



CRNI RESPONSE TO PRE-CONSULTATION ON NATIONAL WASTE PLAN FOR A CIRCULAR ECONOMY

1.0 OVERVIEW

This last year has seen momentum significantly build behind the community reuse, repair and recycling sector. The European Circular Economy Action Plan 2.0, Waste Action Plan for a Circular Economy and cross sectoral developments like the [Climate Plan Interim Actions](#) and [Rural Development Policy 2021-2025](#) all show real ambition and signal a pivotal time for the circular and social economy.

CRNI welcomes this new ambition, which puts prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning. We hope the same ambition will be included in this National Waste Management Plan for a Circular Economy (NWMPCE), backed by coordinated measures that will drive growth in community based reuse, repair and recycling.

Specifically, we recommend for the NWMPCE:

- introducing a kg/inhabitant reuse target in the next 2 to 3 years
- introducing targets for repair including preparation for reuse of WEEE
- introducing resource efficiency targets and bringing Ireland's circular material use rate above the EU average by the end of this decade
- introducing a mandatory food waste prevention target of 50% by 2030
- exploring the possibility of all island targets for reuse and/or circular material use rates
- treating prevention and preparation for reuse infrastructure as critical waste infrastructure and prioritising this for investment and supports
- supporting indigenous recycling infrastructure to reprocess mattress components and supporting market development for the end products
- developing guidance on limiting "commercial" rates for prevention and preparation for reuse centres to a maximum of 50% and minimum of 0% rates
- the continuation and ongoing development of Reuse Month October
- increasing support for existing national waste prevention campaigns and support for new pilot projects or replication of existing pilots
- supporting ReMark in developing to the next phase and delivering an all island roll out
- exploring the potential for a shared island approach to prevention or preparation for reuse infrastructure



- providing more widespread and appropriate reception facilities that preserve reuse potential at civic amenity sites, including requirements for reception and screening in tender clauses and encouraging operators to partner with or provide priority access to social enterprises
- providing ongoing recognition and continued commitment to collaborate with CRNI and our members
- supporting increased uptake of criteria or tender design and grant or funding design supporting circular and social procurement

We believe annual updates on progress against targets and objectives for the NWMPCE should be embedded in the plan to help track the successes or where remedial action is required.

CRNI is committed to taking action that will support these recommendations, in line with our strategic objectives to support our members and help mainstream community resources. In some cases, we are already working on measures - for example, we are involved in research to develop a methodology for measuring reuse¹, which would underpin a reuse target. We work closely with the Regional Authorities every year on the Reuse Month October campaign and collaborate together on research (including a new EPA Green Enterprise *Circular Textiles* project). CRNI is also involved in setting up a reuse and repair network in Northern Ireland ([NI-RN](#)) on behalf of DAERA, and through this work we have included all island insights in this response.

We look forward to working with the Regional authorities and other key stakeholders in the sector as part of a coordinated approach under the NWMPCE to transition to a more Circular Economy.

2.0 BACKGROUND

2.1 PREVENTION, REUSE AND REPAIR IN THE CIRCULAR ECONOMY

When the Regional Waste Management Plans were published in 2015, they provided for the first time concrete measures to support prevention including reuse and repair. This was an important signal for the prevention, reuse and repair sector.

Since then, there have been significant further developments in relation to the vision, policy and legislation for a circular economy. These have been underpinned by the European Commission's Circular Economy Action Plans 1.0 and 2.0 and related legislation (e.g. the revised Waste Framework Directive), developments in climate policy and action plans (which cross reference circular economy²) and social economy policy and action plans (which also cross reference circular economy³), a general growth in consumer awareness and engagement with suppliers on the sustainability of supply chains and of course the global pandemic Covid-19.

¹ See <http://www.rediscoverycentre.ie/research/q2reuse/>

² See for example Interim Climate Actions 2021 available at <https://www.gov.ie/en/publication/ccb2e0-the-climate-action-plan-2019/>

³ See for example Our Rural Future: Development Policy 2021-2025 available at <https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/>



These changes have brought even greater focus on and support for community prevention, reuse and repair activities. Reuse and recycling are at the heart of the Circular Economy and Ireland's new Waste Action Plan for a Circular Economy. The economic, social and environmental benefits of these activities are significant:

- Firstly, the EU acknowledges that prevention, reuse and repair have potential to provide **social and economic benefits** 'including jobs and growth, the investment agenda ... the social agenda and industrial innovation.' 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. As highlighted in the *Whole of Government Circular Economy Strategy 2021 - 2022 Pre-consultation*, social enterprises have long been associated with reuse and refurbishment in Ireland, tapping the value of unwanted materials to build social capital in communities through training, retail and capacity building.
- Secondly, by keeping goods within the economy for longer, prevention, reuse and repair can support **resilience in communities** through localising supply chains. Covid-19 has had a significant impact on global supply chains and impacted the supply of new goods as well as international outlets for reuse (e.g. exports of used textiles effectively ceased) and recycling (e.g. collapse in material value). As highlighted in the *Whole of Government Circular Economy Strategy 2021 - 2022 Pre-consultation*, local repair hubs have the potential to support the economic and social renewal of town and village centres, which is an important part of balanced regional development and rural renewal and is also a Programme for Government commitment. This clearly demonstrates the potential benefits of a more localised approach and local investment in Circular Economy activities.
- Thirdly, these activities have significant **environmental and climate benefits**, reducing the consumption of new goods (which reduces the impact of upstream extraction, manufacturing and transport - a 2020 report by Circularity Gap Reporting Initiative highlights that switching to a CE could **reduce global greenhouse gas emissions by 39%**⁴. These savings relate to avoided emissions associated with upstream material extraction, manufacturing and transport and end of life management. More specifically, the European RREUSE⁵ 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 jobs⁶.

To move toward a more climate-neutral circular economy that reaps these benefits , the NWMPCE should build on the leadership and ambition shown in 2015 **by putting prevention (including**

⁴ <https://www.circularity-gap.world/2020>

⁵ 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 .

⁶ See <https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/>



avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of the plan.

2.2 COMMUNITY RESOURCES NETWORK IRELAND

CRNI's vision is an Ireland where the word waste doesn't exist and the entire community benefits from the environmental, social and economic benefits of reuse. We work towards this vision by supporting our members, mainstreaming community resources and developing our capacity and are funded by the EPA under the National Waste Prevention Programme.

