



SUBMISSION ON REVIEW OF THE ENVIRONMENT FUND

The Community Resources Network Ireland (CRNI) welcomes the opportunity to make a submission on the DCCAIE consultation paper *Review of the Environment Fund: Public Consultation on the Proposed Introduction of New Environmental Levies*.

CRNI is the all-Island representative body for community-based reuse, repair, recycling and waste prevention organisations. CRNI members are market leaders in reuse, repair and specialist recycling activities in Ireland, which puts CRNI in an excellent position to offer policy input on behalf of the sector.

Our vision is for an Ireland where the word 'waste' doesn't exist and where our entire community benefits from the social, environmental and economic value of all reusable resources. The network objectives are to:

1. Support our membership base
2. Mainstream Community Resources
3. Develop the network's capacity

CONTEXT - CURRENT LEVEL OF REUSE, REPAIR AND RECYCLING

Our current consumption model means our greenhouse gas emissions are strongly coupled with economic growth; Ireland's material consumption is well above the EU average and continues to rise as the economy grows.

Prevention, reuse and recycling all contribute to offsetting consumption and are at the heart of the Circular Economy. Reducing consumption mitigates the greenhouse gas impacts of natural resource extraction, manufacturing and distribution of products, as well as the downstream impacts of waste management.

CRNI members are responsible for reusing over 23,200 tonnes of products and recycling over 6,000 tonnes of materials, supporting more than 690 jobs, 1,600 training and work experience opportunities and 5,800 volunteer positions. However, the reuse figure given above accounts for only 1 - 5%¹ of all goods discarded², showing both the considerable challenge and jobs potential involved in reaching a more circular economy. CRNI members also dismantle for recycling difficult items like mattresses and WEEE, recovering high value materials and providing opportunities for the establishment of local reuse and recycling in the future.

While public awareness is high regarding the need for urgent climate action and to reduce single use plastics, there remain considerable barriers facing the reuse and preparation for reuse sectors. These include:

¹ Our membership base is broadly representative of the reuse sector in Ireland, including over 450 retail outlets under the umbrella of the Irish Charity Shop Association. Based on a conservative estimate of non-member reuse including second hand retail and online exchanges we do not estimate this figure to be greater than 3 - 5%.

² It is noted that an EPA funded research project Q2Reuse will clarify the scope and scale of reuse activities.

- competition with cheap new products whose cost does not reflect environmental or social externalities,
- a lack of investment or financial measures to support reuse or preparation for reuse activities ,
- the high cost of meeting preparation for reuse standards and insurance costs,
- sometimes negative public perception of second hand goods, and
- a lack of targets for reuse or preparation for reuse, amongst other things.

In order to become a truly Circular Economy, and realise important greenhouse gas emissions savings, **CONSIDERABLE EFFORT AND INVESTMENT** is needed to enable and grow the reuse and preparation for reuse sectors.

POLICY RESPONSE

Overall CRNI broadly supports the proposed policy measures, which will contribute to supporting reuse and recycling through directly incentivising reusable cups, bags and containers, and also providing a disincentive to recovery and disposal. In this submission we also propose that measures are required to properly enforce the existing landfill levy in order to promote recycling.

The introduction or use of environmental levies aligns with the revised Waste Framework Directive Article 4.3 requirement for Member States to “make use of economic instruments ... for application of the waste hierarchy”. As noted above, an important barrier to reuse is competition with new products whose cost is not reflective of environmental or social externalities. Levies and other instruments help to create a level cost playing field for these products and encourage behavioural change.

PROPOSAL 1: INCREASE THE PLASTIC BAG LEVY

CRNI supports the proposal to increase the plastic bag tax by three cents.

Although the increment is small, an increase may help avoid complacency in plastic bag usage and facilitates progress towards the high levy ceiling which will ultimately help reduce plastic bag usage. As Cre has highlighted in its submission, as well as being a single use item, plastic bags are also a source of contamination in food waste collections in Ireland.

PROPOSAL 2: REMOVE THE EXEMPTION OF THE MEDIUM WEIGHT PLASTIC BAGS FROM PLASTIC BAG LEVY

CRNI supports the proposal to remove the exemption of the medium weight plastic bags from the levy. There are adequate alternatives available to consumers for such products and therefore they are entirely avoidable.

It is important that this levy is applied in an effective manner (e.g. with a clear definition of “medium weight plastic bags”) and that it does not lead to unintended consequences. It will be important to avoid confusion with lightweight plastic bags which are expected to fall under an Extended Producer Responsibility scheme as per the Single Use Plastics Directive by December 2024.

The effectiveness of both levies on behavioural change should be reviewed after a year when sufficient data is available to secure general acceptance of their importance and ensure future buy-in of similar levies.

PROPOSAL 3: COFFEE CUP LEVY

CRNI supports the Conscious Cup Campaign (CCC) and Voice of Irish Concern for the Environment (VOICE) submissions regarding the coffee cup levy. The Conscious Cup Campaign is a member of our network, under the umbrella of VOICE Ireland.

As noted by CCC, the Single Use Plastic Directive establishes an obligation to reduce consumption across Member States of cups for beverages (including covers and lids). As the plastic bag levy has demonstrated, and other studies have found (see CCC submission), economic instruments can be very effective at incentivising this type of behavioural change particularly where there is clear pricing to the consumer.

We agree with CCC that the legislation should impose 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 e.g. soft drink cups at on the go food retailers. The cost of the cups used in a retail setting should be passed onto the consumer at the till. This ensures consumers can base their choice of using their own cup or buying a disposable one on the price signal provided. Additionally, a requirement on vendors to serve drinks for consumption onsite in reusable cups (e.g. crockery) should be introduced.

