CRNI RESPONSE TO PRE-CONSULTATION ON ALL OF GOVERNMENT CIRCULAR ECONOMY STRATEGY

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 momentum and growing 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.

To realise this ambition in practical terms, we ask that the framework of the All of Government Circular Economy Strategy connects and aligns the various national plans, policies and programmes for a circular economy, **providing a strategic mix of policy action and financial incentives that ensures:**

- **products are better designed**

… by backing a strong sustainable product policy at EU level, the extension of ecodesign regulations to non energy products and facilitating the right to repair for all consumers, and

… by supporting European Commission efforts to develop consumer labelling

- **and prevention and preparation for reuse are more attractive,**

… by creating a framework in the upcoming Circular Economy Bill for targets, coordinating with other plans, tracking progress and taking corrective actions to ensure they are met,

… by including a minimum target for procurement of used goods, monitoring circular procurement in the <€25,000 threshold tenders and supporting efforts to build the local supplier base for circular goods and service

- **… more viable**

… by requiring EPR schemes to focus to a much greater extent on prevention and preparation for reuse and supporting an EPR scheme for mattresses

... by introducing measures to improve access to goods for preparation for reuse operators and at Civic Amenity Sites

... by ensuring end of waste considerations give priority to products that have been or are being prepared for reuse

... by investing in the CSP to create a dedicated fund for circular and climate friendly community services

... by availing of the multitude of European and national funds to back jobs and skills development and facilitating a coordinated approach to jobs and skills

... by assessing the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste

- **... more accessible**

... by prioritising and supporting investment in significant infrastructure for larger scale projects driving prevention and preparation for reuse

... by incorporating and prioritising prevention and preparation for reuse in infrastructure planning and exploring the potential for a shared island approach

.., by continuing to expand and grow grant schemes and research funding in this area

- **... and more affordable than the alternative and become mainstream**.

... by introducing financial measures such as a 0% VAT rate for prevention and preparation for reuse, a tax incentive encouraging businesses to donate surplus goods, a transport subsidy scheme to better support the flow of donations, a limit on commercial rates for prevention or preparation for reuse centres

... by reviewing and moderating all forms of subsidies at national level on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse

We believe this framework should include concrete action with set timeframes and a commitment to tracking progress. These recommendations are described in more detail below.

2.0   CONSULTATION QUESTIONS

2.1   DO YOU AGREE WITH THE DRAFT STRATEGY'S PROPOSED KEY OBJECTIVES? IN YOUR VIEW, ARE THERE FURTHER OR ALTERNATIVE OBJECTIVES THAT SHOULD BE INCLUDED?

TO PROVIDE A NATIONAL POLICY FRAMEWORK FOR IRELAND'S TRANSITION TO A CIRCULAR ECONOMY AND TO PROMOTE PUBLIC SECTOR LEADERSHIP IN ADOPTING CIRCULAR POLICIES AND PRACTICES

We welcome a new dedicated national policy framework and promotion of public sector leadership.

For this broad reaching and complex area, a framework will be important in coordinating interventions across the supply chain and across all sectors necessary for the circular transition. A framework is also required to connect and align the various national plans, policies and programmes for a circular economy.

In this regard, further clarity is sought on how measures, targets and ambition in the All of Government Circular Economy Strategy (AGCES) will align with measures, targets and ambition in the Waste Action Plan for a Circular Economy (WAPCE), National Waste Management Plan for a Circular Economy (NWMPCE), the EPA Circular Economy Programme (CEP).

In addition to setting the scene and creating a framework, we believe that this first AGCES should include more concrete actions and timeframes. We are facing a global climate crisis for which we have a window of less than 10 years to act.

This sense of urgency should be reflected in the AGCES. Ranges should be set for the potential improvements by 2030 and clear policy actions are needed, as proposed in the *Circular Economy Report for the Joint Committee on Environment and Climate Action*.

We have summarised our recommended policy actions in Section 1.0.

We welcome the proposal to regularly update the strategy, which is necessary for this quickly evolving sector.

In addition, we would like to see commitment to producing progress reports and an outline of strong and corrective measures that will be taken where progress is not being made.

In the absence of progress reports, policy ambition is weakened due to a lack of information or repercussions for failure to make progress. A strong precedent has been set recently in relation to 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.

CRNI welcomes this key objective to introduce a target for resource efficiency and we have been advocating for targets for reuse, food waste prevention and preparation for reuse for some time.

However, it is not clear to us how the circularity gap measure will support progress in the areas of prevention, reuse and preparation for reuse. Given the circularity material use rate is a measure of secondary material (rather than product) use, we are concerned that this could downplay the role of prevention and preparation for reuse and lend more focus to recycling.

For example, the EU Waste Framework Directive sets a combined target for preparation for reuse and recycling. However, very little preparation for reuse has counted towards this target, possibly because recycling is easier to achieve within current systems and structures. Therefore, while the overall target in theory supports preparation for reuse it is primarily met through recycling. RREUSE[1] has been calling for a separate target (or a target within a target) for preparation for reuse but to date, only Spain has seen the introduction of preparation for reuse targets.

As flagged, there are already ambitious targets set for recycling through the Waste Framework Directive.

Targets to support prevention and preparation for reuse activities should be the priority in delivering a more circular economy.

We also seek clarity on how targets proposed in various Government plans and policies will be implemented and how they will align. This includes:

- targets for reuse, repair, resource consumption and reduction of contamination levels anticipated in the upcoming NWMPCE (as flagged in the WAPCE), to be implemented by the Regional Waste Authorities. CRNI included in its recent consultation response[2] to this plan a detailed outline of the opportunity for and potential design of such targets.
- targets for material circular use rate targets and priority waste prevention targets in Circular Economy Sectoral Roadmaps flagged for the AGCES, to be implemented by the Department
- quantitative targets that will integrate with monitoring frameworks being developed to capture and report circularity, and support Circular Economy Package reporting requirements flagged in the CEP, to be implemented or supported by the EPA.

It is essential for any clear, effective strategy to drive prevention and preparation for reuse that any and all new targets are accompanied by:

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[1] https://www.rreuse.org/
[2] https://crni.ie/content/uploads/2021/05/CRNI_National-Waste-Management-Plan-for-a-Circular-Economy.docx.pdf

- clear linkages with other targets (are complementary and coordinated)
- clear lines of responsibility and accountability
- clear review periods, corrective measures and consequences for failure to meet targets

A clear plan showing the connection between all proposed targets is required, with lines of responsibility, accountability and measures to be taken following regular reviews of progress.

To raise awareness amongst households, business and individuals about the circular economy and how it can improve their lives
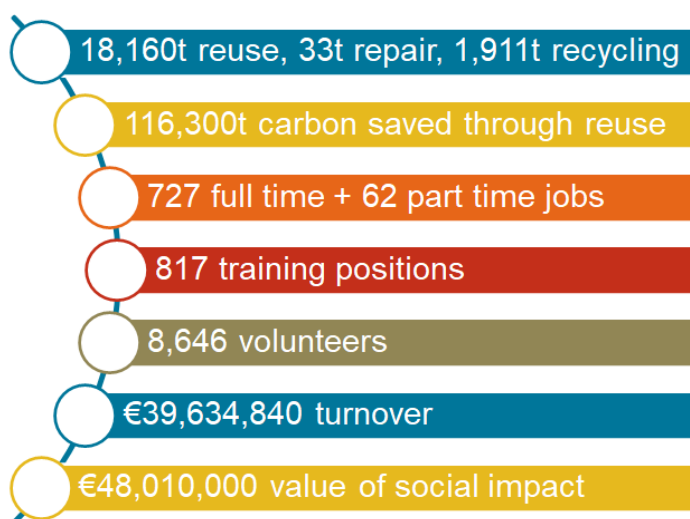
Raising awareness is complex and involves both providing information (to raise awareness), encouraging behavioural change and providing an opportunity to take action, which is the desired outcome of awareness raising.

This requires an understanding of behavioural science and marketing as well as providing a mix of infrastructure and services on the ground that make it easy for people to make the right choices. Measures that can help address these challenges are outlined in Sections 2.5, 2.8, and 2.9 below.

To support and promote increased investment in the circular economy in Ireland, with a view to delivering sustainable, regionally balanced economic growth and employment

We welcome greater investment and support for prevention and preparation for reuse activities to help level the playing field and ensure they are the most accessible, affordable, viable and attractive options and become mainstream.

Current levels of reuse and repair in Ireland are estimated from CRNI member **environmental, social and economic** impact data compiled each year. The impact of their work in 2020[3] is shown below.

CRNI MEMBER
Reuse Repair Recycle

- 18,160t reuse, 33t repair, 1,911t recycling
- 116,300t carbon saved through reuse
- 727 full time + 62 part time jobs
- 817 training positions
- 8,646 volunteers
- €39,634,840 turnover
- €48,010,000 value of social impact

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[3] which was significantly affected by closures due to Covid-19 restrictions

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.

- 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.

This compares with member impacts in 2019 as shown below.

A directory of members is provided on our website[4] and in Annex 1 below.

Overall, this level of reuse represents less than 1% of all goods discarded[5]. Taking into account reuse operators not included in our membership, we estimate reuse is no greater than 2%[6] of all goods discarded overall. Reuse and repair clearly remain far from mainstream in Ireland.

We have described in Section 2.8.1 how targets could be introduced to help address this market failure, but without investment or other support measures, such targets will not be realised. This is because, in the absence of a level playing field, the cost of prevention or preparation for reuse activities can be higher than the alternative (e.g. buying new, single use). In particular, the cost of labour associated with sorting, checking, cleaning, repairing, upcycling and retailing

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[4] crni.ie/directory
[5] It is noted that an EPA funded research project Q2Reuse will clarify the scope and scale of reuse activities.
[6] Based on an initial estimate from the Q2Reuse project, overall reuse levels appear to be no more than double CRNI estimates

goods can outweigh the cost of cheap new goods that do not reflect environmental externalities.

> Investment and other financial support are required to ensure that prevention and preparation for reuse are always the most accessible, affordable, viable and more attractive than the alternative and become mainstream.

We have outlined a number of measures we believe are needed to rebalance the playing field in Section 2.9 below.

> TO IDENTIFY AND ADDRESS THE ECONOMIC, REGULATORY AND SOCIAL BARRIERS TO IRELAND'S TRANSITION TO A MORE CIRCULAR ECONOMY

We support putting prevention, preparation for reuse and social actors at the heart of the strategy. We have identified a number of barriers and possible measures to address these in Sections 2.8 and 2.9 below.

