were aware of the CE and EU's CEAP</li> <li>13% of Respondents address CE in annual report or other reporting</li> <li>11% of Respondents have a CE strategy</li> </ul> <p>BRISH MANUFACTURING RESEARCH   TECHNOLOGY CENTRE</p> </div>

<sup>2</sup> For example of projects related to waste data, see the ORAMA Project (Optimising quality of information in RAW MAterials data collection across Europe), WEEE Forum, <https://weee-forum.org/projects-campaigns/orama/>, or the Urban Mine platform from the ProSUM project (Prospecting Secondary raw materials in the Urban mine and Mining wastes - financed through the EU's Horizon 2020 programme), WEEE Forum, <https://weee-forum.org/projects-campaigns/prosum/>.

<sup>3</sup> [EPR-and-the-role-of-all-actors\\_final.pdf](https://weee-forum.org/wp-content/uploads/2020/06/EPR-and-the-role-of-all-actors_final.pdf) (weee-forum.org)

		<p>It is extremely important to raise public awareness as consumers and businesses are the backbone of the transition to a more circular economy and are key to create a market for more circular goods and services. To achieve optimal awareness our compliance scheme would support more integration of circular practices, 'circular language' and circular reporting across society, infrastructure and services (e.g. procurement, waste management reporting, retail marketing and joined up educational programmes for primary and secondary school students).</p> <p>WEEE Ireland supports cooperation between all EPR schemes and public authorities to develop effective communication programmes and support a societal change to more circular living. Clear and practical calls to action are required, the challenge being to coordinate all environmental messages in a systematic way from so many organisations and operators: communications should be organised under a strategic circular economy and waste communications plan and coordinated by an appointed communication officer in the DECC.</p> <p>This could be implemented by developing a centralised PR and social media strategy, and a media campaign to attract attention and inform in a compelling way across multi-channels. This would involve working with a creative agency to build out a one to two-year advertising campaign to reach all touch points.</p> <p>Moreover, WEEE Ireland's opinion is that awareness raising needs to be complemented by enforcement and accessibility measures. People, particularly those in business, need to know that their efforts are supported by the government and backed by enforcement to ensure a level-playing field.</p>
5	<p>What are the most effective awareness raising measures that could be taken under the Strategy?</p>	<p>WEEE Ireland conducted two consumer surveys in 2021 and results from these highlighted that people need to be given accessible and simple information related to products' end-of-life to realise the true impact of their purchase decisions on society, the climate and the environment.</p> <p>The importance of education from a young age to encourage an overall culture shift from a linear mindset to acceptance and trust in other models including repair and second hand must also be noted.</p> <p>From our compliance scheme's experience, visible environmental information in retail stores and on advertising and media, through for example visible fees (vEMCs), or our <i>We'll take it back</i> programme, alongside local public collection events, has been key to increase public awareness of both EEE end-of-life and our compliance scheme's work.</p> <p>WEEE Ireland support the continuation of an option for a visible fee in the Irish WEEE System, which has provided significant benefits to the system and underpinned a high performing takeback and recycling programme to date. The significant contributions by Producers via the Schemes, to Retailers and Local Authority Collection Points as well as to consumer awareness, research and EPA enforcement programmes, has all been supported by the continuation of visible fees since 2014.</p>





WEEE Ireland has worked on a number of other awareness raising campaigns since 2005, including our battery box campaign for LauraLynn which is a good example of the success of pairing an environmental message with a positive social message. Our recent participation in *Eco Eye* on RTE allowed us and other interviewees to demonstrate how local solutions can foster a circular economy.

WEEE Ireland would support awareness raising measures which connect consumer's purchasing power to sustainable practices and ensure that consumer agency messaging is aligned.

In the field of repair, the [RepairMyStuff.ie](http://RepairMyStuff.ie) initiative has had a very positive impact on both consumer and industry and through engagement by WEEE Ireland and the White Goods Sector in 2020 and 2021 on the platform we have been able to encourage more authorised repair operators to register and increased the promotion of this resource to the public.



