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To: wastecomments
Subject: ERP Ireland - Submission to the Public Consultation Waste Action Plan for a Circular Economy

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Introduction

ERP has been operating very successfully since 2005 and have enabled Ireland to reach our domestic and EU recycling targets. ERP have also contributed significantly to the achievement of Irelands environmental goals and have diverted substantial amounts of waste from landfill. We had also played a pivotal role educating and inspiring Citizens to recycle . EPR schemes such as ERP form an essential part of a circular economy and of efficient waste management and we welcome the opportunity to contribute to the public consultation process.

Advisory Group - ERP Ireland are represented on the advisory group established by Minister by Martin Tobin, CEO ERP Ireland, to assist in the drafting of the new waste action plan for a Circular Economy. Our experience as PRI operating on Ireland and across Europe since 2005 will enable us to contribute significantly to the decision-making in the preparation of a Waste Action Plan for a Circular Economy. We are also ready to be a part of the implementation body that shall provide a governance framework for the realisation of the objectives set out in the Waste Action Plan.

Role of Regulatory Bodies - Since 2005, ERP has worked closely with the Regulatory Bodies operating in the Waste Electrical and Electronic Equipment and Waste Batteries and Accumulators sector, namely the Department of Communications, Climate Action & Environment and the Environmental Protection Agency. As we move forward, we believe the National Waste Collection Permit Office (NWCPO) and the National Trans-Frontier Shipment Office will have significant roles to play to ensure the movement of waste by operators outside of the EPR's adhere to the appropriate standards.

Extended Producer Responsibility (EPR) Compliance Schemes - As an EPR for Waste Electrical and Electronic Equipment and Waste Batteries we assume responsibility for our producer Members as outlined in the directives. We also finance awareness campaigns to encourage and inspire consumers to recycle responsibly. As we move towards a Circular Economy, we need to examine the B2B model in Ireland and ensure B2B producers are contributing to the collection rates, are operating to the appropriate recycling standards and are contributing to awareness raising.

Circular Economy – It aims to reduce waste at all stages of the economic cycle and ensure materials are used as efficiently as possible. The EPR's for WEEE are uniquely positioned to support this concept and support and drive the forecasts of the European Commission for resource efficiency and job creation. Practical Actions for businesses are required as only 9% of the resources used globally are re-used, re-manufactured or recycled; The rest is typically landfilled or incinerated – We need to ask ourselves;

- How can the secondary markets for electronics can be improved?
- How can we improve our recycling standards to improve the quality of end products?
- How can sustainable options create jobs?

Innovation - We also need to take an active role in supporting innovative circular economy solutions and start-ups. One example of such programme ERP has supported is the Green Alley Awards which is aimed at all start-ups and

entrepreneurs who have developed a business model in the areas of a digital circular economy, recycling, and waste prevention. The business idea must help reduce waste or turn waste into resources. The winner of the Green Alley Award receives a cash prize of €25,000. 12 Irish eco-start-ups entered.

Roles and responsibilities - The transition towards a circular economy requires all actors to fully understand their specific roles and responsibilities. This holds for producers, PRIs, waste collectors and recyclers, but also for consumers, the civil society, and, local authorities, enforcement bodies and regulatory authorities. All these actors need to understand how their individual actions and messages fit into the overall picture and our successful transition towards a circular economy.

Citizen Engagement, Awareness & Education - Climate change, environmental pollution and resource scarcity are just a few of the many reasons why our society needs to transition towards a circular economy. WEEE is the fastest growing waste stream in the developed world. There are more electronic devices connected to the internet than there are humans on earth. ERP are a part of the Landbell Group which operate 35 Pros' for waste electrical and electronic equipment, batteries and packaging in 15 countries. We have contributed to the circular economy for over 20 years and are committed to maintain this role for the journey ahead. Based on this long-time experience, ERP has worked with policy makers across Europe to build a framework which paves the way towards an innovative and sustainable circular economy in the EU. ERP is well-positioned in engaging and educating citizens about the importance of WEEE and battery recycling. Our strategic approach for all communications campaigns is to ensure they are integrated, innovative and support our core objectives. ERP's communication programmes are created to drive behavioural change. One award winning campaign we launch is Batteries for Barretstown which has had a massive positive effect on community from many perspectives. Citizenship is defined by key attributes: Environmentally responsible; Positive influence on society and Promoting good causes. Environmentally responsible – Batteries for Barretstown is driving battery recycling across Ireland, and recovering battery minerals, and delivered a 45% increase in collections since its launch in 2017. In 2018 ERP surpassed its EU waste battery recycling target of recycling 45% of all batteries placed on the market with a collection rate of 68%. Positive influence on society – educating consumers on the importance of battery recycling with a view to changing behaviour. The education initiative generated sustained media coverage across national, regional and online media. To date, the campaign has reached over 2.8 million people through social media, our partnerships, Bloom, and through print and radio interviews. Promotes good causes – Batteries for Barretstown is Powering Positivity at Barretstown, educating and encouraging public to recycle to support Barretstown and 'Power Positivity'. The 'Batteries for Barretstown' partnership are helping to Power Positivity by funding the charity's energy costs. Consumers play an important role in the transition towards a circular economy. Their consumption behaviour has a huge impact on the amount of resources used. The way they dispose of their waste products and packaging heavily influences both quantity and quality of recycling.