2.2 DO YOU AGREE WITH THE OVERALL LEVEL OF AMBITION SET OUT IN THE DRAFT STRATEGY? IF NOT, IS FURTHER AMBITION NEEDED OR IS THE DRAFT STRATEGY OVERLY AMBITIOUS?

We believe the level of ambition in the AGCES could be further strengthened through:

- providing more measurable outcomes
- focusing more on prevention and preparation for reuse
- providing clarity as to how the ambition in the AGCES aligns with the NWMPCE and EPA's CEP

For example, many current actors in the sector carry out awareness raising measures to promote circular economy activities. To what extent will this strategy support or go beyond these actions? What represents increased investment in the circular economy? At what point is this objective considered sufficiently addressed?

> To achieve a systemically circular economy, involving change at so many levels, a clearer set of outcomes is required. More data collection is required to provide a baseline from which we can develop, but also to inform the level of ambition that can be achieved.

Some practical examples of making prevention and preparation for reuse more accessible, more affordable, more viable and more attractive than the alternative and become mainstream are outlined in Sections 2.5, 2.8 and 2.9.

We also believe there are areas where further ambition is needed.

> Specifically, the opportunity for an all island approach to resource efficiency should be addressed in the AGCES.

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](#)[7], to help drive progress to create a more CE in Northern Ireland. This presents an opportunity for all island approaches to targets and to developing shared infrastructure, particularly in light of work undertaken by the Department of Taoiseach on our Shared Island[8].

2.3   SHOULD IRELAND MEASURE ITS PROGRESS IN ACHIEVING A MORE CIRCULAR ECONOMY RELATIVE TO ITS EUROPEAN UNION PEERS? IF NOT, WHAT ALTERNATIVE BENCHMARK SHOULD IRELAND ADOPT AND WHY?

Showing progress against a target in relation to our European peers can be a good communication tool and helps the population to understand where we are, where we need to go and how. However, we have seen from recycling and other targets that comparisons are often complicated by different reporting methods or completely different approaches to developing a sector.

Oko-Institut and Plan Institut held a webinar in March 2021 on *New Data Streams for Circular Economy Monitoring* to discuss a wide range of potential metrics to measure progress on circular economy. The European Topic Centre will take on the outcome of this workshop to develop concrete monitoring frameworks.

> This work toward a Circular Economy monitoring framework may provide a more comprehensive and in depth assessment of Ireland's position in relation to key sections of the circular economy.

2.4   WOULD YOU RATE IRISH PUBLIC AWARENESS OF THE CIRCULAR ECONOMY AS HIGH, MEDIUM OR LOW? AND HOW IMPORTANT DO YOU THINK RAISING PUBLIC AWARENESS IS TO FURTHER DEVELOPING THE CIRCULAR ECONOMY?

As highlighted in the recent *Circular Economy Report for the Joint Committee on Environment and Climate Action* produced by rapporteur Richard Bruton TD, there is growing concern among consumers about the environmental impact of choices, the ethical means of production and where waste ends up.

The pandemic has seen significant changes to consumer behaviour too with more people shopping locally, which has helped to drive demand for second hand goods particularly in small towns and rural areas. While this may not be specifically linked to an understanding of the circular economy, it is these trends that will ultimately underpin the viability of the sector.

> There is general consensus among CRNI members that raising awareness is of crucial importance. However, this area is complex and awareness on its own is not enough to drive progress.

This is further elaborated in Section 2.5.

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[7] Recently established by CRNI with funding from DAERA
[8] https://www.nesc.ie/work-programme/shared-island/

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 flagged in Section 2.1, achieving this is complex and involves providing information (to raise awareness), delivering behavioural change and providing an outlet for this behavioural change. For example, even if people are aware of what the circular economy means or like the idea of avoiding waste, it can be challenging and not always more economical to act on this knowledge. Furthermore, as noted in Section 2.4, behavioural change (positive or negative) in relation to prevention is not always linked to awareness raising efforts but other macro trends.

There are a number of barriers currently facing consumers such as low accessibility to goods or services that are circular, a lack of clear information and often ambiguous labelling and low confidence on the safety or quality of second hand goods. Discussion at the recent CRNI conference on jobs and skills[9] highlighted that businesses need to understand circular concepts across the entire value chain and applying knowledge of circular practices often requires a tailored approach.

Therefore, parallel effort is required to support education and communication, alongside addressing cost and other barriers, and providing the infrastructure and services on the ground to support action.

As summarised by behavioural scientist Cass R Sunstein, we need to simplify choices and make the best choice the easiest one.

> It is not enough to simply raise awareness but in parallel we need to see improved accessibility and viability of prevention and preparation for reuse activities. This involves a strategic mix of policy and financial incentives for operations and/or infrastructure that makes prevention and preparation for reuse **better designed**, **more accessible, more affordable, more viable and more attractive than the alternative and become mainstream..**

Measures to address this are provided in Sections 2.8 and 2.9.

2.5.1   ENSURE A COORDINATED APPROACH

With an increasing number of stakeholders including CRNI members, DECC, the EPA, the Regional Authorities and NGOs involved in the area of prevention and preparation for reuse, it has become more important than ever to ensure campaigns and messaging are coordinated and collaborated on. While CRNI continuously works to connect with others in this space, a centrally coordinated strategy would best facilitate alignment of individual efforts at national

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[9] See crni.ie/presentations for details

level. This would ensure that the limited resources available to the sector can deliver the greatest impact.

> We welcome the proposal to develop a national circular economy online platform, and an overarching national circular economy 'brand' for Ireland.

A similarly coordinated approach to awareness campaigns is required. As recommended in the WAPCE, a centrally coordinated, multi-annual cross-sectoral national communications and education programme should be put in place.

> This should involve coordination of messaging between all relevant stakeholders, connecting various awareness raising efforts and channels, prioritising messaging and providing coherent, clear and simple communications that engage citizens and businesses.

2.5.2 Support the National Roll out of a Quality Mark

We welcome the proposal in the pre-consultation to expand - in the next iteration of the Strategy - national circular economy branding to non-public sector organisations and private sector circular economy enterprises, products and services, *in a manner analogous to a certification mark.*

Thanks to EPA Green Enterprise funding, ReMark[10], Ireland's Reuse Quality Mark of Excellence has already been developed and piloted by CRNI. This was specifically designed to address negative consumer perceptions about the quality and safety of reused or repaired goods by improving the standard of service and customer experience with reuse organisations, demonstrating to the public the commitment to quality, highlighting the social and environmental benefits of the goods and driving demand.

In the ReMark pilot, surveys conducted before and after accreditation found that ReMark did have a positive impact on customer attitude. Through delivering training and supports, ReMark also helped to build the capacity of participating reuse operators as summarised in the videos[11]. When the ReMark pilot programme finished in March 2019, the report recommended that ReMark be further developed and rolled out throughout Ireland and Northern Ireland.

> We believe that, as it has been for Scotland, ReMark could be a game changer for the sector in Ireland, underpinning measurement and reporting on reuse, Circular Procurement, all island collaboration and national circular economy branding. However, this will require Exchequer support in the near term in order to build and develop the mark before it can support national branding and before the full potential and benefits to the sector are realised.

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[10] https://www.crni.ie/re-mark/
[11] https://www.crni.ie/re-mark/

2.5.3   AVAIL OF EXISTING CHANNELS

Civic Amenity Sites represent an important existing public interface. These should be used to develop awareness of and a culture for prevention, as further outlined in Section 2.8.

We support the ground-up approach proposed in the WAPCE involving community-based networks and will be happy to support this. There are many CRNI members focusing on awareness raising and prevention through creative or practical means, including the Cloth Nappy Library Ireland, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green and Native Events. We would welcome efforts to involve and build on the expertise in such organisations when developing awareness campaigns.

Community development is also an extremely important area for promoting awareness on the circular economy. This is because community development projects can provide education through practical learning and training.

Finally, raising awareness through the education sector can be challenging. Teachers and students are becoming increasingly aware of the concept of sustainability but circular economy awareness lags behind. However, changes to the national curriculum can be very slow.

> Building on existing channels through support of and funding for Civic Amenity Sites, community based organisations and development projects (see also section 2.9), programmes such as Green Schools and teacher supports would be effective measures to support the national awareness raising effort.

2.5.4   POSITIVE MESSAGING

Circular economy terminology can be off putting. There is a need to demystify the concept and clarify the link between circular economy actions and well understood concepts such as climate change. We believe that the following messaging can help encourage people to change their behaviour:

- the broad range of benefits of a more circular economy eg training, jobs that can't be easily offshored

- the assets that the circular economy can help to protect, to provoke thought in everyone's mindsets to help inspire change

- information on the sustainability of products both environmentally and in humanitarian terms (see also labelling in Section 2.8.6)

- practical information to help address confusion (as has worked well for the recycling list). For example, a campaign to highlight that compostable packaging is only suitable for in vessel composting or AD, and that in all cases reusable packaging is easier and better.

We would like to highlight the important role that the social economy can and will play in delivering circular objectives and ensure this is represented in the new Circular Economy Working Group to be chaired by DECC.

Recent national policy developments have shown that this linkage is being increasingly recognised and supported and this is very welcome. The European network RREUSE found that Ireland was the only Member State to make a connection between social economy and sustainability in its national reform programme, through the framework of the social enterprise strategy. The DRCD recently launched a €3 million Pilot Bike and E-Bike Upcycling Initiative through the Community Services Programme. Social enterprises and social impact are acknowledged in the WAPCE and the Pre-consultation on the AGCES includes a paragraph dedicated to the social benefits of transitioning to a circular economy, including a description of the role of social enterprise.

Explicitly recognising and supporting the role of social economy actors in the circular economy at local and national level is an effective way to make the circular economy more just and inclusive.

We therefore see a valuable role for the DRCD in the CE Working group to further this opportunity.

2.7 WHAT DO YOU SEE AS THE MAJOR ECONOMIC AND/OR SOCIAL CO-BENEFITS OF MOVING TOWARDS A MORE CIRCULAR ECONOMY IN IRELAND, SO THAT ENVIRONMENTAL IMPROVEMENTS ALSO PROVIDE ECONOMIC AND SOCIAL OPPORTUNITIES, AND VICE VERSA?

