



CRNI policy for a Circular Ireland - WAP submission



Environmental Protection Agency

CRNI Objectives

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.



Provide supports
to members



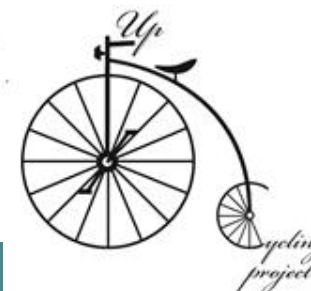
Mainstream
community
resources



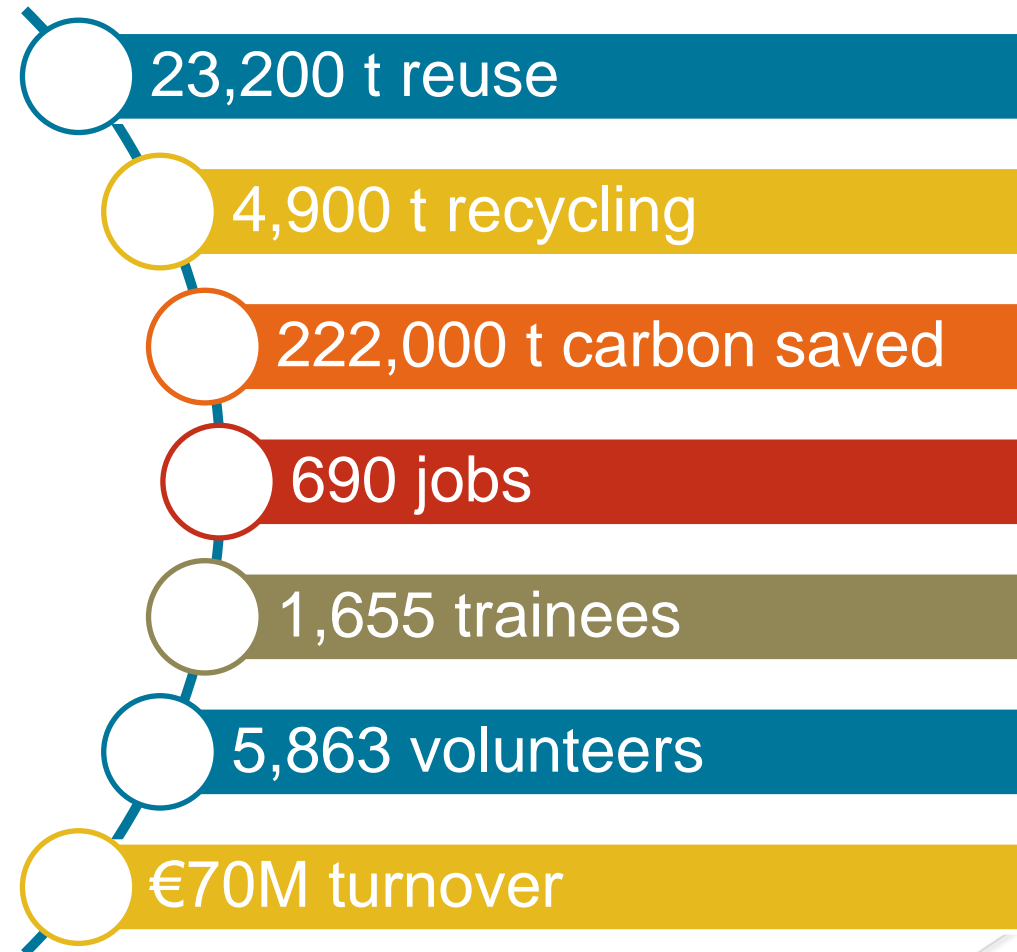
Develop the
capacity of
CRNI



Members



CRNI member reuse & recycling 2018



1. Key principles



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.

We need to invest in and support prevention, preparation for re-use, recycling and social enterprise, who will play an essential role in delivering a more Circular Economy in Ireland.

2. Targets - Recommendations



Set kg/inhabitant **NATIONAL TARGETS** to drive reuse

- ▶ That are binding from 2022, 2025, 2030
- ▶ Where EPR schemes and waste collectors are - in part - accountable
- ▶ With consequences for failure to meet



Set **NATIONAL TARGETS** for food waste prevention

- ▶ That are mandatory target from 2030, with an interim target in 2025
- ▶ Supported by improved data collection



Set **NATIONAL TARGETS** for preparation for reuse of IT equipment and LHA

- ▶ introduced on a phased basis starting with 1% up to 3% within 3 years
- ▶ requiring EPR schemes to demonstrate support for preparation for reuse by 2022, for next approval date in 2022.

3. Financial Incentives Recommendations



Procurement: Continue to drive and support Green Public Procurement - hold public sector bodies to account; align with national targets; share best practice; encourage smaller scale lots / contracts & social clauses.

Tax:

- ▶ 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.
- ▶ Introduce tax rebates on donated goods from businesses, similar to “Gift Aid”.
- ▶ Increase the plastic bag tax, introduce a levy on the wholesale purchase of disposable cups, introduce takeaway container levies (Phase 2)
- ▶ introduce a levy on waste-to-energy
- ▶ increase of the landfill levy in line with any above-mentioned waste-to-energy levy.

Rates: 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.

3. Financial Incentives Recommendations



Subsidies: 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. Review the benefits of a similar transport subsidy scheme Ireland to better support the flow of donations.

Investments: Prioritise infrastructure driving prevention followed by infrastructure for preparation for reuse in designing supports through low interest loans, grants, or other.

