

CRNI RESPONSE TO DAERA WASTE PREVENTION PROGRAMME 2019

1.1 OVERVIEW

CRNI welcomes this programme update as an interim measure to meet the legal requirements set out in the Waste Framework Directive and the Waste Regulations (Northern Ireland) 2011 and recognises that as such, the programme does not seek to introduce any new waste prevention policies.

Waste prevention is of central importance to developing a more Circular Economy, which will require new approaches to every stage of a product's life cycle including addressing consumption patterns (the demand for products), product design, the intensity of use of items (through ownership models like leasing / swapping) and the useful life of products through reuse, repair and upcycling.

THE ENVIRONMENTAL, SOCIAL AND ECONOMIC BENEFITS OF WASTE PREVENTION ARE SIGNIFICANT.

- Firstly, these activities avoid goods or keep goods within the economy for longer and thereby reduce consumption, leading to a reduction in raw material extraction, manufacturing and transport.
- Secondly, these activities avoid the creation of waste and hence the need for waste management.
- Thirdly, the EU acknowledges that prevention and preparation for reuse have potential to impact social and economic benefits 'including jobs and growth, the investment agenda ... the social agenda and industrial innovation.'

The greenhouse gas emissions associated with upstream material extraction, manufacturing and transport (55% and 65% of typical national emissions) and end of life management (3-4% of total emissions from the average OECD country) are avoided. The European [RREUSE](#)¹ network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO2 emissions by 5% while supporting around 400 000 jobs². A WRAP UK study has shown that by increasing the reuse of key household products such as textiles, appliances and electrical equipment, UK GHG emissions could be reduced 4 million tonnes CO2 eq per annum between 2009 and 2020³.

CRNI is **committed to supporting** the implementation of waste prevention actions in line with our strategic objectives to support our members and help mainstream community resources. We look forward to working with DAERA and other key stakeholders in the sector as part of a coordinated approach to delivering on the waste prevention agenda.

1.3 COMMUNITY RESOURCES NETWORK IRELAND

CRNI is an all-island network that represents a diverse range of 25 social enterprises, funded projects and other enterprises in reuse, repair and recycling as shown below.

¹ CRNI is a member of RREUSE, an international network representing social enterprises active in re-use, repair and recycling. RREUSE members divert approx 1 million tonnes of goods and materials annually from landfill through re-use, repair and recycling, generating a combined turnover of 1,2 billion EUR .

² See <https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/>

³ WRAP, *Meeting the UK climate change challenge: The contribution of resource efficiency*, 2009, https://www.wrap.org.uk/sites/files/wrap/AC_Exec_Summary_WEB_2.pdf



Our priorities include supporting our members, mainstreaming community resources and developing our capacity. We are funded by the Irish EPA under the National Waste Prevention Programme.

The **environmental, social and economic benefits** of our members in 2018 is estimated as follows:



A large proportion of the reuse tonnage relates to textiles due to the extensive charity shop network within the Irish Charity Shop Association (ICSA). Other important product groups include food (redistributed) and IT equipment (refurbished). The recycling figure mainly reflects mattress recycling⁴.

2.0 GENERAL COMMENTS

Becoming a more Circular Economy will require a significant shift in policy focus and language, from the previous focus on a linear take-make-dispose model to a focus on effective resource management.

⁴ Note it does not include Bryson Recycling's kerbside collection figures which are in the order of 50,000 tonnes

RECOMMENDATION #2: We recommend that any discussions about the Circular Economy or waste prevention focus on “resources” rather than “waste”.

For example, in Section 1.3 “waste must be reduced” could be rephrased as “resource consumption must be reduced”; “the waste that is generated” could be rephrased to “the products in circulation” ... must be used in a resource efficient manner.

We believe a more circular economy should be delivered through a dedicated and holistic strategy. It is important, due to the broad impact of the Circular Economy, that waste prevention is embedded within and central to Circular plans and policies. While this Waste Prevention Programme (WPP) is an interim programme to meet the requirements of the existing WFD, we would recommend the integration of any future programme within an overarching Circular Economy strategy (whether the European Circular Economy Package is transposed in full or not).

POLICY RECOMMENDATION #3: Integrate future Waste Prevention Programmes into a holistic Circular Economy strategy or action plan insofar as prevention is front and central to the Circular Economy.

For future strategies, we also propose a focus on the strategic mix of policy and financial incentives and penalties for operations and/or infrastructure that **ensures prevention and preparation for reuse are cheaper and/or more convenient** than waste activities.

