

Submission from Community Resources Network Ireland (CRNI) To the Department of Climate, Energy and the Environment (DCEE) Consultation on the Whole of Government Circular Economy Strategy 2026-2028: Accelerating Action

The Community Resources Network Ireland (CRNI) is the nation's only community-based reuse, repair, and recycling network. We represent social enterprises that actively contribute to circularity targets while simultaneously creating employment and training opportunities, particularly for those traditionally distanced from the job market.

Our mission is to promote community-based, sustainable management of reusable resources to address Ireland's waste challenges.

The CRNI warmly welcomes the publication of the Whole of Government Circular Economy Strategy 2026-2028 and sees its great potential to advance Ireland's circular economy. We strongly support the whole of government approach, which recognises the circular economy as a core enabler of climate action, job creation, equality, and community development.

CRNI occupies a unique and strategically useful position in Ireland's Circular Economy and is uniquely positioned to help advance the just transition. We are satisfied that this strategy recognises that the CRNI, along with its members, has "the potential to play a unique and valuable role in the development of resource efficiency and circular economy initiatives at both local and national levels". We are determined to play our role in ensuring the mainstreaming of the circular economy and to be an effective representative body for our members' interests.

The CRNI has drawn on a significant collection of member feedback, research findings and practitioner insights to support its answers to the questions posed in this consultative process:

1. Do you agree with the draft Strategy's proposed key objectives? In your view, are there further or alternative objectives that should be included?

CRNI agrees with the core objectives of the draft Strategy, particularly the aims to increase material circularity, decouple economic growth from resource use, drive innovation and job creation, and empower citizens.

Our members operate as social enterprises and deliver on this triple bottom line of social, environmental, and economic impact. We propose reinforcing the objective concerning social equity to ensure the strategy fully embraces the potential for social inclusion through supporting inclusive employment schemes and providing training opportunities for individuals traditionally distanced from the labour market. Between 2020 and 2023, CRNI's members offered on-the-job training to over 2,800 individuals.

2. The draft Strategy aims to raise Ireland's circular material use rate (CMUR) by at least 2 percentage points every year with an aim of reaching the EU average of 11.8% by 2030. Do you agree with this level of ambition? If not, is further ambition needed or is the draft Strategy overly ambitious?

CRNI supports the ambitious targets set out in the Strategy. The community-based repair, reuse, and recycling sector is essential to achieving these goals. We highlight that the current CMUR metric may appear lower as it often does not account for informal reuse activities or those not captured by official statistics. Data gathered by CRNI's annual member survey can play a vital role in tracking circular bio-based material flows and evaluating environmental, social, and economic impacts, complementing official monitoring systems.

3. The draft Strategy includes 71 proposed actions across key sectors as well as cross-cutting actions required to accelerate the transition to a more circular economy. Are there further actions that should be considered for inclusion? If so, please specify.

CRNI positively notes and supports numerous proposed actions, while offering suggestions to ensure effective implementation and the robust inclusion of the community resource sector. Our main observations are as follows:

Action Number	CRNI Position
A19	70% of CRNI members are Work Integrated Social Enterprises. Supporting social enterprises with financial assistance is essential for sector growth and resilience.
A20	As the representative body for the community-based repair/reuse sector, CRNI warmly welcomes this proposal and through its membership base we will facilitate the development of community-based reuse, repair, and refurbishment initiatives.
A36	CRNI facilitates collaboration to enable social enterprises to access green and social procurement opportunities. We believe additional support is necessary to assist in enhancing GPP knowledge and market condition insight for social enterprises as well as providing practical support to small operators in responding to Tender requests,
A47	It is important to recognise and practically support crucial role of social enterprise in ensuring the growth of repair cafes and second-hand markets. This support should include the development of sectoral skills and knowledge through workshops, training, and peer-learning events enabling CRNI member who operate repair cafes and libraries of things to share their knowledge, grow and expand.
A52	This research is vital as high operating costs and labour costs are major barriers to reuse and repair enterprises, but it should also recognise that many social enterprises are not required to register for VAT and will require alternative support measures.

