



18th February 2021

Dear NRRP Team,

RE: National Recovery and Resilience Plan

The Community Resources Network Ireland welcomes this opportunity to make a submission on Ireland's National [Recovery and Resilience](#) Plan, alongside the National reform programme. These will, crucially, provide an overview of the reforms and investments that Ireland plans to undertake in the coming years to address key challenges identified in the European semester, create jobs and growth and underpin the green and digital transitions.

Two country-specific recommendations for Ireland issued as part of the European Semester are to **support employment** through developing skills and to focus **investment on the green and digital transition**.

We would like to take this opportunity to highlight how we believe reform and investment can contribute to these objectives as well as complementing the Programme for Government. Specifically, we would like to propose the NRRP facilitates investment in:

- 1. A work integration scheme delivering climate action**
- 2. Circular and social public procurement**
- 3. Infrastructure and projects that facilitates climate action in the social economy**
- 4. The Quality Mark "ReMark" to transform behaviour toward second hand goods**

Justification for this and further details about these proposals are included below.

Employment opportunities in a Circular Economy

The Department of Environment, Climate and Communications (DECC)'s [Waste Action Plan for a Circular Economy](#) identified circularity as being central to the Green Deal, delivering on environmental aspirations, opening up opportunities for job creation and simultaneously reducing our carbon footprint and helping us towards our climate targets. According to the Commission, by 2030 the circular economy is estimated to create between 200,000 and 500,000 gross jobs and reduce unemployment by between 54,000 to 102,000.



Social enterprises are ideally positioned to deliver these jobs because of the level of manual labour and diversity of skills types and levels involved in recovering products and materials and returning them to the economy. This ranges from trade and craft skills to industry, retail and business skills. Many of these skills are associated with sectors that have traditionally gone into decline.

CRNI's social enterprise members¹ are leaders and innovators in the Circular Economy. They are often the primary or only enterprises handling certain goods or materials, diverting them from incineration or landfill through repair or reuse while providing quality training and job opportunities. For example, social enterprises dominate the local second hand clothes market and are the only actors in paint reuse. They also help to address the digital divide with low-cost refurbished laptops and support families in need by providing low-cost household goods. The Circular Economy has proven its value in 2020 from a localised and sustainable supply chain perspective, with the linear economy's vulnerabilities being more exposed.

Through their diverse activities, our members are involved in at least 7 of the 14 industrial ecosystems identified by the European Commission for the recovery. Amongst these are **Social Economy and Proximity, Textiles, Electronics, Construction, Low Carbon - Energy Intensive Industries, Agri-Food and Retail.**

Covid-19 Impact on sector

The COVID-19 crisis has had a major impact on the operating capacity of social enterprises in the circular economy. While most CRNI members ceased operations during successive lockdowns, many of them retained staff including those on labour activation schemes. In the absence of any operating income, already limited reserves were used to support associated costs.

In 2019 approximately 2,100 Tus, Community Employment, Community Services Programme, Rural Social Scheme, Wage Subsidy Scheme and other placements were provided by CRNI members. Many of the people involved came from vulnerable or marginalised backgrounds and would find it difficult to be re-employed. With the high levels of unemployment the country is now facing, it is more important than ever that these enterprises are supported in their efforts to stay afloat and continue to provide work placements.

However, while the Covid-19 crisis saw a suite of new supports become available, these generally and understandably focused on short term emergency response organisations. This meant that few of our members qualified for them.

¹ See <https://crni.ie/our-members/>



Funds for Climate Action through Social Enterprise

We believe the National Recovery and Resilience Plan provides an opportunity to take stock and ensure investment is also made in areas that will deliver **longer term gains** in line with the European Semester priorities.

We would like to propose that the NRRP is used to boost green and social priorities through public procurement, infrastructure investment and grant schemes as described below.