The environmental, economic and social benefits of prevention and preparation for reuse are significant:

- ENVIRONMENTAL: These activities have global **environmental and climate benefits**, reducing the consumption of new goods.

A 2020 report by Circularity Gap Reporting Initiative highlights that switching to a circular economy could **reduce global greenhouse gas emissions by 39%**[12]. The European RREUSE[13] network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO_2 emissions by 5% while supporting around 400,000 jobs[14]. A WRAP UK study has also shown that by increasing the reuse of key household products

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[12] https://www.circularity-gap.world/2020

[13] 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 .

[14] See https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/

such as textiles, appliances and electrical equipment, UK GHG emissions could be reduced by 4 million tonnes CO2 eq per annum between 2009 and 2020.

These savings relate to avoided emissions associated with upstream material extraction, manufacturing and transport and end of life management. As much of this takes place abroad, it is difficult to account for the savings within national emissions reporting. However, not only do we need to collectively acknowledge our global responsibility for the global carbon footprint of our goods but we also stand to gain significantly from the economic and social impacts of doing so at national level as shown below.

- ECONOMIC: By keeping goods within the economy for longer, prevention, reuse and repair can support **resilience in communities** through localising supply chains.

Prevention and preparation for reuse are localised activities that can be widely distributed across rural, urban and manufacturing landscapes[15]. As highlighted in the AGCES 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. The shift during the pandemic toward shopping locally has also highlighted the value of keeping goods recirculating locally, as second hand retail can sometimes be the only available outlet for certain goods in small towns and villages. Covid-19 also 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).

This clearly demonstrates the potential benefits of a more localised approach and local investment in Circular Economy activities.

- SOCIAL: 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.'

As highlighted in the pre-consultation, the EU Commission estimates a circular transition could deliver an additional 700,000 EU jobs across all skill levels by 2030. 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 AGCES 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. The valuable role of social enterprise in the circular transition is further described in Section 2.12.

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[15] See full Green Alliance presentation to CRNI "Future Jobs and Skills for a Circular Economy" event at crni.ie/presentations

2.8.1 LACK OF TARGETS

In our submission to the WAPCE and more recently to the NWMPCE consultation (attached – see Section 3.1) we made a detailed case for the immediate introduction of targets for:

- reuse – in the form of kg reuse/inhabitant, preferably linked to job creation
- preparation for reuse – 3% of IT equipment and LHA
- food waste prevention – of 50% by 2030 along with an interim target to drive progress

The *Circular Economy Report for the Joint Committee on Environment and Climate Action* recommends a target to double the size of the Reuse Sector 2026. We strongly welcome and support this ambition and believe it is ultimately achievable. It also recommends reducing food waste by half by 2026, as well as other overarching targets such as halving extracted raw materials, residual waste and reducing pollution and plastics to incineration or landfill.

Ireland is currently leading the way in developing a methodology for measuring reuse through the EPA funded Q2Reuse project[16], which is led by the Clean Technology Centre Cork alongside the Rediscovery Centre and CRNI. This tailored methodology can facilitate the immediate introduction of targets and help realise the ambition in the WAPCE to introduce a reuse target in advance of any EU targets. We submit that a reuse target should be **introduced within the next 2 to 3 years.**

> We note that the AGCES does not refer to creating a framework in the Circular Economy Bill for the introduction of such targets. We believe this would be a missed opportunity, does not reflect the urgency of required action and should be addressed.

Urgent measures are also 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 advocated[17] targets for preparation for reuse in line with recommendations in the EPA research report[18] by University of Limerick, with a focus on IT equipment and large Household Appliances (LHA)[19].

> Preparation for reuse targets should be introduced on a phased basis starting with 1% up to 3% within 3 years.

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[16] See http://www.rediscoverycentre.ie/research/q2reuse/ for more information

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

[18] 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

[19] 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.

These must be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014.

> Finally in relation to food waste prevention we recommended a mandatory food waste prevention target of 50% by 2030 along with an interim target to drive progress.

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 developed[20], it has not been widely adopted to date across the supply chain. However, a baseline year should be selected now for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

2.8.2   Poor Design

Consumer goods are now less durable and repairable than in the past. The increasing difficulties associated with attempting to repair modern electronic equipment including lack of access to and high costs of spare parts, lack of appropriate repair information, as well as product design preventing repair is a serious environmental issue that puts at risk the economic viability of re-use and repair organisations[21].

Design for durability, repairability, reusability and modularity is essential to improve the quality of products, and will also support the development of the second hand market. Measures that can be taken at national level to address these challenges are outlined below.

●   **Support EU measures through Sustainable Product Policy**

As highlighted by RREUSE, one of the CEAP's most promising measures is the legislative proposal for a sustainable product policy initiative. To counter premature obsolescence, resource efficiency requirements for electronic products already developed by the Commission should be implemented more widely to ensure durable, re-usable, upgradable and repairable products.

> We strongly encourage the Government to ensure the proposed initiative sets an ambitious policy framework to increase the potential of products to be reused, repaired and recycled, all while ensuring that consumers are provided with relevant, accurate and comparable information about the sustainability performance of their products.

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[20] Available for download at https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/
[21] RREUSE (2019), Easy product repair (available at https://www.rreuse.org/improving-product-design/)

A few more specific asks are outlined in this article by ECOS, which describe the need for greater alignment with the hierarchy in value retention from

- prioritising sharing, better durability and quality in products;
- followed by ensuring devices are easy to repair, maintain and refurbish;
- only where this is not possible, ensuring products can be upgraded or repurposed;
- in the worst case scenario, ensuring products are easy to disassemble or dismantle
- and as a last resort, components should be recyclable, separable or suitable for reuse as a secondary raw material.

The European network RREUSE recommends a cautious approach to product-as-service models, which are mentioned throughout the CEAP as a solution to encourage producers to manufacture longer lasting products. In these models, producers keep the ownership of the product or the responsibility for its performance throughout its lifecycle. Though promising, these models can potentially backfire in a context where cheap virgin materials and low labour costs remain a reality in manufacturing countries. This makes it more cost effective to bypass repair and replace products once they are not functioning anymore.

These models could also be used by manufacturers and retailers to develop monopolies on repair activities, posing severe risks on the independent repair sector. Retailers may end up competing with subscription models providing the widest choice of products and the most flexible services, exerting even more pressure on resources. Safeguards will have to be developed to ensure that product-as-service models favour the use of durable goods that, if broken or damaged, will eventually be repaired, including by independent repairers.

- **Help strengthen and broaden the Ecodesign Regulations**

CRNI is a member of the Right to Repair campaign, a coalition of European organisations pushing for system change around repair and of ECOS, the Environmental Coalition on Standards. As shared in a recent presentation to the EPA, DECC and other stakeholders, product requirements related to circularity (e.g. repairability, availability of spare parts and repair information to professional repairers) have been incorporated in ecodesign regulations adopted by the Commission on 1 October 2019 concerning electronic displays, washing machines, dishwashers and refrigerators.

These regulations will be extremely important in facilitating repair in Ireland. Many of the common barriers facing the repair sector, some of which are highlighted in a University of Limerick report on *A Preparation for Reuse Trial of Washing Machines in Ireland*[22], will be addressed through ecodesign measures including the relatively short lifespan of goods, the difficulty of disassembly for repair, the availability of spare parts and provision of repair and maintenance information.

The Ecodesign regulations also require that producers make most spare parts and repair manuals available to professional repairers for 7 to 10 years after retiring the product from the

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[22] Available at https://crni.ie/content/uploads/2021/05/UL_REhab-trial-writeup.pdf

market, depending on the product. However, the definition of "professional repairer" is lacking, though it is suggested that they are either included in an official national registration system as a professional repairer (where such a system exists) or is determined by the manufacturers. CRNI and the Right to Repair campaign are concerned that this latter option effectively allows manufacturers to decide who qualifies as a professional repairer or not.

> We encourage the Government to support the right to repair by ensuring access to repair for all consumers. It is important to note that, if producers are prevented from developing monopolies on product repair, consumers will have more choice and therefore, better access to repair services.

It is noted that the repairmystuff.ie directory is currently open and free for any repair centre or activity to register, which does support the right to repair. We would be happy to see this directory being used in its current form as an official register to avoid any limitation on access to spare parts or information.

Through the CEAP, Ecodesign regulations will also apply to non-energy products in future, providing a valuable opportunity to extend the lifetime of goods such as construction, textiles and furniture. Such policies will greatly help the reuse and repair sectors that have suffered from the decreasing quality of products put on the EU market in recent years.

> We recommend that the Government supports European efforts to extend Ecodesign regulations beyond energy related devices, prioritising those with the highest environmental impact including construction products[23], textiles[24], furniture and plastics[25]. We also ask that the Government backs robust rules and strong legislative measures, rather than voluntary measures which do not work, to make sustainable products the norm and effectively take us closer to a circular economic model.

For example, printers are one of the most iconic examples of premature obsolescence and some of the least repairable products brought to community repair events. According to data from the Open Repair Alliance, only 37% of printers get repaired at events, while 33% are deemed end of life. At present the Commission is exploring a voluntary agreement as a way to engage the sector in improving repairability. Unfortunately this has not proven effective, and the Right to Repair campaign is now seeking a commitment to strong regulatory action. Read more about this campaign here.

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[23] See also: ECOS conference on circular construction & ECOS report: From barrier to enabler – towards a greener EU construction products policy
[24] See also: ECOS webinar on ecodesign for circular textiles & ECOS report: Durable repairable and mainstream – how ecodesign can make our textiles circular
[25] See also: ECOS conference on plastic in a circular economy & ECOS report: For better not worse – applying ecodesign principles to plastics in the circular economy

2.8.3 LACK OF SUPPORT FROM EXTENDED PRODUCER RESPONSIBILITY SCHEMES

As submitted in our response to the WAPCE, Irish EPR schemes to date have historically strongly supported recycling but provided only very limited support[26] to prevention or preparation for reuse activities. As a result, recycling (through subsidies) has become more viable than prevention or preparation for reuse, going against the waste hierarchy.

> All EPR schemes should be required to focus to a much greater extent on prevention and preparation for reuse, through financial supports as well as effective eco-modulation fee structures and more in line with the waste hierarchy.

This historical misalignment of support has led to a degree of caution as regards supporting any new EPR scheme. RREUSE has flagged from European experience that EPR schemes can lead to unintended consequences particularly when introduced into an already well established reuse sector.