A53	Increasing the CEIGS is very welcome. Additional support to aid capacity building (such as training and application support) is necessary for smaller social enterprises to successfully access and utilise these opportunities.
A55	Repair voucher schemes should be designed carefully, mindful that micro-enterprises can find reporting requirements burdensome and that participation of social enterprises in repair activities must be facilitated if there is to be broad uptake of repair schemes nationally.
A58	CRNI is already developing Regional Hubs across waste regions to connect members, share experiences, and build stronger relationships. It is vital that community-based practitioners have a pathway to be involved in the planning and development of such hubs
A 61 & A62	CRNI is dedicated to mainstreaming the Community Resource Sector. Leveraging CRNI's existing network of 50+ community-focused social enterprises provides a foundation for the CEDOH rollout and can help ensure an effective bottom-up approach involving established local stakeholders which will enhance success.

4. Are the associated 38 proposed targets sufficient to realise the objectives of the Strategy or are further targets required? If so, please specify.

The targets set for reuse and repair are encouraging. To ensure the social dimension of circularity is tracked, we suggest a complementary target focused on Social Impact Metrics including measuring the amount people distant from the labour market who are supported in their journey towards employment.

5. Are you satisfied that the Governance structures proposed in the draft Strategy are sufficient to address the complex challenge of developing the circular economy across government?

CRNI welcomes the proposed establishment of a Circular Economy Advisory Group (CEAG) (A70) and a High-Level Oversight Group (A71). As the national representative body for community-based repair, reuse, and recycling, CRNI seeks active representation on the CEAG to ensure that policies reflect Social Enterprise interests and the crucial role of our members in achieving circularity.

6. Are the actions proposed in the draft Strategy sufficient to address the issues cited such as barriers to reuse and repair in Ireland? Are there further measures that could be considered to realise the potential of this sector?

The actions addressing financial and administrative barriers (A51-A57) are highly necessary as the low cost of new goods and high labour costs are major barriers inhibiting reuse and repair.

Further measures to fully realise the sector's potential include addressing key structural issues identified by our members:

- Addressing Insurance Barriers (A56): The cost of product liability insurance remains a significant challenge, especially for repair enterprises and repair cafés. While A56 proposes working with insurance bodies, explicit support for creating group insurance schemes or professionalising repair organisations (through standards and policies) should be prioritised to mitigate this problem and achieve economies of scale.
- Addressing Premises and Space: The CRNIs' *Future Loop* annual conference identified the need for secure long-term structural supports such as premises for community-based reuse and repair activities, and making these as easily accessible to the public as traditional retail zones. This physical infrastructure is vital for scaling activities.
- VAT Support for Social Enterprises (A52): The commitment to research taxes and subsidies is critical. It is imperative that this research recognises that many social enterprises may not be required to register for VAT and need alternative support measures to fully benefit from fiscal incentives designed to promote repair and reuse.
- Professionalising repair organisations, potentially via supporting quality standards such as the ReMark Quality Mark piloted by CRNI and the successful timely transposition of the Right to Repair Directive will also help realise the sectors potential, strengthen the market, and make repair services more attractive.

8. Are there other existing hubs and networks that could be utilised to deliver transformative solutions for increased circularity?

Yes. CRNI itself is an indispensable national network and platform that can be leveraged to deliver solutions.

- CRNI Regional Hubs: CRNI is launching a new phase of activity through the establishment of Regional Hubs. These hubs are designed to strengthen collaboration, grow impact, and build stronger relationships with local authorities and regional waste offices within their waste regions.

They form the foundation of wider capacity-building programs, including Communities of Practice (CoPs) and Members Teaching Members (MTM)

- **International Network Utilisation:** CRNI is a board member of RREUSE (Reuse and Recycling European Union Social Enterprises) and leverages this network to learn from and share best practices nationally and internationally. Effective sharing and adaptation of best practices benefits CRNI members and initiatives.
- **All-Island Collaboration:** CRNI works closely with its sister organisation, the Northern Ireland Resources Network (NIRN), promoting increased awareness and growth of reuse/repair activities across the shared island. Utilising Shared Island Funds to develop All Island circular economy opportunities (A65) should explicitly leverage the CRNI/NIRN collaboration framework.

9. What clusters and networks do you think will be needed in the future to maximise resource use?

As outlined in the above question 8. Networks focused on specific material streams are crucial for sharing specialised knowledge and tackling challenges specific to those materials. CRNI currently coordinates CoPs for textiles, furniture, and bike sectors, and has piloted new groups for sharing activities and prevention/education/storytelling activities.