This submission is informed by our 38 members working in reuse, repair and recycling, the majority of which are social enterprises. Our members are leaders and innovators in the circular economy. They are often the main or only organisations handling certain goods or materials, diverting them from the waste stream while providing quality training and job opportunities. They also help to support communities by providing low-cost goods to families in need or by helping to address the digital divide. These members are shown below.



This submission is also informed by our European and national policy and research work. In 2020, CRNI made or contributed to 18 policy consultations at European and national level involving over 180 recommendations. CRNI is a member of the European network [RREUSE](#), sitting on the board, executive committee and holding the Vice Presidency position and is a member of the European campaign [Right to Repair](#). In Ireland, CRNI sits on the EPA's [National Waste Prevention Committee](#), the Department of Environment, Climate and Communications' [Waste Action Plan Advisory Group](#), and the EPA's mattress working group. The network also recently contributed to the Department of Rural and Community Development's Awareness Strategy Sub-Group for the [National Social](#)



[Enterprise Policy](#), the [Community Services Programme Review](#) Consultative Forum and the [Circuleire](#) Green Procurement working group.

As highlighted above, the network is currently leading research on [Developing a Circular Textiles System for Ireland](#) through the EPA Green Enterprise programme, and on establishing a network in Northern Ireland for prevention, reuse and repair ([Northern Ireland Resources Network](#)) supported by DAERA. CRNI is also a partner on research on the [Qualification and Quantification of Reuse](#), funded by the EPA through the STRIVE research programme.

For further information on our activities in 2020 please see [here](#).

3.0 EXISTING SITUATION AND RECOMMENDATIONS

3.1 PREVENTION, REUSE AND RECYCLING TARGETS

The aim of the 2015 Regional Waste Management Plans (RWMPs) was to underpin European and national mandatory targets and, in doing so, ensure the health of communities in the region, its people and the environment are not compromised. The three common targets set out in the three Regional Waste Plans were:

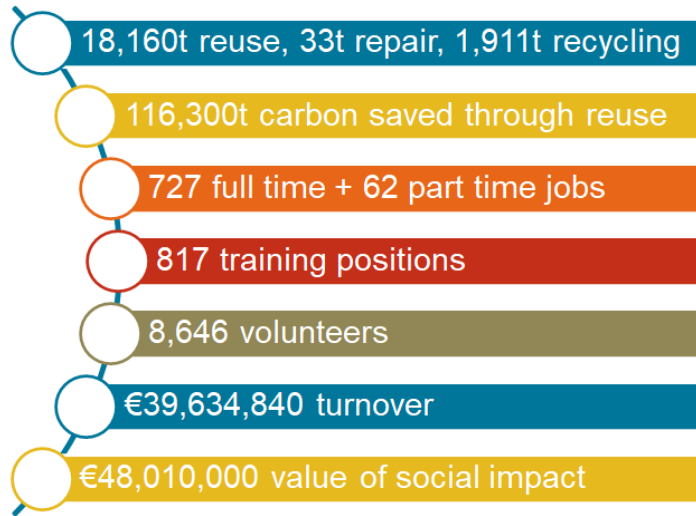
- 1% reduction per annum in the quantity of household waste per capita over the period of the plan
- achieve a recycling rate of 50% of managed MSW by 2020
- reduce to 0% the unprocessed residual MSW to landfill (from 2016 onwards) in favour of higher value pre-treatment processes and indigenous recovery practices

Of most relevance to CRNI members activities is the first goal to reduce household waste arising per capita, as prevention, reuse and repair would all contribute to meeting this target. Our social recycling members working with a range of materials including specialist recycling of mattresses and WEEE also contribute to recycling targets.

EXISTING SITUATION: PREVENTION AND REUSE

While the data is difficult to obtain, our understanding is that household waste per capita has increased, rather than decreased, since 2015. Although this shows that the Regional Plans objective to reduce household waste per capita by 1% was not achieved, we support the ambition it represents.

Current levels of reuse and repair in Ireland are estimated from CRNI member **environmental, social and economic** impact data compiled each year. In 2020, our members had the following estimated impact:



Of these figures:

- Approximately 12,000 tonnes relates to **textile reuse** through the extensive charity shop network within the Irish Charity Shop Association (ICSA) and other actors. Over half of this is reused locally, which is high compared with other Member States and likely due to the quality of goods collected in-store.
- The next largest product groups included in the reuse figure are **food** redistributed (approx 3,000 tonnes)
- Other materials included in this reuse figure are IT and other equipment, furniture, paint, bicycles, wood and surplus packaging and other stock
- The recycling figure reflects Ireland’s network of social **mattress recyclers**, WEEE recycling and other streams that cannot be reused.

The number of jobs and training positions created by our members demonstrates the strong social impact of this work. It highlights the potential impact that investment in the sector could have on jobs growth as well as environmental gain, in moving Ireland toward a more climate-neutral, circular economy as outlined above.

However overall, this level of reuse represents less than 1% of all goods discarded⁷. Taking into account reuse operators not included in our membership, we estimate reuse is no greater than 3 - 5%⁸ of all goods discarded overall. Ireland’s material consumption also remains above the EU average and continues to rise as the economy grows. As highlighted in the Whole of Government Circular

⁷ It is noted that an EPA funded research project [Q2Reuse](#) will clarify the scope and scale of reuse activities.

⁸ Our membership base is broadly representative of the reuse sector in Ireland, including over 460 retail outlets under the umbrella of the Irish Charity Shop Association. The reuse estimate from members at 23,200 tonnes represents less than 1% of all goods discarded. Based on a conservative estimate of non-member reuse including second hand retail and online exchanges we do not estimate the overall figure to be greater than 3 - 5%.



Economy Strategy 2021 - 2022 pre-consultation document, Ireland's circular material use rate was the second worst in the EU in Ireland in 2019.

Reuse and repair clearly remain far from mainstream in Ireland.

EXISTING SITUATION: REPAIR

Many CRNI members undertake repair activities, with a particular focus on furniture, IT asset management and bicycles. However, certain types of repair - and especially community based repair such as repair cafes or repair of other EEE - remains hampered by liability and administrative barriers in Ireland.

The world-wide repair cafe movement⁹ aims to engage more people in repair through community events where volunteers provide free repair advice and show visitors how to repair. Although there are over 2,000 repair cafes worldwide, in Ireland these events have been stymied by insurance concerns. It is now extremely difficult to find any insurance company that will provide product liability cover for repair cafes.

CRNI, as a member of the [Right to Repair](#) campaign, is working at European level to address other barriers to repair including design factors and access to spare parts and repair manuals.

