

## 1.1 OVERVIEW

CRNI welcomes this important consultation and the opportunity to contribute to Ireland's transition to a more Circular Economy.

A circular economy is based on the principles of designing out waste and pollution, keeping products and materials in use, and regenerating natural systems<sup>1</sup>.

Becoming a more Circular Economy will require new approaches to every stage of a product's life cycle and beyond - from **prevention** by addressing consumption patterns (the demand for products), product design, the intensity of use of items (through ownership models like leasing / swapping), and the useful life of products through reuse, repair and upcycling, to **preparation for reuse** and material **recycling**.

The revised Waste Framework Directive (WFD), adopted on 30 May 2018, sets out a greater ambition for prevention, preparation for reuse and recycling than ever before, acknowledging that a more Circular Economy could significantly reduce greenhouse gas emissions associated with resource extraction and production as well as creating many new jobs.

### THE ENVIRONMENTAL, SOCIAL AND ECONOMIC BENEFITS OF PREVENTION AND PREPARATION FOR REUSE ARE SIGNIFICANT.

- Firstly, these activities keep goods within the economy for longer and thereby reduce consumption, leading to a reduction in raw material extraction, manufacturing and transport.
- Secondly, these activities avoid the creation of waste and hence the need for waste management.
- Thirdly, the EU acknowledges that prevention and preparation for reuse have potential to impact social and economic benefits 'including jobs and growth, the investment agenda ... the social agenda and industrial innovation.'

The greenhouse gas emissions associated with upstream material extraction, manufacturing and transport (55% and 65% of typical national emissions) and end of life management (3-4% of total emissions from the average OECD country) are avoided. The European [RREUSE](#)<sup>2</sup> network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO2 emissions by 5% while supporting around 400 000 jobs<sup>3</sup>. A WRAP UK study has shown that by increasing the reuse of key household products such as textiles, appliances and electrical equipment, UK GHG emissions could be reduced 4 million tonnes CO2 eq per annum between 2009 and 2020<sup>4</sup>.

<sup>1</sup> <https://www.ellenmacarthurfoundation.org/circular-economy/what-is-the-circular-economy>

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

<sup>3</sup> See <https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/>

<sup>4</sup> WRAP, *Meeting the UK climate change challenge: The contribution of resource efficiency*, 2009, [https://www.wrap.org.uk/sites/files/wrap/AC\\_Exec\\_Summary\\_WEB\\_2.pdf](https://www.wrap.org.uk/sites/files/wrap/AC_Exec_Summary_WEB_2.pdf)



While the pathway to a more circular economy has important global implications, it also demands a high level of local ambition and investment. CRNI therefore welcomes the ambition expressed in the consultation to “lead the transformation from waste management to circular economy practice through delivery of a new national policy”, “step up ambition” and “match the level of ambition in the Waste and Climate areas being shown across the EU”.

Through the innovative and supportive measures that we have outlined here to effectively drive prevention and preparation for reuse, there lies an exciting opportunity to demonstrate this leadership and match EU ambition.

## 1.2 RESPONSE OUTLINE

This consultation response contains 81 policy recommendations that can deliver a fairer and more circular economy for all, and in doing so, help to address the urgency of climate action in Ireland.

Rather than respond in line with the format of the consultation paper, we have provided recommendations in line with the **priority order of the waste hierarchy**, starting with the highest priority - prevention and followed by preparation for reuse and recycling. We would like to see a *Circular Economy Action Plan* in its final form reflect this same priority order through its policy **focus** and **language**. For clarity, all policy recommendations in this response are also cross referenced against relevant consultation questions in the directory at the end.

The main focus of our policy recommendations is on delivering **long term sustainable transformation to a Circular Economy** by investing in and supporting prevention (including citizens engagement, better design, sharing, leasing, reuse and repair) and preparation for re-use (including repair and refurbishment) across a range of sectors. We also include measures to support recycling (in particular social recycling) and social enterprise, who will play an essential role in delivering a more Circular Economy in Ireland.

CRNI is **committed to taking action** that will contribute to the implementation of these policy recommendations, in line with our strategic objectives to support our members and help mainstream community resources. In some cases, we are already working on measures that will underpin the recommendations - for example, we are involved in research to develop a methodology for measuring reuse, which would underpin a reuse target. We look forward to working with the Department and other key stakeholders in the sector as part of a coordinated approach under the *Circular Economy Action Plan* to transitioning to a more Circular Economy.

## 1.3 COMMUNITY RESOURCES NETWORK IRELAND

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

We represent a diverse range of 25 social enterprises, funded projects and other enterprises in reuse, repair and recycling as shown below.

## CRNI Members

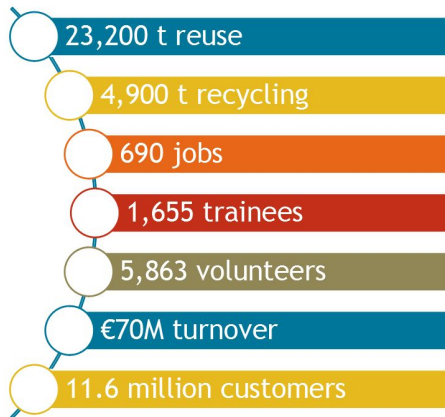


The term “**Community**” in our title refers to our social enterprise members working in and for the community. They do this by providing much needed local jobs and training for people with high barriers to employment, boosting the local economy by recirculating products and supporting marginalised communities by providing access to low cost household goods. By “**entire community**” we refer to making reuse, repair and recycling accessible to citizens, public sector and businesses, and across all sectors of society.

The term **resources** in our title refers to the goods and materials that our members aim to keep within the economy for as long as possible. This is achieved through:

- **Prevention**, which covers all measures taken before a substance, material or product has become waste, that reduces the quantity of waste. This includes avoidance, reuse and repair, where **reuse** refers to the operation *by which products or components that are not waste are used again for the same purpose for which they were conceived.*
- **Preparation for reuse** which refers to the operation on the second tier of the waste hierarchy, involving *checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.*
- **Recycling** as a last **resort**, where waste materials are reprocessed into products, materials or substances whether for the original or other purposes.

The **environmental, social and economic benefits** of our members in 2018 were as follows:



Of these figures:

- Approximately 19,500 tonnes relates to **textile reuse** through the extensive charity shop network within the Irish Charity Shop Association (ICSA) and other actors. Over half of this is reused locally, which is high compared with other Member States and likely due to the quality of goods collected in-store.
- The next largest product groups included in the reuse figure are **food** redistributed (approx 2,000 tonnes) followed by **IT equipment** reuse (approx. 1,000 tonnes).
- Other materials included in this reuse figure are furniture, paint, bicycles, wood and surplus packaging and other stock redistributed by ReCreate
- The recycling figure reflects Ireland's network of social **mattress recyclers** as well as other streams that cannot be reused such as IT equipment, rag from textiles<sup>5</sup> and so on.

It is notable that the reuse figure accounts for only 1 - 5%<sup>6</sup> of all goods discarded<sup>7</sup>, showing both the considerable challenge and the jobs potential that will be met in becoming a more circular economy.

### 1.3.1 SOCIAL IMPACT OF THE CIRCULAR ECONOMY

The number of jobs and training positions created by our members demonstrates the strong social impact of this work.

Social enterprises are leaders and innovators in the Circular Economy. They are often the primary or only enterprises handling certain goods or materials, diverting them from incineration or landfill while providing quality training and job opportunities.

According to the European Commission, by 2030 the circular economy is estimated to create between 200,000 and 580,000 gross jobs and reduce unemployment by between 54,000 to 102,000. Jobs in this sector tend to add to the jobs market rather than displacing traditional jobs because of the labour involved in repairing,

<sup>5</sup> rough estimate based on ICSA figures

<sup>6</sup> Our membership base is broadly representative of the reuse sector in Ireland, including over 460 retail outlets under the umbrella of the Irish Charity Shop Association. The reuse estimate from members at 23,200 tonnes represents 1% of all goods discarded. Based on a conservative estimate of non-member reuse including second hand retail and online exchanges we do not estimate the overall figure to be greater than 3 - 5%.

<sup>7</sup> It is noted that an EPA funded research project Q2Reuse will clarify the scope and scale of reuse activities.

upcycling or deconstructing the highly diverse and complex mix of products that are returned via reuse and recycling loops.

The potential for job creation in the Circular Economy covers a broad skills base and wide geographic distribution **including rural areas and areas of economic and social deprivation**<sup>8</sup>. These activities include trade and craft skills (e.g. carpentry, dressmaking), industry specific skills (e.g. forklift driving, waste management systems), life skills and business including retail (e.g. team work, first aid). Many of these skills are associated with sectors that have gone into decline, as is reflected in the *Labour Shortages and Surplus* report (2019), from the European Commission which states ‘the highest number of top shortage occupations were among the craft group of occupations’<sup>9</sup>.

Social enterprise is ideally positioned to create these jobs because of the level of manual labour and diversity of skills types and levels involved. Our members work with individuals or groups that have high barriers to employment such as disadvantaged communities (e.g. members of the Traveller and Roma community), the long-term unemployed, people with disabilities, ex-offenders, and people from drug rehabilitation thereby promoting equality.

This role of social enterprises in supporting **vulnerable people participate in the labour market** is recognised by the European Council conclusions on inclusive labour markets<sup>10</sup>. They effectively provide an “on and off ramp” to education through work experience, leading to stable employment. To illustrate this, the personal impact of these services on our member’s trainees can be seen through CRNI’s video, *Inclusive Communities at Work*, found on CRNI’s videos page: <https://www.crni.ie/videos/>.

Many of these operators address **poverty and social inclusion** by providing refurbished or reused goods at affordable prices and in some cases, at a significant discount. This enables low-income families to meet their needs without incurring debts or making do without essential items. By creating volunteer opportunities, they help to address social exclusion by offering a sense of community, purpose and belonging to those who are lonely or otherwise excluded. According to a Volunteer Ireland study<sup>11</sup>, 55% of respondents to an online national survey of volunteers stated that their mental health and well-being had increased following their volunteering experience. It is notable that volunteers often also progress into part time or full time employment within the same organisation.

As described above and recognised by the European Commission, becoming a more Circular Economy can deliver benefits to the environment, society and economy (or the “triple bottom line”).

**POLICY RECOMMENDATION #1.1:** Realising triple bottom line benefits in the delivery of a more circular economy will require careful policy formation that ensures a job rich, just and inclusive circular transition focused on the wellbeing of all individuals.

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<sup>8</sup> See *Moving Towards the Circular Economy* in Ireland, a study for the National Economic and Social Council (NES) by Dr Simon O’Rafferty

<sup>9</sup> Report prepared by the European Commission, *Analysis of shortage and surplus occupations based on National and Eurostat Labour Force survey data*, 2019, available <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8269&type=2&furtherPubs=no>

<sup>10</sup> See full text of the conclusions, 10 December 2019, download from <https://www.consilium.europa.eu/en/press/press-releases/2019/12/10/better-access-of-people-in-a-vulnerable-position-to-the-labour-market-the-council-adopts-conclusions/>

<sup>11</sup> Volunteer Ireland report, *The Impact of Volunteering on the Health and Well-Being of the Volunteer*, available at <https://www.crni.ie/publications/>

## 2.0 TOWARDS A MORE CIRCULAR ECONOMY

As outlined above, becoming a more Circular Economy will require new approaches to every stage of a product's life cycle and beyond.

**POLICY RECOMMENDATION #2.1:** The transition to a more Circular Economy will require a significant shift in Ireland's **policy focus** and **language** to better align with the waste hierarchy.

It will require a strategic mix of policy and financial incentives and penalties for operations and/or infrastructure that **ensures prevention and preparation for reuse are cheaper and/or more convenient** than waste activities.

**POLICY RECOMMENDATION #2.2:** Invest in and support prevention (including citizens engagement, better design, sharing, leasing, reuse and repair) and preparation for re-use (including repair and refurbishment) across a range of sectors for the **greatest long term sustainable transformation** to a Circular Economy.

We believe a more circular economy must be delivered through a dedicated and holistic strategy.

**POLICY RECOMMENDATION #2.3:** Rename this plan to a *Circular Economy Action Plan*, and restructure it to align with and prioritise the waste hierarchy across all subject areas.

To model this, we have chosen to respond to the consultation by listing measures required **in the order of the waste hierarchy**, starting with the highest priority - prevention and followed by preparation for reuse and recycling. We have consistently used the language of the waste hierarchy; "prevention" as the first tier of the hierarchy which includes avoidance, (non-waste) reuse and repair and "preparation for reuse" as the second tier of the hierarchy.

For clarity, all policy measures are cross referenced at the end against the consultation questions.

## 3.0 PREVENTION

'Prevention' refers to measures taken before a substance, material or product has become waste. This includes efforts to reduce consumption, better design, and models that increase the intensity of product usage and extend the product life span (e.g. re-use and repair). Products here relate to a broad range of household and commercial goods from electrical and electronic equipment to textiles, furniture and fittings, food, bicycles, paint and much more<sup>12</sup>.

Prevention, being at the top tier of the waste hierarchy, has the greatest potential to generate greenhouse gas savings as well as support job creation. However, there is insufficient policy focus on or support for this priority activity.

The measures outlined in the following section can firmly place prevention at the centre of our Circular Economy in Ireland.

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<sup>12</sup> It is noted that many of the key reuse policy measures are set out in Section 10.0 on textiles and Section 21.0 of the consultation on Bulky Waste. We would like to highlight that these measures should apply across the board as priorities for all resource management.

### 3.1 SUPPORT ECO-DESIGN AND ECO-LABELLING

Consumer goods are now less durable and repairable than in the past. The increasing difficulties associated with attempting to repair modern electronic equipment including lack of access to and high costs of spare parts, lack of appropriate repair information, as well as product design preventing repair is a serious environmental issue that puts at risk the economic viability of re-use and repair organisations<sup>13</sup>.

Design for durability, repairability, reusability and modularity is essential to improve the quality of products, and will also support the development of the second hand market. Repair must become the norm, including giving consumers a right to repair their products. The revised WFD requires Member States take measures to support eco-design as follows:

**Article 9(1)(d):** Member States shall take measures to prevent waste generation. Those measures shall, at least: (b) encourage the design, manufacturing and use of products that are resource-efficient, durable (including in terms of life span and absence of planned obsolescence), repairable, re-usable and upgradable

The European *Prevent Waste Coalition*, of which RREUSE is a member, recently published a paper *10 Priorities to transform EU waste policy*<sup>14</sup>. This calls for all products under the scope of the Ecodesign Directive to be circular in design through repairability and durability requirements. Similar design rules must also be set for product categories not covered by the Directive, notably textiles and furniture. The revised WFD requirements for eco-modulation of fees also presents a very important opportunity to incentivise better design and should be enforced with this in mind.

As recently highlighted by a Guardian<sup>15</sup> article on mattresses, the disconnect between design and recycling - as well as changing consumer expectations - has led to an increase in designs (e.g. pocket sprung mattresses and triple stitching) that create downstream problems for recyclers and an “ever-growing mattress mountain” for disposal. However, in Ireland almost half of all mattresses sold in 2010 were Irish-made, presenting an opportunity to address this problem locally.

**POLICY RECOMMENDATION #3.1: Engage the design and manufacturing community** through collaboration with DBEI, and foster opportunities to connect these communities with operators handling their products at reuse, repair or recycling stages.

One recent best practice example of fostering connections between the design and practitioner communities is the NCAD<sup>16</sup> Master's in Circular Product Design scholarship funded by the EMWR and supported by the Rediscovery Centre. More initiatives like this would be welcome to help foster these important connections.

It is also important to communicate more circular design to consumers that enables them to make more informed choices and drive behavioural change.

**POLICY RECOMMENDATION #3.2:** Pursue European Commission efforts to **develop consumer labelling** showcasing the durability and repairability of products including non-energy products and review local opportunities for same.

<sup>13</sup> RREUSE (2019), Easy product repair (available at <https://www.rreuse.org/improving-product-design/>)

<sup>14</sup> <https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/>

<sup>15</sup>

[https://www.theguardian.com/environment/2020/feb/12/mattress-landfill-crisis-recycling-nightmare?CMP=share\\_btn\\_tw](https://www.theguardian.com/environment/2020/feb/12/mattress-landfill-crisis-recycling-nightmare?CMP=share_btn_tw)

<sup>16</sup> <https://www.ncad.ie/study-at-ncad/postgraduate-application/scholarship-ma-product-design/>



For textiles in particular, RREUSE recommends<sup>17</sup> an expert working group be established to address the textile chain, potentially by extending the scope of the existing European Commission’s Expert Group on Textile Names and Labelling. The group should involve all actors of the value chain and focus on both product design and end-of-life solutions for textiles.

**POLICY RECOMMENDATION #3.3:** Establish an expert working group on the textile chain at national level.

### 3.2 INTRODUCE REUSE TARGETS

Targets play an essential role where the markets fail to ensure the right environmental or social outcome, due to a failure to recognise externalities. For example, renewable energy and recycling have been widely subsidised through different schemes to ensure that Ireland meets its respective targets and as a result, both activities could now be considered mainstream. In the case of renewable energy, this financial support has seen massive growth in the sector coupled with a dramatic reduction in cost, which will enable renewables to become more self-sufficient in future.

The revised Waste Framework Directive introduces for the first time a requirement to measure reuse with a view to considering targets for reuse in the future, as shown below.

**Article 9.4:** Member States shall monitor and assess the implementation of their measures on re-use by measuring re-use on the basis of the common methodology established by the implementing act referred to in paragraph 7, as from the first full calendar year after the adoption of that implementing act.

**Article 9.9:** By 31 December 2024, the Commission shall examine data on re- use provided by Member States in accordance with Article 37(3) with a view to considering the feasibility of measures to encourage the re-use of products, including the setting of quantitative targets...

The European *Prevent Waste Coalition* paper *10 Priorities to transform EU waste policy* called for, **as the top priority**, ambitious and binding waste prevention and reuse targets. A recent CIWM report<sup>18</sup> also found a key barrier to reuse in the UK and Ireland was a lack of targets or legislation to drive the sector.

Other regions across Europe have adopted reuse targets. As noted in Chapter 10.6 of the consultation, Flanders has a reuse target (see also below). At the time of writing, French lawmakers have also decided to set a combined re-use and preparing for re-use target of which the level will be set for the period between 2021 and 2025 and then renewed every five years. The draft European Commission’s Circular Economy Action Plan 2.0<sup>19</sup> goes even further, setting targets to halve residual waste arising and halve the EU’s material footprint.

**POLICY RECOMMENDATION #3.4:** Set targets for reuse in order to effectively prioritise prevention in the waste hierarchy as required under the WFD.

As shown above, the WFD commits to “considering” setting quantitative targets for waste prevention and/or for the reuse of products by the end of 2024. However, 2024 is still 5 years away and from this point it could

<sup>17</sup> <https://www.rreuse.org/vision-for-a-new-fashion-season-social-and-circular/>

<sup>18</sup> CIWM report, *Reuse in the UK and Ireland - a “State of the Nations” report for the CIWM*, 2016, available at <https://www.ciwm.co.uk/ciwm/news-and-insight/reports-and-research.aspx>

<sup>19</sup> See

<https://www.euractiv.com/section/circular-economy/news/leak-eus-new-circular-economy-plan-aims-to-halve-waste-by-2030/>



take a further 3 to 5 years before such a target is implemented Europe-wide and more time again before it is effective at Member State level.

**It is widely understood that we have a window of 10 years to act on reducing GHG emissions.** In the absence of individual Member State leadership, we will miss this opportunity to tackle emissions associated with consumption within the above timeframe.