3.0 COMMENTARY ON SECTIONS OF THE PROGRAMME

SECTION 2.2: DECOUPLING OF WASTE GENERATION AND ECONOMIC GROWTH

It is very positive to see the decoupling of waste generation and economic growth demonstrated in Figures 3 and 4.

RECOMMENDATION #4: Further analysis of the relationship between waste arisings and GVA, based on Figure 4, would be very valuable and could yield useful insights for other jurisdictions.

SECTION 2.3: FOOD WASTE

While it is also positive to see the increase in uptake of household food waste collections and reduction in contamination of recycling, it is noted that the figures presented in Figure 4 relate to waste arisings for different kerbside bins as opposed to food waste prevention.

RECOMMENDATION #5: It would be useful to include in this section a snapshot of total food waste arising or other data to show the relationship between consumption / population and food waste.

SECTION 4.1: PRODUCER RESPONSIBILITY

As highlighted in Section 4.1 of the WPP, consumer goods are now less durable and repairable than in the past. The increasing difficulties associated with maintenance or repair of many consumer goods from electronic equipment to clothing, including lack of access to and high costs of spare parts, lack of appropriate repair information and product design preventing repair, put at risk the economic viability of re-use and repair

organisation⁵. As DAERA will be aware, the recently published Circular Economy Action Plan 2.0 sets considerable ambition around the right to repair in order to address this⁶.

We therefore welcome and support ongoing efforts by this area by DAERA, in particular:

- work in exploring how to incentivise producers to manage resources more efficiently, with the focus on good design and the right to repair, providing information about the product, its durability and life cycle
- work on the UK wide ambition to extend the ecodesign standards to non-energy resource intensive product groups
- work as described in Section 4.1.3 toward mandatory consumer information and labelling which is essential in enabling consumers to make more informed choices and drive behavioural change.

SECTION 4.2.1: TACKLING PLASTICS

CRNI member the Conscious Cup Campaign aims to decrease the use of single use cups, by encouraging cafes and other outlets to incentivise, through rewarding, customers who bring their own. The cafe map⁷ is an excellent resource, showing where discounts can be obtained for individuals bringing a reusable cup.

RECOMMENDATION #6: Extending a similar mapping platform and associated awareness exercises throughout Northern Ireland could support the Tackling Plastic project.

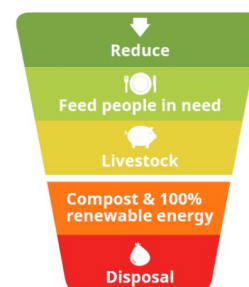
It is noted that carrying a reusable cup can become a trigger for other conscious consumerism efforts and is often the start of an individual's journey towards waste reduction.

SECTION 4.3: TACKLING FOOD WASTE

The Courtauld Commitment and Love Food Hate Waste campaigns are excellent programmes for reducing food waste arising in the first instance.

Second in the food waste hierarchy⁸ across is feeding people in need. CRNI member FoodCloud is a social enterprise prioritising feeding people by redistributing surplus food to charities. To date they have redistributed over 29,399 tonnes of food or 70 million meals. CRNI therefore strongly welcomes the support by DAERA to initiatives like Fareshare NI to increase their ability to redistribute surplus food to people through charities.

To effectively support redistribution projects, fiscal measures such as subsidies that are counterproductive to prevention and redistribution efforts need to be addressed. Substantial investment in and support for Anaerobic Digestion (AD) in the UK has made it cheaper to divert surplus food suitable for human consumption to AD, thereby cannibalising food redistribution. Although AD generates renewable energy, the energy and resources embedded in edible food that are lost in the digestion process far outweigh any benefits of renewable energy production.



⁵ RREUSE (2019), Easy product repair (available at <https://www.rreuse.org/improving-product-design/>)

⁶ e.g. committing to establishing a new 'right to repair' and considering new horizontal material rights for consumers for instance as regards availability of spare parts or access to repair and, in the case of ICT and electronics, to upgrading services

⁷ <https://consciouscup.ie/cafe-map-discount-reusable-cup.php>

⁸ Image source: <https://feedbackglobal.org/food-waste-ranking/hierarchy/>

RECOMMENDATION #7: A review of subsidies for activities lower in the waste hierarchy would help identify and mitigate any potential counterproductive subsidies that undermine efforts to support food surplus redistribution.

We also believe a mandatory food waste prevention target, with an interim target, would support the objectives of the sustainable development goals in the longer term.

SECTION 4.4: COMMERCIAL AND INDUSTRIAL ACTIVITY

CRNI commends the ongoing support by Invest NI towards the NI industrial symbiosis programme. In Ireland, the withdrawal of funding from the industrial symbiosis programme *SMILE Resource Exchange*⁹ at the end of 2018 represented an unfortunate loss to the sector.