RECOMMENDATIONS: PREVENTION, REUSE AND REPAIR TARGETS

Progress against prevention targets can be difficult to interpret as population changes or consumption patterns can affect them as much as actions that directly reduce household waste arising. Furthermore, the absence of any repercussions for failure to meet the 1% household waste reduction has weakened the case for support and investment in waste prevention including reuse and repair.

In the revised NWMPCE, we support the introduction of targets for reuse, repair and resource consumption as committed to in the Waste Action Plan for a Circular Economy. The case for introducing reuse targets in particular is strong.

Targets play an essential role where the markets fail to ensure the right environmental or social outcome, due to a failure to recognise externalities. For example, renewable energy and recycling have been widely subsidised through different schemes to ensure that Ireland meets its respective targets and as a result, both activities could now be considered mainstream. As flagged above, reuse and repair remain far from mainstream in Ireland and a target is needed to help address this market failure.

Introducing quantitative targets for reuse would put Ireland in a leadership position and prepare the sector for the introduction of targets under the Waste Framework Directive from 2024. The European Prevent Waste Coalition paper *10 Priorities to transform EU waste policy* called for, as the top

⁹ See <https://repaircafe.org/en/>



priority, ambitious and binding waste prevention and reuse targets. The CIWM¹⁰ found a key barrier to reuse in the UK and Ireland was a lack of targets or legislation to drive the sector.

RECOMMENDATION: A kg/inhabitant reuse target (as per the Flemish target) that is linked to job creation must be introduced.

This was effectively achieved in Flanders and supports the social economy which is instrumental in delivering reuse.

In addition, any targets that repair¹¹ and resource efficiency¹² are warmly welcomed. Further clarity on what is envisaged in relation to these would be helpful. Regarding repair, CRNI has been seeking the introduction of targets for preparation for reuse of WEEE (IT equipment and LHA) as outlined below. We also welcome the ambition in the *Whole of Government Circular Economy Strategy 2021 - 2022 pre-consultation* to bring Ireland's circular material use rate above the EU average by the end of this decade.

Setting a target for and measuring reuse in Ireland presents an opportunity to make a crucial link between reuse and emissions reduction under the Climate Action and Low Carbon Development (Amendment) Bill 2021. Already the Climate Interim Actions 2021 clearly demonstrate joined up thinking and a strong commitment from Government to climate action and circular economy. While we acknowledge this is a complex area due to the global nature of manufacturing of consumer goods, providing a link between reuse and manufacturing emissions would highlight the impacts of production and distribution of the goods we use on a daily basis and strengthen links to the Climate Action Plan.

RECOMMENDATION: We propose that the NWPCE should commit to exploring this potential for reuse to contribute to greenhouse gas emissions reporting.

As the sector strengthens in Northern Ireland, with the establishment of the Northern Ireland Resources Network, there is also an opportunity for cross border collaboration on a reuse target which could drive a Shared Island approach to reuse and repair. The Department of the Economy in Northern Ireland is currently working to benchmark Northern Ireland's circularity gap and has established a Circular Economy coalition, which involves the [Northern Ireland Resources Network](#)¹³, to help drive progress to create a more CE in Northern Ireland.

RECOMMENDATION: The opportunity for all island approaches to targets for both reuse and circular material usage rates and/or circularity gap closure should be explored.

¹⁰ CIWM report, Reuse in the UK and Ireland - a "State of the Nations" report for the CIWM, 2016, available at <https://www.ciwm.co.uk/ciwm/news-and-insight/reports-and-research.aspx>

¹¹ Noting the scope of the reuse measurement under investigation in Q2Reuse does not include repair where the item is returned to the owner.

¹² Which may be informed by the work of Oeko-Institut and Plan Institut on *New Data Streams for Circular Economy Monitoring* (discussed during a webinar in March 2021) which will be developed into monitoring frameworks by The European Topic Centre.

¹³ Recently established by CRNI with funding from DAERA



CRNI would be happy to contribute to further discussions with DAERA on these targets.

The ability to measure reuse is crucial in setting a reuse target. Clear and transparent methods of measurement and close monitoring would be required to prevent any false reporting or out of scope activities being included.

Ireland is currently leading the way in developing a methodology for measuring reuse through the EPA funded Q2Reuse project¹⁴. Led by the Clean Technology Centre (CTC), in collaboration with the Rediscovery Centre, Community Resources Network and the Eastern Midlands Waste Region, this project aims to develop methodologies for the qualitative and quantitative assessment of the reuse sector that reflects EU guidance but is tailored to the Irish market.



The tailored methodology made available through the Q2Reuse project to measure reuse will facilitate the near term introduction of targets and help realise the ambition in the Waste Action Plan for a Circular Economy to introduce a reuse target in advance of any EU targets.

RECOMMENDATION: The reuse target should be introduced within the next 2 to 3 years.

As highlighted above, clear accountability and consequences for failure to meet any target are required for it to be effective. The current “competition in the market” model removes any accountability for waste prevention or reuse from waste collectors, who only focus on recycling or disposal. There is no mechanism for them to support or drive wider prevention or reuse activities. We believe EPR schemes (for relevant product groups) and waste collectors **should be held accountable for waste prevention to a much greater extent** - including for at least part of a reuse target.

Requiring the reuse sector to measure their activities toward a target would add an administrative burden to some already struggling enterprises. Supports will be crucial to underpin a reuse target including financial instruments or grants for data collation. **Further recommendations in relation to supports are provided in Sections 3.2 and 3.4.**

RECOMMENDATION: While we understand that data to support annual reports for regional plans is challenging to obtain, we propose that annual updates on progress against targets and objectives for the NWPCE should be embedded in the plan.

This would enable a wider discussion about potential countermeasures that can be taken if required to meet the ambition of the plan. A strong precedent has been set recently in terms of progress updates in Ireland’s *Rural Development Policy 2021-2025*, which commits to committee oversight and biannual progress updates on the implementation of the policy.

¹⁴ See <http://www.rediscoverycentre.ie/research/q2reuse/> for more information

Food Waste Prevention Targets



In Ireland, the EPA estimates that one million tonnes of food is wasted every year. At the same time, one in ten people do not have enough food to eat.

CRNI member FoodCloud is a social enterprise prioritising feeding people by redistributing surplus food to charities. In 2020 they redistributed over 3,000 tonnes surplus food.

RECOMMENDATION: For Ireland to make progress in food waste reduction and become a "farm to fork" global leader in this area, **a mandatory food waste prevention target of 50% by 2030** along with an interim target to drive progress must be introduced.