**POLICY RECOMMENDATION #3.5: Introduce binding reuse targets in legislation from 2022** (to align with the development of a methodology per below) with further target objectives set for 2025 and 2030.

### 3.2.1 REUSE TARGET - SCOPE

Through the Regional Waste Plans, there is a commitment to a national waste prevention target of 1% reduction household waste per year. However, this target has not proven to be effective as household waste has continued to increase and it is difficult to account for the impact of population changes or consumption patterns as opposed to actions that effectively reduce household waste arising.

Instead, as per Policy Recommendation #3.4, a kg/inhabitant reuse target (as per the Flemish target below) should be introduced that covers select and measurable material streams.

#### Case Study: Flanders reuse target tied to jobs

Flanders is the northern federated part of Belgium with a population of approximately 6.4 million people.

A unique social and environmental target for reuse was developed in collaboration between the Environmental Agency OVAM and the Ministry of Employment. This required that 5kg/inhabitant goods were reused and 3,000 jobs were created by 2015. This target applied exclusively to activities under the social enterprise reuse network Kringwinkeloop operating in Flanders and is an excellent example of joined up thinking. With buy-in from both Agencies, the target was achieved.

The Flanders Waste Management Plan for Household Waste (Uitvoeringsplan huishoudelijk afval en gelijkaardig bedrijfsafval) outlines that by 2022, accredited reuse centres should achieve a reuse target of 7 kg/inhabitant and a reuse rate of or greater than 50%.

This target should apply initially to the following product categories: textiles; Electrical and Electronic Equipment; furniture; other household goods (books, media, bric a brac); packaging and other surplus materials; paint and bicycles. A separate target is proposed for food waste prevention (see Section 3.3).

We also propose that the target be linked to job creation. This was effectively achieved in Flanders and supports the social economy which is instrumental in delivering reuse currently.

**POLICY RECOMMENDATION #3.6: Set the level (number of kg/inhabitant) of this target once the Q2reuse research project has delivered a first estimate of Ireland's reuse rate and apply this to no later than 2022.**

Setting reuse targets for Ireland will demonstrate leadership and ambition, and will be supported through the measures set out below to strengthen the sector.

### 3.2.2 REUSE TARGET - MEASUREMENT

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

Ireland is currently leading the way in developing a **methodology for measuring reuse** through the EPA funded Q2Reuse project. Led by the Clean Technology Centre (CTC), in collaboration with the Rediscovery Centre, Community Resources Network and the Eastern Midlands Waste Region, this project will develop methodologies for the qualitative and quantitative assessment of the reuse sector.

This project, in parallel with EU guidance, will clarify the scope of activities and materials that could count towards a reuse target and is due for completion in early 2021. Importantly, it will also provide a methodology that is tailored to the Irish market, which would be a strong base on which to build reuse data and measure against Irish reuse targets.



It is acknowledged that requiring the sector to measure their activities toward a target would add a layer of administration to some already struggling enterprises.

**POLICY RECOMMENDATION #3.7:** Support a reuse target through policy drivers (including financial instruments per Section 3.4) and underpin it with penalties for failure to meet targets.

Finally, setting a target for and measuring reuse in Ireland presents an opportunity to **link reuse to greenhouse gas emissions reporting**. While we acknowledge this is a complex area due to the global nature of manufacturing of consumer goods, providing a link between reuse and manufacturing emissions would highlight the impacts of production and distribution of the goods we use on a daily basis and strengthen links to the Climate Action Plan.

### 3.2.3 REUSE TARGET - EFFECTIVENESS

Failure to meet the Regional Waste Plan objective to reduce household waste by 1% per year has, to our knowledge, had no repercussions. It is not flagged in Measure #6 of Annex 1<sup>20</sup> of the consultation document, which reports “satisfactory progress” on compliance with the waste hierarchy.

This removes any impetus to invest in or focus on waste prevention to meet the target.

**POLICY RECOMMENDATION #3.8:** Provide for clear accountability and consequences for failure to meet any target. Ensure that EPR schemes (for relevant product groups) and waste collectors are held accountable for waste prevention to a much greater extent.

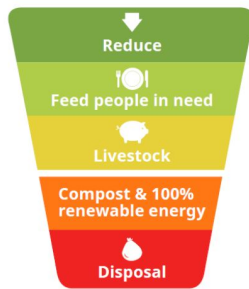
The current “competition in the market” model removes any accountability for waste prevention or reuse from waste collectors, who only focus on recycling or disposal. There is no mechanism for them to support or drive wider prevention or reuse activities. We believe they must be **held accountable for at least part of a reuse target**.

<sup>20</sup> Annex 1: Progress Report on A Resource Opportunity - Waste Management Policy in Ireland (measures listed in table with traffic light system)

### 3.3 INTRODUCE FOOD WASTE PREVENTION TARGETS

With 88 million tonnes worth of food wasted annually in Europe, there are strong reasons for the new Commission to keep the fight against food waste at the top of its agenda<sup>21</sup>.

The food hierarchy prioritises **prevention and feeding people** followed by feeding livestock<sup>22</sup> and then activities handling waste food as illustrated here<sup>23</sup>.



CRNI member FoodCloud is a social enterprise prioritising feeding people by redistributing surplus food to charities. To date they have redistributed over 29,399 tonnes of food or 70 million meals.



The revised WFD includes provisions addressing the level of food waste:

**Article 9.5:** Member States shall monitor and assess the implementation of their food waste prevention measures by measuring the levels of food waste on the basis of the methodology established by the delegated act referred to in paragraph 8, as from the first full calendar year after the adoption of that delegated act.

**Article 9.6:** By 31 December 2023, the Commission shall examine the data on food waste provided by Member States in accordance with Article 37(3) with a view to considering the feasibility of establishing a Union-wide food waste reduction target to be met by 2030 on the basis of the data reported by Member States in accordance with the common methodology established pursuant to paragraph 8 of this Article. To that end, the Commission shall submit a report to the European Parliament and to the Council, accompanied, if appropriate, by a legislative proposal.

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

**POLICY RECOMMENDATION #3.9:** For Ireland to make progress in food waste reduction and become a "farm to fork" global leader in this area, a **mandatory food waste prevention target** of 50% by 2030 along with an interim target to drive progress must be introduced.

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

As for a general reuse target outlined above, any food waste prevention target must be supported by data, policy drivers and underpinned by clear lines of accountability and penalties for failure to meet targets.

<sup>21</sup> RREUSE commentary on Food Waste - <https://www.reuse.org/wp-content/uploads/FINAL-Commentary-on-Food-Waste-RREUSE-4.pdf>

<sup>22</sup> which can be problematic in Ireland

<sup>23</sup> Image source: <https://feedbackglobal.org/food-waste-ranking/hierarchy/>

**POLICY RECOMMENDATION #3.10:** Improve data collection on food waste prevention in Ireland to enable tracking and measuring against a target.

While a commercial food waste measurement methodology has been developed<sup>24</sup>, it has not been widely adopted to date across the supply chain. However, a baseline year could be selected now for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

**POLICY RECOMMENDATION #3.11:** Support measures required to align investment with the food hierarchy (Sections 3.4.2.b - aligning incentives with the food waste hierarchy, Section 3.4.2.c - tax rebates and 3.4.2.d - supporting the cost of transport) and to raise consumer awareness about the true cost of food waste (Section 3.6.1.b).

Other options like a policy driver requiring retailers to donate unspoiled food to charities (recently implemented in France<sup>25</sup>) should be reviewed.

### 3.4 INVEST IN AND SUPPORT PREVENTION AND PREPARATION FOR REUSE ACTIVITIES

A cornerstone of the WFD is the waste hierarchy which must apply as a priority order in legislation and policy. This means supporting and investing in prevention and preparation for reuse through a mix of policy and financial incentives and penalties, for operations and/or infrastructure, that **ensures prevention and reuse are cheaper and/or more convenient** than waste activities.

As noted in Section 1.3, CRNI estimates that only 1 - 5% of goods in Ireland are reused and many social reuse and recycling operators are deeply under-resourced.

The use of economic and other instruments is actively supported through the WFD as follows:

**Article 4.3** Member States shall make use of economic instruments such as those proposed in Annex IVa for application of the waste hierarchy [Annex includes use of fiscal measures or other means to promote the uptake of products and materials that are prepared for reuse or recycled; economic incentives of regional / local authorities to promote waste prevention and intensify separate collection schemes]

**Article 11.1:** Member States shall take measures to promote preparing for re-use activities, notably by encouraging the establishment of and support for preparing for re-use and repair networks, by facilitating, where compatible with proper waste management, their access to waste held by collection schemes or facilities that can be prepared for re-use but is not destined for preparing for re-use by those schemes or facilities, and by **promoting the use of economic instruments, procurement criteria**, quantitative objectives or other measures.

Below are the measures CRNI recommends are taken to enact these Articles.

<sup>24</sup> Available for download at <https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/>

<sup>25</sup> Further information available at:

<https://www.telegraph.co.uk/news/worldnews/europe/france/12145755/French-supermarkets-banned-from-binning-unsold-food.html>

### 3.4.1 DEMONSTRATE LEADERSHIP THROUGH GREEN PUBLIC PROCUREMENT FOR PREVENTION & PREPARATION FOR REUSE

Example #7 of economic instruments set out in Annex IVa of the revised Waste Framework Directive is “Sustainable public procurement to encourage better waste management and the use of recycled products and materials”.

Public authorities have significant potential in driving markets for ethical and sustainable purchases and supporting local job creation. However, approximately 55% of procurement procedures across the EU still use the lowest price as the only award criterion<sup>26</sup>, without considering any potential added social or environmental value.

A key priority of the RREUSE network in its *Social and Circular Outlook* is obtaining stronger guidance and leadership in green and social procurement to encourage increased inclusion and use of social clauses, reserved contracts and environmental criteria within both public and private tendering procedures. Other regions also prioritise green public procurement in their Circular strategies, as per the Welsh Government’s consultation *Beyond Recycling*<sup>27</sup>, which includes as a top 10 objective “... prioritising re-used and remanufactured content in the goods that the public sector purchases”.

The Irish Government’s annual public sector purchasing accounts for 10% to 12% of Ireland’s GDP, a large part of economic activity and demand. This provides Ireland’s public sector with significant potential to drive more resource-efficient, less polluting goods, services and works within the marketplace. This is recognised through the Climate Action Plan, by placing Green Public Procurement high on the agenda.

CRNI has supported and welcomes the Green Public Procurement work the Department has been undertaking through the GPP4Growth project. *Circular 20/2019: Promoting the use of Environmental and Social Considerations in Public Procurement* was important and timely in encouraging Public Sector bodies to consider green and social criteria in procurement projects.

**POLICY RECOMMENDATION #3.12:** Disseminate regular feedback on the **implementation of green and social criteria** considered in line with this Circular (e.g. via a league table) to demonstrate progress and hold public sector bodies to account.

CRNI also welcomes the work of The Irish Prison Services (as the contracting authority) conducting market consultation to introduce social procurement<sup>28</sup>, which has led to their collaboration with social recyclers. We would strongly encourage Public Sector Bodies to **review and adopt this model** where relevant.

However, as noted above price criterion are still driving many procurement decisions and there are very few examples of public procurement supporting prevention or preparation for reuse activities. This includes procuring second hand goods (furniture in particular) or services for the removal of goods for reuse or social recycling (e.g. surplus food, surplus packaging or other materials, IT equipment, furniture, and more).

A recent CRNI research project, funded by the EPA, to encourage the public sector to donate unwanted bulky items for reuse<sup>29</sup> identified a need for **stronger policy drivers** to provide the right incentive to reuse instead of

<sup>26</sup> European Commission, Public procurement strategy, available at [https://ec.europa.eu/growth/single-market/public-procurement\\_en](https://ec.europa.eu/growth/single-market/public-procurement_en)

<sup>27</sup> Welsh Government, Beyond recycling, a strategy to make the circular economy in Wales a reality, available at: <https://gov.wales/beyond-recycling>

<sup>28</sup> As highlighted in a recent *Buying for Social Impact Guide* (page 40) <https://op.europa.eu/en/publication-detail/-/publication/3498035f-5137-11ea-aece-01aa75ed71a1>

<sup>29</sup> See <https://www.crni.ie/bulky-items-reuse/> for detail

recycling, recovery or disposal. However, we do recognise that public bodies have diverse procurement needs and there is no one size fits all.

**POLICY RECOMMENDATION #3.13: Align** public procurement, at minimum, with **national prevention or preparation for reuse targets**. It should also be necessary for public bodies to **incorporate reuse policies** into asset management and procurement.

Such measures would support the objectives of Resource Efficiency Action Plans (REAPs), the national Climate Action Plan (in which Green Public Procurement is a high priority) and local Climate Action Charters. Clear guidance on how to address the green criteria in practice, specifically in the context of waste prevention and reuse e.g. through eco-design or repair contracts, will be required. Guidance in social procurement is also required through social clauses and reserved contracts in public tendering to further commitment.

Stronger policy backing for reuse activities will also help the public sector to access budgets to provide longer term investment in reuse programmes e.g. exchange platforms or repair / refurbishment schemes.

#### 3.4.1.A BUILD AWARENESS AND SUPPORT AND DISSEMINATE BEST PRACTICE

As this is still an emerging area, good practice examples are required to stimulate interest in and a market for reuse through procurement.

CRNI recently supported a consortium of members in a green and social procurement project to furnish a vacant office space (see [here](#) for details).



The NWCPD issued a request for quotation for the Delivery, Assembly & Installation of Upcycled Furniture to their new office space in Tullamore in April 2019. A consortium of CRNI members was awarded this project including the Rediscovery Centre, ReMark-accredited Back2New and CRNI. Collaboration Ireland assisted with the initial project management.



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

Through this experience, and the “Bulky Item Reuse” project (see above), we identified the following barriers and opportunities:

- There are many **NEGATIVE PERCEPTIONS** about the opportunity for reuse (either in purchasing or handling unwanted items)

Individuals asked through the Bulky Item Reuse project to adopt reuse practices often identified with certain barriers (storage, indemnity, resource, previous lack of interest in reuse/exchange etc.) and then felt it is insurmountable to starting a reuse scheme. Compared with the positive feedback from the UK reuse case studies, it was noted the feedback from our project workshops and interviews was somewhat negative with participants focusing on the barriers of reuse in their organisations rather than what they could achieve.

Measures needed to overcome these attitudes include increased awareness of success stories and quality assurance.

**POLICY RECOMMENDATION #3.14:** Continue to identify and share **good practice examples** to demonstrate the opportunities for prevention and preparation for reuse in procurement and support the **roll out of ReMark** (see Section 3.6.1.a).

- **The small scale of the reuse sector currently is a barrier for procurement projects.**

Many reuse organisations as suppliers do not have the scale to provide for the full specifications of typical procurement projects. For procurement projects like the NWCPO project, involving 97 items of furniture, a consortium approach led by CRNI was required as no single supplier could provide all items.

Likewise for the effective exchange of unwanted goods, a wide network (of both donors and claimants) interested in reuse is necessary. Currently, the absence of a ready-made platform or network to tap into is dissuading some organisations from getting started. The withdrawal of funding from the SMILE Resource Exchange platform<sup>30</sup> at the end of 2018 represented an unfortunate loss of such a network.

Furthermore, the business offerings that could support reuse schemes (transport, storage and repair services) are often underdeveloped and where they do exist, they are under resourced (as is the case in several social enterprises that support reuse activities).

To overcome the scale issue, potential buyers need to be informed about the sector and encouraged to take on smaller scale projects to match the scale of the market.

**POLICY RECOMMENDATION #3.15:** Encourage public bodies (and businesses) to divide procurement projects into smaller lots to facilitate the small scale of social enterprises and others in the prevention and preparation for reuse sector.

- **Storage is an important perceived barrier**

The lack of storage to manage unwanted surplus items (prior to finding a claimant) is often perceived as a significant barrier. However, storage is problematic in itself and often only works if there is constant demand for stored items.

It is recommended that public sector bodies are encouraged to launch reuse schemes in advance of or without the option of interim storage. Instead, there should be focus on finding a wide network of potential claimants or suppliers, and allowing enough turnaround times for products to be sourced or claimed.

- **Disincentivise replacement**

Bulky goods are sometimes replaced for the sole purpose of spending budget surplus at year end, thereby justifying annual budgets. This is clearly a waste of both natural and public resources and should be addressed through procurement measures.

**POLICY RECOMMENDATION #3.16:** Take measures to avoid public spending of end of year budget surplus on replacement furniture to justify annual budget levels.

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<sup>30</sup> It is noted in Measure #36 of Annex 1 the withdrawal of funding and closure of the platform is not acknowledged despite explicit reference to SMILE in the measure itself.



Finally, it is noted that in Measure #38 of Annex 1 the reuse website PREP is highlighted as a service for the exchange of bulky goods in the public sector. However, this platform is currently dormant as it is not funded for operations. The Bulky Item Reuse<sup>31</sup> research referred to above reviewed this and other services (including SMILE) to identify the best channel for public bodies to pass goods on for reuse.

By way of conclusions, taking into account the withdrawal of investment from SMILE and lack of funding for PREP<sup>32</sup>, public sector bodies who want to engage in reuse activities are encouraged to implement one of four reuse models outlined in the research. These involve varying levels of engagement and investment and therefore require the backing of strong policy drivers as per Recommendation #3.13.

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#### 3.4.1.B SUPPORT SOCIAL RECYCLERS

As outlined in Section 5.1.2, social enterprise dismantling mattresses for recycling in Ireland include Eco-Mattress Recycling (Eastern-Midlands) and BounceBack Recycling (Connaught-Ulster).



The last two years have seen the delivery of very successful mattress amnesty events as part of the Anti-Dumping Initiative. These have also seen enhanced collaboration between Local authorities and social recyclers for one-off events. However, in the longer term, a continuous relationship with social recyclers for mattress removal through tendering processes at Civic Amenity Sites would be preferable.

**POLICY RECOMMENDATION #3.17:** Encourage Local Authorities to prioritise social mattress recyclers by **splitting Civic Amenity Site management contracts into lots** or facilitating smaller contracts for specific streams like mattresses and/or by specifying that successful awardees of larger tenders provide social gain through subcontracts.

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#### 3.4.1.C PRIORITISE SECOND HAND THROUGH SOCIAL HOUSING VOUCHERS

Another means of supporting Green Public Procurement targets and objectives would be to build second hand goods into Government spend on social housing. This would also have the potential to create cost efficiencies in housing.

The Scottish reuse network CRNS has established a [reuse consortium](#) of social enterprises providing second hand goods to help furnish social housing. Traditionally these items have been supplied new. The benefits of the consortium approach according to CRNS are:

- Value for money enabling budgets to cover more goods and support more people in need
- Exposure to reuse may encourage people to consider it over second hand goods for future purchases, potentially discouraging them from using high street weekly payment stores and payday lenders

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<sup>31</sup> See <https://www.crni.ie/bulky-items-reuse/> - details will be published shortly following approval by the EPA

<sup>32</sup> to relaunch either without public funding would require upfront commitment from a minimum of 60% of public sector bodies plus set up costs

- Local authority budgets are spent in the local social enterprise organisation providing the reuse furniture, contributing to their financial viability. This supports them in providing social impact in the community, through providing opportunities for employment and volunteering to those who are furthest removed from the job market
- Items are diverted from landfill resulting in a more circular approach to the local economy.

In Ireland, new tenants to social housing that are in receipt of social welfare benefits can request support from the Department of Employment Affairs and Social Protection to purchase furniture and other necessary household equipment. This support comes in the form of vouchers for local stores (e.g. electrical or furniture stores) where the tenant can choose the items they wish to purchase up to an agreed amount.