SECTION 4.5: WASTE PREVENTION IN THE EDUCATION AND HEALTH SECTORS

An essential component to driving waste prevention and reuse is engaging citizens and supporting behavioural change. This involves sustained and consistent communications to encourage citizens and businesses to adopt reuse or prevention practices as part of their everyday activities.

DAERA's efforts to intervene at an early stage by building waste prevention into the schools curriculum is a very important initiative in this regard. The Eco-Hospitals programme is also valuable and may benefit from potential synergies with the EPA's Green Healthcare programme (if not already explored).

It is noted that a recent CRNI research project *Bulky Item Reuse*, funded by the EPA to encourage the public sector to donate unwanted bulky items for reuse¹⁰ saw considerable interest from and engagement by the health sector. The project provided a range of reuse scheme options for the public sector, as shown in Figure 1 below.


⁹ It is noted in Measure #36 of Annex 1 the withdrawal of funding and closure of the platform is not acknowledged despite explicit reference to SMILE in the measure itself.

¹⁰ See <https://www.crni.ie/bulky-items-reuse/> for detail

BULKY ITEMS REUSE in the Public Sector

THE PROBLEM

OVER 1.2 MILLION potentially reusable bulky items are going to waste on the island of Ireland every year.



REUSE & REPAIR

of bulky items has the potential to reduce waste and prolong the useable life of materials.

This in turn can support carbon savings, contribute towards sustainability initiatives, improve social impact & reduce costs

THE PROJECT

Through this project, CRNI identified reuse schemes for public bodies to pass on unwanted bulky goods such as:

OFFICE FURNITURE

FIXTURES & FITTINGS


OFFICE CONSUMABLES

ELECTRONIC EQUIPMENT

LAB EQUIPMENT


MEDICAL/HOSPITAL EQUIPMENT

"for redistribution to **OTHER PUBLIC SECTOR OR THIRD SECTOR ORGANISATIONS**"



KEY BARRIERS

Time, cost and lack of knowledge or support associated with setting up a reuse scheme



Overcome this by demonstrating the savings & other benefits of reuse schemes through good practice examples

THE SMALL SCALE

The demand for bulky items is not well developed and reuse organisations do not have the scale to accept large volumes of furniture or other bulky goods.


Public bodies need to be encouraged to start with smaller scale clearance projects to match the scale of the sector.

STORAGE

The lack of storage for unwanted items (prior to finding a claimant) is often identified as a barrier.

To remove the need for storage, it is recommended that public bodies focus on allowing enough turnaround time for items to be claimed.

EVERYTHING MUST GO... OR WE'LL BURST!



REUSE SCHEMES

Different approaches can be taken to establish a reuse scheme within organisations, depending on requirements. Some options identified through the project are:

INTERNAL REUSE/EXCHANGE WITHIN A PUBLIC SECTOR BODY

A single organisation provides for the exchange of unwanted items either via an online platform or manual system.

EXTERNAL REUSE EXCHANGE WITH THIRD SECTOR

A single organisation offers unwanted items that are not claimed internally to the Third Sector. An online exchange platform is recommended for this model to facilitate communication

REUSE/EXCHANGE WITHIN REGIONAL CLUSTERS

A cluster between the various organisations within a geographical area. A suitable commercial platform is implemented by all organisations in the cluster, which may also provide internal or internal and external exchanges.

REUSE/EXCHANGE FOR AN OFFICE REFURBISHMENT OR RELOCATION PROJECT

For public sector bodies who want to trial an element of reuse/ exchange as part of an office refurbishment or relocation project.

FOR MORE INFO on setting up reuse systems or to connect with CRNI members as potential third sector claimants or refurbishers, please get in touch with info@crni.ie or visit crni.ie/bulky-item-reuse.

CRNI would be happy to share these findings with the Eco-Hospitals programme to facilitate reuse of goods and services through procurement and facilities management. In Northern Ireland, WARP-IT is also a well established commercial exchange platform and presents opportunities to support this area.

RECOMMENDATION #8: Explore potential synergies between the EPA's Green Healthcare programme and the Eco-Hospitals programme (if not already done so). Encourage the health sector to engage in reuse schemes to pass on bulky items for reuse as part of the Eco-Hospitals programme.

SECTION 4.3: SUPPORT TO THE THIRD SECTOR

The number of jobs and training positions created by our members (See Part 2.0) demonstrates the strong social impact of this work. Social enterprises 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 while providing quality training and job opportunities.