6 Are you satisfied with the proposed stakeholder engagement arrangements in the draft Strategy? Which additional stakeholders (if any), not already

WEEE Ireland engaged with DECC and other stakeholders during the Waste Action Group meetings of 2020 and commends the DECC for the arrangements and the many opportunities given to provide additional feedback and submissions during the ideation development for the Waste Action Plan Policy.

We would propose the inclusion of some additional stakeholders to the arrangement in the draft strategy to support the significant work already undertaken by the Waste Action Group:

- Experts on the issues of warranty and liabilities for repaired or

	<p>part of the Waste Action Group, do you think should be included in the Strategy's implementation?</p>	<p>reused goods.</p> <ul style="list-style-type: none"> <li>- Youth Representatives and Educators</li> <li>- Producers, Retailers and Trade associations</li> <li>- Community Business groups such as Chambers of Commerce</li> <li>- Communication specialists</li> </ul>
7	<p>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?</p>	<p>There are many economic and/or social co-benefits of moving towards a more circular economy in Ireland, including:</p> <ul style="list-style-type: none"> <li>- Keeping resources on the island and within Europe with added value from higher quality environmental management of waste</li> <li>- Reduction in resource extraction, waste and related pollution</li> <li>- Local job creation, as already demonstrated by indigenous recycling and recovery companies such as KMK Metals Recycling in Tullamore and Kilbeggan and Irish Lamps Recycling in Athy, certified to high quality standards EN 50625 for environmental management of e-waste.</li> <li>- Training and up-skilling opportunities, such as the WEEE Ireland-led <i>Skillset for A Circular Economy</i> White Goods repair training programme with CIRCULÉIRE (see case study no1)</li> <li>- New business models and opportunities arising from circular innovation in the supply of goods and services.</li> <li>- ...in turn leading to more accessibility to these same goods and services by end-users across Ireland.</li> <li>- Marketing of Ireland as a testbed for CE innovation and pilot programme testing to attract new business and investment</li> <li>- Increased R&amp;D opportunities</li> </ul>
8	<p>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.</p>	<p>The parallel development of several regulatory frameworks applicable to EEE and batteries has brought challenges for producers, especially SMEs. WEEE/Battery Producer compliance achievement already represents a disproportionate administrative and financial burden in Ireland for many smaller producers, which cannot be understated. It is a reoccurring theme from all feedback received from our Members. Supporting smaller organisations in their compliance obligations and enforcement of same, ties up key Regulatory, Enforcement, Scheme support services that could be deployed in CE activation in Ireland.</p> <p>WEEE Ireland would support streamlining of current EPR compliance and reporting requirements for small producers and retailers in Ireland as a preliminary step towards the inclusion of additional circular economy requirements.</p> <p>Another important regulatory barrier to the development of circular practices in WEEE, lies in the complexity of the current end-of-waste definition and criteria, which prevents reuse of certain materials, alongside the difficulty to reuse post-consumer waste, especially plastics, because of concerns related to persistent organic pollutants (POPs). On this topic, WEEE Ireland would like to note APPLIA's recent submission to the EC consultation on the SPI "<i>Industry is fully committed to reduce the content of hazardous substances in products to support a more circular</i></p>

		<p><i>economy. We support any principle which seeks to minimise the presence of substances or materials which may inhibit recyclability and therefore restrict the circular economy. However, policymakers need to recognise the compromise between chemical and product safety legislation (e.g. fire safety) and circular ambitions.”<sup>4</sup></i></p> <p>Difficulties related to transboundary movement of waste are also a barrier to innovation and collaboration between countries. On this topic, WEEE Ireland would like note APPLiA’s Director-General, Paolo Falcioni’s position on the need to create a Single Market for waste to make a circular society a reality.<sup>5</sup></p> <p>Another significant barrier limiting the development of repair and reuse of EEE is the concerns from the current ‘compensation culture’ in Ireland and the risk of litigation, coupled with the high price of insurance and risk perception for Producers as well as reuse and repair operators.</p>
9	<p>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 economy wide issues or those affecting your sector in particular</p>	<p>We received many different answers from our Members and stakeholders on these points and have outlined them below.</p> <p>A lack of awareness of CE in society was a common theme addressed as a priority –</p> <p><i>“consumers are the backbone of the transition, need to create demand and a market for circular goods and services”</i></p> <p><i>“Culture shift, need more understanding and acceptance of reused goods in market and mark of quality repair/reuse that people can trust”</i></p> <p>The knowledge gap, training and upskilling requirements as well as time and resource allocations within organisations were also key points noted.</p> <p>The impact on Circular Design that Irish stakeholders can have in the WEEE and Battery Value chain is also a point to consider, as many of the Producers in the Irish system are importers/distributors rather than manufacturers and there is limited manufacturing in this sector in Ireland.</p> <p>WEEE Ireland would also like to highlight the complexity of existing WEEE and Battery flows and the significant investment and efforts it has taken to achieve the recycling and recovery rates from the legacy e-waste arising over the last 16 years of the Scheme.</p>