**POLICY RECOMMENDATION #3.18:** Enabling tenants to **spend vouchers in second hand stores** would give them greater leverage in the voucher value while also supporting the local economy and environmental objectives.

Any such scheme should be carefully designed in collaboration with tenants to identify potential barriers (e.g. accessibility to reused goods, negative perceptions of second hand goods). For example, several categories of household items are not easily available second hand such as electronic goods or appliances (see Section 4.0). As outlined in Section 3.6.1.a, we believe ReMark accreditation of stores can help overcome negative perceptions of second hand.

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### 3.4.2 FINANCIAL MEASURES TO MAKE PREVENTION, REUSE AND REPAIR MORE ATTRACTIVE THAN BUYING NEW

Financial or other policy mechanisms introduced at any level of the hierarchy must be structured in a way that ensures prevention and preparation for reuse are **always the cheapest and/or most convenient options**. The revised Waste Framework Directive introduces an obligation on Member States to show how suggested economic instruments (from Annex IVa) have been considered in waste prevention programmes.

**Article 29.2:** When establishing such programmes, Member States shall, where relevant, describe the contribution of instruments and measures listed in Annex IVa to waste prevention and shall evaluate the usefulness of the examples of measures indicated in Annex IV or other appropriate measures. The programmes shall also describe existing waste prevention measures and their contribution to waste prevention.

We have outlined below financial mechanisms that should be implemented to address this cost imbalance and drive waste prevention.

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#### 3.4.2.A 0% VAT FOR PREVENTION AND AND PREPARATION FOR REUSE ACTIVITIES

Economic Instrument #9 of Annex IVa of the revised Waste Framework Directive is *“Use of fiscal measures or other means to promote the uptake of products and materials that are prepared for re-use or recycled”*.

According to a European Commission Eurobarometer report<sup>33</sup>, 77% of European citizens would be willing to have their goods repaired but hardly ever do because it is too expensive. Re-use and repair activities need to be made more accessible in order for citizens to keep the value of products and prevent wasting resources.

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<sup>33</sup> Flash Eurobarometer 388, ATTITUDES OF EUROPEANS TOWARDS WASTE MANAGEMENT AND RESOURCE EFFICIENCY, [https://ec.europa.eu/commfrontoffice/publicopinion/flash/fl\\_388\\_en.pdf](https://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf)

Under the current VAT Directive, reduced VAT rates may be applied to the ‘supply of goods and services by organisations recognised as being devoted to social wellbeing by Member States and engaged in welfare or social security work’. Several Member States have granted social enterprises the opportunity to offer reduced VAT rates for their services or the sale of their goods where their activities contribute to social welfare, social inclusion and the move towards a circular economy.

The Directive also allows for reduced VAT on small repairs of product groups clothing, shoes and bicycles.

**POLICY RECOMMENDATION #3.19:** Set a 0% VAT rate for prevention and preparation for reuse, a reduced VAT for recycling activities carried out by **social enterprises** in Ireland and a 0% VAT rate on “small” repairs.

We support the RREUSE<sup>34</sup> position on applying different VAT rates in accordance with the waste hierarchy, as follows:

- **Repair:** 0 % VAT should be applied on the cost of the labour of repair, maintenance, upgrade services on products such as furniture, electronic and electrical equipment, construction materials, bicycles, shoes and leather goods;
- **Sales of second-hand goods:** 0 % VAT should be applied on the sale of second-hand goods as VAT was already paid once during the purchase of a new product;
- **Collection services:** collection services provided by social enterprises that preserve the re-use potential of the collected products should be subject to a 0 % VAT rate;
- **Recycling:** the sale of recycled material or material to be recycled should be entitled to a reduced VAT rate, in order to promote a market for quality recycled materials.

This would give a strong and direct signal to consumers about the impact of consumer goods and provide opportunities for consumers to make savings through better environmental choices.

However, it is our understanding that proposed revisions to the EU VAT Directive include a ‘negative list’ of products and services to which reduced VAT rates cannot be applied. We are concerned that this includes certain household goods, which if sold as second-hand, would not be able to benefit from reduced VAT rates.

If no difference is made in VAT terms between new and used goods, second-hand musical instruments, electronics and furniture would be placed on equal footing to VAT rules for alcoholic beverages, tobacco and weapons. This clearly does not align with the waste hierarchy and would compromise any ability to support a more Circular Economy via VAT reductions.

**POLICY RECOMMENDATION #3.20:** The Department should ensure that any revisions to the VAT Directive **align with the waste hierarchy** and prioritise reuse and repair goods and services.

#### 3.4.2.B INVEST CONSISTENTLY AND IN LINE WITH THE HIERARCHY

Economic Instrument #8 of Annex IVa of the revised Waste Framework Directive is “*Phasing out of subsidies which are not consistent with the waste hierarchy*”.

<sup>34</sup> See RREUSE comments on EU VAT rule proposals  
[http://www.rreuse.org/wp-content/uploads/Position-paper-on-VAT-proposal\\_29-September-2018-FINAL.pdf](http://www.rreuse.org/wp-content/uploads/Position-paper-on-VAT-proposal_29-September-2018-FINAL.pdf)

Subsidies and other support for recycling and recovery often have unintended consequences that hamper prevention or preparation for reuse.

With the revised WFD, EPR schemes must move towards a “cradle to cradle” ethos, involving significant changes and requiring greater accountability for the full life cycle of the goods and products their producers are responsible for including end of use management.

To date, Irish EPR schemes have strongly supported recycling but provided only very limited support<sup>35</sup> to prevention or preparation for reuse activities. As a result, recycling (through subsidies) has become more viable than prevention or preparation for reuse, going against the waste hierarchy<sup>36</sup>. We therefore do not agree that “satisfactory progress” is being made to ensure householders are **encouraged and facilitated to reuse** through Producer Responsibility models, or to implement and demonstrate significant prevention and reuse initiatives for PRI waste streams, as is marked against measure #15 or #33 of Annex 1.

Some of the best examples of EPR schemes supporting and driving reuse and social enterprise activity can be found in France. Although there are already over 14 EPR schemes in place covering household and commercial streams such as batteries, medicines, furniture, clothing and electronic equipment, a new Circular Economy bill in France proposes additional schemes for construction materials, gardening products, cigarettes and toys. The French Government also proposes to introduce a *Solidarity Re-use Fund* that will earmark 5% of all EPR fees for social enterprises carrying out reuse and preparation for reuse.

**POLICY RECOMMENDATION #3.21:** Require all EPR schemes **to focus to a much greater extent on prevention and preparation for reuse**, through financial supports as well as effective eco-modulation fee structures and other supports, in line with the waste hierarchy.

This is also discussed further in Section 4.2.2.

**POLICY RECOMMENDATION #3.22:** Review opportunities to introduce EPR schemes for mattresses, furniture, paint and textiles (amongst other areas), but with a strong focus on prioritising and financially contributing to existing and prevention and preparation for reuse activity.

Recent experience from the UK demonstrates how subsidies can have unintended consequences that hamper efforts to prevent or redistribute surplus food. Substantial investment in and support for Anaerobic Digestion (AD) in the UK made it cheaper to divert surplus food suitable for human consumption to AD, thereby cannibalising food redistribution. Although AD generates renewable energy, the energy and resources embedded in edible food that are lost in the digestion process far outweigh any benefits of renewable energy production.

Likewise waste-to-energy in Ireland is subsidised for its renewable energy output, even though this ultimately brings down the cost of waste-to-energy and thereby undermines prevention, preparation for reuse and recycling. For this reason, CRNI also supported the introduction of the proposed levy on waste-to-energy through the recent Environmental Levies consultation.

Policy Action G.1.1 of the Regional Waste Plans aimed to review local authority expenditure on lower waste order activities to determine if there is scope to deliver a more cost effective service and balance expenditure across the hierarchy. We would like to see a similar review carried out at national level to address the above concerns.

<sup>35</sup> REPAK’s “prevent and save” scheme; WEEE Ireland’s support to EPA research

<sup>36</sup> See also Section 4.0 on WEEE preparation for reuse

**POLICY RECOMMENDATION #3.23:** Review and moderate all forms of subsidies at national level on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse.

#### 3.4.2.c INTRODUCE TAX REBATES ON DONATED GOODS

Economic Instrument #3 of Annex IVa of the revised Waste Framework Directive is “*Fiscal incentives for donation of products, in particular food*”.

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

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

- end of line, remaindered, surplus and unwanted materials and items with potential from local businesses as handled by ReCreate
- DIY equipment and home improvement materials as handled by Habitat for Humanity
- surplus IT equipment as handled by Rehab Recycle and Camara
- surplus food as handled by FoodCloud for redistribution
- other items including furniture, bicycles, paint donated by businesses to upcycling enterprises

It would also see the introduction of EPOS (Electronic Point of Sale) systems that track and measure sales, which would contribute to data collection on second hand sales while also benefiting retailers (see Section 3.2.2).

**POLICY RECOMMENDATION #3.24:** Introduce **tax rebates on donated goods** from businesses, similar to “Gift Aid”.

This has been very effectively implemented in the UK and Northern Ireland for donations from individuals.

#### 3.4.2.d SUPPORT BUSINESS DONATION TRANSPORT COSTS

A key barrier in food surplus redistribution is the cost of delivery of surplus food to redistribution hubs.

In 2018, the UK Government launched a pilot scheme to subsidize transport for retail and manufacturing companies donating food<sup>37</sup>. While this was a one-off provision, it worked well at engaging businesses and demonstrating the viability of passing on surplus edible food for redistribution.

**POLICY RECOMMENDATION #3.25:** Review the benefits of a similar transport subsidy scheme to be piloted in Ireland to better support the flow of donations.

<sup>37</sup> See details here: <https://fareshare.org.uk/giving-food/about-the-fareshare-surplus-with-purpose-fund/>

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#### 3.4.2.E REDUCED RATES FOR REUSE AND PREPARATION FOR REUSE CENTRES

CRNI supports a nation-wide policy of reduced “commercial” rates for prevention and preparation for reuse activities. Currently these rates are varied due to the different approaches by Local Authorities to commercial activities. In some areas, for example, charity shops pay full commercial rates for their retail premises. As a result, charity shops in Ireland are spending approximately €2 million total or between 1/3 and 1/2 of their store income on rates in areas where they are deemed to be commercial operators. This approach diminishes their potential for social impact e.g. providing essential health and disability services as noted in Section 3.7 that supplement State services.

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

**POLICY RECOMMENDATION #3.26:** Provide nation-wide guidance to local authorities asking them to support the Circular Economy by limiting “commercial” rates for prevention or preparation for reuse centres to a **maximum of 50% and minimum of 0% rates.**

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#### 3.4.2.F OTHER TAXATION MEASURES

CRNI responded to the environmental levies consultation and agrees that economic instruments can be very effective at incentivising behavioural change, particularly where there is a clear pricing signal to the consumer.

**POLICY RECOMMENDATION #3.27:** Introduce or revise the following levies:

- increase the plastic bag tax by three cents.
- remove the exemption of the medium weight plastic bags from the levy.
- introduce a levy of at least €0.25 to the wholesale purchase of all types of cups, whether compostable, recyclable or otherwise, including disposable cups with similar construct.
- introduce takeaway container levies as Phase 2 of the levies proposals.
- introduce a levy on waste-to-energy.
- increase of the landfill levy in line with any abovementioned waste-to-energy levy.

We also welcome longer term measures set out in Chapter 5.4 to encourage retailers to address excessive packaging and to work toward an EU-wide plastic packaging tax.

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#### 3.4.3 INVEST IN INFRASTRUCTURE THAT WILL GROW THE SECTOR

Economic Instrument #6 of Annex IVa of the revised Waste Framework Directive is “*Sound planning of investments in waste management infrastructure, including through Union funds*”.

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

For example, sorting centres, storage hubs, refill systems<sup>38</sup>, reverse logistics systems<sup>39</sup>, exchange platforms (see below), redistribution centres, repair / upcycling workshops, surplus food transformation centres and retail spaces are all part of the prevention infrastructure landscape. As noted in Section 3.4.1.a, such infrastructure is underdeveloped in Ireland and where it does exist, is under resourced.

Chapter 11.0 - Waste Infrastructure of the consultation discusses how to develop more indigenous waste facilities for recycling.

**POLICY RECOMMENDATION #3.28:** First and foremost support **infrastructure driving prevention** followed by infrastructure for preparation for reuse through low interest loans, grants, or other mechanisms.

Some specific examples of where investment and support is required include:

- **Online Platforms:**

FreeTrade, a CRNI member, provides a free peer to peer exchange point and plays an important role in **making reuse more accessible**. This project is funded under the National Waste Prevention Programme and with some minor investment and development could enhance access to goods donated to Civic Amenity Sites, support charity shops and more.



**POLICY RECOMMENDATION #3.29:** Continue to fund FreeTrade Ireland as a public service, not only to support a culture of reuse, but also provide important data and convey messaging for the public good.

The withdrawal of funding from the SMILE Resource Exchange platform at the end of 2018 represented the loss of an important exchange platform and service that was making reuse accessible on a large scale. Based on the outcome of CRNI's *Bulky Item Reuse* research project, it is apparent that significant effort from engagement to awareness will be required to re-establish the business-to-business exchange of bulky and other goods in Ireland.

It is noted that another CRNI member Thriftify operates a commercial platform making books, media and high value clothing from charity shops available for sale online. This important service increases the accessibility of products in the second hand charity shop market to online users.



- **Food Surplus Transformation Infrastructure:**

Supporting surplus food transformation capacity would provide an opportunity to extend shelf life and better facilitate redistribution. For example, as there is a low demand for seasonal Irish apples, there are many underutilised orchards. By harvesting these unwanted apples and transforming them into juice the shelf life of this food can be increased to one year. Investment and other support for infrastructure that enables the transformation of surplus food would provide long term benefits in food waste prevention.

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<sup>38</sup> For example Loop, an innovative waste-free shopping and delivery model for reusable packaging innovations and refillable product formats, the result of a coalition of large companies including other manufacturers, as well as the retailer Carrefour, courier UPS and resource management company SUEZ, along with TerraCycle. See <https://www.unilever.com/sustainable-living/reducing-environmental-impact/waste-and-packaging/rethinking-plastic-packaging/>

<sup>39</sup> For example Zeronet's reverse logistics system, run by one of Ireland's first CE100 companies in the Ellen MacArthur Foundation, <https://www.thezeronet.com/how-does-it-work>



- **Cloth Nappies:**

It is estimated that an astonishing 70,000 tonnes disposable nappies are in the household residual waste bin, according to the latest EPA Waste Characterisation Survey. This represents approximately the same quantity as discarded textiles<sup>40</sup>. Approximately 750 tonnes of nappies were also found in recycling bins and 500 tonnes in the organic waste bin, creating problems with contamination.



Reusable cloth nappies have the potential to help to reduce residual waste arising and recycling contamination via the prevention and reuse tier of the hierarchy.

CRNI member Cloth Nappy Library Ireland is a small NGO providing lending service and education on the use of cloth nappies. Although cloth nappies were widespread in the past, awareness about their use is now limited and the nappies are not easily accessible outside of programmes like those offered by the Cloth Nappy Library. Bringing cloth nappies more into the mainstream will require investment in awareness (see Section 3.6.1) and **accessibility**.

**POLICY RECOMMENDATION #3.30:** Subsidise the **upfront investment in cloth nappies** for new parents through rebates to help the uptake of these reusable items.

These subsidies are offered across many local authorities in the UK in the form of rebates on purchased nappy kits. Engaging and encouraging new parents to avail of such a scheme would be best done pre-baby, through maternity hospital info packs, pre-natal classes, health centres and public health nurses.

There is also a perception that cloth nappies are complicated to use, messy and time consuming. A demonstration programme is needed to help overcome these perceptions.

**POLICY RECOMMENDATION #3.31:** Support a **pilot programme with new parents** to demonstrate the ease of use and potential savings with cloth nappies, underpinned by education on how to use them e.g. in partnership with Cloth Nappy Library Ireland.

### 3.5 CLOSING THE LOOP - ACCESS TO MATERIALS

An important part of the reuse cycle is gaining access to unwanted products and ensuring they remain in good condition prior to collection.

#### 3.5.1 PROVIDING ACCESSIBILITY AND ENHANCING QUALITY THROUGH COLLECTION SERVICES

While Civic Amenity Sites provide for reasonable levels of separation and - with investment - preservation of quality, they are not always accessible to the public (e.g. where citizens don't have transport options, or due to opening hours).

For greatest accessibility for citizens, and to best preserve the quality of goods, many CRNI members collect bulky goods on-demand, door to door including charity shops and furniture upcycling organisations listed below:

<sup>40</sup> See EPA Household Waste Characterisation Campaign here:  
<http://www.epa.ie/pubs/reports/waste/wastecharacterisation/householdsurveysfinalreport.html>



These social enterprises collect items that are in good condition and have reuse potential, often free of charge or very low cost. This service relieves Local Authorities of the burden of what would otherwise become bulky waste, and closes the loop on reuse.

However, an important barrier for many of these organisations is the volume of bulky items presented that do not have a market on the retail end due to a lack of demand e.g. couches.

**POLICY RECOMMENDATION #3.32:** Supports outlined in this document that are necessary to drive demand for second hand goods include **nation-wide roll out of the quality mark ReMark** (Section 3.6.1.a), **greener public procurement** (Section 3.4.1), **financial measures** reducing operating costs or taxes (Section 3.4.2), and communications to drive **public awareness** (Section 3.6).

### 3.5.2 ENHANCING ACCESS AT CIVIC AMENITY SITES

CRNI is aware of and has contributed to research ongoing about the potential for CAS to harmonise services. Below we have outlined the feedback we contributed to this research, and we look forward to receiving the report from this work to better inform the next steps.

Civic Amenity Sites have been a cornerstone in driving recycling rates from very low levels in the late 1990's to current levels as reported by the Agency. They provide a valuable service particularly in rural areas as well as providing an economic alternative to the private sector. As public facing facilities, we believe that Civic Amenity Sites provide an important opportunity to enhance access to reuse (both for donations and claimants) and develop awareness of and a culture for reuse.

The Regional Waste Management Plans committed in Policy Action C.1.2 to *“Review and amend (where appropriate) existing and/or condition the award of new LA CAS contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations”*. A target of 10% reuse was proposed for Civic Amenity Sites to be achieved through clauses in tenders.

However, at present very few Civic Amenity Sites in Ireland provide set aside areas for reuse. We are only aware of set aside areas in Limerick and some paint and bicycle schemes outlined below and offered by CRNI member Bryson Recycling in Donegal. Other than this, there are few examples of tender clauses delivering on the 10% target.

**BEST PRACTICE - CASE STUDY:** CRNI member and social enterprise Rediscovery Centre works with several Dublin based Civic Amenity Sites in both paint and bicycles collection. In these facilities, there are set aside areas where items are donated for reuse, with some level of screening by Civic Amenity Site staff. The Rediscovery Centre staff provide further screening prior to collection. Such schemes, connecting reuse centres

with Civic Amenity Sites, particularly where difficult materials like paint are handled, should be more widely supported through tender clauses.

**POLICY RECOMMENDATION #3.33:** Change the language by rebranding them as “*Recovery Parks*” and make them more accessible by providing opening hours that better facilitate the public, to engage the public and support behavioural change.