An interim target will place Ireland on the correct pathway in the near term. For example, an interim target for 2025 of 30% food waste prevention was set in Scotland. This was measured against the baseline year being discussed at EU level of 2017/18.

As for a general reuse target outlined above, any food waste prevention target must be supported by data, policy drivers and underpinned by clear lines of accountability and penalties for failure to meet targets. While a commercial food waste measurement methodology has been developed¹⁵, it has not been widely adopted to date across the supply chain. However, a baseline year could be selected now for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

Further data is also being investigated as regards food waste prevention. FoodCloud has just embarked on a project to investigate the potential for increasing surplus food redistribution from the Irish horticulture sector. There is evidence which has been recently studied through Munster Technological University and confirm through the Efficient Food Project that a significant amount of edible food is being 'wasted' (AD, animal feed, in-field) in the sector and that with the correct intervention and financial support for producers, redistribution of edible products could become a more attractive option.

This project, inspired by a project in the UK, Fareshare's 'Surplus with Purpose' fund, aims to shed light on the situation in an Irish context and trial innovative solutions to facilitate the redistribution of surplus food from the horticulture sector to the charity sector, thereby reducing food waste and addressing food insecurity in Ireland. Outputs will include a detailed waste profile report on the produce sector, as well as trialled and tested solutions that reduce edible waste and increase the ability of the sector to redistribute edible waste.

Other support measures would clearly be required to support this target and align investment with the food hierarchy and to raise consumer awareness about the true cost of food waste. For example, the project referred to above will provide a blueprint for a fund or initiative which helps companies

¹⁵ Available for download at <https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/>



to offset the costs involved in diverting edible surplus food to FoodCloud that otherwise may not have been sent for human consumption.

EXISTING SITUATION: PREPARATION FOR REUSE

Preparation for reuse refers to the operation on the second tier of the waste hierarchy involving *checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing*. In Ireland, the only activity formally registered as “preparation for reuse” is the refurbishment and sale of Waste Electrical and Electronic Equipment (WEEE) that has been taken back through the EPR schemes as a waste.

There are currently no companies in Ireland registered for preparation for reuse. This means that all of the WEEE collected via take back schemes or at Civic Amenity Sites is recycled.

According to the European Commission, between “13% and 16% of waste electric and electronic equipment (WEEE), furniture and leisure goods disposed of at household waste collection centres are in excellent working condition and could easily be prepared for re-use”¹⁶. This suggests that in Ireland, up to 2,325,000 appliances were lost to recycling in 2017 that may have been perfectly functional and potentially reusable when collected by take back schemes¹⁷.

RECOMMENDATIONS: PREPARATION FOR REUSE TARGETS

Urgent measures are required to address the total absence of preparation for reuse activity, which is a major gap in Ireland’s Circular Economy journey.

CRNI has strongly advocated¹⁸ targets for preparation for reuse in line with recommendations in the EPA research report¹⁹ by University of Limerick, with a focus on IT equipment and large Household Appliances (LHA)²⁰. These must be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014.

Other measures are also required to underpin a target or generally support preparation for reuse are within the plan’s remit. In particular, suitable infrastructure is required in order to underpin a preparation for reuse activity.

¹⁶ European Commission (2019), *Waste potential: more of our refuse electronics, furniture and leisure goods could be reused, suggests German study*. Available at

https://ec.europa.eu/environment/integration/research/newsalert/pdf/waste_reuse_potential_Germany_530na3_en.pdf

¹⁷ Based on collected data from <https://www.weeeireland.ie/>

¹⁸ See also our submission to the Waste Action Plan for a Circular Economy at <https://crni.ie/key-policy-areas/>

¹⁹ Report prepared for the EPA by Johnson, M., McMahon, K, Fitzpatrick, C. *Research of Upcycling Supports to Increase Re-use, with a Focus on Waste Electrical and Electronic Equipment (UpWEEE)*, REF 2015-SE-DS-5, published 2018

²⁰ LHAs and IT were identified as the main product categories with potential for re-use. Further consideration and feasibility studies for alternative WEEE product categories and the introduction of preparation for re-use is necessary before increasing the number of product categories that preparation for re-use will apply to.

RECOMMENDATION: Preparation for reuse infrastructure must be viewed as critical waste infrastructure and prioritised for investment and support in line with the waste hierarchy.

As long as these activities continue to be omitted from the overall landscape of resource management, they will not be brought into the mainstream as is required for an effective circular economy. This is elaborated further in Section 3.4.

Access to sufficient volumes of good-quality material is also cited in the EPA/UL report as a “*block that hinders the success of the Irish system*” in establishing and preparing for re-use for WEEE.

RECOMMENDATION: Recommendations from the EPA/UL report to reduce the damage to the structural integrity of appliances, cosmetic dents, scratches and blemishes, and general transport damage should also be implemented including:

- **improving collection facilities at civic amenity sites** and retailers;
- providing preparation for reuse operators **with direct with access to material at these facilities;**
- requiring compliance by collection and transport agents to minimum technical recommendations that ensure the quality of waste goods is preserved for preparation of reuse.

Many of these actions can be supported through transforming Civic Amenity Site services and functions, as part of the current ongoing review. This is further elaborated in Section 3.4.

EXISTING SITUATION: RECYCLING

As noted the former RWMPs included a target of achieving a recycling rate of 50% of managed MSW by 2020. They also included a Policy Action C.3.1 to liaise with & support Economic Development Departments of Local Authorities in the identification of enterprises and potential clusters of enterprises for the development of secondary material markets.

The revised Waste Framework Directive includes more stringent combined preparation for reuse / recycling targets. These are not only more ambitious in the rate that must be achieved, but are also more challenging for Ireland because they now must be measured against the entire MSW stream rather than specific material categories as was previously the case.

While this will make it more difficult to meet the target, it also presents an opportunity to include previously uncounted activities within the target calculation.

For example, approximately 620 tonnes of steel springs were recycled by our social mattress recycling members in 2020. Other materials from dismantling such as fabric covers or “ticking” (mainly polyester), foam padding (polyurethane foam or synthetic latex and felt padding (natural and synthetic fabric scraps) could also contribute to these targets in the future if recycling outlets became available.

However, there is currently a lack of indigenous facilities to deal with these materials. As most of the recycling markets for these products are only available in Britain, their bulky nature and cost of shipping and transportation reduces the margin to recyclers. Outlets are needed within Ireland to close the loop and better facilitate reuse and recycling of these problematic waste streams.

