



Green Foundation Ireland

25 Portobello Road, Dublin 8, Ireland

Email: info@greenfoundationireland.ie

Web: www.greenfoundationireland.ie

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SUBMISSION

from:

Green Foundation Ireland

to:

The Department of Communications, Climate Action and Environment

Public Consultation on:

Waste Action Plan for a Circular Economy

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Directors: Donna Mullen (Chair); Brendan Hanifin (Company Secretary); John Barry; Joan Campbell;
Claire Downey; Sandy Dunlop; Eileen McDermott; Martin Nolan; Duncan Stewart.

Management Team: Nuala Ahern (Publications Editor); Ciaran Monahan (Researcher); Stiofán Nutty (Director of Education);
Ann O'Conarain (Administrator); Tommy Simpson (Projects Co-Ordinator).

RESPONSE TO WASTE ACTION PLAN FOR A CIRCULAR ECONOMY

INTRODUCTION

Green Foundation Ireland ("GFI") welcomes this important consultation and the opportunity to contribute to Ireland's transition to a more Circular Economy.

Circular Economy is described in the consultation paper as an economy where resources are kept in use for as long as possible, extracting maximum value from them while in use then recovering and regenerating products and materials at the end of each service life.

This will require new approaches to every stage of a product's life cycle and beyond – from prevention including avoidance, better product design, leasing, 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 Department has also expressed ambition 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"*. This is very welcome and we look forward to seeing this ambition realised through a new policy.

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

Greater co-ordination of the various stakeholders within the sector would help leverage limited resources to communicate, engage and carry out research for a more Circular Economy.

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?

Support and incentivise prevention / reuse and make reuse more accessible as explained in Section 7.0.

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

As outlined in Section 7.0, a centrally coordinated, multi-annual cross-sectoral communications programme is needed, 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.

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

Investment in and support for 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 is necessary and will yield the greatest long term sustainable transformation to a Circular Economy as set out in Section 7.0.

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.

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. This will involve a 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.

Specifically, this will include measures that:

- Support 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, through engaging the design and manufacturing community and supporting consumer labelling that clearly shows the durability and repairability of products at the point of purchase.
- The introduction of binding and quantitative reuse (kg/inhabitant - level to be determined following further research), food waste prevention (50% reduction) and preparation for reuse of WEEE (% prepared for reuse) targets in advance of the revised WFD timeframe. In the absence of any targets these activities will remain low priority.
- Introduce financial instruments to support these targets including:
 - driving reuse and preparation for reuse through greener public procurement (reflecting national targets) - see also Section 20.0
 - applying 0% VAT on repair, sale of second hand goods, collection for reuse and reduced VAT on recycling
 - Requiring EPR schemes to support financially and otherwise prevention and preparation for reuse. To date Irish EPR schemes have strongly supported recycling but provided only very limited support to reuse activities. As a result, recycling has become more viable than prevention or reuse, going against the waste hierarchy. To monitor and drive progress in this area, there should be a greater role for reuse and preparation for reuse operators in informing how producer responsibility schemes support (finance) and prioritise reuse and preparation for reuse.
 - Introduce tax rebates on donated goods ("gift aid") encouraging businesses to donate surplus goods or food, to divert unwanted materials from disposal towards reuse.
 - Reduce or limit commercial rates for second hand retailers or other repair / reuse activities to a maximum of 50% and minimum of 0% rates.

- Introduce levies per GFI's recommendations to the environmental levies consultation.
- Support investment first and foremost in infrastructure that will drive reuse and repair – whether it be through low interest loans, grants, or other mechanisms.
- Providing better access to materials by improving services offered at Civic Amenity Sites including appropriate reception facilities for all types of reusable goods (including WEEE, paint, mattresses) that preserves their reuse potential.
- Supporting the transition to a more Circular Economy by encouraging the education sector to integrate circular economy into courses and training opportunities. Third level institutes should be encouraged to appraise their courses for opportunities to provide training in and education about circular economy.
- Overcome liability barriers to reuse through providing better guidance and enhance cross Departmental efforts to address insurance costs.

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

Communicating the Circular Economy will require a significant shift in both focus and language to better align with the waste hierarchy. This would be better delivered through a Circular Economy Action Plan, rather than a Waste Action Plan.

It also requires a more co-ordinated, multi-annual cross-sectoral communications programme about the Circular Economy 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.

GFI agrees with VOICE Ireland in that face to face engagement (through workshops, etc.) is a highly effective method of citizens and community engagement.

8.7 CONSULTATION QUESTIONS – CITIZEN ENGAGEMENT

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

As outlined above, supporting consumer labelling would clearly show the durability and repairability of products at the point of purchase and empower householders to better prevent waste. Making reuse opportunities more accessible, as outlined in Section 7.0, will also contribute to this.

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

As noted in the consultation, significant volumes of textiles are poorly segregated or downcycled leading to loss of value for reuse and upcycling. The negative impact on reuse in Ireland of exporting quality textiles is also highlighted.

Local second hand clothing retailers (like charity shops) must be central to any future separate collection scheme to ensure maximum local reuse. This could be achieved by requiring waste collectors to provide for the separate collection of textiles in partnership with local second hand retailers or an increase in textile banks that are connected with local charities.

However due to the lack of transparency about the operation and beneficiaries of textile banks, greater controls are needed including regulations requiring clear information to be provided on each collection bank about the beneficiary of the textile donations and contact details of the textile bank operators.

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

The 'fast fashion' phenomenon shapes the way we consume clothes and has soared per capita sales. Overconsumption and insufficient regulation on circularity has led to increased volumes of low quality textiles, unfit for re-use let alone recycling.

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.
- 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.
- Thirdly, as noted above, poor quality textiles are in many cases unsuitable for reuse. We need to encourage better design 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, education will be required on the importance of sending textiles for reuse (and how) over placing them in the residual waste bin.

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?

Opportunities to introduce EPR schemes for furniture, paint and textiles (amongst other areas) should be reviewed, but with a strong focus on prioritising and financially contributing to existing and prevention and preparation for reuse activity.

A mandatory EPR scheme for mattress recycling should be introduced to address this particularly problematic waste stream.

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

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).

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

The current EPA research programmes are excellent, supporting practical pilots and development work as well as high level research. These programmes are essential to informing decision making about our transition to a sustainable and low-carbon society and economy.

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

The small scale of the sector is a significant barrier for GPP. Public bodies must be encouraged 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. This would enable them to demonstrate progress in line with *Circular 20/2019: Promoting the use of Environmental and Social Considerations in Public Procurement*, and reduce logistical challenges associated with co-ordinating multiple suppliers of reused goods, etc.

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