As previously highlighted in our submission to the WAPCE, a number of Member States are reviewing the option of EPR schemes for textiles in view of the mandatory separate collection requirement set out in the Waste Framework Directive. Should EPR schemes be implemented, they must be designed to help reuse operators finance their textile management operations, in particular the cost for the ever-growing portion of textiles that is not reuseable. However, if not designed properly, EPR schemes may streamline the focus and financing to recycling rather than prevention.

Therefore, while CRNI supports EPR schemes in principle, it is not clear that the existing networks of second hand outlets, dominated by social enterprises / charities in the textiles sector would be best supported by an EPR scheme at this stage.

> On the other hand, we support and are contributing to a review of EPR schemes for mattresses through our EPA work plan. Similarly, EPR schemes could work for furniture or paint if well designed and if the focus is on prioritising and financially contributing to existing and prevention and preparation for reuse activity.

2.8.4 LIMITED ACCESS TO REUSABLE GOODS

Improving the collection and treatment of WEEE is a key step in preserving the reuse potential of unwanted yet reuseable electrical goods. Legislation can support priority access to waste collected through EPR schemes for preparation for reuse operators from the social economy. Although this is currently an underdeveloped sector in Ireland, a lack of access to goods as early as possible in the collection system was identified as a key challenge in the report *A Preparation for Reuse Trial of Washing Machines in Ireland*[27]. All too often, WEEE is collected with the sole objective of being recycled using techniques that automatically damage the product.

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[26] REPAK's "prevent and save" scheme; WEEE Ireland's support to EPA research
[27] University of LImerick, *A Preparation for Reuse Trial of Washing Machines in Ireland*, available at https://crni.ie/content/uploads/2021/05/UL_REhab-trial-writeup.pdf

A study carried out in Bavaria[28], Germany demonstrated that weatherproof storage for WEEE at collection points could prevent up to 86% of damage to collected items and found that between 13% and 16% of the waste streams considered (WEEE, used furniture and leisure goods) could immediately be prepared for reuse. A further potential of 13% - 29% could be unlocked through changes to the mode of collection, storage and the overall treatment of wastes at Bavaria collection points.

This would mean that of the appliances recycled in 2017 in Ireland, **approx. 2,325,000 appliances may have been perfectly functional** and potentially reusable[29].

> Measures are required to provide preparation for reuse operators with direct access to material at collection points and that collection and transport of WEEE meets minimum technical recommendations that ensure the quality of goods is preserved for preparation of reuse.

In parallel, stronger action is required to promote reuse at Civic Amenity Sites. While the former Regional Waste Management Plans set an objective to reuse or prepare for reuse of up to 10% of non residual waste at local authority CAS, there has been little progress in this area.

> Stronger incentives or requirements for Local Authorities to both record reuse and meet performance targets for reuse at CAS should be set in place.

An example of regulation in this area is the obligation in the Spanish waste management plan 2016–2022 that social enterprises handling second-hand goods have priority access to municipal waste collection points in order to acquire goods for repair and reuse.

2.8.5 Low Uptake of Green Public Procurement

This is discussed in further detail in Section 2.10.

2.8.6 Poor Labelling

Labelling can help communicate and engage consumers in the circular economy, where there is some awareness already of the value of the information and where there is consumer choice.

One excellent and recent example is the new labelling requirements for product repairability in France. Applicable to electrical and electronic equipment, this lets the consumer know whether their product is repairable, difficult to repair or not repairable. This is implemented through legislation[30] as an obligation on producers, importers and distributors to communicate to the sellers of their products (and any person who requests it) the index of the repairability for electrical and electronic equipment placed on the market.

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[28] Messman, L. et al, *Potentials of preparation for reuse: A case study at collection points in the German state of Bavaria*, Journal of Cleaner Production, 2019, available at
https://www.sciencedirect.com/science/article/abs/pii/S0959652618336679
[29] Based on collected data from https://www.weeeireland.ie/, and calculations in Section 3.4 of our response to the NWMPCE
[30] Article 16 of the law related to anti-waste and the circular economy (No 2020-105)

Labelling can also support transparency and traceability in relation to the social impact of production of products, as has proven successful for the FairTrade mark.

> We recommend the Department reviews the opportunity to replicate repairability labelling, supports transparency on social impacts, and supports European Commission efforts to develop consumer labelling showcasing the durability and repairability of products including non-energy products.

2.8.7   END OF WASTE

- **Preparation for reuse**

While prevention is outside of the waste regime, the question of waste designation and end of waste does arise in the case of preparation for reuse where, for example, goods are collected as waste that may be perfectly reusable (see above) through channels such as take back schemes (in the case of WEEE) or at Civic Amenity Sites.

The current end of waste regime in Ireland does not sufficiently recognise this potential and is largely focussed on recycling.

> We believe that greater consideration and priority must be given to products that have been or are being prepared for reuse to address this potential barrier.

Furthermore, we believe that products that have been prepared for reuse should not have to comply with the same legislation as new products.

While legislation is updated regularly, this does not render a product already in circulation unusable or unsafe. To enable the continuous circulation of goods as part of a circular economy, it should only be necessary for second-hand products to meet the requirements that were existing when they were first placed on the EU market. A CE marking (for products to which the CE marking applies) should be enough for a second-hand product to be considered as compliant with legislation (for further details see here).

These and other comments were also submitted in our consultation response here to the EPA in the review of End of Waste guidelines.

- **Recycling**

Many of our members working in recycling (e.g. mattress dismantling) wish to explore opportunities to recycle or repurpose the materials recovered.

Some opportunities, such as the reuse of foam or felt may require little further processing but would require end of waste status before local outlets can be developed. Therefore, end of waste criteria for these materials will be important to enable more waste to be moved up the waste hierarchy and recycled.

> We believe representatives from the community reuse and recycling sector should be included in any group to review national End of Waste decisions.

2.9 WHAT DO YOU SEE AS THE MAJOR NONREGULATORY BARRIERS TO THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY IN IRELAND? IN ANSWERING THIS QUESTION PLEASE FEEL FREE TO ADDRESS ECONOMYWIDE ISSUES OR THOSE AFFECTING YOUR SECTOR IN PARTICULAR?

As highlighted above, we need a strategic mix of policy and financial incentives for operations and/or infrastructure that ensures prevention and preparation for reuse are **better designed, more accessible, more affordable, more viable and more attractive than the alternative and become mainstream**. Some non regulatory opportunities are outlined below.

2.9.1 LACK OF LEVEL PLAYING FIELD AFFECTING AFFORDABILITY AND VIABILITY

The *Circular Economy Report for the Joint Committee on Environment and Climate Action* correctly points out that there is currently a market failure in terms of the circular economy, with cost constraints at each of the rungs of the hierarchy ladder.

To address the cost to the consumer of prevention or preparation for reuse, and the viability for the operator of these activities, we propose a range of fiscal incentives including:

- **Subsidised labour costs through existing labour activation schemes or an extension of the Wage Subsidy Scheme for climate related projects.**

One key programme that has enabled many social enterprises in the circular economy to grow, build capacity and become resilient has been the Community Services Programme. This supports community-based organisations to deliver social, economic and environmental services that tackle disadvantage. For many of our members, the scheme underpins employment, training and wider social impacts in disadvantaged communities as well as climate action through reuse and repair activities.

Since 2014, funding for this programme has not changed by more than 5% which has limited access for emerging reuse and repair projects, though it it acknowledged the programme is currently under review[31].

> We propose that additional investment in the CSP should be made to create a dedicated fund for green, circular and climate friendly community services. This has the potential to deliver significant impact in supporting green employment opportunities and driving the climate agenda.

One recent example of how this could work was the launch of €3 million Pilot Bike and E-Bike Upcycling Initiative, delivered through the CSP programme. While this was limited to existing CSP organisations only, it showed the potential for circular activities to address multiple objectives such as sustainable transport, social inclusion and reuse.

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[31] CRNI has been involved in this review process with the DRCD

Alternatively, current mechanisms such as the wage subsidy scheme could be extended for social enterprises that deliver both employment opportunities and climate action for a green recovery.

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

A combined social and circular support scheme could be particularly timely in helping Ireland to meet the WAPCE commitment to introducing national reuse targets ahead of the introduction of EU targets as well as supporting the viability of operations.

- **Invest in Prevention and Preparation for Reuse infrastructure**

The growth of prevention and preparation for reuse activities will require the development of physical infrastructure as well as investment in equipment and operations. Examples of reuse and repair infrastructure are sorting centres, storage hubs, state of the art reuse parks, refill systems[32], reverse logistics systems[33], exchange platforms, redistribution centres, repair / upcycling workshops, surplus food transformation centres and retail spaces. Such infrastructure is currently underdeveloped in Ireland and where it does exist, is under-resourced.

Investment in significant infrastructure for larger scale projects driving prevention and preparation for reuse needs to be prioritised and supported through grants, low interest loans or other mechanisms. The opportunity to support this investment across emerging funds at EU and national level should be explored.

This is a time of great opportunity for the circular economy, with significant European funding going into a green and inclusive recovery. Further details of these funds is provided in Section 2.9.3 below, but of note is the €1 trillion Sustainable Europe Investment Plan. This provides a unique opportunity to source the necessary finance for investment. Other policies, such as *Our Rural Future*[34], also support access to community spaces throughout rural Ireland and should be explored at local level as a way to provide workshop and retail spaces for circular activities.

Infrastructure planning is further elaborated in Section 2.9.2 below.

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

[33] 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

[34] https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

● **Support repair through 0% VAT and/or a national repair grant scheme**

A European Commission Eurobarometer report[35] has found that 77% of European citizens would be willing to have their goods repaired but hardly ever do because it is too expensive.

Under the current VAT Directive, reduced VAT rates may be applied to the *'supply of goods and services by organisations recognised as being devoted to social wellbeing by Member States and engaged in welfare or social security work'*. Several Member States have granted social enterprises the opportunity to offer reduced VAT rates for their services or the sale of their goods where their activities contribute to social welfare, social inclusion and the move towards a circular economy. The Directive also allows for reduced VAT on small repairs of product groups clothing, shoes and bicycles.

We recommend a reduced or 0% VAT rate for prevention and preparation for reuse, a reduced VAT for recycling activities carried out by social enterprises in Ireland and a reduced or 0% VAT on small repairs.

By way of international example, Belgium has introduced a reduced VAT rate of 6% for goods and services[36] provided by social reuse/repair enterprises if they are engaged in the social development of disadvantaged groups. The VAT rate has also been reduced in Austria for small repairs from 20% to 10%.