Empowerment - Consumers are able to actively contribute to the circular economy only if they are fully aware of their actions' consequences. We must empower consumers to correctly dispose of their waste products and packaging and explain how each individual can make a difference. We must provide transparent and verified information on the recyclability and reusability of products and packaging, in order to increase consumers' trust and allow them to make informed consumption choices. We must look at new ways of consumption which are based on the principle of sharing rather than on the principle of ownership.

Extended Producer Responsibility- EPR has been operating very successfully in Ireland and across Europe since 2005 and have enabled Ireland to reach our domestic and EU recycling targets. ERP have also contributed to Ireland meeting our overall environmental goals and have diverted substantial amounts of waste from landfill. EPR schemes form an essential part of a circular economy and of efficient waste management. We can and should work with our Producer members to provide an incentive to design products that contribute to waste prevention and facilitate recycling by considering their durability, reparability, re-usability, recyclability and the presence of hazardous substances. In relation to WEEE we must acknowledge that it is the fastest growing waste stream globally, and we are now faced with ambitious WEEE collection targets of 65% since 2019. Access to and management of all WEEE and Waste Battery flows must be re-examined as these streams must be managed in strict accordance with the regulations and must contribute to the national targets. Going forward, EPR schemes need to modulate where possible, the financial contributions paid by producers by 2023 and ERP will fully support this process.

WEEE Funding and the PRI Review - The implementation of the Waste Electrical and Electronic Equipment (WEEE) Directive in Ireland in August 2005 facilitated formal funding system for the environmentally sound management of WEEE. Visible environmental management costs (vEMCs) were introduced to cover the cost of "historic WEEE", that is, all electrical and electronic equipment (EEE) that was placed on the Irish market before 15 August 2005. When vEMCs were introduced there was limited information available about the levels of historic WEEE that would arise in the future. This created uncertainty as to how much would be required to fund the environmentally sound management of WEEE. The review of the Producer Responsibility Initiative examined this and concluded that the fund generated by the vEMCs were wholly insufficient to provide for the environmentally sound management of pre 2005 WEEE.

Future levels of WEEE - A report was prepared by the Department of Electronic and Computer Engineering at University of Limerick for the Environmental Protection Agency and research was carried out to address this problem by employing modelling techniques to determine WEEE levels and the percentages of historic WEEE in Ireland over the period from 2000 to 2020, inclusive.

The research focused on the three categories of EEE that contribute the largest amounts of WEEE each year by weight (fridges and freezers ("cold" WEEE), large household appliances and televisions) and were the main categories under discussion with regard to the continued use of vEMCs. This model was developed by the United Nations University and has been employed in other European countries to calculate total WEEE levels arising. It was tailored to calculate Irish historic WEEE levels using data gathered from a number of disparate sources, including trade statistics, Department of Environment,

According to the model predictions for 2020, these figures will only reduce to 45% historic WEEE for the cold category, 38% historic WEEE for large household appliances and 54% historic WEEE for televisions.

In summary, The UL and EPA report The Development of a Model to Ascertain Future Levels of Historic WEEE Arising EPA Research Report 2016 reaffirmed the PRI report findings that the levels of historical WEEE are far greater than ever anticipated and will continue beyond 2020. This issue must be addressed by the WEEE PRO's.

ERP's extensive experience as a PRI operating on Ireland and across Europe since 2005 will enable us to contribute significantly to the decision-making in the preparation of a Waste Action Plan for a Circular Economy. We are also ready to be a part of the implementation body that shall provide a governance framework for the realisation of the objectives set out in the Waste Action Plan.

Kind regards

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