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To whom it may concern,

Circol ELT are pleased to be afforded the opportunity to provide feedback to the Draft Green Public Procurement Strategy and Action Plan 2023-2027. Effective management of tyre waste using environmentally responsible solutions helps conserve natural resources, reduce pollution, cut down on energy consumption, and slow down global warming. Encouraging government agencies to promote and advance the usage of environmentally sustainable solutions will be of great benefit to addressing climate change and carbon reduction.

We have attached a submission in response to the draft plan. Within this we have framed our feedback having regard to particular interests of Circol ELT while aligned to general sustainability principles. We now offer some context to help understand our response.

Introduction to Circol ELT

Circol ELT is approved by the Department of the Environment, Climate and Communications (DECC) to operate as the approved body under the Waste Management (Tyres and Waste Tyres) Regulations 2017. We are a not-for-profit, member-driven Producer Responsibility Initiative (PRI) scheme whose mission is to develop and utilise sustainable solutions for managing waste tyres.

In 2022 we:

- Managed over 4 million tyres on behalf of our members through our network of authorised collectors.
- Achieved a 97% collection rate of waste tyres for each new tyre placed on the Irish market.
- Recovered / recycled over 35.5k Tonnes of tyre waste.
- Numbered almost 2,700 members.

1. Retreads

Truck and bus tyres are designed to have multiple lives. These tyre casings are developed so that once they reach the end of their productive life, they can then be prepared for reuse by applying a fresh layer of rubber tread.

This process reduces Carbon Emissions by 24% (Source: <https://www.bandag.com/en-us/bandag-difference/sustainability>).

A number of tyre retread facilities operate in Ireland, however the usage of retreads in Ireland is below the EU average.

We propose that government fleet vehicles within this sector should be required to use a minimum of 40% retread tyres by January 1st, 2025.

2. Travel infrastructure

i) Tyre Modified Asphalt

Tyre Modified Asphalt incorporates the properties of recycled rubber to produce a pavement surface that is more durable, requires less maintenance and is better able to cope with adverse weather conditions.

This product has been in use in roads and cycle paths globally for over 20 years.

Circol ELT have engaged with various stakeholders and testing of this application in Ireland has already begun with initial feedback being positive.

The rubber used in the asphalt mix, as well as enhancing the performance of the surface, performs as a direct substitute for imported products, providing reduced carbon impact of the surface.

We propose that road construction should be required to include a minimum of 30% recycled material by 2026.

ii) Cycle paths

Cycle paths use a higher proportion of rubber in their mix which enhances the safety rating of the surface, protecting cyclists and walkers in the event of a fall.

These surfaces also help improve safety with better outcomes related to fall injuries.

We propose that cycle path construction should be required to include a minimum of 50% recycled material by 2025.

3. Road Furniture and Fittings

Rubber kerbs and bollards used on roads and road-side cycle paths can be made from recycled rubber.

A variety of moulded rubber products are produced in Ireland using recycled rubber from Irish waste tyres.

An increased usage of moulded rubber products should stimulate the development of the use of recycled rubber in products and could lead to increased economic activity for the domestic and export market.

This is the proximity principle at work and we should be requiring that Local Authorities seek out Irish made products for their road installations as direct import substitutes.

We propose such roadside furniture should be produced with a minimum of 30% recycled materials by 2026.

Kind regards,



CEO

Circol ELT Logo



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Circol ELT response to Draft Green Public Procurement Strategy and Action Plan Public Consultation

1. Do you think the approach as detailed in the draft Green Public Procurement Strategy and Action Plan will significantly increase Green Public Procurement across the Public Sector?

Response:

Circol ELT welcome this draft Green Public Procurement Strategy and Action Plan. The plan is very broad and can be expected to have substantial positive impact on an extensive cross-section of industry. It is essential to gather all public sector bodies under this plan to ensure maximum results. By the public sector providing this strong leadership other bodies and businesses will become energised to adapt their sustainable procurement policies.

2. Are there any other key aspects or actions that could be effective in implementing Green Public Procurement and that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?

Response:

More transparency on positive outcomes. Auditing and verification of green procurement outcomes, including an assessment of the carbon impact of public procurement decisions.

3. In terms of the sectoral/product targets included in the draft Green Public Procurement Strategy and Action Plan, do you have any views in relation to the targets, the ambition level, and a timeframe for target achievement?

Response:

Circol ELT welcome the 11 sectoral/product targets. Regarding T1, we would like to see minimum targets delivered by 2026. We believe an appropriate rate of construction materials procured by public bodies under new contract arrangements comprising reused or recycled materials would be in the region of 30% to 40%, with time-bound annual reviews thereafter. These reviews should be publicly available.

4. Are there any other sectoral/product targets related to Green Public Procurement that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?

Response:

We propose the following targets to be included:

- i) All public sector bus/truck fleet vehicles should be required to use a minimum of 40% retread tyres by January 1st, 2025.
- ii) All road construction should be required to include a minimum of 30% recycled material by 2026.
- iii) All cycle path construction should be required to include a minimum of 50% recycled material by 2025.
- iv) All road-side furniture and fittings should be produced with a minimum of 30% recycled materials by 2026.

5. Have you any other comments or feedback on the content of the draft Green Public Procurement Strategy and Action Plan?

Response:

Green Public Procurement should seek to promote a number of trial initiatives creating innovative products using recycled materials. Trials for other products using recycled waste tyres could be a catalyst to developing the sector further and be key in creating a commercially viable sustainable solutions long term. Circol ELT are committed to support the trialling of such products, with a view to bringing more Green products to the public sector.

Appendix:

1. Development of Functional Rubber-Based Impact-Absorbing Pavements for Cyclist and Pedestrian Injury Reduction

The development of the rubber-based impact-absorbing pavements (IAP) offers a possibility to rethink the design of urban pavements and address safety on roads, which constitutes a major challenge in terms of attaining more sustainable, resilient, and safe cities for cyclists and pedestrians.

<https://www.mdpi.com/2071-1050/13/20/11283> Published October 2021

2. Economic and environmental analysis of crumb rubber modified asphalt

Life cycle analysis of the service life of Tyre modified asphalt compared to standard pavement with asphalt concrete, asphalt concrete for very thin layers or stone mastic asphalt wearing course to be more sustainable in some or all sustainability parameters.

<https://www.sciencedirect.com/science/article/pii/S095006182201145X> Published April 2022