**POLICY RECOMMENDATION #3.34:** As proposed in Chapter 21.5 of the consultation paper, require *Recovery Parks* to have **appropriate reception facilities** that preserve the reuse potential of items. These may vary from site to site but should facilitate better segregation and storage for a minimum number of product categories such as bulky goods, WEEE (see Section 4.2.3), paint and mattresses (see Section 5.0). The requirement for these facilities should be included in tender clauses as envisaged in the Regional Waste Plans. Operators should also be encouraged to partner with or provide priority access to donated materials for social enterprises (see also Section 3.7.3 in relation to textile banks).

**POLICY RECOMMENDATION #3.35:** Invest in more trained operators to screen, better signage and improved layout (requiring investment) to support the roll out of reception facilities for reuse.

In addition to partnering or collaborating with social enterprises for reuse, there is also an opportunity for *Recovery Parks* to increase support for social recyclers as outlined in Section 3.1.4.b.

Most recycling centres in Northern Ireland provide reuse containers and many have linked with local charities or social enterprises to manage goods donated to those containers. In Ireland, the incentive to invest in prevention services appears to be lower due to the privatised structure of the market and outsourcing the management of recycling centres. However, cost savings can be realised through reuse as has been demonstrated in those facilities that have trialled or are collaborating on paint reuse.

**POLICY RECOMMENDATION #3.36:** A combination of **state investment, incentivised charging and increased responsibility on waste collectors and EPR schemes** (see Section 3.4.2.b) for prevention and preparation for reuse objectives (outlined in Section 3.2) should help to fund the necessary investment in *Recovery Parks* to improve facilities.

### 3.6 SUPPORT EDUCATION AND BEHAVIOURAL CHANGE PROGRAMMES

An essential component to driving waste prevention and reuse is engaging citizens and supporting behavioural change. This involves sustained and consistent communications to encourage citizens and businesses to adopt reuse or prevention practices as part of their everyday activities.

This is also encouraged through the revised Waste Framework Directive as follows:

**Article 9.1(m):** Member States shall take measures to prevent waste generation. Those measures shall, at least ... develop and support information campaigns to raise awareness about waste prevention and littering.

Proposed measures to help deliver education and behavioural change are outlined below.



In parallel with efforts to raise awareness, it is critical that prevention and preparation for reuse opportunities are made cheaper and / or more easily accessible to all citizens and businesses. This will involve **expanding the sector through investment and strong policy ambition** as set out in Section 3.4.

### 3.6.1 A COORDINATED APPROACH TO COMMUNICATIONS

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

As noted above in Section 2.0, this will require use of the correct language and focus on the top tiers of the hierarchy including prevention (avoidance, reuse) and preparation for reuse, moving beyond recycling. This will also help to convey the true meaning of a more circular economy.

Many organisations are already working to raise awareness about prevention and engage the public including:

- the EPA through the NWPP programmes (including Stop Food Waste and CRNI)
- CRNI members the Rediscovery Centre, ReCreate, Sustainable Fashion Dublin, Cloth Nappy Library Ireland and Conscious Cup Campaign
- the Regional Authorities through mywaste.ie<sup>41</sup> and reuse month
- VOICE Ireland, the IEN, and other NGOs.

Due to the work of these and other developments such as the “Blue Planet effect”, as highlighted by VOICE Ireland, we have seen some shift in behaviour by individuals and businesses particularly in tackling single use plastics. This prepares the ground for an effective communications programme.

**POLICY RECOMMENDATION #3.37:** As discussed via the Waste Action Plan Advisory Group, develop a **centrally coordinated, multi-annual cross-sectoral communications programme** involving all relevant stakeholders, connecting various awareness raising efforts and channels, prioritising messaging and providing coherent, clear and simple communications that engages citizens and businesses.

This will require proper and coordinated investment and support from business for it to be effective in a crowded communications space dominated by marketing for the sale of new products. As suggested by CIWM, this should also be continuously reviewed and improved based on real time feedback from the target audience measuring its effectiveness.

We agree with VOICE Ireland in that face to face engagement (through workshops and events) is a highly effective method of citizens and community engagement. CRNI members Rediscovery Centre<sup>42</sup>, ReCreate, Conscious Cup Campaign, Cloth Nappy Library Ireland and Sustainable Fashion Dublin all run educational workshops and events in the community involving face to face engagement that encourage sustained behavioural change.

**POLICY RECOMMENDATION #3.38:** Continue to invest in community based workshops and events, in line with a nation-wide programme per above, **to deliver a high impact** on behavioural change even where direct reach may be smaller than social media or advertising campaigns.

<sup>41</sup> We note the significant investment into mywaste per Measure #13 in Annex 1 and are pleased to see some of this has been directed toward prevention (but would like to see this better connected with other campaigns).

<sup>42</sup> See educational programme <http://www.rediscoverycentre.ie/education/>

It is noted that greater coordination of messaging between Departments would also support these efforts. For example, coordination between the Department of Business, Enterprise and Innovation and DCCA is needed to clarify messaging around business growth vs consumption.

Some examples of messages requiring the backing of a coordinated communications programme include:

### 3.6.1.A TRANSFORM BEHAVIOUR TOWARD SECOND HAND GOODS



One important step taken to address citizens attitudes to reuse was the development of a quality mark “[ReMark](#)” through the EPA Green Enterprise programme. This was established to address negative consumer perceptions about second hand goods due to concerns about quality and safety. It is an organisational level accreditation process for the reuse sector.

Organisations wishing to become accredited must meet operational or “back-end” as well as consumer facing criteria that will enhance their capacity to deliver goods/services and increase their traded income through changing consumer perceptions about second hand goods.

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



In addition to addressing consumer engagement, we found the quality mark delivers broad and positive impacts to reuse operators participating in the ReMark accreditation programme as summarised in the videos [here](#).

According to Zero Waste Scotland, the Scottish quality mark [Revolve](#) (upon which ReMark is based) is a **key part of the reuse development work** being taken forward as part of the Scottish Government’s *Making Things Last* strategy<sup>43</sup>. This quality mark has been funded by the Exchequer through the Zero Waste Scotland programme for over 8 years and has accredited over 150 stores. It is used in Scotland to provide transparency and assurance to businesses, public bodies and citizens for procurement of services or goods.

ReMark has significant potential to provide assurance to EPR schemes that support reuse or preparation for reuse (see Section 3.4.1.a and Section 4.0), such that only accredited reuse organisations are eligible for support. It could also be used as a recognised symbol for consumers to help develop markets for traceable, genuinely repurposed and reused goods e.g. from recycled mattresses (see Section 5.1.3).

When the ReMark pilot programme finished in March 2019, the final report recommended that ReMark be rolled out throughout Ireland and Northern Ireland. **This will require funding commitment** to be realised.

<sup>43</sup> <https://www.letsrecycle.com/news/latest-news/zero-waste-scotland-reports-growth-of-revolve-standard/>

**POLICY RECOMMENDATION #3.39:** Give ReMark formal recognition in policy and funding to develop it to the next stage on an all-island basis and in collaboration with Northern Ireland’s DAERA<sup>44</sup>.

3.6.1.B RAISING CONSUMER AWARENESS ABOUT FOOD WASTE AND TEXTILE WASTE PREVENTION

Systematic changes in food waste prevention and surplus redistribution across the supply chain will only be effectively driven by consumer pressure or directly by the Government.

In Ireland, there has to date been too much focus on the “end of the pipe” when the food is already wasted and not enough focus on prevention. There is still a lack of awareness about the environmental cost of food production and distribution or of food waste. The low cost of food can also reduce the financial incentive to avoid waste particularly amongst householders.

The EPA awareness programme *Stop Food Waste* is an excellent programme already aimed at raising awareness amongst householders.



**POLICY RECOMMENDATION #3.40:** Further resource StopFoodWaste to gain a broader reach and greater support from the media and to connect with the broad cultural support for and marketing of Ireland’s food industry and farmers.

In the UK, for example, many of the newspapers have run campaigns or ongoing reports on food waste (e.g. the Evening Standard London ran a month-long campaign; the Guardian prints articles on an ongoing basis) and the television programme *War On Waste* by Hugh Fearnley Whittingstall highlighted the issue of food waste. This has made it a higher profile issue in a way that consumers understand. The latest figures from WRAP show that excellent progress is being made in reducing food waste, with a 7% reduction per person in the last three years<sup>45</sup>. This has been attributed to their Love Food Hate Waste campaign amongst other measures.

For recommendations on Textile Waste prevention, please see Section 3.7.1.

3.6.1.C SUPPORT THE PREVENTION / REUSE OF EEE

There is a misconception amongst businesses and citizens that EEE containing data should be destroyed or recycled rather than reused due to sensitivity to GDPR and data security.



However, IT reprocessors like CRNI members Rehab Recycle and Camara guarantee full and secure data erasure for any donated equipment to a very high standard. Equipment refurbished through these organisations support charities and schools locally and abroad and therefore deliver social and environmental value. As noted in Section 4.1, EEE has a particularly high carbon footprint from



<sup>44</sup> DAERA commits through *Delivering Resource Efficiency* to supporting “the development of a certifiable re-use voluntary quality assurance scheme and work with DECLG in assessing the feasibility of introducing a scheme on an all-island basis”.

<sup>45</sup> See article

[https://wrap.org.uk/content/courtauld-commitment-2025-milestone-progress-report?goal=0\\_b554dd0387-769a174bea-5067077](https://wrap.org.uk/content/courtauld-commitment-2025-milestone-progress-report?goal=0_b554dd0387-769a174bea-5067077)

manufacturing due to the complexity of its components and assembly.

The revised WFD, under general minimum requirements for EPR schemes, requires that:

**Article 8.a(2):** Member States shall take the necessary measures to ensure that the waste holders targeted by the extended producer responsibility schemes established in accordance with Article 8(1), **are informed about waste prevention measures, centres for re-use and preparing for re-use**, take-back and collection systems, and the prevention of littering. Member States shall also take measures to create incentives for the waste holders to assume their responsibility to deliver their waste into the separate collection systems in place, notably, where appropriate, through economic incentives or regulations.

**POLICY RECOMMENDATION #3.41: Require WEEE EPR schemes** to provide clear information and awareness raising about the services available for the prevention (reuse) of EEE and preparation for reuse of WEEE.

#### 3.6.1.D PRIORITISE PACKAGING WASTE PREVENTION OVER SINGLE USE

As highlighted in the consultation (Chapter 5.4), Ireland generates more packaging per capita than the majority of other Member States. We believe this must be addressed through prevention initiatives, and welcome the short term measure proposed to explore why Ireland appears to generate so much packaging.

As outlined in Section 3.4.2.f, levies can be effective at driving packaging waste behavioural change. However, it appears that there is still much confusion about single use packaging, which is not helped by inconsistency in labelling and definitions. As highlighted by the Conscious Cup Campaign, consumers seeking sustainable choices by switching to other products (e.g. compostable or paper) are not aware that the alternative does not always deliver the desired behavioural or environmental impact.

**POLICY RECOMMENDATION #3.42:** Give the Competition and Consumer Protection Commission (CCPC) added responsibility to protect the Consumer from misleading advertising and labelling on packaging. Clear communications about single use packaging and the benefits of reusable cups and containers is also needed, through the coordinated communications programme and in partnership with stakeholders like CRNI member Conscious Cup Campaign.

Fortunately, as noted by the Conscious Cup Campaign, measures such as carrying a reusable cup can become a trigger for other conscious consumerism efforts and is often the start of an individual's journey towards waste reduction.



#### 3.6.1.E ALIGN EXISTING SUSTAINABILITY SCHEMES WITH THE CIRCULAR ECONOMY

One proposal in the consultation (Chapter 3.9 - questions on commercial waste) is for a certification scheme for businesses to show that they are recycling correctly.

**POLICY RECOMMENDATION #3.43:** Existing Government backed programmes that already aim to promote the sustainability credentials of businesses (e.g. Origin Green, which touches on food waste prevention) should be required to better **align their objectives with the Circular Economy** agenda. This would create synergies and convey messages through existing channels.



As emphasised above, any promotion of business achievements should focus on prevention and preparation for reuse initiatives and **drive businesses to move beyond recycling**. Furthermore, all efforts to raise consumer awareness of these initiatives should tie into the above mentioned centrally coordinated and multi-annual communications programme to avoid ad-hoc and confusing messaging.

### 3.6.2 ENSURE WE ARE PREPARING FOR CIRCULAR ECONOMY JOBS AND SKILLS

As described in Section 1.1, a more Circular Economy is expected to lead to net job creation. This is because, as highlighted by the Green Alliance<sup>46</sup>:

- circular economy activities require substantially more labour inputs than their linear economy alternatives
- as a heavy net importer of raw materials and manufactured products, the displacement of existing activity and employment is likely to be relatively modest
- through the likely rural and urban distribution of jobs circular activities like reuse can help reduce regional mismatch.

Therefore, a more Circular Economy can deliver jobs across all skills levels, throughout rural and urban communities and across different sectors from craft to manufacturing<sup>47</sup>.

Given the nature and diversity of job opportunities in this sector we feel there is an important opportunity to link **Circular Economy opportunities with regions facing transition** away from fossil fuels or other key industries.

**POLICY RECOMMENDATION #3.44:** Ensure that public investment in just transition plans (at regional or national level) includes and supports Circular Economy opportunities.

CRNI explored these issues in the context of how prepared Ireland is for a Circular Economy through a recent event *Future Jobs and Skills for a Circular Economy* supported by EMWR and CIWM in October 2019. This found that greater engagement of the education sector in appraising existing courses and developing further courses and training opportunities is required to prepare enable people to develop the necessary skills for a more Circular future. It was also important to address the current regional mismatch of skills and to look at digital<sup>48</sup>, tech, STEM and data as part of the overall picture.

Education in third level and businesses is key to increasing this understanding. Many experts in the field such as CRNI members and other stakeholders already provide training for knowledge sharing and skills development.

**POLICY RECOMMENDATION #3.45:** Take a whole of Government approach to preparing for jobs and skills in a Circular Economy across apprenticeships programmes, further learning and third level courses.

In addition to improving third level education it is important to build the capacity of enterprises already operating within the Circular Economy. For example, the Rediscovery Centre, through its partnership with the EPA, runs the *Circular Economy Academy*, which provides support to social entrepreneurs to develop their

<sup>46</sup> Green Alliance, *Opportunities to tackle Britain's labour market challenges through growth in the circular economy*, available at <https://www.green-alliance.org.uk/resourcestewardship.php>

<sup>47</sup> See presentation by Green Alliance to CRNI event *Future Jobs and Skills for a Circular Economy*, available here [https://www.crni.ie/content/uploads/2019/11/GreenAlliance\\_191029-Circular-economy-jobs.pdf](https://www.crni.ie/content/uploads/2019/11/GreenAlliance_191029-Circular-economy-jobs.pdf)

<sup>48</sup> See for example, Emmaus France has a Training programme 'Label Ecole' for e-commerce which is linked to their 'Label Emmaus' online brand.

activities. CRNI also supports social enterprises and other projects in prevention, reuse, repair and recycling (see also Section 3.11).

**POLICY RECOMMENDATION #3.46:** Funding toward the **support for training and capacity building** to social entrepreneurs, enterprises and businesses working in or moving toward a more Circular Economy is crucial in this early developmental phase for the sector.

### 3.7 TEXTILES

The textiles industry covers a range of activities from the transformation of natural (cotton, flax, wool, etc.) or synthetic (polyester, polyamide, etc.) fibres into yarns and fabrics, to the production of a wide variety of products such as hi-tech synthetic yarns, bed-linens, industrial filters, and clothing.

The European Commission has set textiles as a key priority area for the draft Circular Economy Action Plan 2.0. There has been considerable focus in particular on the sustainability of the clothing industry. According to a recent RREUSE publication *Vision for a New Fashion Season: Social and Circular*<sup>49</sup>, each EU citizen consumes 26 kg of textiles per year on average with the textile supply chain responsible for 15 % of primary raw material consumption of EU households. The ‘fast fashion’ phenomenon shapes the way we consume clothes and has seen per capita sales increase dramatically. Overconsumption and insufficient regulation on circularity has led to increased volumes of low quality textiles, unfit for re-use let alone recycling.

Measures in the revised Waste Framework Directive, specifically to separately collect textiles from 2025 as set out below, will lead to significant changes in the textiles sector.

**Article 9(d):** Member States shall take measures to prevent waste generation. Those measures shall, at least: (d) encourage the re-use of products and the setting up of systems promoting repair and re-use activities, including in particular for electrical and electronic equipment, **textiles** and furniture...

**Article 11.1:** ... Member States shall set up separate collection at least for paper, metal, plastic and glass, and, **by 1 January 2025, for textiles**

To move beyond collection, the Commission’s draft Circular Economy Action Plan 2.0 seeks to develop a “comprehensive EU strategy” for textiles and clothing, aimed at stimulating the market for circular textiles.

As highlighted by RREUSE, this plan should aim to boost re-use, primarily in cooperation with social enterprises and municipalities, through providing for cost-coverage of non-reusable textiles, innovation for local re-use, increased consumer participation in maintenance and creativity, management of textile over-stock and customer returns. Special attention should also be given to increasing the durability and quality of textiles sold through binding eco-design type measures at EU level as well as economic measures including reduced taxation favouring the sale and donation of used goods.

**POLICY RECOMMENDATION #3.47:** **Support the development** of a cohesive textiles strategy at EU and national level.

<sup>49</sup> <https://www.rreuse.org/vision-for-a-new-fashion-season-social-and-circular/>

By far the most important reuse material stream currently measured by CRNI is textiles<sup>50</sup>. CRNI members involved in textile reuse include the Irish Charity Shops Association, Rediscovery Centre and ReCreate and affiliate members Sustainable Fashion Dublin and the Cloth Nappy Library Ireland.



As highlighted by RREUSE<sup>51</sup>, social enterprises active in used textile management deliver significant environmental and social impact through:

- Offering a readily available alternative consumption model, enabling citizens to contribute to a better world by donating to social enterprises and buying second-hand.
- Providing a wealth of hands-on experience including specific know-how on logistics, technical aspects of re-use and repair, local policies, consumer and community engagement.
- Boosting local employment and strengthening community through volunteer opportunities
- Adding a social dimension to emerging businesses models including take-back schemes, repair, sharing and repurposing, including engagement with private brands and retailers on textile waste prevention.

The **Irish Charity Shops Association** represents over 460 charity shops operating nationwide handling about 23,000 tonnes of textiles per year<sup>52</sup>. In addition to the environmental benefits that textile reuse provides, charity shops also raise much needed funds for essential services (e.g. over 50% of ICSA members raise funds for health, housing and disability services) as well as strengthening communities by providing local jobs and volunteer opportunities and supporting low income families by providing affordable goods.

Ireland and the UK are unique in Europe in both the spread of charity shops and the culture of charity shopping. Of the quantities handled by ICSA members, an estimated 12,000 tonnes (equivalent to 11 million garments or 52% of collected textiles) is sold locally through charity shops for reuse and 11,000 tonnes are sent to commercial textile recyclers for export for reuse<sup>53</sup>. These quantities are based on donations into the stores only and are therefore a conservative estimate. There are currently five members of the ICSA with textile collection banks, four of which send textiles collected to their stores and one to recycling. The quantity of textiles collected through these banks is not known.

**POLICY RECOMMENDATION #3.48:** Recognise, in the design of any textile strategy or collection system in Ireland, that the **backdrop is very different** to many other EU member states.

The **Rediscovery Centre** provides education workshops and training in fashion upcycling and repair as well as running a social enterprise upcycling textiles. These workshops empower people to repair and upcycle

<sup>50</sup> Comprising clothing and household textiles (bed linen, curtains, etc) but not duvets or pillows.

<sup>51</sup> <https://www.rreuse.org/vision-for-a-new-fashion-season-social-and-circular/>

<sup>52</sup> These account for the majority of charity shops in Ireland.