<sup>4</sup> [Feedback from: APPLiA - Home Appliance Europe \(europa.eu\)](https://www.europa.eu)

<sup>5</sup> [The Single Market should be single also for waste - APPLiA - Home Appliance Europe \(applia-europe.eu\)](https://www.applia-europe.eu)

		<p>The overall 65% national target remains a priority under the WAPCE and involves 'linear' reporting requirements – collection of all WEEE volumes in a single year benchmarked against placed on the market 3-year average volumes. It does not consider individual activity Producers may be undertaking in repair, reuse and refurbishment, product as a service or eco design aspects. National data on WEEE and Waste Batteries is not published until 2 years after the activity has occurred despite Scheme and Waste operator reporting being available in Q2 of the subsequent year. Audit and inspections of national datasets from all stakeholders are needed to ensure information is valid and accurate and we are working with the best quality data available to inform circular action in our sector.</p> <p>Financial incentives to accelerate a move to circularity in the EEE and Battery sector would be welcomed. It is difficult for organisations to allocate time and resources and invest or foster collaboration in the supply chain toward more circular practices when they see limited or no return in the short to medium term. Defined pathways and timelines are required for businesses to plan ahead and it is hoped the publication of this national strategy and the Circular Economy Bill in 2021 will help in this regard.</p> <p>Feedback from our Members also included the following points:</p> <ul style="list-style-type: none"> <li>• <i>“Lack of manufacturing.</i></li> <li>• <i>We are a small country and in the main, and decisions on reuse and design of products is not within our control locally.</i></li> <li>• <i>Not a strong culture of formal reuse &amp; refurbishment practises.</i></li> <li>• <i>Business could join a 'waste exchange' model where by-products could be identified &amp; treated / repurposed / reused etc.</i></li> <li>• <i>Sourcing parts that may have become obsolete or too expensive</i></li> <li>• <i>Access to parts, scavenging by others, trained engineers are scarce</i></li> <li>• <i>Lack of awareness of the importance of CE in business</i></li> <li>• <i>Creating the business justification for financial decision makers”</i></li> </ul>
10	<p>How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?</p>	<p>WEEE Ireland considers GPP to be extremely important in supporting the development of new circular goods and services because of the combined buying power of the public sector.</p> <p>Our point of view is that all government procurements should include waste hierarchy principles including reuse, repair, preparation for reuse as well as end of life management recycling and recovery. This will drive a better market for these aspects in the Producer sector but will also help regulators and authorities better understand the challenges in circular economy development e.g., labelling, warranties, insurances etc. and support problem solving in these areas.</p> <p>WEEE Ireland supports the inclusion of proof of EPR registration criteria for producers taking part in all relevant public tenders as a key</p>