RECOMMENDATIONS: RECYCLING TARGETS

RECOMMENDATION: The full recycling potential for mattresses will only be realised by **supporting indigenous recycling infrastructure** to reprocess mattress components (textiles, foams) in infrastructure planning, and supporting market development for the end products.

Some excellent work has already been carried out in this area e.g. by the former Boomerang Enterprises in partnership with Ventec on the noise barrier properties of materials. However, further research and business supports are required to demonstrate the properties of these materials and bring them to market. If successful, these materials could be marketed under a quality mark such as ReMark²¹ as a recognised symbol for consumers for traceable, genuinely repurposed and reused goods.

A shared island approach to mattress recycling infrastructure, including expanded deconstruction capacity and end markets for extracted components (that currently have to be shipped for recycling) also warrants further investigation as a way of providing cost efficiencies in recycling of this difficult waste stream.

Other measures to drive mattress recycling include the introduction of a mandatory EPR scheme, **increased collection of mattresses through Civic Amenity Sites** (see Section 3.4) in partnership with social enterprise and a ban on mattresses going to landfill.

3.2 MAKING AVAILABLE RESOURCES FOR WASTE PREVENTION ACTIVITIES

EXISTING SITUATION: RESOURCES FOR WASTE PREVENTION ACTIVITIES

Policy Action B.1.2 of the former RWMPs is to ensure that an ongoing financial allocation is made in the Local Authority budgets to cover expenditure on waste prevention and related activities over and above staff costs and any grant aid (a minimum of €0.15/inhabitant).

Local and national supports and investment will be crucial in driving the sector in today's linear economy, and ensuring that reuse and repair become the cheapest and/or most convenient options.

CRNI is aware of some excellent examples of Local Authorities supporting new initiatives to get off the ground, for example paint reuse in Waterford and Cork. However, in the absence of any data relating to how this money was spent on prevention and related activities, it is difficult to understand how effective this measure has been.

²¹ See <https://crni.ie/re-mark/>

RECOMMENDATIONS: RESOURCES FOR WASTE PREVENTION ACTIVITIES

As noted in Section 3.1, **more regular reporting on progress against plan objectives** would help clarify how effective the spend has been and generate discussion on how it could be better targeted in the future.

CRNI has been lobbying for the introduction of support measures including a 0% VAT on refurbished goods, a tax incentive encouraging businesses to donate surplus goods or food, reduced “commercial” rates nation-wide for prevention and preparation for reuse activities, investment in infrastructure, a dedicated Community Services Programme or equivalent for green, circular and climate friendly community services and inclusion of second hand bikes in the Cycle to Work Scheme.

At least three of these instruments are within the remit of the National Waste Plan; reduced “commercial” rates, Green Public Procurement and investment in infrastructure.

1. Rates

Currently, rates for reuse and repair centres are varied due to the different approaches by Local Authorities to commercial activities.

In some areas, for example, charity shops pay full commercial rates for their retail premises. As a result, charity shops in Ireland are spending approximately €2 million total or between 1/6 and 1/3 of their store income on rates in areas where they are deemed to be commercial operators. This approach diminishes their potential for social impact e.g. providing essential health and disability services that supplement State services. By contrast, charity shops in Northern Ireland are exempt from commercial rates and in the UK pay approx. 20% full commercial rates.

A uniform reduced rates approach to reuse or repair centres nation-wide is within the scope of the NWMPCCE and would help underpin the viability of reuse and repair operations.

RECOMMENDATION: Support for waste prevention activities should include rates relief. This could be delivered through 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.

2. Green and Social Public Procurement

There is significant potential for Local Authorities and other public bodies to leverage their purchasing requirements to deliver circular and social impacts. **Recommendations on this are elaborated in Section 3.4.**

3. Infrastructure

The growth of prevention activities including reuse, redistribution and repair will require the development of physical infrastructure as well as investment in operational and behavioural change activities. **Recommendations on this are elaborated in Section 3.4.**



3.3 PROMOTING BEHAVIOURAL CHANGE AND WASTE PREVENTION ACTIVITIES

EXISTING SITUATION: PROMOTIONAL ACTIVITIES

One of the roles of the Regional Authorities is to provide education and advice to households and communities to empower them to reduce, reuse and recycle. Key policy actions under the former RWMP objective (B.2) include collaboration on prevention initiatives and programmes targeting priority areas, cataloguing and disseminating documents on waste prevention actions and programmes, maintaining effective local awareness and education programmes and maintaining and developing prevention measures and systems in Local Authority offices and operations.

Many excellent initiatives have evolved from this objective including the annual Reuse Month campaign, support for the Conscious Cup campaign, Refill Ireland and the National Centre for a Circular Economy and the development and roll out of the mywaste.ie portal. Reuse month continues to be a valuable platform for promoting reuse and CRNI values the ongoing collaboration with the regional authorities, and support for our members, during these campaigns. Like any campaign, its value continues to grow as it becomes more widely known and can build on past support.

With an increasing number of stakeholders including CRNI members, DECC, NGOs, involved in the area of prevention, reuse, and repair it has become more important to coordinate and collaborate on awareness campaigns and messaging. For example, many CRNI members focusing on awareness raising and promotion of reuse through creative or practical means include the Cloth Nappy Library Ireland, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green and Native Events.

RECOMMENDATIONS: PROMOTIONAL ACTIVITIES

RECOMMENDATION: Alongside our members, we support and look forward to the continuation and ongoing development of Reuse Month October as an important fixture in the calendar.

The role of community action like that fostered during reuse month and other local authority initiatives is very important in raising awareness and reducing waste in key areas. The Local Authorities are in a unique position to support such actions that provide opportunities for experiential learning that have real impact at community scale.

RECOMMENDATION: We would like to see **more support for existing national waste prevention campaigns** such as Conscious Cup Campaign, Refill Ireland and Cloth Nappy Library Ireland - through Local Authority funds, promotional channels and through support from Councillors.

We would also like to encourage more support for pilot projects **or more support to replicate successful pilots** in other areas.



In general, we encourage **greater collaboration** between the Regional Authorities through the NWMPCE, the proposed new DECC national communications and education programme and other stakeholders in relation to the provision of education and advice on reducing, reusing and recycling, including campaigns.



One important tool aimed specifically at promoting behavioural change is “**ReMark**”, a quality mark developed by CRNI through the EPA Green Enterprise programme. ReMark aims to address negative consumer perceptions about the quality and safety of second hand goods. It builds customer experience through improved service and visual merchandising as well as delivering training and additional profile to build the capacity of reuse operators as summarised in the videos here²².