<sup>53</sup> of which some low quality textiles are sent for rag recycling

themselves, and raise much needed awareness about the impact of textiles and action that can be taken while the social enterprise helps to divert textiles from recycling or disposal. **ReCreate Ireland** also handles textiles among other product groups and run education workshops on creative reuse.

CRNI affiliate members **Sustainable Fashion Dublin** and **Cloth Nappy Library Ireland** also provide important awareness and education services to key target markets (younger demographic and new parents respectively) about the prevention, reuse and repair of textiles.

### 3.7.1 BUILDING AWARENESS ABOUT PREVENTION AND REUSE OF TEXTILES

Clothing bought in any given year will last for 3.37 years on average before it is discarded or passed on<sup>54</sup>. Large volumes are therefore wasted - while an estimated 12,000 tonnes textiles are reused locally in Ireland via charity shops<sup>55</sup>, a much larger portion is either exported to second hand markets (unknown quantity via textile recyclers) or discarded in recycling and residual waste bins (approx 80,000 tonnes household<sup>56</sup> and 20,000 tonnes non-household<sup>57</sup>).

While there is growing awareness of the impact of the fashion industry, more work is required. We propose the following measures are required to support the sustainable consumption of textiles by the general public:

- First and foremost, a concerted effort to build awareness about the impact of textiles on global systems and encourage consumers to **reduce their consumption**. For example, awareness programmes at secondary level such as Junk Kouture and the Relove fashion competition, supported by the Rediscovery Centre, have been effective at engaging the younger demographic.
- Secondly, the introduction of separate collection of textiles will see increasing volumes of textiles enter the second hand market. This is not a sustainable solution unless there is increasing local demand for those textiles. **Driving the demand** for second hand textiles is therefore key in enhancing the flow of textiles locally (see recommendations in Sections 3.4.2 and 3.6.1.a).
- Thirdly, as noted above, poor quality textiles are in many cases unsuitable for reuse. We need to encourage better design (see policy recommendations in Section 3.1) and engage consumers to prioritise **good quality items** in purchasing new goods, to ensure a longer life and longer term circularity of those items.
- Finally, and particularly to support a separate collection objective (see Section 3.7.3), education will be required on the importance of **sending textiles for reuse** (and how) **over placing them in the residual waste bin**.

**POLICY RECOMMENDATION #3.49:** Prioritise an awareness campaign about the impact of textiles on global systems, encouraging consumers to **reduce their consumption** or buy **better quality** items and to use available channels to borrow, swap, or **pass them on for reuse**, in the coordinated national communications programme (see Section 3.6.1).

<sup>54</sup> See WRAP Textiles Market Situation Report 2019 Available at <https://www.wrap.org.uk/sites/files/wrap/Textiles%20market%20situation%20report%202019.pdf>

<sup>55</sup> Not including vintage or other second hand retailers

<sup>56</sup> See EPA Household Waste Characterisation Campaign here: <http://www.epa.ie/pubs/reports/waste/wastecharacterisation/householdsurveysfinalreport.html>

<sup>57</sup> See EPA Non-Household Characterisation Campaign here: [http://www.epa.ie/pubs/reports/waste/wastecharacterisation/Final\\_Report\\_NHWC.pdf](http://www.epa.ie/pubs/reports/waste/wastecharacterisation/Final_Report_NHWC.pdf)

### 3.7.3 SUPPORT LOCAL TEXTILE SECOND HAND RETAILERS IN SEPARATE COLLECTION ARRANGEMENTS

The revised Waste Framework Directive requires that Member States introduce separate collection of textiles by the end of 2024. This implies that demand for textile reuse or recycling outlets will increase significantly. As noted above, EPA figures indicate that 80,000 tonnes of textiles is going into the recycling and residual waste bins from householders.

Current pathways for the separate collection of textiles<sup>58</sup> in Ireland include:

- Donations in-store to charity shops or to textile collection banks operated by charity shops
- Collections in communities / schools operated by commercial recyclers
- Donations to textile banks operated by commercial recyclers, which are primarily exported
- Collections through take back schemes by retailers which are also primarily exported at present (though signs of increasing links to local charity shops are encouraging)

As noted in Chapter 10.4 of the consultation, significant volumes of textiles are poorly segregated or downcycled leading to loss of value for reuse and upcycling. The negative impact of exporting quality textiles on reuse in Ireland is also highlighted. A reliance on export markets can also expose Ireland to price fluctuations as has been seen for the plastics industry and more recently for textiles, where receiving African markets<sup>59</sup> are pushing for bans on the import of low quality second hand clothing.

**POLICY RECOMMENDATION #3.50: Ensure local second hand clothing retailers (like charity shops) are central to any future separate collection scheme** to ensure maximum local reuse. Some options for prioritising local second hand clothing retailers while extending the separate collection network include local second hand retailers partnering with waste collectors for kerbside collections or an increase in textile banks.

- A condition could be introduced to **waste collector permits** to provide for the separate collection of textiles in partnership with local second hand retailers (e.g. charity shops). Those partners would provide a regular (but less frequent than the food waste or recycling bin) kerbside collection service using textile bags as has been demonstrated in the UK<sup>60</sup>. In this option it would be important to manage any potential interference by bogus collectors<sup>61</sup>.
- In addition or alternatively, separate collection could be supported by an **increase in textile banks** that are connected with local second hand retailers.

**POLICY RECOMMENDATION #3.51:** Encourage Local Authorities to prioritise textile banks that direct textiles to local second hand retailers (e.g. charity shops) when procuring for Civic Amenity Sites (“Resource Parks”) or on public land.

A number of Member States are reviewing the option of **EPR schemes** for textiles in view of the mandatory separate collection requirement set out in the Waste Framework Directive.

<sup>58</sup> Not including problematic materials like pillows or duvets

<sup>59</sup> e.g. Rwanda, Uganda, Tanzania all contemplated bans in 2018 - see

<https://www.dw.com/en/east-africa-pushes-second-hand-clothing-ban/a-42747222>

<sup>60</sup> e.g. by British Heart Foundation - see <https://www.bhf.org.uk/what-we-do/our-policies/kerbside-collections>

<sup>61</sup> See ICSA website on bogus collectors

RREUSE has flagged from European experience that EPR schemes can lead to unintended consequences particularly when introduced into an already well established reuse sector. As outlined in Section 3.4.2.b, CRNI supports EPR schemes in principle, but only where these are carefully designed to support local reuse. **It is not clear** that the existing networks of second hand outlets, dominated by social enterprises / charities, in the textiles sector **would be best supported by an EPR scheme at this stage.**

### 3.7.4 PROVIDE TRANSPARENCY ON THE DESTINATION OF TEXTILES

Finally, there is a lack of transparency about the operation and beneficiaries of textile banks, which is misleading textile donors and facilitating bogus operators. Some common practices include:

- identifying with a charity or programme (in some cases non-existent, see image below) without specifying how much of the revenue raised from the sale of the clothing goes to that charity / programme. We understand that the proportion of profit given to charities named on textile banks can be as low as 5%.
- failing to provide basic contact details or information about the textile bank operator (see across).
- failing to provide any information about the destination of collected textiles. As noted, where it is not linked to a local charity shop network, the textiles are likely to be 100% exported.
- placing textile banks on private land without permission of the landowner (required), and without any contact details making it difficult to have removed.



As a result, donors are unaware that their donation may benefit a commercial outfit and be exported out of the country as opposed to benefiting a charity and going for local reuse.

**POLICY RECOMMENDATION #3.52: Introduce regulations providing greater control** over all textile collection banks (in public or private spaces), requiring clear information to be provided on each bank about the beneficiary of the textile donations and the identity and contact details of the textile bank operators.

## 3.8 ADDRESS LIABILITIES AND INSURANCE ISSUES

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

Guidance from key authorities can help to address liability concerns. For example, the Food Safety Authority of Ireland (FSAI) has played a key role in overcoming barriers created by liability concerns in surplus food distribution. It has been particularly effective at facilitating working groups to address and resolve liability questions in legal grey areas in collaboration with FoodCloud and others. For example, an important catalyst to enable food surplus redistribution was providing clarity and guidelines on rules for food donation to charities and businesses. This gave confidence to charities, Environmental Health Officers, and businesses in the redistribution process before any guidelines were developed at EU level, demonstrating strong Government leadership.

Elsewhere, guidance from the FSAI has been less helpful for reuse. The Conscious Cup Campaign is working to engage consumers in switching to reusable containers for convenience and take away foods. However at present there remains confusion in the food sector on the liability associated with possible contamination in containers brought by consumers. The FSAI guidance on reusable containers<sup>62</sup> issued during the levies consultation only added to these concerns by highlighting food hygiene issues, rather than finding opportunities for businesses and consumers to support reuse. Guidance provided by Food Standards Scotland<sup>63</sup> provides more proactive and supportive text on reusable containers.

**POLICY RECOMMENDATION #3.53:** Engage with FSAI (and other standards bodies where relevant) to ensure **simple guidance is provided for retailers and citizens** that protects business but also facilitates reusable containers (and other items as arising) on the journey to a more Circular Economy.

In other areas, liability concerns present important barriers to reuse. For example, it is now extremely difficult to find any insurance company that will provide cover for repair cafes. This world-wide movement<sup>64</sup> aims to engage more people in repair through community events where volunteers provide free repair advice and show visitors how to repair. Although there are over 2,000 repair cafes worldwide, in Ireland these events have been stymied by insurance concerns.

In addition to repair and reuse liability concerns, specialist recycling operators in our membership are experiencing significant increases in insurance premiums. For example, one member saw their premium double from €14,000 to €27,000 between last year and this year. Additional insurance levies are now imposed on organisations with TuS workers. Social enterprises operating in this area are directly impacted by such increases, which hamper their ability to provide people from marginalised backgrounds with jobs and skills through training and placements.

To help tackle these issues, CRNI has joined the Alliance for Insurance reform<sup>65</sup> and supports its work to deliver reforms to the insurance sector.

**POLICY RECOMMENDATION #3.54:** Acknowledge the barriers that insurance poses to this sector in Ireland and help address them through support to the Alliance calls for reform.

This includes:

1. Reducing unfair general damages to reflect international norms and the principles already established by the higher courts – including that ‘minor injuries attract modest damages’,
2. Reviewing and re-balancing the “common duty of care” to require occupiers to take a duty of care that is reasonable, practical and proportionate,
3. Supporting a fully-resourced Garda Insurance Fraud Unit,
4. Insisting on insurers committing to a schedule of forecast reductions for planned reforms.

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<sup>62</sup> [https://www.fsai.ie/faq/reusable\\_containers\\_and\\_cups.html](https://www.fsai.ie/faq/reusable_containers_and_cups.html)

<sup>63</sup> <https://www.foodstandards.gov.scot/consumers/food-safety/buying-food-eating-out/reusable-bags-and-containers>

<sup>64</sup> See <https://repaircafe.org/en/>

<sup>65</sup> <https://insurancereform.ie/>



### 3.9 PROVIDE FOR A JOINED UP CIRCULAR AND SOCIAL APPROACH THROUGH ENHANCED COOPERATION BETWEEN DEPARTMENTS

The importance and role of social enterprises in the circular economy is described in Section 1.3.1. The recent *National Social Enterprise Policy for Ireland 2019-2022* for the first time sets out a cohesive policy that aims to recognise and back social entrepreneurship, showing the Government's commitment to this important sector.

While the participation of producers and retailers is essential to achieve a truly circular economy, it is also important to safeguard the activity of social enterprises in their role as innovators, experts in their field and providers of social impact<sup>66</sup>.

**POLICY RECOMMENDATION #3.55: Collaborate with DRCD** to ensure better alignment of policy measures that support the sector, and the creation of **dedicated funding streams or grants** facilitating, for example, access to equipment where this activity will not otherwise take place in the private sector.

Ongoing support for and development of **labour action schemes** that currently underpin most social enterprises working in prevention, preparation for reuse and recycling is also critical. As outlined in Section 1.3.1, labour activation schemes give opportunities for meaningful work and progression to people otherwise at distance from the labour market. The value of engaging people in meaningful work also includes the avoided costs of social issues.

Prevention, preparation for reuse and recycling activities provide an excellent opportunity for people on labour activation schemes as they cover a very broad range of skills. At the same time, the contribution of trainees to this labour-intensive and poorly resourced sector is very important.

The Community Services Programme (CSP) has proven particularly effective at delivering training and opportunities to its participants while also contributing to the output of social enterprises in this area. However trainees do not achieve any certification or qualifications through this programme that could better facilitate progression. As highlighted in Section 3.6.2, Ireland may be facing a skills shortage in Circular Economy jobs and will need therefore to foster and actively encourage career development in this area. For example, a pilot short-term apprenticeship programme through CSP could enable participants to gain practical experience in social enterprises, supported by coursework, leading to a minor FETAC or other qualification.

**POLICY RECOMMENDATION #3.56:** Take a whole of Government approach with DRCD, the Department of Education and DBEI to identify ways by which **qualifications in the area of the Circular Economy** could be delivered through CSP or other schemes.

### 3.10 CONTINUED SUPPORT FOR EPA RESEARCH PROGRAMMES

The current EPA research programmes including the *Green Enterprise* programme (facilitating practical pilots and development work) as well as the *Research Call on Environmental Sustainability* (facilitating high level research) are essential to informing decision making about our transition to a sustainable and low-carbon society and economy.

These programmes have supported CRNI's work contributing to policy and behavioural change, as follows:

- through Green Enterprise funding CRNI developed ReMark, as described in Section 3.6.1.a

<sup>66</sup> See RREUSE feedback on the New Circular Economy Action Plan, available at <https://www.rreuse.org/rreuse-feedback-on-the-new-circular-economy-action-plan/>

- through Green Enterprise funding CRNI identified models for public bodies to engage in reuse, as described in Section 3.4.1
- through the Research call CRNI is involved with CTC and Rediscovery Centre in qualifying and quantifying reuse, which is key to setting targets as outlined in Section 3.2

There are many more areas where more RD&D is needed to drive progress toward a more circular economy from exploring behavioural change to industrial symbiosis or developing viable business models. For example, research is required to inform effective behavioural change, mechanisms for the separate collection of textiles, opportunities for reuse or recycling of surplus textiles including felt, polyester and foam from mattresses, and the viability of and opportunities for indigenous recycling infrastructure (including in particular recycling of mattress components).

**POLICY RECOMMENDATION #3.57: Expand the Green Enterprise programme** in both its funding and scope to drive higher in hierarchy activity, to help overcome the challenges Ireland is facing in developing a more circular economy.

### 3.10.1 COORDINATION AND PROMOTION OF RESEARCH

As noted above, evidence-based policy and practice is highly effective. While excellent research is being conducted through EPA research programmes, there is often a lack of connectivity between the outcome of research and how we inform policy and practice.

CRNI has used its own research findings throughout this submission to inform policy recommendations, including ReMark, Bulky Item Reuse and Q2Reuse as well as important EPA research by University of Limerick into WEEE reuse (Section 4.0). However, beyond internal and external dissemination efforts, there are no obvious channels at present for organisations to use research outcomes to help drive action.

**POLICY RECOMMENDATION #3.58: Provide a clear and common pathway for disseminating research findings and using them to inform policy and practice.**

The NESC<sup>67</sup> report referred to the need for a dedicated research centre or centres of expertise on the Circular Economy. The Rediscovery Centre has been established as the National Centre for a Circular Economy and carries out and/or participates in research in this field. The centre recently began work to develop a gateway platform “circular.ie” to link people and sectors in the common goal of driving a more circular economy. This platform would act as a directory for research and key stakeholders in the circular economy amongst other things.

**POLICY RECOMMENDATION #3.59: Support the development of a gateway platform to help coordinate work carried out in this field and better enable Irish researchers to compete for funding.**

### 3.11 PROVIDE RECOGNITION OF CRNI AS IRELAND’S REUSE AND REPAIR NETWORK

CRNI is an all-island representative body for community based reuse and recycling enterprises. It is the only network supporting repair, reuse and recycling actors which makes CRNI well-positioned to drive growth of the sector in line with national, European and international objectives, such as the United Nations Sustainable Development Goals (SDGs 8, 12, 13) via the implementation of the EC’s Circular Economy Package.

<sup>67</sup> O’Rafferty, S. *Moving Towards the Circular Economy in Ireland*, NESC, available at <https://www.crni.ie/publications/>



The revised Waste Framework Directive recognises the importance of national networks in promoting reuse and preparation for reuse as follows:

**Recital 29:** Member States should facilitate innovative production, business and consumption models that ... promote reuse including through the establishment & support of reuse and repair networks, such as those run by social enterprises ...

**Article 11.1:** Member States shall take measures to promote preparing for re-use activities, notably by encouraging the establishment of and support for preparing for re-use and repair networks ...

CRNI has been funded under the EPA's National Waste Prevention Programme since 2015. Examples of how CRNI has engaged with and supported the sector include:

- Fostering collaboration and networking between members, which resulted in the expansion of mattress recycling operating at three locations across the country.
- Engaging with Government Departments and Agencies to provide policy and technical input in order to better support and grow the community resources sector, which through CRNI's engagement with DEASP increased CSP placements offered to members.
- Holding a Biennial Conference and other networking events to connect members with policy makers and funders, such as the 2018 Everyday Reuse conference which attracted speakers from government, social enterprises, industry and education, and CRNI's Bulky Items Reuse project workshops which created new public sector procurement and surplus materials business opportunities for CRNI members.
- Promoting CRNI members' reuse and recycling services, such as via a Pop-Up Shop.
- Building CRNI members' capacity through training and guidance, such as supporting members interested in achieving the reuse quality standard of excellence, ReMark
- Connecting members with communities throughout Ireland, such as a mobile reuse space used at 60+ events nationwide and member involvement in National Reuse Month.

**POLICY RECOMMENDATION #3.60:** Through Article 11.1, **formally recognise** the role of the network in the context of institutional arrangements.

#### 4.0 PREPARATION FOR REUSE

Preparation for reuse refers to the operation on the second tier of the waste hierarchy involving *checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.*

In Ireland, the only activity formally registered as "preparation for reuse" is the refurbishment and sale of Waste Electrical and Electronic Equipment (WEEE) that has been taken back through the EPR schemes as a waste. It is our understanding that currently there are **no companies in Ireland** registered for preparation for reuse.

#### 4.1 INTRODUCE SPECIFIC TARGETS FOR WEEE PREPARATION FOR REUSE

Electrical and Electronic Equipment (EEE) is an important product group due to the complex mixture of materials and components, involving the use of scarce and expensive resources and is a key target group for the draft European Commission’s Circular Economy Action Plan 2.0. The prevention and preparation for reuse of EEE / WEEE can lead to significant carbon savings. For example, providing 1 tonne of TVs for direct reuse e.g. via a charity shop or online exchange can result in a net GHG saving of 8 tonnes CO<sub>2</sub>-eq<sup>68</sup>.

According to the European Commission, WEEE is one the fastest growing waste streams in the EU, with some 9 million tonnes generated in 2005, and expected to grow to more than 12 million tonnes by 2020<sup>69</sup>. However, between “13% and 16% of waste electric and electronic equipment (WEEE), furniture and leisure goods disposed of at household waste collection centres are in excellent working condition and could easily be prepared for re-use”<sup>70</sup>.

Although Ireland’s recycling rates for WEEE are high compared with EU targets, preparation for reuse rates are extremely negligible. It is our understanding that currently there are **no accredited preparation for reuse centres** handling WEEE. Therefore, all of the WEEE collected via take back schemes or at Civic Amenity Sites is recycled. Consequently, the value of whitegoods and other consumer electrical goods that may be perfectly functional when collected by take back schemes (as suggested above) is almost entirely lost to recycling.