		<p>requirement. Our compliance scheme would especially welcome proof of registered supply chain for tenders related to green mobility and energy storage projects involving long-life Lithium Batteries and photovoltaic panels.</p> <p>Indeed, while registered as part of an EPR system, producers are in a safety net; registration helps ensure at a minimum that reporting of the products on the market is carried out and end-of-life is taken care of and properly funded.</p>
11	<p>What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?</p>	<p>WEEE Ireland recommends several priority actions to be undertaken by the government to promote and support the development of the Circular Economy, including:</p> <ul style="list-style-type: none"> <li>- Continued support to resource enforcement against free riders, unauthorised WEEE treatment and for the active implementation of mandatory standards for WEEE collection and treatment</li> <li>- Simplification and streamlining of existing EPR compliance requirements especially for SMEs. The current financial and administrative burden caused by EPR registration and reporting prevents many small and medium enterprises from being fully compliant. For example this would be the case in practice for small car dealers importing from the UK, or a small foreign company placing EEE, batteries and packaging onto the Irish market whereby a least 5 different registration, reporting and/or compliance agreements need to be completed<sup>6</sup></li> <li>- Recognition of EPR as the backbone of the development of a more circular economy and building on EPR successes, including cooperation agreements with retailers, visible fees, one-for-one takeback,...</li> <li>- Continued funding of CIRCULÉIRE as a knowledge and resource hub for the circular economy in Ireland, with mandatory partnership of all EPR schemes to the platform.</li> <li>- Fiscal incentives e.g. reduction in VAT for repair and other circular activities, higher taxes on virgin materials.</li> </ul>
12	<p>Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?</p>	<p>Our compliance scheme would like to highlight the leading role of IT, new green energy and mobility technologies and digitalisation in the development and the maximisation of the potential of a Circular Economy. However, it is crucial to keep in mind the e-waste challenge that the development of these new products and services will create in the coming decades.<sup>7</sup> Therefore, a focus on enforcement of EPR registration and other requirements for these sectors needs to be prioritised.</p> <p>WEEE Ireland also notes a number of initiatives put in place by producer-</p>

<sup>6</sup> Producer Responsibility may include Packaging, WEEE, Batteries, Tyres, ELV Registration, EPR Scheme Memberships, Authorised Representative engagement, B2B Annual Reporting, Monthly Blackbox Submissions and 6- monthly Packaging Submissions, Annual Returns ....

<sup>7</sup> See ITU and WEEE Forum Paper on Internet Waste: [Internet-Waste 2020.pdf \(itu.int\)](#)

led organisations which can inform Ireland’s CE strategy development, including :

- APPLIA’s new website for the European household appliances sector <https://www.circularappliances.eu/> which collects initiatives that promote circularity in different sectors and countries.
- CEP 2030’s roadmap, which is a good example of a sectoral roadmap for the Circular Economy with timelines and stakeholder actions outlined across 6 pathways.



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?	<p>WEEE Ireland would welcome the addition of ‘Sustainable EEE and Batteries’ as a policy area in the strategy, in alignment with the Key Product Value Chains mentioned in the new European Circular Economy Action Plan published last year and the Priority Areas of the new EPA Circular Economy Plan under consultation.</p> <p>Our compliance scheme would also support the inclusion of another policy area related to ‘Education/Training for the Circular Economy’ as this sector have the potential to make significant contributions to the circular transition</p>
14	Any other comments?	No additional comment

## Case Studies

WEEE Ireland is directly engaging with our Irish and European partners, Members and Trade Associations on solutions throughout the waste hierarchy to further 'Close the WEEE Loop' toward a Circular Economy. Some of these research and industry programmes are detailed on the 'Close the WEEE Loop' page on our website : [Close the WEEE Loop - WEEE Ireland](#) and include:

- Partnership with [www.RepairMyStuff.ie](http://www.RepairMyStuff.ie) to encourage authorised repair agents to sign up on the website, alongside the development of an "authorised repair" badge for easy identification on the directory
- Research projects as part of EPA STRIVE programme, including [TriReuse](#), [ColectWEEE](#) and [EEE2WEEE](#)
- WEEE Ireland's partnership with [Recycle IT](#), a Community Electronic Recycling Social Enterprise providing a neighbourhood and community kerbside and business collection service for WEEE in South Dublin and surrounding areas. Recycle IT was established in 2002 to offer employment and reduce environmental harm created by the illegal dumping of old household appliances. Income generated by collection and breakdown of e-waste is reinvested in training, employment and environmental awareness.

WEEE Ireland is also currently developing our compliance scheme's own Circular Economy Strategy to meet the requirements of our EPR Scheme Approval including existing and new CE obligations and to transform the existing successful WEEE and Waste Battery system in Ireland into a more sustainable model which benefits environment, business and society.