Another measure to incentivise repair that has been highly successful in Austria is the "repair bonus". This scheme, implemented in several Austrian federal states and due to be rolled out nation-wide, funds up to 50% of the total cost of a repair, up to a maximum of €100. This only applies to large and small electrical appliances from commercial establishments. Consumers must apply to be reimbursed once the repair is done and an invoice has been paid. This model directly incentivises consumers who otherwise face cost barriers for repair.

We recommend the Austrian model of giving a "repair bonus" to consumers is explored for Ireland.

● **Phase out subsidies that are inconsistent with the hierarchy**

As submitted in our WAPCE consultation response, 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*". Subsidies and other support for recycling and recovery often have unintended consequences that can seriously hamper prevention or preparation for reuse.

Some areas where there is currently an imbalance of subsidies are:

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[35] Flash Eurobarometer 388, ATTITUDES OF EUROPEANS TOWARDS WASTE MANAGEMENT AND RESOURCE EFFICIENCY, https://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf

[36] https://mk0eeborgicuypctuf7e.kinstacdn.com/wp-content/uploads/2020/05/No-time-to-waste_Europes-new-waste-prevent_web.pdf

- Irish EPR schemes, which have subsidised recycling but provided only very limited support[37] to prevention or preparation for reuse activities. See above for recommendations on this.

- waste-to-energy, which is subsidised for its renewable energy output. This ultimately brings down the gate fee for waste-to-energy and thereby undermines prevention, preparation for reuse and recycling. For this reason, CRNI also supports the introduction of the levies on waste-to-energy.

- funding toward litter and anti dumping. Although essential in maintaining a clean environment, supporting tourism and healthy communities this also represents a subsidy for single use products, where the clean up cost of those products is covered by the State. At least equal if not superior investment should be made in prevention measures such as supporting refill of cups, containers or bottles to rebalance the hierarchy.

- subsidies toward Anaerobic Digestion where this hampers efforts to prevent or redistribute surplus food. Substantial investment in and support for Anaerobic Digestion (AD) in the UK 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.

A review of all forms of subsidies at national level is required to ensure that activities lower in the waste hierarchy are not impeding prevention and preparation for reuse.

- **Introduce tax rebates on donated goods**

One difficulty many business-to-business operators in prevention (reuse) experience is encouraging businesses to pass on unwanted items for reuse. In the absence of any incentives, businesses are more likely to discard than reuse due to the low cost of disposal in skips and short term inconveniences such as limited storage. Worse still, the accounting system may actively discourage such donations as goods cannot be written off if they are donated for reuse.

A tax incentive encouraging businesses to donate surplus goods or food would divert unwanted materials into the reuse sector.

Examples of products that this incentive may encourage the donation of are:

- end of line, remaindered, surplus and unwanted materials and items with potential from local businesses as handled by ReCreate
- DIY equipment and home improvement materials as handled by Habitat for Humanity
- surplus IT equipment as handled by Rehab Recycle, Camara Education and Tech2Students

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[37] REPAK's "prevent and save" scheme; WEEE Ireland's support to EPA research

- surplus food as handled by FoodCloud for redistribution
- other items including furniture, bicycles, paint donated by businesses to upcycling enterprises

It would also support the introduction of EPOS (Electronic Point of Sale) systems that track and measure sales, which would contribute to the quantification of reuse as identified in the Q2Reuse project. Similar tax incentives have been very effectively implemented in the UK and Northern Ireland for donations from individuals. In Milan[38], Italy, businesses that donate their food losses to charities (supermarkets, restaurants, canteens, producers, etc.) can avail of a discounted Waste Tax.

A new research project being carried out by FoodCloud will also provide a blueprint for a fund or initiative to help companies offset the costs involved in diverting edible surplus food to FoodCloud that otherwise may not have been sent for human consumption. 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.

- **Support Business donation transport costs**

A key barrier in food surplus redistribution is the cost of delivery of surplus food to redistribution hubs. In 2018, the UK Government launched a pilot scheme to subsidize transport for retail and manufacturing companies donating food[39]. While this was a one-off provision, it worked well at engaging businesses and demonstrating the viability of passing on surplus edible food for redistribution.

A similar transport subsidy scheme should be piloted in Ireland.

- **Reduce rates for prevention and preparation for reuse centres**

CRNI supports a nation-wide policy of reduced "commercial" rates for prevention and preparation for reuse activities. Currently these rates 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 ⅙ and ⅕ 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.

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[38] See EEB paper
https://mk0eeborgicuypctuf7e.kinstacdn.com/wp-content/uploads/2020/05/NoTimeToWaste_Annex-IVa_web.pdf
[39] See details here: https://fareshare.org.uk/giving-food/about-the-fareshare-surplus-with-purpose-fund/

By contrast, charity shops in Northern Ireland are exempt from commercial rates and in the UK pay approx. 20% full commercial rates.

> We recommend providing 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.

- **Levies on Single Use Products**

We support the upcoming environmental levies on single use products including the increase in plastic bag tax, and levies on single use cups and take away containers.

We also welcome longer term measures set out in the WAPCE to encourage retailers to address excessive packaging and to work toward an EU-wide plastic packaging tax.

- **Continued support for grant funds and research**

We welcome the new Circular Economy Innovation Grant Scheme which provides opportunities for social enterprises in particular to explore new business areas or expand their activities. The annual nature of this scheme is particularly welcome and, alongside the excellent EPA Green Enterprise programme, provides a predictable funding pipeline for innovation and growth.

Other community based funds such as the EPA supported Community Foundation circular economy fund are also welcome to help support grassroots activities.

> We believe these funds should all continue to expand and grow, by connecting to funding streams for climate action.

For example, the Climate Challenge Fund (CCF) in Scotland provides grants and support for community-led organisations to tackle climate change by running projects that reduce local carbon emissions that reduce over-consumption, encourage the reuse of items, extend the life of everyday items through repair and maintenance and promote the recycling of materials. For examples of Circular Economy projects currently live under this programme please see here.

2.9.2 POOR ACCESSIBILITY TO PREVENTION AND PREPARATION FOR REUSE

As highlighted above, if prevention or preparation for reuse is not accessible then people cannot act on the information they have about circular economy.

> In the context of the Circular Economy it is crucial that infrastructure planning now incorporates and prioritises infrastructure for prevention (avoidance, reuse and repair) and preparation for reuse and supports this as described in Section 2.9.1.

We propose ambitious goals that set out minimum infrastructure requirements within the community.

For example, the proposed transposition of the Waste Framework Directive in Greece includes a requirement to **develop and operate at least one "Centers for Creative Reuse of Materials" in all municipalities with over 20.000 inhabitants** by the end of 2023. For municipalities with less than 20.000 inhabitants, the local Solid Waste Management Bodies are obliged to create and operate CCRMs through inter-municipal collaborations.

These "CCRMs" are defined as appropriately demarcated and landscaped areas, where every kind of used objects, such as electrical and electronic equipment, furniture, toys, bicycles, books and textiles may be deposited by citizens for reuse.

> We ask for similar ambition to establish reuse centres facilitating sorting and storage of resources to facilitate a much greater level of reuse.

Opportunities also exist in collaborating further with Northern Ireland.

> The potential for a shared island approach to prevention or preparation for reuse infrastructure storage should be explored. This would offer economies of scale and/or a buffer to localised capacity shortages.

One barrier that arises in addressing prevention infrastructure can be liability. Public bodies may be reluctant to invest in infrastructure, such as public water refill stations, where they perceive a future cost liability associated with maintenance or repair.

> Here, as for other investments above, there is a need for an assessment of the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste.

2.9.3 LACK OF FOCUS ON JOBS & SKILLS DEVELOPMENT FOR CIRCULAR ECONOMY

A coordinated approach to training and jobs growth for this sector is required.

CRNI held its biennial conference on 2 and 3 June (recordings here) with a focus on growth of jobs and skills for the circular economy. This brought together over 190 stakeholders from industry, business, social enterprise, education and environment at European and national level.

It highlighted the wide diversity of skills required to support the circular transition from communications to repair, engineering design and more and the current skills shortage in areas of reuse and repair. For example, bike mechanics, upholsterers and upcycling tutors have all proven extremely difficult to source in order to train up a new team of reuse and repair specialists. Some of the skills required are bespoke to prevention activities e.g. textile deconstruction and upcycling, or knowledge of materials.

> The expert group on Future Skills Needs through the Department of Further Education should be asked to consider the circular skills gap and how to fill it.

The event also highlighted the significant funding and policy evolution from the €30 million allocated to ireland via the European Just Transition Fund, the €1 trillion Sustainable Europe Investment Plan (see above), the €95 billion Horizon Europe research fund, the ESF+ fund for investment in education and training and the €900 million being sought by Government through the EU's recovery and resilience fund[40] including support for a "green skills" training programme.

> These funds can and should be sought after to back jobs and skills development to support a circular transition as a cross Departmental collaborative effort.

Some CRNI members have pioneered community education approaches such as developing new QQI training qualifications[41] and this is to be applauded and supported. Initiatives such as the aforementioned DRCD Pilot Bike and E-Bike Upcycling Initiative, which supports mechanic training, are also welcome in this regard.

> Innovations such as those being pioneered by CRNI members need to be embraced at local level by ETBs and funding is required to support them and similar social and community projects. This also helps to build awareness of the circular economy as highlighted in Section 2.5 above.

This work would be supported by improved data on the number and types of jobs currently in the sector and the potential for jobs creation. Work being undertaken through the Q2Reuse project funded by the EPA on measuring reuse will help create a basis for improved data collection in the long term. In the short term, the Circle Economy's *Circular Economy Jobs monitor*, or other studies, would be worth exploring to create a better understanding of the current situation, and whether there is decoupling of jobs growth and resource use[42].

The CRNI conference also highlighted the importance of the growing ties between circular and social policy and the opportunities this can present. As shown above, CRNI members currently provide over 820 training positions for people through labour activation schemes who would not otherwise have access to the labour market, and this support is particularly important in times of recession. On the flipside, volunteers and labour activation schemes are key to making many reuse and repair activities possible. The role of social economy is elaborated in Section 2.12.

> As the economy reopens and the Departments of Social Welfare and Rural and Community Development expand labour activation schemes[43], it will be important to tie in circular economy goals. Support from all Departments is also needed to address challenges such as the stigma attached to labour activation schemes.