EPR Schemes: Require EPR schemes focus on prevention and preparation for reuse, through financial supports as well as effective eco-modulation fees. Review EPR schemes for mattresses, furniture, paint and textiles but only where existing sector is prioritised and financially supported.

4. Access to Materials - Recommendations



Collections: Recognise the important role of social enterprises in collecting items often free of charge or very low cost, relieving Local Authorities of the burden of bulky waste burden.

Civic Amenity Sites:

- ▶ Rebrand as “Recovery Parks”
- ▶ Make them more accessible - with better opening hours for the public, more engagement with the public and supporting behavioural change.
- ▶ Require appropriate reception facilities (through tender clauses) that preserve the reuse potential of items for a minimum number of products e.g. bulky goods, WEEE, paint and mattresses
- ▶ Invest in more trained operators to screen, better signage and improved layout
- ▶ Operators should also be encouraged to partner with or provide priority access to donated materials for social enterprises

5. Behavioural Change - Recommendations

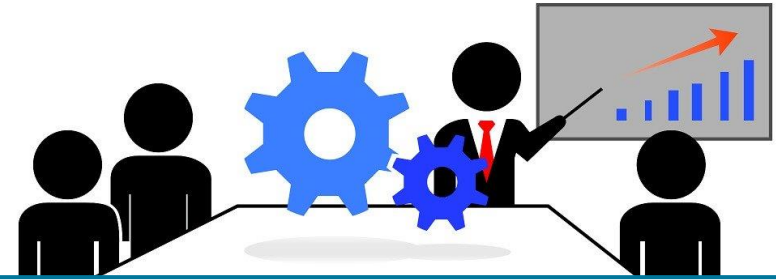


Give ReMark, Ireland's Quality Mark for reuse, formal recognition in policy and funding to develop it to the next stage on an all-island basis in collaboration with Northern Ireland's DAERA

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.

- ▶ **Textiles:** Run a campaign on the impact of textiles on global systems, encouraging consumers to reduce consumption / buy quality and borrow, swap, or pass on for reuse
- ▶ **Food:** Properly resource StopFoodWaste to gain a broader reach and support
- ▶ **WEEE:** Require WEEE EPR schemes to provide information and raise awareness about the services available for the prevention (reuse) of EEE and preparation for reuse of WEEE.
- ▶ **Packaging:** Give the Competition and Consumer Protection Commission (CCPC) added responsibility to protect the Consumer from misleading advertising and labelling on packaging.

6. Jobs & Skills - Recommendations



Ensure that public investment in just transition plans (at regional or national level) includes and supports Circular Economy opportunities.

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.

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.

7. Textiles - Recommendations



Support the development of a cohesive textiles strategy at EU and national level.

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.

Ensure local second hand clothes retailers are central to the Waste Framework Directive mandatory separate collection scheme for textiles to ensure maximum local reuse, through e.g.

- ▶ local second hand retailers partnering with waste collectors for kerbside collections
- ▶ increase in textile banks

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

Introduce regulations providing greater control over textile collection banks requiring clear information be provided on the beneficiary, the identity and contact details of the operators.

8. Address Liabilities - Recommendations



Engage with FSAI to ensure simple guidance is provided for retailers and citizens that protects business but also facilitates reusable containers (and other items)

Acknowledge the barriers that insurance poses to this sector in Ireland and help address them through support to the Alliance calls for reform.

9. Support Social Enterprise



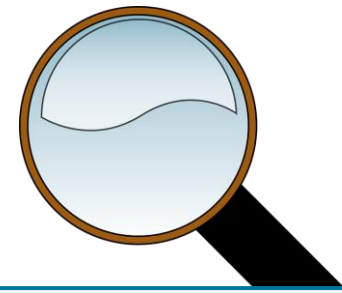
Realising triple bottom line benefits in the delivery of a more circular economy will require careful policy formation that ensures a job rich, just and inclusive circular transition focused on the wellbeing of all individuals.

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.

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.

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. A regular platform is required to facilitate this.

10. Research



Expand the EPA's 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.

Provide a clear and common pathway for disseminating research findings and using them to inform policy and practice.

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

11. National Networks

Through the Waste Framework Directive's Article 11.1, formally recognise the role of CRNI in the context of institutional arrangements.

12. WEEE preparation for reuse



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

In line with the hierarchy, prioritise measures that support indigenous facilities for the Preparation for Reuse as well as facilities for prevention. Prioritise preparation for reuse facilities in the assessment of critical waste infrastructure.

To make preparation for reuse viable, require that EPR schemes support at minimum preparation for reuse compliance and insurance costs.

Take measures to preserve the quality of materials collected, by:

- ▶ improving collection facilities at civic amenity sites and retailers
- ▶ permit approved WEEE prep for reuse organisations to operate collections targeting preparation for reuse
- ▶ provide preparation for reuse operators with direct with access to material
- ▶ require compliance by collection and transport agents to minimum technical recommendations that ensure the quality of waste goods is preserved

13. Recycling



Investigate the model used to develop circular material flows in Northern Ireland to help inform how to develop similar opportunities in Ireland

Introduce a mandatory EPR scheme within (e.g. 2 years) to support and grow mattress recycling

Review end of waste criteria for components extracted from mattresses to advance mattress recycling and ensure representatives from the community reuse and recycling sector are included in any group to review national End of Waste decisions.

Set up a dedicated fund to test and develop markets for the reuse and recycling of recovered materials.

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.

Thank you



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Network Ireland