However, with appropriate measures, preparation for reuse could emerge as a valuable contributor to the increased combined preparation for reuse and recycling targets.

**POLICY RECOMMENDATION #4.1: Take urgent measures to address** the total absence of preparation for reuse activity, which is a major gap in Ireland’s Circular Economy journey.

Again, we believe this missing link in the waste hierarchy should be flagged in Measure #6 of Annex 1<sup>71</sup> of the consultation document, which reports “satisfactory progress” on compliance with the waste hierarchy. It should also be flagged as an issue in Measure #33 requiring PRI schemes to implement and demonstrate significant prevention and reuse initiatives and noted as contradictory to the report on Measure #37 which states “repair and reuse of WEEE is well developed in Ireland”.

##### 4.1.1 CASE FOR A PREPARATION FOR REUSE TARGET

The lack of preparation of reuse activity of WEEE in Ireland is a clear example of a failed market. The case for targets in playing an essential role in failed markets is made extensively in Section 3.2 of this response.

A comprehensive EPA research report<sup>72</sup> by University of Limerick on advancing the preparation for reuse of WEEE found that without a target “*preparation for re-use will not be a priority, as the [EPR] schemes will*

<sup>68</sup> WRAP, *Benefits of Reuse Case Study: Electrical Items*. Available at [https://wrap.org.uk/sites/files/wrap/Electricals%20reuse\\_final.pdf](https://wrap.org.uk/sites/files/wrap/Electricals%20reuse_final.pdf)

<sup>69</sup> See [https://ec.europa.eu/environment/waste/weee/index\\_en.htm](https://ec.europa.eu/environment/waste/weee/index_en.htm)

<sup>70</sup> European Commission (2019), *Waste potential: more of our refuse electronics, furniture and leisure goods could be re-used, suggests German study*. Available at

[https://ec.europa.eu/environment/integration/research/newsalert/pdf/waste\\_reuse\\_potential\\_Germany\\_530na3\\_en.pdf](https://ec.europa.eu/environment/integration/research/newsalert/pdf/waste_reuse_potential_Germany_530na3_en.pdf)

<sup>71</sup> Annex 1: Progress Report on A Resource Opportunity - Waste Management Policy in Ireland (measures listed in table with traffic light system)

<sup>72</sup> Report prepared for the EPA by Johnson, M., McMahon, K, Fitzpatrick, C. *Research of Upcycling Supports to Increase Re-use, with a Focus on Waste Electrical and Electronic Equipment (UpWEEE)*, REF 2015-SE-DS-5, published 2018

*understandably continue to focus their energy on achieving existing targets at the lowest cost because of competitive pressures to offer lowest cost compliance and satisfy their members' strategic interests, which do not include preparation for re-use".*

To drive preparation for reuse, the report strongly recommends introducing preparation for reuse targets for IT equipment and large Household Appliances (LHA)<sup>73</sup>. Introducing a target to reach 3% reuse for IT and LHA is also proposed in Chapter 21.5 of the consultation paper.

The revised WFD also allows for setting targets in line with the hierarchy as follows:

**Article 8.a.1:** Where extended producer responsibility schemes are established in accordance with Article 8(1), including pursuant to other legislative acts of the Union, Member States shall:

- (b) in line with the waste hierarchy, set waste management targets, aiming to attain at least the quantitative targets relevant for the extended producer responsibility scheme as laid down in this Directive, Directive 94/62/EC, Directive 2000/53/EC, Directive 2006/66/EC and Directive 2012/19/EU of the European Parliament and of the Council ( 1 ), and set other quantitative targets and/or qualitative objectives that are considered relevant for the extended producer responsibility scheme;

**POLICY RECOMMENDATION #4.2: Introduce preparation for reuse targets** to ensure the greatest value possible is recovered from these extremely material- and energy-intensive products. To align with the required development of preparation for reuse infrastructure, the target should be introduced on a phased basis starting with 1% up to 3% within 3 years.

In addition to the important environmental and social benefits of a WEEE target of this nature, an increase in preparation for reuse will contribute towards the new and more challenging preparation for reuse and recycling targets under Article 11(2)(c) of the revised Waste Framework Directive. Ireland will need all such measures to meet these targets, given the change in measurement methodology (now against a wider benchmark), the increase in the overall target and decline of growth in recycling rates as described in Section 5.1.

#### 4.1.2 MECHANISM FOR IMPLEMENTING A TARGET

Introducing targets through the EPR schemes and requiring accountability from them will be important in ensuring the targets are effective. In Spain, the preparation for reuse target for WEEE has been slow to take off due to the lack of clear accountability.

As highlighted in the EPA/UL research, targets for the preparation for reuse of IT and LHA equipment can be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014. Non-compliance with these targets should result in a PRO being in contravention of its Ministerial approval, which would place its continued operation at risk.

**POLICY RECOMMENDATION #4.3: Require that EPR schemes demonstrate they are supporting preparation for reuse** by 2022, to reflect the next approval date for PROs in 2022.

<sup>73</sup> LHAs and IT were identified as the main product categories with potential for re-use. Further consideration and feasibility studies for alternative WEEE product categories and the introduction of preparation for re-use is necessary before increasing the number of product categories that preparation for re-use will apply to.

It is acknowledged that WEEE Ireland and ERP only target household WEEE and that targets and other related obligations should also be applied to B2B WEEE programmes for a level playing field.

## 4.2 SUPPORT AND INVEST IN PREPARATION FOR REUSE OF WEEE

To support a future preparation for reuse target for IT and LHA equipment, measures will have to be taken to establish preparation for reuse activities and centres as outlined below.

### 4.2.1 FUND THE DEVELOPMENT OF INDIGENOUS PREPARATION FOR REUSE FACILITIES

Chapter 11.6 of the consultation sets out “other policy options and measures” to incentivise / facilitate the development of facilities which can process recyclable materials in the State.

**POLICY RECOMMENDATION #4.4:** In line with the hierarchy, prioritise measures that support indigenous facilities for the Preparation for Reuse as well as (per Section 3.4.3) facilities for prevention.

Great care is required to avoid becoming “locked in” to developed recycling or recovery capacity, to the detriment of prevention and preparation for reuse activities (see Section 3.4.2.b).

### 4.2.2 SUPPORT PREPARATION FOR REUSE COSTS

The high cost of insurance and additional administrative burden associated with the CENELEC preparation for reuse standard have been identified as important cost barriers to preparation for reuse by CRNI members.

At present the draft CENELEC preparation for reuse standard remains in the approval process. However, if approved, any move to introduce this as mandatory, or to require operators to meet these standards to count towards preparation for reuse targets, would lead to additional costs for those operators.

Alongside the high cost of insurance (see also Section 3.8), these additional compliance costs would provide an additional barrier to preparation for reuse, going against the waste hierarchy and hampering efforts to move toward a more circular economy.

**POLICY RECOMMENDATION #4.5:** To make preparation for reuse viable, require that EPR schemes support at **minimum** preparation for reuse compliance and insurance costs.

Other proposals for financial support are introducing a 0% VAT for Preparation for Reuse activities (see Section 3.4.2.a) and reduced rates for preparation for reuse retail centres (See Section 3.4.2.e).

### 4.2.3 PRESERVE THE QUALITY OF WEEE IN STORAGE AND COLLECTIONS

The EPA/UL research report cites access to sufficient volumes of good-quality material as the “**block that hinders the success of the Irish system**” in establishing a preparation for re-use system for WEEE.

A pilot refurbishment programme run by CRNI member Rehab Recycle saw a very small percentage of equipment (LHA/washing machines) pass the first stage of visual inspection for preparation for re-use. The main reason for this was the condition of the LHA WEEE delivered to the facility - including damage to the structural integrity of the appliance, the presence of (often significant) cosmetic dents, scratches and blemishes, and general transport damage to the appliances.

As noted by the EPA/UL report, “this is a significant and potentially fatal detractor to any preparation for re-use undertaking of this magnitude, especially when it is considered that the pre-inspection phase is only visual and does not consider the functionality of the appliances in question”.

**POLICY RECOMMENDATION #4.6:** Take the following measures to preserve the quality of materials collected as recommended in the EPA/UL report:

- improving collection facilities at civic amenity sites and retailers;
- permitting approved preparation for reuse of WEEE organisations to operate collections targeting preparation for reuse;
- providing preparation for reuse operators with direct with access to material at these facilities;
- requiring compliance by collection and transport agents to minimum technical recommendations that ensure the quality of waste goods is preserved for preparation of reuse.

#### 4.2.4 SUPPORT EDUCATION AND BEHAVIOURAL CHANGE

Measures for behavioural change are outlined in Section 3.6 including, specifically, measures relating to improving prevention of EEE.

#### 4.2.5 ENSURE REUSE AND PREPARATION FOR REUSE OPERATORS AND SOCIAL ECONOMY ENTERPRISES HAVE THEIR SAY

Article 8a.1 of the revised WFD states under general minimum requirements for EPR schemes:

**Article 8a.1:** Where extended producer responsibility schemes are established in accordance with Article 8(1), including pursuant to other legislative acts of the Union, Member States shall:

(a) define in a clear way the roles and responsibilities of all relevant actors involved, including producers of products placing products on the market of the Member State, organisations implementing extended producer responsibility obligations on their behalf, private or public waste operators, local authorities **and, where appropriate, re-use and preparing for re-use operators and social economy enterprises;**

**Article 8.a.6:** Member States shall ensure a regular dialogue between relevant stakeholders involved in the implementation of extended producer responsibility schemes, including producers and distributors, private or public waste operators, local authorities, civil society organisations and, where applicable, social economy actors, re-use and repair networks and preparing for re-use operators.

**POLICY RECOMMENDATION #4.7:** Formalise the role and responsibilities for any EPR scheme of reuse and preparation for reuse operators and social economy enterprises, as experts in their field, as informing **how producer responsibility schemes support (finance) and prioritise reuse and preparation for reuse.** As per Article 8.a.6, a regular platform is required to facilitate this.

#### 4.2.6 INCLUDE PREPARATION FOR REUSE AND REUSE ACTIVITIES IN CRITICAL WASTE INFRASTRUCTURE

Chapter 11.5 of the consultation includes short term measures to assess critical waste infrastructure.



**POLICY RECOMMENDATION #4.8:** In line with the waste hierarchy and Circular Economy ambitions, prioritise **preparation for reuse activities**, and review the potential for prevention / reuse activities and infrastructure, in the assessment of critical waste infrastructure.

As long as these activities continue to be omitted from the overall landscape of resource management, they will not be brought into the mainstream as is required for an effective Circular economy.

**5.0 RECYCLING**

We are responding to this section based on the contributions of CRNI social recycling members, who work in the area of household, mattress and WEEE recycling. This includes Bryson Recycling, Eco-Mattress Recycling, BounceBack, RecycleIT, Rehab Recycle and USEL. Until recently, this also included Boomerang Enterprises<sup>74</sup>.



Our social recycling members are leaders and innovators, providing services that enable the recovery of quality materials for recycling with a view to the potential for reuse in the future.

For example, CRNI member Bryson Recycling has developed award winning kerbside collection “wheelie box” services providing for a high level of source separation and leading to a very high quality of recyclate. This includes the recovery of textiles which are sent for reuse. By prioritising quality recyclate, Bryson has been able to connect with local reprocessors and now over 88% of the materials from their kerbside service can be recycled in the UK, helping to support local jobs and the economy<sup>75</sup>. For example, PET plastics are sent to Cherry Recycling while paper is sent to Huhtamaki, both in Northern Ireland.

Our mattress recycling members across the island not only provide a social gain but also focus on the quality of materials recovered and are driving research to explore local recycling and reuse opportunities. One of these mattress recyclers, USEL, has recently begun a carpet tile reuse service.

**5.1 INVEST IN AND INCLUDE ADDITIONAL ACTIVITIES IN THE RECYCLING TARGET MEASUREMENT**

As noted in Chapter 3.4 of the consultation, the revised Waste Framework Directive has introduced more stringent combined preparation for reuse / recycling targets. These are not only more ambitious in the rate that must be achieved, but are also more challenging for Ireland because they now must be measured against the entire MSW stream rather than specific material categories as was previously the case.

<sup>74</sup> Boomerang Enterprises unfortunately closed in the latter half of 2019

<sup>75</sup> For more information see

<https://www.cрни.ie/news/bryson-urge-councils-to-adopt-wheelie-boxes-as-daera-announces-23m-recycling-fund/>

While this will make it more difficult to meet the target, it also presents an opportunity to include previously uncounted activities within the target calculation. This includes, for example preparation for reuse of WEEE (see Section 4.1) and mattress recycling (Section 5.1.2).

**This further provides grounds, in our view, for supporting growth in these areas.**

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#### 5.1.1 INVEST IN QUALITY RECYCLATE FOR INDIGENOUS RECYCLING FACILITIES

An Invest NI-funded scoping study conducted by the Collaborative Circular Economy Network<sup>76</sup> into the dynamic nature of the recycling industry in the north found that a major limiting factor for manufacturing companies to their future growth is the **availability of high quality recyclables**. Most of these reprocessors import higher quality recyclables from outside of Northern Ireland while at the same time, tens of thousands of tonnes of recyclables are exported for recycling.

The report estimated that £50 million of economic potential could be realised if additional high quality recyclables were available locally to manufacturers of new products from paper, plastics and glass.

Clearly, driving indigenous recycling relies on the collection of high quality recyclate through high levels of separate collection.

As noted above, the Bryson Recycling 'wheelie box' scheme coupled with bespoke collection vehicles that preserve the quality of collected materials help to achieve high quality recycling across the region. This has enabled Bryson to send 88% of these materials for recycling in the UK.

**POLICY RECOMMENDATION #5.1:** Investigate the model used to develop circular material flows in Northern Ireland to help inform how to develop similar opportunities in Ireland and how to foster cross border collaboration for economies of scale.

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#### 5.1.2 INTRODUCE A MANDATORY MATTRESS EPR SCHEME

In 2018 a report was commissioned by the EPA (not published) on the status of mattress recycling with recommendations for developing an EPR scheme to target this waste stream. This found that an estimated 600,000 mattresses are discarded each year, compared with 53,000 recycled in total in 2018 by social enterprises in Ireland (Northern Ireland figures not currently available).

The carbon footprint of an average double mattress is over 80kg CO<sub>2</sub>. Through dismantling and recycling, tonnes of valuable metal, wood and fabric are recycled or prevented from going to landfill (where it takes over 10 years to decompose), avoiding CO<sub>2</sub> emissions. Social enterprises also provide jobs and training for people from disadvantaged communities and are leaders in the Circular Economy, pioneering research and business models that drive forward a more circular agenda.

Other forms of mattress recycling (e.g. whole mattress shredding) do not promote high quality recycling as the recovered materials are of lower value to the recycling sector, particularly with respect to future potential streams e.g. textiles, foam. In Northern Ireland CRNI member USEL is able, through dismantling and quality separation, to send these latter streams for recycling to the UK market.

As noted above, there are social enterprises dismantling mattresses for recycling in the Eastern-Midlands region (Eco-Mattress Recycling) and Connacht-Ulster region (BounceBack Recycling). USEL also dismantle

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<sup>76</sup> See [https://www.brysonrecycling.org/images/uploads/general/CE\\_Scoping\\_Study\\_-\\_Final\\_Report\\_-\\_desensitised\\_.pdf](https://www.brysonrecycling.org/images/uploads/general/CE_Scoping_Study_-_Final_Report_-_desensitised_.pdf)

mattresses for recycling in Belfast (Ulster). These deliver not only cost savings – through avoided landfill gate fees and avoided use of scarce landfill void - but also environmental and social benefits.

Unfortunately, Ireland’s third mattress dismantling social enterprise in the Southern region, Boomerang Enterprises, ceased operation in the latter part of 2019. **Cost recovery for recycling is a major problem** for this problematic waste stream.

The abovementioned report recommended that policy makers consider whether a legislatively-backed system or an industry-led voluntary approach to EPR for end-of-life mattresses would be appropriate to Ireland.

Many retailers are already providing mattress take back services, but these are not capturing enough of the mattresses arising (see above) and **do not all collect fees that adequately cover the cost of recycling**. It is not therefore clear how a voluntary scheme could improve on this system.

**POLICY RECOMMENDATION #5.2:** Introduce a **mandatory EPR scheme** in Ireland within a specified timeframe (e.g. 2 years) to support and grow mattress recycling. This would be supported by increased efforts to recover mattresses through *Recovery Parks* (Section 3.5.2) in partnership with social enterprise (see Section 3.4.1.b) and a ban on mattresses going to landfill.

Consultation with stakeholders will be key to delivering such a scheme. Setting a fixed timeframe for introduction of a scheme would give time for interested parties (e.g. EPA mattress WG stakeholders) to engage and involve retailers and/or manufacturers in the development of a scheme and for the Government to prepare the necessary legislation. It may also provide an opportunity to test a voluntary type scheme, so that retailers and/or manufacturers can better prepare for the mandatory scheme. Finally, signalling an intent to support local mattress recycling will also drive further research into and development of local reuse or recycling outlets for recovered materials (see Section 3.10 and Section 5.1.3).

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### 5.1.3 DEVELOPING THE MARKET FOR MATTRESS COMPONENTS

Mattresses are composed of four key component parts including fabric covers or “ticking” (primarily polyester), foam padding made of polyurethane foam or synthetic latex, a felt pad that acts as an insulator made from fabric scraps (natural and synthetic) and metal springs for support.

Through the dismantling process these components can be recovered with low levels of cross contamination, facilitating onwards reuse or recycling. As highlighted in the EPA report noted above, some of (typically) positive-value markets for these materials include:

- Existing recycling markets for steel in the scrap metal market
- Washed and baled outer fabrics, shredded and recycled into fibres that are spun and woven
- White flock, derived from cotton, cleaned and recycled to utilise as yarn
- Felt, which can be sold to the automotive sector as interior vehicle matting
- Flexible polyurethane foam, which can be washed and shredded for use in the manufacturing of products such as carpet underlay or mats or for insulation or acoustic products
- Coconut fibre and felt, which can be used as a plant growing medium for urban or vertical gardens or be used as animal bedding / flooring.

Currently most of these markets are only available in Britain. Due to the bulky nature of these materials (even baled), shipping and transporting these materials considerably reduces the margin to recyclers. Outlets are

needed within Ireland to close the loop and better facilitate reuse and recycling of these problematic waste streams.

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

**POLICY RECOMMENDATION #5.3:** Review end of waste criteria for **components extracted from mattresses** to advance mattress recycling.

**POLICY RECOMMENDATION #5.4:** Ensure **representatives from the community reuse and recycling sector** are included in any group to review national End of Waste decisions.

In addition to providing end-of-waste status for these materials, it is necessary to develop the market for them. Some excellent work has already been carried out in this area e.g. by Boomerang Enterprises in partnership with Ventec on the noise barrier properties of materials. However, further research (see Section 3.10) and business supports are required to demonstrate the properties of the re-purposed materials and bring them to market. If successful, these materials could be marketed under a quality mark such as ReMark as a recognised symbol for consumers for traceable, genuinely repurposed and reused goods.

Current funding programmes are not fit for purpose to support these types of market trials with a Circular Economy focus which may, for example, require a longer lead-in time to overcome the significant barriers facing the sector.

**POLICY RECOMMENDATION #5.5:** Set up a dedicated fund to test and develop markets for the reuse and recycling of recovered materials.

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#### 5.1.4 REDUCED VAT FOR MATTRESS COLLECTIONS

The EPA mattress report also recommended, amongst other things, supporting VAT exemptions for end-of-life mattress recycling schemes. VAT is charged at 13.5% on collections which are a prime revenue stream for these schemes.