As set out in the *Circular Economy Report for the Joint Committee on Environment and Climate Action,* the circular economy transition represents a (re)training and upskilling opportunity for both young and older workers across all regions of the country, and is therefore also well aligned with the national Just Transition effort.

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[40] See also CRNI submission to this programme at https://crni.ie/key-policy-areas/
[41] See Lightning Talks session from conference here.
[42] where Nevin Economic Research Institute has identified a decoupling of jobs growth and carbon emissions
[43] As proposed in *Our Rural Future* https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

> Just as Ireland has embraced just transition planning for the energy sector, we believe that this same approach is now required for the circular economy.

2.9.5 LIABILITY

As highlighted in our submission to the WAPCE, the issues arising from "duty of care" in Irish tort law are an ongoing concern for the sector. The reuse or repair of a range of items from take out containers to repaired electrical and electronic equipment is restricted by liability concerns.

> We recommend engaging with key authorities such as the FSAI and others to ensure simple guidance is provided for retailers and citizens that protects business but also facilitates reusable containers (and other items as arising) on the journey to a more Circular Economy.

The AGCES pre-consultation rightly raises the issue of liability concerns presenting important barriers to repair. It is extremely difficult to find any insurance company that will provide cover for repair cafes[44]. Although there are over 2,000 repair cafes worldwide, in Ireland these events have been stymied by insurance concerns.

In addition to repair and reuse liability concerns, specialist recycling operators in our membership are experiencing significant increases in insurance premiums. Social enterprises operating in this area are directly impacted by such increases, which hamper their ability to provide people from marginalised backgrounds with jobs and skills through training and placements.

To help tackle these issues, CRNI has joined the Alliance for Insurance reform[45] and supports its work to deliver reforms to the insurance sector. We are pleased to see progress being made in this area in 2021 with new judicial guidelines on personal injuries expected to bring public liability premiums down by over 50%. However this still does not address the issue of liability for repair.

> We would welcome efforts to identify barriers and address this issue and are keen to support this based on the experience of our members.

2.10 HOW IMPORTANT DO YOU CONSIDER GREEN PUBLIC PROCUREMENT IS IN SUPPORTING THE DEVELOPMENT OF NEW CIRCULAR GOODS AND SERVICES

GPP can play an important role in stimulating the market for new circular goods and services and in demonstrating leadership.

The WAPCE proposed to expand 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**.

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[44] See https://repaircafe.org/en/
[45] https://insurancereform.ie/

> We strongly welcome a minimum target for procurement of used goods and submit that it should be included as a goal, with further action being taken to implement this (including in legislation if required) through the AGCES.

We also welcome the initiative to introduce a GPP monitoring and reporting template, capturing the frequency and value of green criteria in public procurements over €25,000. However, it is noted that suppliers in prevention activities are typically small and would respond to tenders below this threshold.

> Therefore, monitoring of circular procurement in the <€25,000 threshold tenders is also required.

The focus in the pre consultation document is on opportunities to participate in and/or lead multinational green procurement initiatives. While this would support circular design at scale in product procurement, we would welcome parallel efforts to build the local supplier base for circular goods and service through the aforementioned target for procurement of used goods, and other measures such as:

- ensuring the appropriate design of grants and funding to support circular and social procurement. 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.

- requiring public bodies to incorporate reuse policies into asset management and procurement and to adopt a life cycle cost methodology to procurement. This means calculating the cost of an asset or service during its entire life-cycle, not just the cost at the time the contract is awarded to allow the social and environmental costs of the use, repair, recycling and disposal of a product or service to be included.

- requiring public bodies to address circular and social concerns at pre-tender stage and design tenders that facilitate the small scale of actors in prevention and preparation for reuse sector (e.g. through lots, consortium approaches)

- supporting weighted targets for Social Enterprise in public procurement and/or encouraging reserve contracts and/or providing social economy actors active in environmental services to have preferred access to public procurement contracts, notably through the implementation of the most economically advantageous tender (MEAT) criterion (Article 67 of the Directive on Public Procurement).

For example, in Italy all public authorities are required to apply waste prevention criteria into calls for tenders and contracts. The Italian Code for Public Contracts (Legislative Decree 50/2016, as modified by legislative decree n. 57/2017) in Article 34, sets mandatory environmental sustainability criteria that must be applied by public authorities in public procurement.

Actions that Government could take to address the current barriers facing the sector and enable the further development of the circular economy are elaborated in detail in Sections 2.8 and 2.9. They include:

- Creating a framework in the upcoming Circular Economy Bill for targets, coordinating with other plans and policies and tracking progress and taking corrective actions to ensure targets are met.

- Backing a strong sustainable product policy at EU level, the extension of ecodesign regulations to non energy products, prioritise legislative measures over voluntary measures for ecodesign regulations, ensuring ecodesign regulations facilitate the right to repair for all consumers and a cautious approach to product-as-service models

- Requiring EPR schemes to focus to a much greater extent on prevention and preparation for reuse, through financial support as well as effective eco-modulation fee structures and other supports in line with the waste hierarchy. Supporting an EPR scheme for mattresses and reviewing opportunities for EPR schemes for paint and furniture.

- Introducing measures to improve access to goods including:

  - providing preparation for reuse operators with direct access to material at collection points

  - requiring that collection and transport agents meet minimum technical recommendations that ensure the quality of waste goods is preserved for preparation of reuse

  - introducing stronger incentives or requirements for Local Authorities to both record reuse and meet performance targets for reuse at CAS

- Supporting European Commission efforts to develop consumer labelling showcasing the durability and repairability of products including non-energy products and review local opportunities for the same.

- Ensuring end of waste considerations give priority to products that have been or are being prepared for reuse and involve representatives from the community reuse and recycling sector in any group to review national End of Waste decisions.

- Supporting additional investment in the CSP to create a dedicated fund for green, circular and climate friendly community services and/or introduce a new and tailored social and circular support scheme

- Incorporating and prioritising prevention and preparation for reuse in infrastructure planning and supporting investment in this infrastructure through grants, low interest loans or other mechanisms, and exploring opportunities in existing EU and national funds to back this

- Setting minimum infrastructure requirements within the community e.g. a minimum number of reuse centres per rural or urban area.

- Introducing a 0% VAT rate for prevention and preparation for reuse, a reduced VAT for recycling activities carried out by social enterprises in Ireland and a 0% VAT on small repairs and / or a "repair bonus" scheme for consumers

- Reviewing all forms of subsidies at national level on activities lower in the waste hierarchy to ensure they are not impacting on prevention and preparation for reuse

- Introducing a tax incentive encouraging businesses to donate surplus goods or food to the reuse sector and piloting a transport subsidy scheme for food donations

- Providing nation-wide guidance to local authorities asking them to limit "commercial" rates for prevention or preparation for reuse centres to a maximum of 50% and minimum of 0% rates.

- Continuing to expand and grow grant schemes and research funding in this area

- Exploring the potential for a shared island approach to prevention or preparation for reuse infrastructure storage

- Assessing the true product lifetime cost which would demonstrate the value of investment over the cost of dealing with litter and waste

- Availing of the multitude of European and national funds to back jobs and skills development to support a circular transition as a cross Departmental collaborative effort.

- Facilitating a coordinated approach to jobs and skills, involving the expert group on Future Skills Needs, supporting innovations in community education, tying circular economy goals into any growth in labour activation schemes[46] and embracing opportunities for circular activities through just transition planning

- Engaging with key authorities such as the FSAI and others to ensure simple guidance is provided for retailers and citizens that protects business

- Including a minimum target for procurement of used goods, with further action being taken to implement this, in the AGCES.

- Monitoring circular procurement in the <€25,000 threshold tenders

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[46] As proposed in *Our Rural Future* https://www.gov.ie/en/publication/4c236-our-rural-future-vision-and-policy-context/

- Supporting efforts to build the local supplier base for circular goods and service through the appropriate design of grants and funding, requiring public bodies to incorporate reuse policies into asset management and procurement and to adopt a life cycle cost methodology to procurement, requiring public bodies to address circular and social concerns at pre-tender stage and design tenders that facilitate the small scale of actors in prevention and preparation for reuse (lots, consortium approaches), and introducing weighted targets for Social Enterprise in public procurement and/or encouraging reserve contracts and/or providing social economy actors active in environmental services to have preferred access to public procurement contracts

2.12 WHICH SECTORS DO YOU THINK CAN MAKE THE BIGGEST CONTRIBUTION TO MAKING IRELAND'S ECONOMY MORE CIRCULAR?

In Ireland as elsewhere in Europe, social enterprise plays a pivotal role in the circular economy as practitioners and as innovators in driving the circular agenda.

Through the Q2Reuse research project funded by the EPA the research team mapped out reuse operators involved in second hand goods and found that the majority of those identified, just under 50%, were not for profit entities or social enterprises.

The reason why reuse, repair and recycling are so suited to social enterprise model is:

- They are labour intensive, because a range of different products are handled that may need fixing up or cataloging, cleaning, repairing, retail or tech solutions.

- This also means it's suited to a very broad range of skills and training potential, affording marginalised people an opportunity to participate in society through skills training and entry to the jobs market. For example, CRNI members work with individuals or groups that are long-term unemployed, have disabilities, are ex-offenders, come from drug rehabilitation or are part of disadvantaged communities—such as members of the Traveller and Roma community— through employment schemes, such as CSP, Tús, RSS, CE and others. This has knock on social impacts including improved self-esteem and well-being, increased engagement with the community and reduced social exclusion.

- Reuse and repair are highly localised because it involves keeping goods in local circulation so can support the local economy and communities.

- They support a broad range of social aims in addition to creating jobs and training for people at distance from the labour market, supporting low income families and individuals by making available low cost household goods, food, laptops to bridge digital divide or other services

Social enterprises are also pioneers and drivers of research and development. For example, FoodCloud is hugely successful with its tech solution to food redistribution and food waste prevention and has expanded across Europe and the globe. The Rediscovery Centre or National Centre for a Circular Economy is pioneering many areas from research to paint reuse and the

roll out of this nationally. Bounceback Recycling has carried out research into applications for materials recovered from mattresses. Recreate has looked into the impact of creative reuse on mental health. An Mheitheal Rothar is researching the remanufacture of old and damaged bicycles and Roscommon Women's Network is developing a training programme to develop sewing and textile upcycling capabilities – both projects funded through the EPA Green Enterprise programme. There are many other examples besides.