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



According to Zero Waste Scotland, the Scottish quality mark Revolve²³ is a **key part of the reuse development work** being taken forward as part of the Scottish Government’s *Making Things Last strategy*²⁴. 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. *Northern Ireland’s Waste Prevention Programme 2019: Stopping Waste in its Tracks* commits in Action to establishing a reuse quality mark. We believe an all island approach could bring further momentum and benefits and is worth exploring.

RECOMMENDATION: Support is now required to develop it to the next stage, with the opportunity for roll out on an all-island basis in collaboration with Northern Ireland’s DAERA²⁵.

²² <https://www.crni.ie/re-mark/>

²³ upon which ReMark is based

²⁴ <https://www.letsrecycle.com/news/latest-news/zero-waste-scotland-reports-growth-of-revolve-standard/>

²⁵ DAERA commits through *Delivering Resource Efficiency* to supporting “the development of a certifiable re-use voluntary quality assurance scheme and work with DECLG in assessing the feasibility of introducing a scheme on an all-island basis”.

3.4 ESTABLISHING REUSE, REPAIR AND PREPARATION FOR REUSE ACTIVITIES AND NETWORKS TO RECIRCULATE AND EXTEND THE LIFESPAN OF ITEMS

EXISTING SITUATION: ESTABLISHING REUSE, REPAIR AND PREPARATION FOR REUSE ACTIVITIES

One of the roles of the regional authorities is to work with Local Authorities to achieve waste prevention and resource efficiency targets. The former RWMPs Policy Action C.1.1. is to engage with and facilitate enterprises in the development of repair and preparing for reuse activities. The *Waste Action Plan for Circular Economy* also commits to reviewing the role of the State in supporting the development of indigenous recycling infrastructure.

In the absence of any baseline data, it is difficult to measure growth in reuse and repair activities. There have been many positive developments supported through the Regional Plans or Local Authorities - for example, support for educational services via the National Centre for a Circular Economy at the Rediscovery Centre, the repairmystuff.ie platform and the expansion and production of paint reuse (Rediscovery Centre, Northside Community Enterprises, CycleSense, Renew Enterprises).

However, social supports such as the Community Services Programme, Community Employment scheme or TuS, remain fundamental to the development of new enterprises or ongoing viability of existing reuse and repair enterprises in Ireland. Other funding such as the EPA Green Enterprise programme and Rethink Ireland, have also facilitated the development of new activities (e.g. Roscommon Women's Network CycleUp, Tech2Students).

As shown in Section 3.1, there is **significant scope for growth and development of the prevention and preparation for reuse sectors**. This will require the development of and support for new infrastructure to facilitate the handling and management of increasing quantities of product flows.

Examples of reuse and repair infrastructure are repair / upcycling workshops, sorting centres, storage hubs, reuse parks, refill systems²⁶, reverse logistics systems²⁷, exchange platforms, redistribution centres, surplus food transformation centres and retail spaces. Such infrastructure is currently underdeveloped or where it does exist, is under-resourced.

RECOMMENDATIONS: GROWTH IN REUSE, REPAIR AND PREPARATION FOR REUSE ACTIVITIES

The growth of prevention activities including reuse, redistribution and repair will require the development of physical infrastructure as well as investment in operational and behavioural change activities.

²⁶ For example water refill stations, washing facilities for reusable cup refill, reusable packaging refill stations e.g. Loop

²⁷ 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>



One centrally important function of the RWMPs - and now the NWMPC - is infrastructure planning. Historically this has focused on recycling, recovery and disposal infrastructure.

RECOMMENDATION: In the context of the Circular Economy it is crucial that infrastructure planning now incorporates and supports infrastructure required for prevention (avoidance, reuse and repair) and preparation for reuse.

In parallel, it is important that the planning process ensures material flows are not “locked in” to established recycling or recovery capacity, to the detriment of prevention and preparation for reuse activities.

RECOMMENDATION: Investment in and support for infrastructure driving prevention must be prioritised, followed by infrastructure for preparation for reuse, through low interest loans, grants, or other mechanisms.

Crucially, the Green Recovery and accompanying funding²⁸ provides a unique opportunity to make these investments and source the necessary finance for this important work. Other policies, such as *Our Rural Future*, also support access to community spaces throughout rural Ireland and should be explored at local authority level as a way to provide workshop and retail spaces for circular activities.

RECOMMENDATION: The potential for a shared island approach to prevention or preparation for reuse infrastructure storage should also be explored.

This would offer economies of scale and/or a buffer to localised capacity shortages. The small scale of the sector currently means this potential has yet to be widely realised.

CRNI would welcome the opportunity to contribute to prevention and preparation for reuse infrastructure planning, given the knowledge base of our membership and emerging research. Some examples of future infrastructure needs are outlined below.

Textiles

Article 11.1 of the revised EU Waste Framework Directive (WFD) obliges Member States to set up separate collection for textiles from 1 January 2025, which will lead to significant changes in the Irish second hand textiles sector.

A recent study²⁹ for the EPA on post consumer textile flows found that over 100,000 tonnes of used textiles are recovered or sent to landfill each year from household, commercial and industrial sources. This compares with approx. 10,000 tonnes being reused locally and roughly 40,000 tonnes being exported for reuse.

²⁸ e.g. National Recovery and Resilience Plan - see also CRNI submission to this programme at <https://crni.ie/key-policy-areas/>

²⁹ Due for publication shortly. Figures provided can be determined from data in the public domain.



If separate collection led to the diversion of 10% more textiles away from household bins, **a further 7,000 tonnes would require collection, sorting, retail and/or export, upcycling or downcycling**. This represents the total amount currently sold through the network of over 450 charity shops in Ireland. If just 50% of this amount were diverted to reuse³⁰, it would save 33,250 tonnes carbon³¹.

The EPA Green Enterprise [Circular Textiles](#) project led by CRNI, commenced in February 2021, aims to inform the design of separate collection schemes and identify ways to expand or develop local capacity for managing the textiles collected. It will help inform the conversation about infrastructure needs for used textile management. Through this work, we look forward to supporting the Regional Authorities in informing the reuse infrastructure requirements for the textile sector.

Electrical and Electronic Equipment

As highlighted in Section 3.1 on Preparation for Reuse, **approx. 2,325,000 appliances were recycled in 2017 that may have been perfectly functional** and potentially reusable when collected by take back schemes³². However there is a lack of any infrastructure to facilitate the screening, repair and reuse of such equipment.