10. What role can sectoral compacts or voluntary agreements play in enhancing circularity across the key sectors- which should be prioritised and what are the optimum structures, supports and obligations that should be features of such compacts.

N/A

11. What do you see as the major regulatory or non- regulatory barriers inhibiting the use of secondary or recycled materials and how should these be addressed?

From the perspective of CRNI and our members, the major barriers inhibiting the growth and use of secondary materials are primarily financial and market-driven, fundamentally rooted in the distortion caused by the low cost of new goods when contrasted with the high labour costs associated with handling, reusing, and repairing items. This imbalance means repair enterprises often struggle to break even. This financial burden is exacerbated by regulatory misalignment, specifically in taxation. Beyond fiscal policy, critical non-regulatory barriers relate to liability and infrastructure, which pose significant risks to our members. The cost of liability insurance remains a serious challenge for repair enterprises, negatively impacting community-led initiatives such as repair cafés or libraries of things. To overcome these barriers strongly advocate for collaboration with social enterprises to ensure local practitioners have a

pathway to be involved in the planning and development of Circular Economy Hubs ensuring a bottom-up approach to vital infrastructure expansion.

12. Is the proposed monitoring framework sufficiently robust to track progress on our circular economy goals, to ensure accountability, and to guide policy?

N/a

13. How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?

Green Public Procurement (GPP) is highly important. It is crucial that the implementation of the Green Public Procurement Strategy and Action Plan (A36) continues to recognise the importance of social impact. We emphasise the need for enabling supports to allow social enterprises to access these procurement opportunities.

14. What would be the most effective action Government could take to incentivise further investment in the circular economy?

Ensuring sustained multi-annual core funding is vital. Long-term stability allows organisations like CRNI to bolster current successes, achieve strategic growth, and increase impact.

In addition, two other actions are crucial:

- Accessible CEIGS Funding: While increasing the CEIGS allocation (A53) is positive, supporting social enterprises to gain the necessary professional and practical support required to access such funding is equally vital.
- Tax Alignment (A51/A52): Establishing a Cross Departmental Working Group (A51) and undertaking research into VAT and complementary tax measures (A52) are essential to fully align the taxation system with the circular economy.

15. Are there any further significant areas within the circular economy that require research?

(Help needed here)

16. Numerous business startups are developing solutions that promote recycling, reuse, and sustainable practices across various industries. How do we encourage the continued development of innovative startups?

Many of the most impactful circular practices are already being implemented by community-based social enterprises at a local level. Community-based enterprises often evolve organically to meet local needs and may lack a formal business case or growth plan. Providing tailored supports to help these organisations develop clear business models, articulate impact, and identify pathways to scale is a vital first step. Innovation thrives in collaboration. Startups and social enterprises working in complementary areas (e.g., textiles, electronics repair, furniture reuse) should be encouraged to specialise based on their strengths while forming partnerships that enable shared learning, pooled resources, and mutually reinforcing impact. The CRNI's COP model aims to facilitate this collaboration and should be further developed. CRNI can act as an advocate for scaling and challenge the perception that Social Enterprises must remain small. By highlighting success stories and offering mentoring from larger or more established social enterprises, we can build confidence and ambition across the network. Institutional obstacles, such as restrictive displacement clauses or funding conditions that favour pilot projects over evolution must be addressed. A coordinated framework is needed for Social Enterprises to provide access to capital, including philanthropic funding, social finance, and EU-level programmes that mirror the accelerator, and investment supports available to private enterprises. We believe there is potential to develop an EU-wide social enterprise scaling pathway, recognising proven local solutions that could be replicated internationally.

17. Have you any other comments or feedback on the content of the draft Strategy?

CRNI commends the DCEE for this comprehensive strategy. We affirm that the community-based repair, reuse, and recycling sector is essential to ensuring a successful and socially just transition to a circular economy.

We urge the Government to ensure that the Strategy provides adequate provision and support, enabling CRNI to continue and increase its reach, delivering circularity across Ireland. We look forward to continuing our collaboration to support the implementation of the objectives outlined in this Strategy.

Thank you.

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