Overall this highlights the important influence of social enterprise operators in waste prevention.

> 2.13 DO YOU BROADLY AGREE WITH THE POLICY AREAS LISTED FOR FUTURE DEVELOPMENT IN THE DRAFT STRATEGY? IF NOT, WHICH AREAS WOULD YOU REMOVE/ADD TO THE LIST?

As highlighted in Section 2.2, we would like to see a clearer set of outcomes or actions in this AGCES. Many of the actions required for the further development of these policy areas are already outlined in the WAPCE, so the reason for delay is unclear.

One benefit of sectoral roadmaps is it facilitates a systems approach to a particular problem. This is going to be essential in understanding where the gaps are in moving to a more circular economy. For example, mapping out the pathways for a particular product group and identifying where there is leakage from prevention into recycling or disposal would help formulate policy measures and better plan infrastructure to address this (see also Section 2.9). Investment is needed upfront to bring prevention into the mainstream.

- **Construction and Demolition**

We agree this is an important area with huge untapped potential for prevention (reuse, repair) through building modification or deconstruction.

CRNI members in the area of construction include Rediscovery Centre, through the reuse and redevelopment of the Ballymun boilerhouse and Habitat for Humanity, which plans to develop a Restore in Ireland this year to facilitate the reuse of DIY and building materials.

> We would like to see the support for dismantling for reuse of building products (in addition to secondary construction materials) included in the potential actions listed in Annex 3.

An excellent example of this in Austria is the passing of a Recycled Construction Materials Regulation. The regulation sets an obligation to carry out a pre demolition audit for potentially reusable or hazardous construction components and selective demolition requirements. This prevents overall generation of waste and reduces hazardous waste, thus enabling reuse of construction and demolition materials. If there is a demand for reusable construction parts/materials, they **have to be dismantled in a way that enables reuse**, e.g. bricks, stoneware, roof tiles, doors, windows, sanitary objects, radiators and wooden parquets, etc.

This concept has been brought to full implementation with the innovative Baukarussel "Social Urban Mining" project[47].

- **Textiles**

We fully support the development of a cohesive textiles strategy at national level. CRNI members involved in textile reuse, upcycling or education include the Irish Charity Shops Association, the Rediscovery Centre, Roscommon Women's Network, ReCreate Ireland and affiliate members Attention Attire, the Cloth Nappy Library Ireland, the Upcycle Movement and the Useless Project.

From work on the Nature and Extent of Post Consumer Textiles (NATEX)[48] project supported by the EPA and further work on *Circular Textiles*[49] Green Enterprise project funded by the EPA, there is now improved information on the textiles sector in Ireland, including textile flows and key challenges. It is estimated 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.

From this, the need for additional infrastructure can be considered. For example, 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 reuse[50], it would save 33,250 tonnes carbon[51].

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 informing the reuse infrastructure requirements for the textile sector.

Although highlighted as an area for further development, we note that Annex 3 does not include specific policy actions for textiles. CRNI also included in the submission to the WAPCE consultation specific recommendations for actions to advance textile circularity as summarised below.

- Recognise that the backdrop is very different to many other EU member states and ensure local second hand clothing retailers (like charity shops) are central to any future separate collection scheme to ensure maximum local reuse.

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[47] https://www.baukarussell.at/
[48] Due for publication shortly. Figures provided can be determined from data in the public domain.
[49] See https://crni.ie/circular-textiles/ for details
[50] Approx. reuse rate at charity shops based on stakeholder interviews through Q2Reuse
[51] 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

- Carry out an awareness campaign coordinated through the national communications strategy on textiles, covering their impact on global systems and encouraging consumers to reduce consumption, buy better quality and use available channels to borrow, swap, or pass them on for reuse rather than placing them in the bin.

- Support investment in local infrastructure and operations (e.g. sorting capacity) supporting textile reuse as a way to ensure that textiles arising from any new separate collection system will find an outlet.

- Encourage better design through European developments (see Section 2.8.2) to address the issue of poor quality textiles which are unsuitable for reuse.

- Encourage Local Authorities to prioritise textile banks that direct textiles to local second hand retailers (e.g. charity shops) when procuring for Civic Amenity Sites ("Resource Parks") or on public land.

- Introduce regulations providing greater control over all 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.

> We would like to see support for these and other actions for textiles included in Annex 3.

- **Repair and Reuse**

As discussed throughout this document reuse and repair sit on the top tier of the waste hierarchy and are at the heart of a circular economy. It is essential that greater focus is placed on these key areas and specific measures are implemented. Although targets are referred to in this context, we note that no reference is made regarding the Circular Economy Bill including a framework for targets. There is also an urgent need to coordinate and align targets between various Government bodies.

Annex 3 includes measures to promote design for reuse and repair, increase remanufacturing , extend the use of EPRs, support new business models, provide for incentivised take-back and refurbishment for large household goods and address product liability for repaired and re-used goods.

> We have addressed many of these as well as a suite of other measures in this response that should also be included in any reuse and repair strategy.

3.0 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 and ECOS, the international NGO advocating for environmentally friendly technical standards, policies and laws. 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.

4.0　CALL FOR CASE STUDIES

4.1　REPAIR HUBS / SCHEMES

Many of CRNI's members operate repair schemes/hubs, providing repair as a service on bicycles, furniture, small engines and tools. The following provides examples of how our Members are engaged in repair schemes/hubs on the island of Ireland.

AN MHEITHEAL ROTHAR

An Mheitheal Rothar offers a full set of bicycle repair and service options, undertaken by our team of experienced mechanics. Their award winning ReCycle Your Cycle initiative takes bikes sent for scrap to Galway City Council Civic Amenities Centre and repairs them, and concurrently teaches valuable cycle mechanic skills to their trainees. This saves carbon emissions and reduces pollution from transporting, smelting down and recasting scrap metal. At the same time it provides skilled jobs, training opportunities and an affordable, fossil fuel free means of transport. An Mheitheal Rothar is based in Galway City. Visit bikeworkshops.ie.

CORK COMMUNITY BIKES

Cork Community Bikes opened a do-it-yourself bicycle workshop in Summer 2007 at Cork Foyer for the community to use. This is open for public sessions where people can bring their bike into the workshop and where there are a good range of tools, new and second-hand parts for use. There are set prices for parts and a donation is requested to cover the costs of running the workshop and buying tools. They also offer bike repair skill workshops, such as bike maintenance, with tools and guidance if needed. Donated bikes are accepted and are repaired and resold. Cork Community Bikes is based in Blackpool, Co Cork. Visit corkcommunitybikes.com.

CYCLESENSE

CycleSense is a social enterprise based in Skibbereen Co. Cork makes it easier for people to cycle by sharing the many benefits of bikes from their reuse centre, where they operate cycle training, advocacy, eco delivery, upcycling and upskilling. They sell affordable secondhand bikes and provide cycle trainers, bike maintenance, community cycle bus and training and upskilling opportunities. CycleSense is based in Skibbereen Co. Cork. Visit cyclesense.ie.

DEAF ENTERPRISES

Deaf Enterprises restores furniture with repair, reupholstery or French-polishing for private individuals as well as upholstery work for bars, hotels, nursing homes, schools, barbers, and playschools. They also sell

quality refurbished goods. Their activities provide employment, training and work experience to the deaf community in Cork. Visit deafenterprises.ie

IRD Duhallow Furniture Revamp

IRD Duhallow Furniture Revamp contributes to the reduction of waste in the region. From its establishment in 2016, IRD Duhallow Furniture Revamp has collected in excess of 4500 items of furniture, diverting a net weight of over 110 tons from potentially ending up in landfills. Of this, over 103 tonnes have been redistributed in the community. IRD Duhallow Furniture Revamp also provides a refurbishment service for those who wish to have their old pieces upcycled and revived. IRD Duhallow Furniture Revamp has a strict target of using no more than 10% new materials versus recycled material. To date, on average, less than 5% of the total net weight constitutes new material, including fabric for upholstery, new paints and varnishes, etc. These figures are carefully calculated and compiled each month to monitor Revamp's environmental performances. IRD Duhallow Furniture Revamp is based in Newmarket, Co Cork. Visit facebook.com/DuhallowFurnitureRevamp.

Renew Enterprises

Renew Enterprises repairs and services bicycles, tools and small engines and upcycles wood garden furniture. They remain mindful of the need to price their products and services in a manner that makes them affordable. They create full-time employment for people who are most distant from the labour market to learn, train and practice new skills and to experience working in a real time working environment and also offer accredited courses. Renew Enterprises is based in Kilbarry, Co Waterford. Visit renewenterprises.ie

Revamp 3Rs

Revamp 3R combines environmental, social and economic factors, by recycling unwanted household furniture for the disadvantaged with training and the provision of employment opportunities for long-term unemployed young people. They collect furniture and household goods that are suitable for reuse, carry out repairs and refurbishment work in their workshop, with steam cleaning and basic repair work adding value and usefulness to the many items currently disposed of. The high quality low cost household furniture is then made available for sale in the showroom. In doing so they provide a variety of training experiences. Through their training programme, they aim to raise the skills, self-esteem, aspirations and achievements of the participants through high quality training within a professional, caring, communicative environment. Revamp 3R is based in Longford. Visit revamplongford.ie.

Reuse Schemes

All CRNI Members are involved in carrying out or supporting reuse, other than our recycling Members. The following provides examples of how our Members are engaged in reuse on the island of Ireland, including second hand retail, repair of donated items in preparation for resale, IT asset management, paint reuse and education or awareness raising.

Back2New

Back2New Community Upcycling builds local awareness of environmental sustainability through upcycling. Their services include furniture upcycling, fabric upcycling along with an upcycling design service. The initiative provides opportunities for work experience and skills development for long term unemployed individuals. Back2New Community Upcycling is based in Newcastle West, Co Limerick. Visit facebook.com/Back2Newupcycling

Camara Education

Camara Education Ireland provides highly secure and efficient solutions for IT equipment. Operating since 2005, they have securely erased over 100,000 hard drives for businesses, government agencies, and private individuals. Camara reuses technology to enhance education of disadvantaged students around the world. Any IT equipment which cannot be reused is recycled at an authorised WEEE facility. Camara Education Ireland is based in Dublin. Visit camaraireland.ie

Diversion Green

Diversion Green shows households, community groups, schools how to make compost with their unavoidable food waste, to see it as a resource not a waste. They offer food waste audits, food waste prevention plans, workshops, challenges, talks to open the conversation around food waste and work with clients to educate them and to show people how to prevent food waste, make compost and how to brown bin successfully as a last resort. Diversion Green is based in Co Wicklow. Visit diversiongreen.ie

East Belfast Mission

East Belfast Mission repairs bikes and refurbishes and upcycles furniture. They sell these plus other secondhand items in their Restore shops, which raise vital funds to support those in need in one of the most deprived areas of Northern Ireland. Visit ebm.org.uk/retail

Gateway to Education Limerick

Gateway to Education Limerick provides secondhand school essentials, such as school books, reading books, clothing, and uniforms, at a nominal fee to support parents with the cost of sending their children to school and children who struggle with homework activities. To date, they have helped over 4000 families keep school cost to a minimum. Gateway to Education Limerick is based in Limerick City. Visit gatewaytoeducation.ie.