Significant investment is required to establish systems that can protect the quality of goods (see also Section 3.1 on Preparation for Reuse and below recommendations on Civic Amenity Sites), enable screening, checking and diagnosis, repair, testing and retail of these goods to enable their quality and safety on return to the market.

By way of comparison, a pilot on the preparation for reuse of washing machines³³ in 2017 by Rehab Recycle which ran over the course of one year only handled just over 300 units for reuse out of 23,129 appliances accepted into the trial. While this implied a reuse rate of just 1.5%, (noting the lack of systems for preserving quality of the goods), it does illustrate the scale of the infrastructure challenge i.e. 300 units handled over one year vs. over 2 million units potentially reusable.

EXISTING SITUATION: CIVIC AMENITY SITES

In the former RWMPs, Policy Action C.1.2. is to review and amend (where appropriate) existing and/or condition the award of new Local Authority Civic Amenity Site (CAS) contracts to facilitate the segregation of materials for reuse/preparing for reuse by social enterprises and similar organisations. This included an objective to reuse or prepare for reuse of up to 10% of non residual waste at local authority CAS.

As public facing facilities, we believe that CAS provide an important opportunity to enhance access to reuse (both for donations and claimants) and develop awareness of and a culture for reuse.

³⁰ Approx. reuse rate at charity shops based on stakeholder interviews through Q2Reuse

³¹ Based on KPI of 9.5t CO₂/t clothing (based on t-shirt) from report: Miller, S. & Purcell, F., 2017, *Key Performance Indicators for the Reuse sector*, Project Ref 51, available [here](#)

³² Based on collected data from <https://www.weeireland.ie/>

³³ Johnson, M. et al, *A Preparation for Reuse Trial of Washing Machines in Ireland*, 2020, available at <https://www.mdpi.com/2071-1050/12/3/1175>



The National Review of CAS is a very welcome development and highlights this potential for reuse collaborations. The report found a relatively limited amount of reuse is currently taking place at CAS at present but no clear explanation was given as to why this is the case. This is particularly striking when compared with the levels of reuse realised at CAS in many other Member States, where a wide range of materials are screened and stored (in weather proof containers) for reuse, often in partnership with social enterprises or onsite stores.

Some of the activities identified in the review at Irish CAS were paint, books and bicycle reuse (for the ‘School for Africa’ initiative on behalf of Rotary Ireland), while a number of once off reuse projects were noted including the reuse of toys, materials for theatre productions and salvaging of equipment parts (e.g. a knob or a handle for a cooker/fridge).

We note that CAS reuse activity delivered by our members was not highlighted through the report most likely due to the outcome of random sampling. Our members are active at CAS, with, for example, the Rediscovery Centre taking paint and bikes from Dublin based CAS for several years and An Mheitheal Rothar also taking bikes from a CAS in Galway.

While these members also retain records of products taken from CAS for reuse and in some cases, provide receipts of what was taken, they are the only ones recording or reporting this reuse information. It is our understanding that Local Authorities may report this reuse activity as waste taken offsite by a waste contractor. There is no requirement for records to be kept or reporting on reuse activities that take place and this makes it extremely difficult to identify or measure reuse activities taking place.

As such, there is not sufficient information to determine whether any sites are currently delivering on the 10% target. We are not aware of any tenders that meet the policy action C.1.2 particularly involving partnerships with social enterprises.

RECOMMENDATIONS: CIVIC AMENITY SITES

As a first step, any reuse activities already taking place at CAS should be measured and promoted.

RECOMMENDATION: There should be a requirement by Local Authorities to both record reuse and promote the reuse occurring at CAS more strongly. Incentives for Local Authorities to report on reuse or performance targets for reuse at CAS should be introduced.

We look forward to seeing much greater ambition for and progress on reuse at CAS through the NWPCE. We believe this requires a change in language that signals a shift toward reuse such as “**Recovery Parks**” which would also engage the public and support behavioural change.

RECOMMENDATION: We also strongly advocate for more **widespread and appropriate reception facilities that preserve the reuse potential** of items.



We believe that facilities for the reuse or recycling of a minimum number of product groups should be provided at every CAS in coordination with social enterprises (as a priority) that can handle these products. Other product groups may be more easily coordinated at a regional level. Examples of product groups that could be collected for reuse at CAS include bicycles, paint, bulky goods, EEE, wood and mattresses for recycling.

RECOMMENDATION: The requirement for reception and screening should be included in tender clauses in future. Operators should also be encouraged to partner with or provide priority access to donated materials for social enterprises.

EXISTING SITUATION: ENGAGEMENT WITH CRNI

In the former RWMPs, Policy Action C.1.3 is to engage with CRNI and other similar networks to develop a network of reuse/upcycling activities and promotional events.

This action is important not only in the spirit of collaboration and maximising use of resources, but also in the context of European policy. The revised Waste Framework Directive recognises the importance of national networks in promoting reuse and preparation for reuse and requires Member States “promote reuse including through the establishment & support of reuse and repair networks, such as those run by social enterprises ...” and “take measures to promote preparing for reuse activities, notably by encouraging the establishment of and support for preparing for re-use and repair networks ...”.

RECOMMENDATIONS: ENGAGEMENT WITH CRNI

As the only national network supporting repair, reuse and recycling actors, CRNI is well-positioned to drive growth of the sector in line with national, European and international objectives, such as the United Nations Sustainable Development Goals (SDGs 8, 12, 13) via the implementation of the EC’s Circular Economy Package.

RECOMMENDATION: We would welcome in the NWMPCE ongoing recognition and a continued commitment to collaborate on campaigns and research and relevant policy areas with CRNI and our members to promote reuse and preparing for reuse activities.

EXISTING SITUATION: RESOURCE EFFICIENCY CRITERIA IN CONTRACTS

In the former RWMPs, Policy Action C.4.1 is to prepare resource efficiency criteria for Local Authority waste related contracts and Policy Action C.4.2. is to implement a systematic engagement with local / regional Local Authority procurement officers and the Office of Government Procurement (OGP) to ensure the inclusion of resource efficiency criteria in contracts. The *Waste Action Plan for a Circular Economy* also commits to ensuring Green Public Procurement actions feature prominently in the development of future public plans, in particular the National Waste Prevention Plan and the new NWMPCE.



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 criterion³⁴, without considering any potential added social or environmental value.

This experience is also reflected in Ireland where engagement with reuse and repair goods and services through public procurement remains low, despite increasing emphasis on the social and environmental accountability of Public Bodies through the Climate Action Plan, Circular 20/2019, Resource Efficiency Action Plans, the Waste Action Plan for a Circular Economy and more.