1. Social Enterprise Supports

We want to take this opportunity to ensure that Ireland includes Work Integration Social Enterprises (WISE), Social Economy Enterprises (as well as Charity and Circular Enterprises) in the final version of the RRF. With social and environmental impacts at stake, it will surely be an important step for recovery in 2021.

Ireland's National Social Enterprise Policy is based around three Objectives, including Growing and Strengthening Social Enterprise. One key programme that has enabled many social enterprises in the circular economy to grow, build capacity and become resilient has been the **Community Services Programme**. This supports community-based organisations to deliver social, economic and environmental services that tackle disadvantage. For many of our members, the scheme underpins employment, training and wider social impacts in disadvantaged communities as well as climate action through reuse and repair activities.

Since 2014, funding for this programme has not changed by more than 5% which has limited access for emerging reuse and repair projects. We propose that additional investment in the CSP should be made to **create a dedicated fund for green, circular and climate friendly community services**. This has the potential to deliver significant impact in supporting green employment opportunities and driving the climate agenda.

Alternatively, the NRRP could support a **new labour action model** for social enterprises that is tailored to deliver both employment opportunities and climate action.

The Flemish Government provides an excellent example of how reuse and labour activation have been linked through policy instruments. A social and environmental target was developed through waste legislation in a collaboration between the Environmental Agency OVAM and the Ministry of Employment. This required that 5kg/inhabitant goods were reused and 3,000 jobs were created by 2015. The target applied exclusively to activities under the social enterprise reuse network Kringwinkeloop operating in Flanders and is an excellent example of joined up thinking. With buy-in from both Agencies, the target was achieved.



Furthermore, the Extended Producer Responsibility scheme in France (a mechanism used to recover costs from producers to subsidise reuse / recycling) for textiles, EcoTLC France², supports social enterprises in reuse. Reuse enterprises within the scheme wishing to increase their textile sorting capacity are rewarded at a rate of €50 to €125 per tonne sorted, where there are additional jobs created for workers distant from the labour market. Sorting of textiles has provided 1,400 full-time jobs in France as of 2017, among which 49% has been reserved for workers facing employment difficulty. In this way, the scheme drives both the social and environmental agenda.

Such a combined social and circular support scheme could be **particularly timely for Ireland** as the Waste Action Plan for a Circular Economy commits to introducing national reuse targets ahead of the introduction of EU targets.

2. Green and Social Public Procurement

The recent European Council Conclusions on public procurement (25 November 2020)³ outlined how efficient public procurement rules and practices, combined with increased public spending, can accelerate the economic recovery from the COVID-19 crisis and lead to a sustainable and more resilient EU economy. In Ireland, the Programme for Government and the Waste Action Plan for a Circular Economy both commit to developing and implementing a more sustainable procurement model that seeks to minimise the environmental impact and optimise the public benefit of products and services procured.

We submit that these aims should be embedded in **any public contracts financed by national recovery and resilience funds**. These contracts should be required to concretely contribute to sustainability and social impact as an efficient use of public money. For example, contracts should be designed to accommodate social enterprise or circular economy suppliers⁴. Additional scoring should be provided or considerations included for bids from companies that provide more second-hand or sustainably produced and fairly-traded food, goods and services. For more on how circular and social procurement can work in Ireland and the EU see [here](#)⁵.

3. Investment in Circular Infrastructure

The growth of waste prevention activities such as reuse and repair will require the development of physical infrastructure as well as investment in equipment, operations and communication.

² For further information see Bukhari et al (2018) [Developing a national programme for textiles and clothing recovery](#); WRAP (2018) [UK textiles Extended Producer Responsibility](#)

³ Available at <https://crni.ie/publications/#Procurement>

⁴ e.g. through expansive market dialogue, and by facilitating lots or consortium responses to provide access for smaller scale suppliers

⁵ <https://crni.ie/green-and-social-procurement/>



Reuse and repair infrastructure helps to retain the value of used goods locally and enables the country withstand supply chain shocks, which is a key priority in the Department of Environment's (DECC) Waste Action Plan for a Circular Economy.