However, as highlighted by Cre, it would be important to avoid a situation whereby a levy on compostable cups drives the purchase of cheaper non recyclables cups that are either recovered or disposed. A reduced levy on compostable cups may be warranted in situations where there is a closed loop / readily available food waste recycling collection system in place to accept cups that meet the relevant composting standards e.g. at festivals where reuse might be difficult to facilitate.

By imposing a levy large enough to encourage behavioural change, the intended consequence should be the reduction in the number of disposable cups consumed and disposed. As for all reuse initiatives, by reducing consumption the upstream impacts of natural resource extraction, manufacturing, and distribution of the cups will be avoided, as well as downstream impacts of waste management. Additionally, there will be economic savings in the disposal and litter clean-up costs, which currently fall onto the taxpayers shoulders.

PROPOSAL 4: INTRODUCE TAKEAWAY LEVY (PHASE 2:2022-2023)

CRNI supports the introduction of takeaway container levies as Phase 2 of the levies proposals. Pilot projects like the ReCircle³ trial will provide the evidence base for and inform the details of such a levy.

PROPOSAL 6: WASTE RECOVERY LEVY

As landfill levels continue to decline in Ireland, there has been a significant increase in the volume of residual MSW going for energy recovery. However, the proportion of municipal waste recycled has increased very little over the last few years, as shown in the graph below⁴.

³ <https://voiceireland.org/project-work/recircle-ireland.php>

⁴ <http://epa.ie/nationalwastestatics/irelandswastestory/>

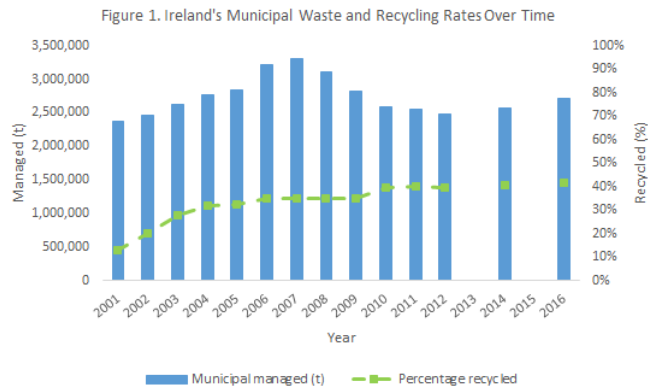


Figure 1: EPA graph showing municipal waste managed vs recycled

To compound this problem, the revised Waste Framework Directive 2018/851 has introduced more stringent recycling targets, both in how they must be measured and in setting higher recycling rates that must be attained. Meeting these targets will pose a real challenge for Ireland in 2025 and beyond.

As noted by the EPA, “exploring the use of more policies that set price signals which directly favour recycling or discourage all other waste management options is therefore an action that can foster recycling”⁴. It is therefore timely to introduce this proposed levy on waste-to-energy, to provide a stronger financial incentive to the public and waste management companies to make it more viable to divert resources to recycling and higher tiers of the waste hierarchy where possible. It is notable that statements from the waste-to-energy sector in the past⁵ have also shown the sector does not object in principle to an incineration levy and fully supports the development of higher in hierarchy waste management options.

In order to avoid an unintended shift across rather than up the hierarchy, it is important that the levy covers all recovery operations as proposed e.g. including Municipal Solid Waste (MSW) Landfills, Waste to Energy Plants and Co-Incineration Plants and the Export of MSW.

PROPOSAL 7: LANDFILL LEVY INCREASE

The significant decline in landfill rates has been a great success story for Ireland. This has largely coincided with the introduction and increase of the landfill levy, which has enabled (as described above) recovery alternatives to become viable.

While it is unlikely that a €5/t levy increase would impact significantly on reducing landfill usage, it is important to introduce in parallel with any waste recovery levy in line with the hierarchy.

However, one area where the landfill levies could be more effectively used to improve recycling rates is in the proper enforcement of the Local Authority exemptions.

At present Local Authorities are exempt from paying the landfill levy where the waste arises from cleansing activities, illegal dumping or local clean-up activities so long as it has undergone a separation process to remove material suitable for recycling or recovery and in other conditions. While this clearly requires that recyclable materials are removed, and that only a limited number of waste types qualify for exemption (e.g. illegal dumping, waste from clean-up activities), CRNI understands that the exemptions are used as a loophole to consign recyclable materials **including mattresses** to landfill.

⁵ <https://www.leanbusinessireland.ie/includes/documents/CEWEP%20Recycling%20submission.pdf>

There are currently three social enterprises, all CRNI members, on the island dismantling mattresses for recycling. The carbon footprint of an average double mattress is over 80kg CO₂. 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 CO₂ emissions. The dismantling process is the only process that ensures the materials recovered are of a high quality, which will enable higher levels of recycling or reuse in the future. 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.

By consigning mattresses to landfill with a levy exemption, Local Authorities are failing to support both social enterprise and the Circular Economy.

OTHER COMMENTS

In addition to the proposed levies, CRNI would like to propose the Department also consider applying a levy or similar instrument to wet wipes, which clog up wastewater systems and are a litter problem on beaches.

While other problem streams like plastic bottles, cotton buds, fishing gear and lightweight plastic bags will be specifically tackled under the Single Use Plastics Directive (e.g. through targets, bans or EPR schemes), the only requirements affecting wet wipes are better marking explaining the appropriate waste handling options.