**POLICY RECOMMENDATION #5.6:** Set VAT rates on the collection of mattresses to 0% to make it more accessible to the consumer as well as making it more viable for operators.

Additional points on VAT are outlined in Section 3.4.2.a.

## 6.0 INSTITUTIONS, COMPLIANCE AND DATA

### 6.1 BETTER COORDINATION OF OVERARCHING STRUCTURES

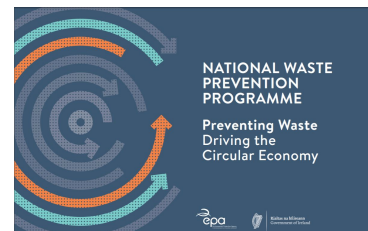
The NESC report *Moving Towards the Circular Economy in Ireland*<sup>77</sup> found that “... while there are a number of actors and stakeholders within the Irish circular economy innovation system many are insufficiently resourced and there was a lack of interaction between them. This means that the existing infrastructure is not achieving a level of impact that will support the transition to a circular economy in the short term”.

We agree that greater coordination of the various stakeholders within the sector would help leverage resources to communicate, engage and carry out research for a more Circular Economy. Clearer distinction is required on the roles of the different institutions delivering on prevention and waste management to avoid duplication and enable them to work together more effectively.

We welcome the establishment of the DCCA Implementation Committee as a means of better connecting work being carried out by parties across all sectors. Further efforts to align this *Circular Economy Action Plan* with the National Waste Prevention plan and one National Waste Management Plan (rather than three regional plans) would also facilitate greater coordination and policy coherence.

**POLICY RECOMMENDATION #6.1:** Develop an overarching *Circular Economy Action Plan* that supports the **Towards a Resource Efficient Ireland** plan, and sets clear guidance for a **National Waste Plan** (amalgamating the three regional plans), which currently (in the form of regional plans) contain provisions to drive prevention and reuse.

This would help align activities of various stakeholders and tie together the strategic role of EPA supported programmes such as Stop Food Waste, Free Trade Ireland, Reuse Month and Community Reuse Network Ireland (CRNI), Regional Authority funded initiatives such as Conscious Cup Campaign and Reuse Month together with mywaste.ie.



**POLICY RECOMMENDATION #6.2:** Support the development of a platform like circular.ie (see Section 3.10) that can bring together industry actors and create links.

### 6.2 DATA COLLECTION AND REPORTING REQUIREMENTS

Good progress has been made towards streamlining reporting to the EPA and waste permitting office last year. However reporting requirements could be reduced further - for example, by allowing the same report to be submitted to both agencies, or ensuring data collected by the EPA is more closely linked to permit requirements.

It is clear that more frequent reporting could help track progress towards targets and provide flexibility to the Government to put in place measures to address any issues arising.

<sup>77</sup> O’Rafferty, S. *Moving Towards the Circular Economy in Ireland*, NESC, available at <https://www.cрни.ie/publications/>



**POLICY RECOMMENDATION #6.3:** Ensure any additional data reporting requirements are accompanied by support to prevention or preparation for reuse operators to provide this information (see also Section 3.2.2).

## DIRECTORY OF POLICY RECOMMENDATIONS IN THIS RESPONSE

### 2.0 OVERARCHING STRUCTURAL AND INSTITUTIONAL ARRANGEMENTS

#### CONSULTATION QUESTIONS – INSTITUTIONAL ARRANGEMENTS

**QUESTION A.** HOW ARE THE CURRENT INSTITUTIONAL WASTE PREVENTION AND MANAGEMENT ARRANGEMENTS WORKING AND HOW COULD THEY BE IMPROVED IN YOUR OPINION?

**POLICY RECOMMENDATION #6.1:** Develop one overarching *Circular Economy Action Plan* that fully integrates the **Towards a Resource Efficient Ireland** plan, and sets clear guidance for a **National Waste Plan** (amalgamating the three regional plans), which currently (in the form of regional plans) contain provisions to drive prevention and reuse.

**POLICY RECOMMENDATION #6.2:** Support the development of a platform like circular.ie (see Section 3.10) that can bring together industry actors and create links.

**POLICY RECOMMENDATION #3.60:** Through Article 11.1, **formally recognise** the role of the network in the context of institutional arrangements.

### 3.0 MUNICIPAL (HOUSEHOLD AND COMMERCIAL) WASTE

#### 3.7 CONSULTATION QUESTIONS - MUNICIPAL WASTE

**QUESTION A.** WHAT FURTHER MEASURES SHOULD BE PUT IN PLACE BY GOVERNMENT, REGULATORY AUTHORITIES AND INDUSTRY IN ORDER TO PROMOTE AND INCENTIVISE WASTE PREVENTION AND IMPROVE PROPER SEGREGATION AND RECYCLING OF WASTE BY BOTH HOUSEHOLDS AND BUSINESSES?

For prevention measures, see Section 7.0 on Circular Economy below.

For awareness and behavioural change, see Section 8.0 below.

With regards to segregation and recycling:

**POLICY RECOMMENDATION #5.1:** Investigate the model used to develop circular material flows in Northern Ireland to help inform how to develop similar opportunities in Ireland and how to foster cross border collaboration for economies of scale.

**POLICY RECOMMENDATION #5.5:** Set up a dedicated fund to test and develop markets for the reuse and recycling of recovered materials.

**QUESTION B.** WHAT MEASURES OR PRACTICES ARE CURRENTLY IN PLACE THAT COULD BE IMPROVED?



For prevention measures and behavioural change, see Section on Circular Economy below.

**QUESTION C. WHAT OTHER NEW MEASURES OR PRACTICES COULD BE PUT IN PLACE?**

**Ecolabelling, reuse targets and financial measures** that ensure prevention and preparation for reuse are always the cheapest and/or most convenient options as outlined throughout Section 3.4 and elsewhere - see Circular Economy below.

**QUESTION D. WHAT DO YOU SEE AS THE BARRIERS / ENABLERS TO THESE MEASURES?**

**Lack of policy focus and supporting language around prevention / reuse; poor design; lack of awareness; poor accessibility and cost of prevention / reuse activities.** See Sections 2.0 and 3.0.

**3.8 CONSULTATION QUESTIONS – HOUSEHOLD WASTE**

**QUESTION C. WHAT ROLE SHOULD CIVIC AMENITY SITES PLAY? SHOULD THERE BE A STANDARD SERVICE ACROSS ALL CIVIC AMENITY SITES SUCH AS THE WASTE STREAMS THEY ACCEPT? SHOULD THEY ACCEPT GENERAL WASTE OR ONLY RECYCLABLES? SHOULD CAS BE USED TO PROVIDE MORE REUSE OPPORTUNITIES E.G. AREAS DEDICATED TO EXCHANGE AND UPCYCLING? IF SO HOW SHOULD THIS BE FUNDED?**

See also Chapter 20.0 response on local authority engagement with social mattress recyclers (recommendation #3.17).

**POLICY RECOMMENDATION #3.33:** Change the language by rebranding them as “*Recovery Parks*” and make them more accessible by providing opening hours that better facilitate the public, to engage the public and support behavioural change.

**POLICY RECOMMENDATION #3.34:** As proposed in Chapter 21.5 of the consultation paper, require *Recovery Parks* to have **appropriate reception facilities** that preserve the reuse potential of items. These may vary from site to site but should facilitate better segregation and storage for a minimum number of product categories such as bulky goods, WEEE (see Section 4.2.3), paint and mattresses (see Section 5.0). The requirement for these facilities should be included in tender clauses as envisaged in the Regional Waste Plans. Operators should also be encouraged to partner with or provide priority access to donated materials for social enterprises (see also Section 3.7.3 in relation to textile banks).

**POLICY RECOMMENDATION #3.35:** Invest in more trained operators to screen, better signage and improved layout (requiring investment) to support the roll out of reception facilities for reuse.

**POLICY RECOMMENDATION #3.36:** A combination of **state investment, incentivised charging and increased responsibility on waste collectors and EPR schemes** (see Section 3.4.2.b) for prevention and preparation for reuse objectives (outlined in Section 3.2) should help to fund the necessary investment in *Recovery Parks* to improve facilities.

**3.9 CONSULTATION QUESTIONS – COMMERCIAL WASTE**

**QUESTION C. SHOULD A CERTIFICATION SCHEME BE INTRODUCED FOR BUSINESSES TO DEMONSTRATE THAT BUSINESSES ARE MANAGING THEIR MUNICIPAL WASTE CORRECTLY?**

**POLICY RECOMMENDATION #3.43:** Existing Government backed programmes that already aim to promote the sustainability credentials of businesses (e.g. Origin Green, which touches on food waste prevention) should be required to better **align their objectives with the Circular Economy** agenda. This would create synergies and convey messages through existing channels.

4.0 FOOD WASTE

4.7 CONSULTATION QUESTIONS – FOOD WASTE

**QUESTION B. SHOULD IRELAND INTRODUCE A NATIONAL PREVENTION TARGET IN ADVANCE OF A POSSIBLE EU TARGET?**

**POLICY RECOMMENDATION #3.9:** For Ireland to make progress in food waste reduction and become a "farm to fork" global leader in this area, a **mandatory food waste prevention target** of 50% by 2030 along with an interim target to drive progress must be introduced.

**POLICY RECOMMENDATION #3.10:** Improve data collection on food waste prevention in Ireland to enable tracking and measuring against a target.

**QUESTION C. HOW CAN IRELAND BECOME A "FARM TO FORK" GLOBAL LEADER IN FOOD WASTE REDUCTION?**

**POLICY RECOMMENDATION #3.11:** Support measures required to align investment with the food hierarchy (Sections 3.4.2.b - aligning incentives with the food waste hierarchy, Section 3.4.2.c - tax rebates and 3.4.2.d - supporting the cost of transport) and to raise consumer awareness about the true cost of food waste (Section 3.6.1.b).

**POLICY RECOMMENDATION #3.23:** Review and moderate all forms of subsidies on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse.

**POLICY RECOMMENDATION #3.24:** Introduce **tax rebates on donated goods** from businesses, similar to "Gift Aid".

**POLICY RECOMMENDATION #3.25:** Review the benefits of a transport subsidy scheme to be piloted in Ireland to better support the flow of donations.

**POLICY RECOMMENDATION #3.40:** **Further resource** StopFoodWaste to gain a broader reach and greater support from the media and to connect with the broad cultural support for and marketing of Ireland's food industry and farmers.

6.0 SINGLE USE PLASTIC

**QUESTION B. ARE THERE MEASURES ALREADY IN PLACE THAT COULD BE STRENGTHENED BY LEGISLATION?**

**POLICY RECOMMENDATION #3.42:** Give the Competition and Consumer Protection Commission (CCPC) added responsibility to protect the Consumer from misleading advertising and labelling on packaging. Clear communications about single use packaging and the benefits of reusable cups and containers is also needed, through the coordinated communications programme and in partnership with stakeholders like CRNI member Conscientious Cup Campaign.

QUESTION F. GIVEN THE RANGE OF PRICES INVOLVED FOR COMMODITIES SOLD IN SUP CONTAINERS AND BEVERAGE CUPS DO YOU BELIEVE A LEVY WOULD AFFECT BEHAVIOURAL CHANGE?

As the plastic bag levy has demonstrated, and other studies have found (see CCC submission to waste levies consultation), economic instruments can be very effective at incentivising this type of behavioural change particularly where there is clear pricing to the consumer.

7.0 CIRCULAR ECONOMY

7.7 CONSULTATION QUESTIONS – CIRCULAR ECONOMY

QUESTION A. WHAT ARE THE AREAS WITH GREATEST POTENTIAL FOR TRANSFORMATION IN IRELAND UNDER THE CIRCULAR ECONOMY?

Becoming a more Circular Economy will require new approaches to every stage of a product's life cycle and beyond.

**POLICY RECOMMENDATION #2.1:** The transition to a more Circular Economy will require a significant shift in Ireland's **policy focus** and **language** to better align with the waste hierarchy.

**POLICY RECOMMENDATION #2.2:** Invest in and support prevention (including citizens engagement, better design, sharing, leasing, reuse and repair) and preparation for re-use (including repair and refurbishment) across a range of sectors for the **greatest long term sustainable transformation** to a Circular Economy.

**POLICY RECOMMENDATION #3.23:** Review and moderate all forms of subsidies on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse.

**POLICY RECOMMENDATION #4.1:** Take **urgent measures to address** the total absence of preparation for reuse activity, which is a major gap in Ireland's Circular Economy journey.

QUESTION B. WHAT MEASURES ARE REQUIRED TO INCREASE UNDERSTANDING OF CIRCULAR ECONOMY PRINCIPLES AND THEIR UPTAKE BY RELEVANT ACTORS?

Change the language through this plan.

**POLICY RECOMMENDATION #2.3:** Rename this plan to a *Circular Economy Action Plan*, and restructure it to align with and prioritise the waste hierarchy across all subject areas.

Support Eco-design and Eco-labelling:

**POLICY RECOMMENDATION #3.1: Engage the design and manufacturing community** through collaboration with DBEI, and foster opportunities to connect these communities with operators handling their products at reuse, repair or recycling stages.

**POLICY RECOMMENDATION #3.2:** Pursue European Commission efforts to **develop consumer labelling** showcasing the durability and reparability of products including non-energy products and review local opportunities for same.

Demonstrate leadership through Green Public Procurement for Prevention & Preparation for reuse (see Chapter 20.0 responses below)

Introduce Financial Measures:

**POLICY RECOMMENDATION #3.19:** Set a 0% VAT rate for prevention and preparation for reuse, a reduced VAT for recycling activities carried out by **social enterprises** in Ireland and a 0% VAT rate on “small” repairs.

**POLICY RECOMMENDATION #3.20:** The Department should ensure that any revisions to the VAT Directive **align with the waste hierarchy** and prioritise reuse and repair goods and services.

**POLICY RECOMMENDATION #5.6:** Set VAT rates on the collection of mattresses to 0% to make it more accessible to the consumer as well as making it more viable for operators.

**POLICY RECOMMENDATION #3.21:** Require all EPR schemes **to focus to a much greater extent on prevention and preparation for reuse**, through financial supports as well as effective eco-modulation fee structures and other supports, in line with the waste hierarchy.

**POLICY RECOMMENDATION #3.22:** Review opportunities to introduce EPR schemes for mattresses, furniture, paint and textiles (amongst other areas), but with a strong focus on prioritising and financially contributing to existing and prevention and preparation for reuse activity.

**POLICY RECOMMENDATION #3.24:** Introduce **tax rebates on donated goods** from businesses, similar to “Gift Aid”.

**POLICY RECOMMENDATION #3.25:** Review the benefits of a similar transport subsidy scheme to be piloted in Ireland to better support the flow of donations.

**POLICY RECOMMENDATION #3.26:** Provide nation-wide guidance to local authorities asking them to support the Circular Economy by limiting “commercial” rates for prevention or preparation for reuse centres to a **maximum of 50% and minimum of 0% rates**.

**POLICY RECOMMENDATION #3.27:** Introduce or revise the following levies:

- increase the plastic bag tax by three cents.
- remove the exemption of the medium weight plastic bags from the levy.
- introduce a levy of at least €0.25 to the wholesale purchase of all types of cups, whether compostable, recyclable or otherwise, including disposable cups with similar construct.
- introduce takeaway container levies as Phase 2 of the levies proposals.
- introduce a levy on waste-to-energy.
- increase of the landfill levy in line with any abovementioned waste-to-energy levy.

**POLICY RECOMMENDATION #4.5:** To make preparation for reuse viable, require that EPR schemes support **at minimum** preparation for reuse compliance and insurance costs.

Invest in Infrastructure that will grow the sector - see Chapter 11.0 responses below.

Closing the loop - providing access to materials

**POLICY RECOMMENDATION #3.32:** Supports outlined in this document that are necessary to drive demand for second hand goods include **nation-wide roll out of the quality mark ReMark** (Section 3.6.1.a), **greener public procurement** (Section 3.4.1), **financial measures** reducing operating costs or taxes (Section 3.4.2), and communications to drive **public awareness** (Section 3.6).

(See above response to 3.8 for recommendations on Civic Amenity Sites)

**POLICY RECOMMENDATION #4.6:** **Take the following measures** to preserve the quality of materials collected as recommended in the EPA/UL report:

- improving collection facilities at civic amenity sites and retailers;
- permitting approved preparation for reuse of WEEE organisations to operate collections targeting preparation for reuse;
- providing preparation for reuse operators with direct with access to material at these facilities;
- requiring compliance by collection and transport agents to minimum technical recommendations that ensure the quality of waste goods is preserved for preparation of reuse.

Support citizen's engagement (see Chapter 8.0 responses below)

Ensure we are preparing for Circular Economy jobs and skills

**POLICY RECOMMENDATION #3.44:** Ensure that public investment in just transition plans (at regional or national level) includes and supports Circular Economy opportunities.

**POLICY RECOMMENDATION #3.45:** Take a whole of Government approach to preparing for jobs and skills in a Circular Economy across apprenticeships programmes, further learning and third level courses.

**POLICY RECOMMENDATION #3.46:** Funding toward the **support for training and capacity building** to social entrepreneurs, enterprises and businesses working in or moving toward a more Circular Economy is crucial in this early developmental phase for the sector.

Address Liabilities and Insurance issues

**POLICY RECOMMENDATION #3.53:** Engage with FSAI (and other standards bodies where relevant) to ensure **simple guidance is provided for retailers and citizens** that protects business but also facilitates reusable containers (and other items as arising) on the journey to a more Circular Economy.

**POLICY RECOMMENDATION #3.54:** Acknowledge the barriers that insurance poses to this sector in Ireland and help address them through support to the Alliance calls for reform.

Provide for a joined up circular and social approach through enhanced cooperation between Departments

**POLICY RECOMMENDATION #3.55: Collaborate with DRCD** to ensure better alignment of policy measures that support the sector, and the creation of **dedicated funding streams or grants** facilitating, for example, access to equipment where this activity will not otherwise take place in the private sector.

**POLICY RECOMMENDATION #3.56:** Take a whole of Government approach with DRCD, the Department of Education and DBEI to identify ways by which **qualifications in the area of the Circular Economy** could be delivered through CSP or other schemes.

**POLICY RECOMMENDATION #4.7:** Formalise the role and responsibilities for any EPR scheme of reuse and preparation for reuse operators and social economy enterprises, as experts in their field, as informing **how producer responsibility schemes support (finance) and prioritise reuse and preparation for reuse**. As per Article 8.a.6, a regular platform is required to facilitate this.

**QUESTION C. WHAT MIGHT BE A MEANINGFUL NATIONAL WASTE REDUCTION TARGET AND HOW COULD IT BE ACHIEVED?**

**POLICY RECOMMENDATION #3.4: Set targets for reuse** in order to effectively prioritise prevention in the waste hierarchy as required under the WFD.

**POLICY RECOMMENDATION #3.5: Introduce binding reuse targets in legislation from 2022** (to align with the development of a methodology per below) with further target objectives set for 2025 and 2030.

**POLICY RECOMMENDATION #3.6:** Set the level (number of kg/inhabitant) of this target once the Q2reuse research project has delivered a first estimate of Ireland's reuse rate and apply this to no later than 2022.

**POLICY RECOMMENDATION #3.7:** Support a reuse target through policy drivers (including financial instruments per Section 3.4) and underpin it with penalties for failure to meet targets.

**POLICY RECOMMENDATION #3.8:** Provide for clear accountability and consequences for failure to meet any target. Ensure that EPR schemes (for relevant product groups) and waste collectors are held accountable for waste prevention to a much greater extent.