Examples of reuse and repair infrastructure are sorting centres, storage hubs, state of the art reuse parks, refill systems⁶, reverse logistics systems⁷, exchange platforms, redistribution centres, repair / upcycling workshops, surplus food transformation centres and retail spaces. Such infrastructure is currently underdeveloped in Ireland and where it does exist, is under-resourced.

We are proposing the NRRP be used to **support investment in significant infrastructure for larger scale projects** driving reuse, repair and refurbishment through grants, low interest loans or other mechanisms.

4. Climate Challenge Fund

As highlighted above, investment is also required in equipment, operations and communication to support green growth for a more circular economy.

We propose that a fund be introduced to support **climate action through community-led organisations, social enterprises and startup organisations** in reuse and repair as a highly effective investment combining multiple priorities. This should make available capital, which is often required to establish or improve reuse and repair services and/or operational funds to support ongoing activities.

The Climate Challenge Fund (CCF) in Scotland is one such example that provides grants and support for community-led organisations to tackle climate change by running projects that reduce local carbon emissions. The scheme was launched in 2008 and over 1,100 projects across all 32 local authorities have been awarded CCF grants.

The fund is operated by Keep Scotland Beautiful on behalf of the Scottish Government. Amongst other things, it supports projects that aim to reduce carbon emissions by working to reduce over-consumption, encourage the reuse of items, extend the life of everyday items through repair and maintenance and promote the recycling of materials. For examples of Circular Economy projects currently live under this programme please see [here](#).

⁶ For example Loop, an innovative waste-free shopping and delivery model for reusable packaging innovations and refillable product formats, the result of a coalition of large companies including other manufacturers, as well as the retailer Carrefour, courier UPS and resource management company SUEZ, along with TerraCycle. See <https://www.unilever.com/sustainable-living/reducing-environmental-impact/waste-and-packaging/rethinking-plastic-packaging/>

⁷ For example Zeronet's reverse logistics system, run by one of Ireland's first CE100 companies in the Ellen MacArthur Foundation, <https://www.thezeronet.com/how-does-it-work>



We propose this resource be developed in Ireland through boosting the [Community Environment Action Fund](#) or LAPN funding to support reuse activities **and/or by establishing a new fund** similar to that outlined above.

5. Invest in ReMark to transform behaviour toward second hand goods



As well as investing in infrastructure and equipment to enable the flow of second hand goods, it will be important to address citizens' attitudes toward reused goods.

“[ReMark](#)” is a quality mark developed by CRNI through the EPA Green Enterprise programme to address concerns about quality and safety in second hand goods. It also delivers training and additional profile to build the capacity of reuse operators participating in the ReMark accreditation programme as summarised in the videos here⁸.

According to Zero Waste Scotland, the Scottish quality mark Revolve⁹ is a key part of the reuse development work being taken forward as part of the Scottish Government’s *Making Things Last* strategy¹⁰. This quality mark has been funded by the Exchequer through the Zero Waste Scotland programme for over 8 years and has accredited over 150 stores. It is used in Scotland to provide training and capacity building as well as transparency and assurance to businesses, public bodies and citizens for procurement of services or goods.

Significant funding has been invested in developing and piloting ReMark in Ireland. We believe, as for Scotland, that it can be a game changer for the sector in Ireland, underpinning Circular Procurement as well as consumer confidence in second hand goods. **We propose that the national roll out of this mark should be funded** through the NRRP.

We hope that you will consider the above mechanisms for investment within the NRRP and would welcome an opportunity to discuss this or provide further information.

Best wishes,

⁸ <https://www.crni.ie/re-mark/>

⁹ upon which ReMark is based

¹⁰ <https://www.letsrecycle.com/news/latest-news/zero-waste-scotland-reports-growth-of-revolve-standard/>



Claire Downey
Executive
[Community Resources Network Ireland](#)