According to the European Commission, by 2030 the circular economy is estimated to create between 200,000 and 580,000 gross jobs and reduce unemployment by between 54,000 to 102,000. Jobs in this sector tend to add to the jobs market rather than displacing traditional jobs because of the labour involved in repairing, upcycling or deconstructing the highly diverse and complex mix of products that are returned via reuse and recycling loops.

The potential for job creation in the Circular Economy covers a broad skills base and wide geographic distribution including rural areas and areas of economic and social deprivation¹¹. Social enterprise is ideally positioned to create these jobs because of the level of manual labour and diversity of skills types and levels involved. Our members work with individuals or groups that have high barriers to employment such as disadvantaged communities, the long-term unemployed, people with disabilities, ex-offenders, and people from drug rehabilitation thereby promoting equality.

As described above and recognised by the European Commission, becoming a more Circular Economy can deliver benefits to the environment, society and economy (or the “triple bottom line”).

RECOMMENDATION #9: Acknowledge the wider social impact of a Circular Economy on page 5.

SECTION 4.6.1: REUSE AND REPAIR NETWORK

Pending the outcome of the feasibility study, CRNI welcomes and looks forward to supporting DAERA in developing a reuse and repair network in Northern Ireland.



This section also refers to establishing a reuse quality mark. CRNI recently developed a quality mark “[ReMark](#)” through the EPA Green Enterprise programme to address negative consumer perceptions about second hand goods due to concerns about quality and safety. It is an organisational level accreditation process for the reuse sector.

Organisations wishing to become accredited must meet operational or “back-end” as well as consumer facing criteria that will enhance their capacity to deliver goods/services and increase their traded income through changing consumer perceptions about second hand goods.

Three CRNI members were accredited as part of the ReMark pilot programme - Duhallow Revamp, Dublin Simon Communities and Back2New.



In addition to addressing consumer engagement, we found the quality mark delivers broad and positive impacts to reuse operators participating in the ReMark accreditation programme as summarised in the videos [here](#).

According to Zero Waste Scotland, the Scottish quality mark [Revolve](#) (upon which ReMark is based) is a **key part of the reuse development work** being taken forward as part of the Scottish Government’s *Making Things Last* strategy¹². This quality mark has been funded by the Exchequer through the Zero Waste Scotland

¹¹ See *Moving Towards the Circular Economy* in Ireland, a study for the National Economic and Social Council (NESC) by Dr Simon O’Rafferty

¹² <https://www.letsrecycle.com/news/latest-news/zero-waste-scotland-reports-growth-of-revolve-standard/>

programme for over 8 years and has accredited over 150 stores. It is used in Scotland to provide transparency and assurance to businesses, public bodies and citizens for procurement of services or goods.

ReMark has significant potential to provide assurance to EPR schemes that support reuse or preparation for reuse, such that only accredited reuse organisations are eligible for support. It could also be used as a recognised symbol for consumers to help develop markets for traceable, genuinely repurposed and reused goods e.g. from recycled mattresses.

When the ReMark pilot programme finished in March 2019, the final report recommended that ReMark be rolled out throughout Ireland and Northern Ireland. This will require funding commitment to be realised.

POLICY RECOMMENDATION #9: Support the roll out of ReMark through policy and provide funding support to help develop it to the next stage on an all-island basis and in collaboration with DCCAE.

SECTION 4.6.2: THIRD SECTOR FUNDING

As noted in Part 2.0 of this response, a strategic mix of policy and financial incentives and penalties for operations and/or infrastructure is required to ensure that prevention and preparation for reuse become cheaper and/or more convenient than waste activities.

A recent survey of the reuse and repair sector in Northern Ireland found that many social reuse and recycling operators are under-resourced and require assistance in particular to increase funding and staff. The availability of capital grant funding to the sector is therefore very important in making reuse more accessible for everything from reusable cloth nappies to mattress recycling equipment.

Other measures that could complement grant aid and support the sector would include:

- setting a 0% VAT rate for reuse and repair carried out by social enterprises and a 0% VAT rate on “small” repairs as permitted in current legislation.
- supporting prevention and reuse through green and social public procurement criteria

Public authorities have significant potential in driving markets for ethical and sustainable purchases and supporting local job creation. However, approximately 55% of procurement procedures across the EU still use the lowest price as the only award criterion¹³, without considering any potential added social or environmental value.