(see also Food Waste Section 4.0)

**POLICY RECOMMENDATION #4.2: Introduce preparation for reuse targets** to ensure the greatest value possible is recovered from these extremely material- and energy-intensive products. To align with the required development of preparation for reuse infrastructure, the target should be introduced on a phased basis starting with 1% up to 3% within 3 years.

**POLICY RECOMMENDATION #4.3: Require that EPR schemes demonstrate they are supporting preparation for reuse** by 2022, to reflect the next approval date for PROs in 2022.

**POLICY RECOMMENDATION #3.13:** Align public procurement, at minimum, with national prevention or preparation for reuse targets. It should also be necessary for public bodies to incorporate reuse policies into asset management and procurement.

This could be achieved through a suite of financial, educational and other measures as set out in response to question D above.

QUESTION D. HAVE YOU ANY OTHER COMMENTS OR SUGGESTIONS ON HOW YOU WOULD LIKE TO SEE IRELAND TRANSITION TO A MORE RESOURCE EFFICIENT AND CIRCULAR ECONOMY BY IMPROVING OUR WASTE MANAGEMENT PRACTICES?

**POLICY RECOMMENDATION #1.1:** Realising triple bottom line benefits in the delivery of a more circular economy will require careful policy formation that ensures a job rich, just and inclusive circular transition focused on the wellbeing of all individuals.

## 8.0 CITIZEN ENGAGEMENT – AWARENESS AND EDUCATION

### 8.7 CONSULTATION QUESTIONS – CITIZEN ENGAGEMENT

QUESTION A. WHAT CAMPAIGNS WOULD BETTER ASSIST HOUSEHOLDERS AND BUSINESSES IN PREVENTING AND SEGREGATING WASTE PROPERLY?

The below recommendations are designed to support broader education and behavioural change toward a more Circular Economy as described in our response Section 3.6.1.

**POLICY RECOMMENDATION #3.37:** As discussed via the Waste Action Plan Advisory Group, develop a **centrally coordinated, multi-annual cross-sectoral communications programme** involving all relevant stakeholders, connecting various awareness raising efforts and channels, prioritising messaging and providing coherent, clear and simple communications that engages citizens and businesses.

**POLICY RECOMMENDATION #3.38:** Continue to invest in community based workshops and events, in line with a nation-wide programme per above, **to deliver a high impact** on behavioural change even where direct reach may be smaller than social media or advertising campaigns.

**POLICY RECOMMENDATION #3.39:** Give **ReMark formal recognition in policy** and funding to develop it to the next stage on an all-island basis and in collaboration with Northern Ireland's DAERA<sup>78</sup>.

**POLICY RECOMMENDATION #3.41: Require WEEE EPR schemes** to provide clear information and awareness raising about the services available for the prevention (reuse) of EEE and preparation for reuse of WEEE.

## 10.0 TEXTILES – WASTE AND RECYCLING

### 10.7 CONSULTATION QUESTIONS – TEXTILES

QUESTION A. WHAT MEASURES WOULD BEST SUPPORT THE SUCCESSFUL COLLECTION OF HOUSEHOLD TEXTILES?

**POLICY RECOMMENDATION #3.48:** Recognise, in the design of any textile strategy or collection system in Ireland, that the **backdrop is very different** to many other EU member states.

**POLICY RECOMMENDATION #3.50: Ensure local second hand clothing retailers** (like charity shops) **are central to any future separate collection scheme** to ensure maximum local reuse. Some options for prioritising local

<sup>78</sup> DAERA commits through *Delivering Resource Efficiency* to supporting “the development of a certifiable re-use voluntary quality assurance scheme and work with DECLG in assessing the feasibility of introducing a scheme on an all-island basis”.



second hand clothing retailers while extending the separate collection network include local second hand retailers partnering with waste collectors for kerbside collections or an increase in textile banks.

**POLICY RECOMMENDATION #3.51:** Encourage Local Authorities to prioritise textile banks that direct textiles to local second hand retailers (e.g. charity shops) when procuring for Civic Amenity Sites (“Resource Parks”) or on public land.

**POLICY RECOMMENDATION #3.52: Introduce regulations providing greater control** over all textile collection banks (in public or private spaces), requiring clear information to be provided on each bank about the beneficiary of the textile donations and the identity and contact details of the textile bank operators.

**It is not clear** that the existing networks of second hand outlets, dominated by social enterprises / charities, in the textiles sector **would be best supported by an EPR scheme at this stage.**

QUESTION B. WHAT MEASURES WOULD BEST SUPPORT SUSTAINABLE CONSUMPTION OF TEXTILES BY THE GENERAL PUBLIC?

**POLICY RECOMMENDATION #3.3:** Establish an expert working group on the textile chain at national level.

**POLICY RECOMMENDATION #3.24:** Introduce **tax rebates on donated goods** from businesses, similar to “Gift Aid”.

**POLICY RECOMMENDATION #3.26:** Provide nation-wide guidance to local authorities asking them to support the Circular Economy by limiting “commercial” rates for prevention or preparation for reuse centres to a **maximum of 50% and minimum of 0% rates.**

**POLICY RECOMMENDATION #3.47: Support the development** of a cohesive textiles strategy at EU and national level.

**POLICY RECOMMENDATION #3.49:** Prioritise an awareness campaign about the impact of textiles on global systems, encouraging consumers to **reduce their consumption** or buy **better quality** items and to use available channels to borrow, swap, or **pass them on for reuse**, in the coordinated national communications programme (see Section 3.6.1).

11.0 WASTE MANAGEMENT INFRASTRUCTURE

11.7 CONSULTATION QUESTIONS – WASTE MANAGEMENT INFRASTRUCTURE

QUESTION A. SHOULD ONE NATIONAL WASTE MANAGEMENT PLAN BE PRODUCED IN PLACE OF THE 3 CURRENT PLANS?

**POLICY RECOMMENDATION #6.1:** Develop one overarching *Circular Economy Action Plan* that fully integrates the **Towards a Resource Efficient Ireland** plan, and sets clear guidance for a **National Waste Plan** (amalgamating the three regional plans), which currently (in the form of regional plans) contain provisions to drive prevention and reuse.

QUESTION C. SHOULD THE STATE ASSIST IN FUNDING THE DEVELOPMENT OF INDIGENOUS WASTE RECYCLING FACILITIES? IF SO, HOW SHOULD THIS BE FUNDED?

Invest in Infrastructure that will grow the prevention and preparation for reuse sector.

**POLICY RECOMMENDATION #3.27:** First and foremost support **infrastructure driving prevention** followed by infrastructure for preparation for reuse through low interest loans, grants, or other mechanisms.

**POLICY RECOMMENDATION #3.28:** **Continue to fund FreeTrade Ireland** as a public service, not only to support a culture of reuse, but also provide important data and convey messaging for the public good.

**POLICY RECOMMENDATION #3.29:** Subsidise the **upfront investment in cloth nappies** for new parents through rebates to help the uptake of these reusable items.

**POLICY RECOMMENDATION #3.30:** Support a **pilot programme with new parents** to demonstrate the ease of use and potential savings with cloth nappies, underpinned by education on how to use them e.g. in partnership with Cloth Nappy Library Ireland.

**POLICY RECOMMENDATION #4.4:** In line with the hierarchy, prioritise measures that support indigenous facilities for the Preparation for Reuse as well as (per Section 3.4.3) facilities for prevention.

**POLICY RECOMMENDATION #4.8:** In line with the waste hierarchy and Circular Economy ambitions, prioritise **preparation for reuse activities**, and review the potential for prevention / reuse activities and infrastructure, in the assessment of critical waste infrastructure.

## 13.0 END OF WASTE

### 13.6 CONSULTATION QUESTIONS – END OF WASTE

**QUESTION B. IF YES, WHAT EXPERTISE WOULD BE NECESSARY FOR SUCH A TEAM? WHO SHOULD BE REPRESENTED? ARE THERE OTHER MATERIALS WHICH YOU BELIEVE ARE SUITABLE FOR NATIONAL END OF WASTE DECISIONS?**

**POLICY RECOMMENDATION #5.4:** **Ensure representatives from the community reuse and recycling sector** are included in any group to review national End of Waste decisions.

**QUESTION C. HAVE YOU ANY OTHER COMMENTS OR SUGGESTIONS ON HOW YOU WOULD LIKE TO SEE IRELAND TRANSITION TO A MORE RESOURCE EFFICIENT AND CIRCULAR ECONOMY BY IMPROVING OUR WASTE MANAGEMENT PRACTICES?**

**POLICY RECOMMENDATION #5.3:** Review end of waste criteria for **components extracted from mattresses** to advance mattress recycling.

## 15.0 EXTENDED PRODUCER RESPONSIBILITY

### 15.7 CONSULTATION QUESTIONS – EXTENDED PRODUCER RESPONSIBILITY

**QUESTION A. HOW IS THE NEW EPR INFRASTRUCTURE GOING TO IMPACT ON IRELAND'S EXISTING EPR STRUCTURES?**

With the revised WFD, EPR schemes must move towards a “cradle to cradle” ethos, involving significant changes and requiring greater accountability for the full life cycle of the goods and products their producers are responsible for including end of use management.

QUESTION C. HOW DO EPRs HELP IRELAND ACHIEVE OUR TARGETS?

**POLICY RECOMMENDATION #3.8:** Provide for clear accountability and consequences for failure to meet any target. **Ensure that EPR schemes (for relevant product groups) and waste collectors are held accountable for waste prevention to a much greater extent.**

**POLICY RECOMMENDATION #3.21:** Require all EPR schemes **to focus to a much greater extent on prevention and preparation for reuse**, through financial supports as well as effective eco-modulation fee structures and other supports, in line with the waste hierarchy.

QUESTION D. HOW DO WE INFLUENCE DECISIONS MADE AT THE PRODUCT DESIGN STAGE TO ENSURE CIRCULAR DESIGN PRINCIPLES ARE PUT IN PLACE?

See Chapter 7.0 response on measures to Support Eco-design and Eco-labelling

QUESTION E. HOW COULD MODULATED FEES BE BEST INTRODUCED TO DRIVE CHANGE AND TRANSFORM OUR APPROACH TO WASTE IN LINE WITH MODERN, CIRCULAR ECONOMY PRINCIPLES?

To date, Irish EPR schemes have strongly supported recycling but provided only very limited support<sup>79</sup> to prevention or preparation for reuse activities. As a result, recycling (through subsidies) has become more viable than prevention or preparation for reuse, going against the waste hierarchy<sup>80</sup>.

**POLICY RECOMMENDATION #3.21:** Require all EPR schemes **to focus to a much greater extent on prevention and preparation for reuse**, through financial supports as well as effective eco-modulation fee structures and other supports, in line with the waste hierarchy.

QUESTION F. PRIMARY FOCUS IS ON INTRODUCING THE NEW EPR SCHEMES AS OUTLINED IN THE SUP DIRECTIVE BUT ARE THERE OTHER WASTE STREAMS THAT WOULD FIT WITH THE EPR MODEL?

**POLICY RECOMMENDATION #3.22:** Review opportunities to introduce EPR schemes for mattresses, furniture, paint and textiles (amongst other areas), but with a strong focus on prioritising and financially contributing to existing and prevention and preparation for reuse activity.

**POLICY RECOMMENDATION #5.2:** Introduce a **mandatory EPR scheme** in Ireland within a specified timeframe (e.g. 2 years) to support and grow mattress recycling. This would be supported by increased efforts to recover mattresses through *Recovery Parks* (Section 3.5.2) in partnership with social enterprise (see Section 3.4.1.b) and a ban on mattresses going to landfill.

QUESTION G. IS THERE A ROLE FOR VOLUNTARY AGREEMENTS WITH INDUSTRY?

<sup>79</sup> REPAK’s “prevent and save” scheme; WEEE Ireland’s support to EPA research

<sup>80</sup> See also Section 4.0 on WEEE preparation for reuse

Many retailers are already providing mattress take back services, but these are not capturing enough of the mattresses arising (see above) and **do not all collect fees that adequately cover the cost of recycling**. It is not therefore clear how a voluntary scheme could improve on this system.

**QUESTION H. WHAT MECHANISMS WILL BRING THE ENTIRE SUPPLY CHAIN AND WASTE MANAGEMENT SYSTEMS TOGETHER TO SHARE SOLUTIONS?**

See Chapter 7.0 response on measures to Support Eco-design and Eco-labelling

Setting a fixed timeframe for introduction of an EPR scheme for mattresses would give time for interested parties (e.g. EPA mattress WG stakeholders) to engage and involve retailers and/or manufacturers in the development of a scheme and for the Government to prepare the necessary legislation. It may also provide an opportunity to test a voluntary type scheme, so that retailers and/or manufacturers can better prepare for the mandatory scheme. Finally, signalling an intent to support local mattress recycling will also drive further research into and development of local reuse or recycling outlets for recovered materials.

**QUESTION I. LOOKING AT THE EXAMPLE OF WEEE, RETAILERS NOW PLAY AN INCREASED ROLE IN COLLECTION, IS THIS APPROACH SUITABLE FOR OTHER POTENTIAL EPR WASTE? IF SO, WHAT AREAS?**

To date, Irish EPR schemes have strongly supported recycling but provided only very limited support<sup>81</sup> to prevention or preparation for reuse activities. As a result, recycling (through subsidies) has become more viable than prevention or preparation for reuse, going against the waste hierarchy<sup>82</sup>.

## 17.0 WASTE DATA FLOWS

### 17.7 CONSULTATION QUESTIONS – WASTE DATA

**QUESTION B. WHAT RESOURCES ARE NEEDED TO VALIDATE THIS DATA MORE QUICKLY AND WHAT ARE THE BARRIERS?**

**POLICY RECOMMENDATION #6.3:** Ensure any additional data reporting requirements are accompanied by support to prevention or preparation for reuse operators to provide this information (see also Section 3.2.2).

**QUESTION F. WHAT CHANGES NEED TO BE PUT IN PLACE TO FACILITATE BETTER REPORTING?**

**POLICY RECOMMENDATION #3.10:** Improve data collection on food waste prevention in Ireland to enable tracking and measuring against a target.

**QUESTION G. WHAT USES CAN BE MADE OF HAVING MORE DETAILED, ACCURATE, TIMELY DATA?**

Tracking and measuring against targets - as proposed here for reuse (Section 3.2.1), food waste prevention (Section 3.3) and preparation for reuse (Section 4.1).

<sup>81</sup> REPAK's "prevent and save" scheme; WEEE Ireland's support to EPA research

<sup>82</sup> See also Section 4.0 on WEEE preparation for reuse

## 18.0 RESEARCH AND INNOVATION

### 18.6 CONSULTATION QUESTIONS — RESEARCH AND INNOVATION

QUESTION A. WHAT ARE THE RESEARCH AREAS YOU WOULD CONSIDER TO BE IMPORTANT IN DEVELOPING A CIRCULAR ECONOMY?

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QUESTION B. WHAT NEW RESEARCH PROGRAMMES/INITIATIVES DO YOU THINK COULD BE PUT IN PLACE?

**POLICY RECOMMENDATION #3.57:** Expand the Green Enterprise programme in both its funding and scope to drive higher in hierarchy activity, to help overcome the challenges Ireland is facing in developing a more circular economy.

QUESTION C. WHAT DO YOU SEE AS THE MAIN BARRIERS/ENABLERS TO FOSTERING A POSITIVE RESEARCH CULTURE AROUND THE CIRCULAR ECONOMY?

While excellent research is being conducted through EPA research programmes, there is often a lack of connectivity between the outcome of research and how we inform policy and practice.

**POLICY RECOMMENDATION #3.58:** Provide a clear and common pathway for disseminating research findings and using them to **inform policy and practice**.

QUESTION D. DO YOU THINK RESEARCH ON WASTE, RESOURCE EFFICIENCY AND THE CIRCULAR ECONOMY COULD BE BETTER PUBLICISED AND MORE READILY ACCESSIBLE? How?

**POLICY RECOMMENDATION #3.59:** Support the development of a gateway platform to help **coordinate work carried out in this** field and better enable Irish researchers to compete for funding.

## 20.0 GREEN PUBLIC PROCUREMENT

### 20.7 CONSULTATION QUESTIONS — GREEN PUBLIC PROCUREMENT

QUESTION A. WHAT ARE THE BARRIERS TO PUBLIC AUTHORITIES USING GPP?

Price criterion are still driving many procurement decisions and there are very few examples of public procurement supporting prevention or preparation for reuse activities.

See also **Section 3.4.1.a:** Build awareness and support and disseminate best practice which identifies the following barriers and recommendations:

- There are many **NEGATIVE PERCEPTIONS** about the opportunity for reuse (either in purchasing or handling unwanted items)

**POLICY RECOMMENDATION #3.14:** Continue to identify and share **good practice examples** to demonstrate the opportunities for prevention and preparation for reuse in procurement and support the **roll out of ReMark** (see Section 3.6.1.a).

- **The small scale of the reuse sector currently is a barrier for procurement projects.**

**POLICY RECOMMENDATION #3.15:** Encourage public bodies (and businesses) to divide procurement projects into smaller lots to facilitate the small scale of social enterprises and others in the prevention and preparation for reuse sector.

- **Storage is an important perceived barrier**
- **Disincentivise replacement**

**POLICY RECOMMENDATION #3.16:** Take measures to avoid public spending of end of year budget surplus on replacement furniture to justify annual budget levels.

**QUESTION B. HOW CAN BUSINESS SUPPORT MORE WIDESPREAD USE OF GPP?**

Continue to identify and share good practice examples per Recommendation 3.14 above.

**QUESTION C. WHAT % TARGET SHOULD APPLY TO THE USE OF GPP IN IRELAND?**

**POLICY RECOMMENDATION #3.13:** Public procurement should, at minimum, align with **national prevention or preparation for reuse targets**. It should also be necessary for public bodies to **incorporate reuse policies** into asset management and procurement.

**QUESTION D. HAVE YOU ANY OTHER COMMENTS OR SUGGESTIONS ON HOW YOU WOULD LIKE TO SEE IRELAND TRANSITION TO A MORE RESOURCE EFFICIENT AND CIRCULAR ECONOMY BY IMPROVING OUR GREEN PUBLIC PROCUREMENT PRACTICES?**

**POLICY RECOMMENDATION #3.12:** Disseminate regular feedback on the **implementation of green and social criteria** considered in line with this Circular (e.g. via a league table) to demonstrate progress and hold public sector bodies to account.

**POLICY RECOMMENDATION #3.17:** Encourage Local Authorities to prioritise social mattress recyclers by **splitting Civic Amenity Site management contracts into lots** or facilitating smaller contracts for specific streams like mattresses and/or by specifying that successful awardees of larger tenders provide social gain through subcontracts.

**POLICY RECOMMENDATION #3.18:** Enabling tenants to **spend vouchers in second hand stores** would give them greater leverage in the voucher value while also supporting the local economy and environmental objectives.

**21.0 HOUSEHOLD BULKY WASTE**

**21.7 CONSULTATION QUESTIONS – HOUSEHOLD BULKY WASTE**

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QUESTION A. WHAT SUPPORTS DO CONSUMERS REQUIRE TO PREVENT BULKY WASTE?

See Chapter 7.0 responses above on Eco-design and Eco-labelling, Financial Measures , measures for investing in infrastructure that will grow the sector, measures to close the loop - providing access to materials, measures to ensure we are preparing for Circular Economy jobs and skills, measures providing for a joined up circular and social approach through enhanced cooperation between Departments

For measures to support citizen's engagement (see Chapter 8.0 responses)