### Case Study 1

In 2020, WEEE Ireland and its partners FIT and WGA applied and successfully secured innovation funding from CIRCULÉIRE for 2 pilot projects, including the *White Goods Repair Skillset for a Circular Economy*.

The Skillset project is run in partnership with FIT, an industry-led training initiative and registered social enterprise not for profit organisation ([FIT.ie](#)), and the White Goods Association, an IBEC coordinated industry association which represents most of the major manufacturers and distributors of white goods products in Ireland.

If eco-design and availability of spare parts are critical to ensure the lifespan of an appliance can be extended, the availability of repair skills is another central component which is currently lacking in Ireland. Indeed, both consumers and OEMs highlighted the difficulty to find trained and authorised repair technicians across the country and the absence of appropriate training programmes to grow the current repair workforce and increase the lifespan of the white goods placed on the Irish market.

Drawing from these observations, WEEE Ireland decided to lead on a White Goods Repair Skillset project and apply for funding as a founding member of the CIRCULÉIRE Platform.

The aim of the Skillset project is to help develop an industry-accredited and standard-based repair training programme – to train young people or those looking to retrain later in their careers, to repair white goods that would otherwise end up as electrical waste.

Development of this program will focus attention on repair and reuse, at the top of the waste hierarchy. The curriculum will also include content related to sustainability and circularity. The kitchen appliances used to train students in practical diagnostic and repair skills have been provided by WGA members to a new training centre established in Dunshaughlin, Co. Meath.

The programme will increase the amount and skills of field service (repair) technicians being trained on a year-by-year basis and improve capacity for transformation of the Irish repair sector, providing a career pathway in this important waste prevention activity. The longer-term objective from the WGA is for the training programme to gain accreditation on the QQI framework of qualifications and continue under the auspices of FIT and national ETBs (Education and Training Boards).

This project is still in early stage, but the first pilot training course will begin during the summer of 2021. A technical committee provides practical advice and guidance to the project and is drawn from the after-sales service managers from many of Ireland's leading kitchen appliance OEM brands and their distributors.

This case study showcases the importance of cross supply-chain cooperation to benefit from funding opportunities available. This project could not have been developed without funding and knowledge resources from CIRCULÉIRE and ongoing collaboration between the WGA, FIT and WEEE Ireland.

## **Case Study 2**

In Q3 2020, WEEE Ireland surveyed 127 of our Producer Members on their understanding, challenges and activities related to the Circular Economy, as part of our work in partnership with the CIRCULÉIRE team at IMR. Results of this preliminary survey showed many of our SME Members needed more direction in this area. They requested more support, guidance and training in understanding and transitioning to Circular Economy models across their business. Lack of information was cited as one of the main barriers to their company transitioning to a circular economy, before costs and lack of resources.

In Q1 2021, WEEE Ireland conducted a follow up survey to document existing circular practices among our Producer Members.

While we were aware that many of our Members already have internal circular strategies and offer various circular options directly to their customers, we had not documented the extent of these services before. There is currently a global lack of visibility regarding individual producers' circular practices for the EEE and batteries put on the Irish market and this situation needs to be addressed to better inform new circular frameworks and requirements.

WEEE Ireland contacted 90 of our producers and received answers from 30. Out of these, 19 stated they had circular practices in place in their company.

The survey results showed that in 2020, circa 200t of WEEE was reused and an estimated 3500t of EEE was repaired by these 19 Producer Members. Other circular practices, including preparation for reuse, closed loop collection and recycling and direct refurbishment activities were also documented.

This pilot reporting programme allowed us to get a better understanding of circular practices and internal WEEE flows within our Membership: it showed what type of data is available from Producers and it also provided some insights on how WEEE Ireland could support further reporting from Members and provide more training in understanding the role they can play in a more circular



Irish economy. While this survey was a positive step in documenting further, it highlighted more comprehensive data may be needed to be used as part of formal annual reporting, and incentives to producers may be required in order to get better quality data. Training and supports will also be required particularly to SMEs and Distributors in Ireland to encourage more other circular activity related to the supply of EEE goods and services.