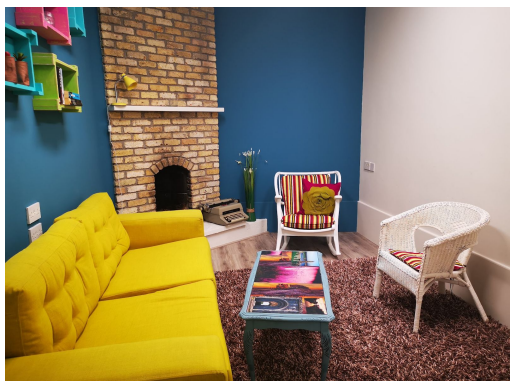
This is increasingly being recognised and supported, for example in the Welsh Government’s consultation *Beyond Recycling*¹⁴, which includes as a top 10 objective “... prioritising re-used and remanufactured content in the goods that the public sector purchases” and the recent publication by Ireland’s Department of Public Expenditure and Reform of *Circular 20/2019: Promoting the use of Environmental and Social Considerations in Public Procurement* which encourages Public Sector bodies to consider green and social criteria in procurement.

CRNI supported in 2019 a consortium of its members in a green and social procurement project to furnish a vacant office space for a public body (see [here](#) for details). This project involved supplying nearly 100 items of

¹³ European Commission, Public procurement strategy, available at https://ec.europa.eu/growth/single-market/public-procurement_en

¹⁴ Welsh Government, *Beyond recycling*, a strategy to make the circular economy in Wales a reality, available at: <https://gov.wales/beyond-recycling>

furniture from 10 different suppliers and saved approx 2.5 tonnes carbon. Recommendations from this project include:



- It is important to identify and share good practice examples to demonstrate the opportunities for prevention and preparation for reuse in procurement
- Public bodies and businesses need to be encouraged to divide procurement projects into smaller lots to facilitate the small scale of social enterprises and others in the prevention and preparation for reuse sector.
- Smaller scale projects and careful planning (e.g. allowing enough turnaround times for products to be sourced or claimed) can also help overcome the often important barrier which is a lack of storage.

POLICY RECOMMENDATION #10: Explore complementary financial measures for the Third Sector including reduced VAT rates for reuse and repair and supporting prevention and reuse through green and social public procurement criteria.

SECTION 4.7: AWARENESS RAISING ACTIONS FOR WASTE PREVENTION

Engaging citizens in a truly circular economy will challenge a system that is designed around consumption, product ownership and growth. It will require transformative changes to the way citizens behave towards goods and services, supported by clear, bold and ambitious communications.

As noted above, this will require use of the correct language and focus on the top tiers of the hierarchy including prevention (avoidance, reuse) and preparation for reuse, moving beyond recycling. This will also help to convey the true meaning of a more circular economy.

Ongoing work in this area undertaken by DAERA including communications to support Rethink Waste, Love Food Hate Waste and other programmes with Local Councils and through the centralised portal MyNI are valuable in providing coordinated, clear and consistent messaging on waste prevention. It is particularly notable that widespread support from the press for the *Love Food Hate Waste* campaign means that it has become a high profile issue across the UK. The latest figures from WRAP show that excellent progress is being made in reducing food waste, with a 7% reduction per person in the last three years¹⁵.

It is also noted that managing textiles is an increasing priority and the upcoming separate collection obligation for textiles in the WFD will involve significant developments in the sector. Consideration could therefore be given to increasing the priority of communications on textiles (e.g. using the Love Your Clothes campaign) to address the quantity and quality of clothing entering the system. This could cover for example the impact of textiles on global systems and encouraging consumers to reduce their consumption or buy better quality items and to use available channels to borrow, swap, or pass them on for reuse.

¹⁵ See article

https://wrap.org.uk/content/courtauld-commitment-2025-milestone-progress-report?goal=0_b554dd0387-769a174bea-5067077

POLICY RECOMMENDATION #11: Expand communications on sustainable textile in anticipation of increased volumes of lower quality clothing entering the reuse system in line with separate collection obligations.

There can also be a lot of confusion about the operation and beneficiaries of textile banks, which is misleading textile donors and facilitating bogus operators. Some common practices include:

- identifying with a charity or programme without specifying how much of the revenue raised from the sale of the clothing goes to that charity / programme. We understand that the proportion of profit given to charities named on textile banks can be as low as 5%.
- failing to provide basic contact details or information about the textile bank operator.
- failing to provide any information about the destination of collected textiles (e.g. sold locally vs exported).
- placing textile banks on private land without permission of the landowner and without any contact details making it difficult to have removed.

POLICY RECOMMENDATION #12: Explore regulations or other measures to provide greater control over textile collection banks (in public or private spaces), requiring clear information to be provided on each bank about the beneficiary of the textile donations and the identity and contact details of the textile bank operators.