In 2019, CRNI coordinated a consortium of members and other suppliers in delivering an award winning project³⁵, which was the first of a kind at scale to support Circular and Social objectives in Ireland. The National Waste Collection Permit Office project involved the delivery, assembly and installation of 100% reused and upcycled furniture for a new office space - in total 97 items of furniture - which saved 2.6t carbon and supported jobs and training in social enterprises. Further information on this project is available [here](#).

There is a very diverse range of reuse, repair and recycling goods and services available that Local Authorities could more actively involve through circular and social procurement as highlighted in our member directory [here](#).

Many opportunities also exist to support more circular and social aims at Civic Amenity Sites. There are currently no charity retailers in the ICSA that have contracts with Local Authorities in Civic Amenity Sites. The textiles collected in banks operated by commercial textile recyclers are typically exported, with a small % of profits passed on to a nominated charity. By contrast, of the textiles collected in banks that are operated by charity retailers, approx 50% are sold locally and 100% of the profits accrue to the charity. Therefore the social and circular gain of supporting charity retailer textile banks is considerably higher than the current alternative. It is also noted that there is an amount of unregulated activity taking place in this sector to the extent that the Charity Regulator has issued guidance on how textile banks should be appropriately labelled³⁶.

Opportunities to improve circular and social procurement via the appropriate design of grants and other funding also exist. Organisations are often required to provide quotes for new items to satisfy funding requirements and demonstrate value for money. This precludes second hand goods even though these may provide the best value.

In relation to recycling, the last few years have seen the delivery of very successful mattress amnesty events as part of the Anti-Dumping Initiative. These have also seen enhanced collaboration between Local Authorities and social recyclers for one-off events. However, social recyclers struggle to access

³⁴ European Commission, Public procurement strategy, available at https://ec.europa.eu/growth/single-market/public-procurement_en

³⁵ The project won the Green Procurement category at the National Procurement Awards in 2020

³⁶ <https://www.charitiesregulator.ie/media/2159/clothing-collections-public-notice-final.pdf>



mattresses for any longer term arrangements at Civic Amenity Sites as the tendering process is not designed to enable this as a separate service.

Social enterprise dismantling mattresses for recycling in Ireland include Eco-Mattress Recycling (Eastern-Midlands) and BounceBack Recycling (Connaught-Ulster).



RECOMMENDATIONS: RESOURCE EFFICIENCY CRITERIA IN CONTRACTS

We welcome the Waste Action Plan commitment to expanding the public sector and public bodies' role in reuse via Green Public Procurement and Circular Public Procurement setting a minimum target for procurement of used goods. In addition to this, we believe social considerations should be more widely included alongside circular objectives. As highlighted above, the design of regional or local grant schemes and funds should also embed the principles of circular and social procurement through facilitating organisations in purchasing second hand goods.

RECOMMENDATION: This should be reflected in relation to all local / regional Local Authority procurement contracts and grant or funding schemes through the NWPCE.

The experience in the NWCP and from Interreg projects working on green and social procurement point to a number of actions that public procurers can take. These include facilitating **market engagement and dialogue**, smaller scale suppliers (e.g. **environmental and social criteria, facilitating lots or consortium responses**) and allowing for some **flexibility in specifications**.

CRNI welcomes the work of The Irish Prison Services (as the contracting authority), in conducting market consultation to introduce social procurement³⁷, undertaking a pilot and working toward a framework for directed contracts that support collaboration with social recyclers.

RECOMMENDATION: We strongly encourage Public Sector Bodies to review and adopt the Irish Prison Service framework contract model, which is progressing measures to accommodate social enterprises (e.g. **social clauses, reserved contracts**).

We also encourage working across a diverse range of procurement activities to identify the potential for circular and social procurement. For example, Tidy Towns maintenance contracts could tie in with tool repair and maintenance services provided by a social enterprise.

³⁷ As highlighted in a recent *Buying for Social Impact Guide* (page 40)
<https://op.europa.eu/en/publication-detail/-/publication/3498035f-5137-11ea-aece-01aa75ed71a1>

RECOMMENDATION: We would like to see Local Authorities support more circular and social aims at Civic Amenity Sites, including supporting textile banks operated by charity retailers. At minimum, clear labelling should be required on all textile banks (as outlined for charity banks in the guidance) to demonstrate where the textiles are managed and where profits are directed.

For mattress recycling a continuous and longer term relationship with social recyclers for mattress removal through tendering at Civic Amenity Sites would be preferable.

RECOMMENDATION: This could be addressed through, for example, Local Authorities **splitting Civic Amenity Site management contracts into lots or facilitating smaller contracts for specific streams like mattresses and/or by specifying that successful awardees of larger tenders provide social gain through subcontracts.**

Regular reporting on progress against a target for used goods, and/or green and social public procurement, should form part of the reporting for the NWPCE referred to in Section 3.1.

CRNI has developed a webpage on Green and Social procurement [here](#) and a members Procurement Directory [here](#) to help raise awareness about these and other actions. We also fed extensively into the new Green Public Procurement guidelines due for publication by the EPA shortly.

3.5 PROGRESS ON MANAGEMENT SCHEMES FOR STREAMS INCLUDING (BUT NOT LIMITED TO) PAINT, MEDICINES, MATTRESSES, BULKY WASTES, AGRICULTURAL & HORTICULTURAL CHEMICALS, WASTE OILS

The former RWMPs Policy Action H.2.1. is to investigate the viability of running a pilot scheme for the management of paints. CRNI welcomes the support that has been made available for the expansion of paint reuse schemes, and acknowledges the central role of our member the Rediscovery Centre in making this possible. The success of this targeted action should be applied to other material streams to support reuse and repair initiatives and networks.

3.6 PROGRESS ON ENSURING THE UPPER TIERS OF THE WASTE HIERARCHY ARE FUNDED APPROPRIATELY

Policy Action G.1.1 is to review Local Authority expenditure on disposal / recovery to determine if there is scope to balance expenditure across the hierarchy (e.g. toward prevention, reuse & recycling).

Subsidies and other support for recycling and recovery often have unintended consequences that can seriously hamper prevention or preparation for reuse. Economic Instrument #8 of Annex IVa of the revised Waste Framework Directive is *“Phasing out of subsidies which are not consistent with the waste hierarchy”*.

For this reason we believe policy action G.1.1 is a very important exercise and we request access to any report or update on this assessment.



Our recommendations on supports and investment required for the sector to help rebalance expenditure across the hierarchy are provided in Sections 3.2 and 3.4.