

Public Sector

Q78: What practical steps should the public sector take to adapt to climate change?

VOICE:

Full adoption and implementation of Green Public Procurement criteria and therefore leading by example.

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.

Enterprise, Waste & Circular Economy

Q71: What are the main barriers to consumers embracing the Circular Economy, e.g. lack of awareness, increased costs compared to disposable products, lack of access to circular goods and services?

VOICE:

We must move away from a focus on waste and recycling and look towards initiatives that futureproof the design of sustainable products and developing circularity in key value product chains. Circularity is a prerequisite for climate neutrality as nearly 50% of all GHG emissions come from making and consuming stuff.

Lack of Awareness

Public awareness of the 'circular economy' is quite low, however, 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. 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.

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 behaviour change:

- Raise awareness amongst households, business and individuals about the circular economy and how it can improve their lives and implement actions that support and lead to effective, ambitious and long lasting behaviour change;
- We call on the government to invest in and adopt a Community Based Social Marketing (CBSM) Approach. . 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 Programme 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.

Policy and Regulation:

Industry will not change their practices unless it is more economic, brings in more money or is required by law. Shifting to a new way of consuming that provides services rather than products or packaging will require foresight and investment. Therefore it is incumbent on the government to put in place ambitious policy to curb resource use, keep products in use as long as possible and change how we consume. Some of this work has been done in the Circular Economy bill framework, but the details must be ironed out through future regulations.

We need binding targets for reusable/refillable packaging, which other countries have adopted. For instance, France passed an anti-waste law February 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 as well as a provision that requires 20% of the floor surface of shops larger than 400 square metres must be fitted with refill systems by 2030.

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 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.

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."

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.

We also need a 'Right to Repair' with open-source repair manuals and a cap on liability for community events such as Repair Cafes where volunteers give their time and expertise to fix items. These events are becoming rarer and rarer as they cannot acquire essential insurance to carry out their activities. The government should investigate indemnifying repair activities done by volunteers in a community setting.

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 is investigating imposing 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.

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 report, 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 the wastage of 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. 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.

- 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:

We must ‘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.

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 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.

- 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. 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. 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. We would like to see something similar introduced in Ireland.

es, canals)

- Seawater

- Ground source heat pumps (shallow)

- Deep geothermal

- Mine water

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