Irish Charity Shops Association

Irish Charity Shops Association (ICSA) is the nationwide umbrella organisation for charities who operate shops to fundraise for their causes. Textile reuse is the largest re-use activity in Ireland. Charity shops are the main drivers of this re-use activity and have been operating in this space for the past 25 years. They estimate that in total 21,420 tonnes per year textiles is handled by all of their members of which 3,525 tons are reused through sale in their shops and the remainder sold to textile merchants for reuse. A further 2,758 tonnes of books, furniture and bric a brac are reused through sale in their shops annually. Visit icsa.ie

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Northside Community Enterprises

Northside Community Enterprises launched an environmentally friendly paint re-use service in late 2020. The project is in partnership with Cork City Council and allows unused paint that is brought to civic amenity sites to be remixed and sold at their shop and customers will be able to purchase this paint at a fraction of the cost of new. This project comes as part of NCE's commitment to being community leaders in eco-friendly initiatives. Northside Community Enterprises is based in Farranferris, Co Cork. Visit nce.ie

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The Rediscovery Centre

The Rediscovery Centre is the National Centre for a Circular Economy in Ireland. It is a creative movement connecting people, ideas and resources to support greener low-carbon living. At their headquarters in Ballymun, the Centre supports four reuse social enterprises: Rediscover Furniture, Rediscover Fashion, Rediscover Paint and Rediscover Cycling. These social enterprises use unwanted materials donated for reuse to create new upcycled products and designs. At the same time, they create training opportunities for the long term unemployed and all revenue generated from its activities are reinvested in the enterprise.

In addition to their Dublin based activities, they also run a national education programme delivering environmental workshops and programmes to students at all levels of the formal education system and also to teachers, community groups and the general public. Through their strategic partnership with the EPA they also facilitate the Circular Economy Academy, offering

mentoring and support to individuals and organisations in the early stages of their circular economy journey. Visit rediscoverycentre.ie

Rehab Recycle

Rehab Recycle facilitates secure donations of IT equipment to schools, charities and community groups through their Promise IT programme. They take surplus or unused IT equipment from companies who are no longer using it, securely and certifiably wipe all the data from the hard drives, rebuild the equipment, clean it, repair where necessary, polish it and deliver it to its new home so it can begin its second life. They process and remarket thousands of assets, including computers, laptops, servers, networking equipment, TFT screens, communications systems across Europe on a weekly basis. They also support the sustainable employment of people with disabilities. Rehab Recycle is based in Dublin. Visit promiseit.ie

Rethink Ireland

Rethink inspires others to action, and to support their resilience and sustainability through demonstration and education (at all levels). They inspire conversations through workshops, encouraging reflection and action that will help people rethink their consumption, their connection with nature and demonstrate sustainability. This is to enable and foster prevention of waste, through reuse as much as possible. They offer a workshop and education series and also collaborate with research institutions. Visit facebook.com/RethinkIreland.

Tech2Students

Tech2Students is a nationwide initiative that bridges the digital divide by providing refurbished devices and providing them to students in need. The campaign was developed in April 2020 by Trinity Access and Camara Ireland and in Phase 1, they delivered over 1,000 laptops to students in the Dublin area. Covid 19 showed that the digital divide is real and remains a huge problem for second-level students, those in direct provision and adult learners in marginalised communities. For example, between 50-70% of students in DEIS schools experience a lack of access to broadband or a suitable learning device. They now aim to deliver 5,000 devices to students in need all over Ireland. Visit tcd.ie/trinityaccess/tech2students.

The Useless Project

The Useless Project helps people take steps toward more sustainable living through tutorials, workshops, tips on food waste prevention, reuse, secondhand and upcycled fashion for individuals, schools or businesses. Visit theuselessproject.com.

SHARING PROJECTS

A Sharing Platform is a circular business model in which collaboration is promoted among users to increase the usage and value of underutilised assets including skills, products, or spaces, for monetary or non-monetary benefits. One CRNI member operates this business model as outlined below.

WESHARE

WeShare is a Gift Economy Community that shares skills, knowledge, practical support, ideas, stuff and time, and all for free. WeShare was founded by volunteers, for volunteers and is run by volunteers. All WeShare activities are conceived, designed, implemented, and administered by people who give their time so that we can all benefit from a more caring society and live a more sustainable life. They give, swap, lend, teach and learn from and with each other – for free. Their website provides the platform for sharing for all groups within the WeShare collective. They are a community of people aiming to reduce the environmental impact of consumption by sharing the things we only use occasionally. WeShare inspires, connects, supports and equips members to create local initiatives that strengthen ourselves and community. They link with other groups for a more sustainable and caring world. WeShare is based in Dublin. Visit weshare.ie.

LIBRARIES OF THINGS

A Library of Things is any collection of objects loaned, and any organization that practices such loaning. The following provides examples of how our Members are engaged in Libraries of Things for toys and nappies.

CARRICKMACROSS TOY LIBRARY

Carrickmacross Toy Library promotes play for children aged 0-6 by enabling families to borrow, not buy quality, sustainably sourced toys. 80% of children's toys end up in landfill or in the sea after being used for an average of six months. Toys are difficult to recycle as they can contain materials that cannot be easily separated. Carrickmacross Toy Library aims to address this environmental challenge through a sustainable toy lending service. Users can borrow up to four toys, puzzles or games for up to three weeks at a time. Parents pay a small membership fee that goes towards repairing or replacing broken toys. Carrickmacross Toy Library is based in Carrickmacross, Co Monaghan. Visit carrickmacrosstoylibrary.lend-engine-app.com/products.

CLOTH NAPPY LIBRARY IRELAND

Cloth Nappy Library Ireland is a nationwide non-profit that provides cloth nappy loans and local support. Disposable nappies take 200-500 years to decompose in landfills: using even just one cloth nappy a day

reduces that number by almost 1,000. Five nappies a day 365 day a year for 2.5 years totals up to almost 4500 nappies. Local libraries do a monthly nappuccino where parents can see various cloth nappies, ask questions and borrow a kit to try at home. Their postal loans cater for newborns, right up to toddlerhood and beyond. Visit clothnappylibrary.ie

CIRCULAR DESIGN

Design is key to the first principle of circular economy, "design out waste and pollution." The following provides examples of how our Members are engaged in the area of design and upcycling of second hand goods and materials.

ATTENTION ATTIRE

Attention Attire was created as a response to Irish festival campsite waste. Every year, hundreds of weekend camping festivals across Ireland generate tonnes of camping waste that is extremely difficult to recycle. Items at the epicentre of this waste crisis are tents, sleeping bags and other material based camping gear which is near impossible to salvage sustainably. They create limited edition, handmade outerwear and accessories from upcycled camping gear left behind at Ireland's music festivals. Each piece is crafted with recycled materials that would otherwise end up in landfill. They use everything - zips, toggles and velcro - ensuring nothing goes to waste. Attention Attire is based in Dublin. Visit attentionattire.ie

NATIVE EVENTS

Native Events produces sustainable events, including shows and markets, demonstrating Irish innovations in crafts and sustainability. They supply trained and skilled crew to events, who follow our ethos of efficiency and sustainability. They hire bespoke, ecodesign, upcycled furniture and decor, and temporary solar power installations for events, shows and activations. Native Events is based in Dublin. Visit nativeevents.ie

THE REDISCOVERY CENTRE

The Rediscovery Centre is the National Centre for a Circular Economy in Ireland. It is a creative movement connecting people, ideas and resources to support greener low-carbon living. Their four social enterprises bring circular design to life through training, lectures and by developing innovative products that highlight circular design principles. Their products are then sold in their Eco Store along with other sustainably designed brands. The Rediscovery Centre is based in Dublin. Visit rediscoverycentre.ie.

ROSCOMMON WOMEN'S NETWORK

Roscommon Women's Network is a local community project and charity based in Roscommon that is piloting a Textile Upcycling Training Project through EPA Green Enterprise funding. They are hoping to reduce the unsold textiles that are generated by their charity shop by upcycling these textile items into different products for sale under their CycleUp brand. They empower women to achieve sustainable development and to achieve individual or common goals. Their work with individual women benefits the women themselves, their families and their communities. Visit rwn.ie

The Upcycle Movement

The Upcycle Movement is a creative design studio specialising in transforming waste into worth. Neo Collection is their debut design collection, which are bags and accessories made from upcycled wetsuits for everyday adventures. They are home to 'Re Source' – a platform for sourcing waste streams (resources) and connecting these with designers who can repurpose them. They also facilitate talks and workshops which focus on upcycling and finding a business opportunity in locally sourced waste materials. Visit theupcyclemovement.com

Circular Business Models

A circular business model ensures that materials are retained within productive use, in a high value state, for as long as possible. In addition to reuse, repair, sharing and library of things approaches, we have outlined some examples of how our Members are engaged in circular business models with a focus on refill, rescue, online sales and redistribution.

Conscious Cup Campaign

Conscious Cup Campaign works with the industry, consumer and government bodies to communicate and promote waste prevention through reuse. They ask participating cafes to incentivise customers who bring reusables and in turn they promote those Conscious Cafes. They provide support, information and toolkits to all types of community groups, organisations and educational facilities who want to reduce single use food to go packaging. They assist Cafes in reducing their waste, advise them on policy in relation to single use plastics and also provide solutions to participate in the circular economy so they can be both profitable and sustainable. Visit consciouscup.ie

FoodCloud

FoodCloud enables the redistribution of surplus food from the food industry to the charity sector through two solutions – the FoodCloud Technology platform and FoodCloud Hubs. Over 12,800 tonnes of food has been received

by over 7,500 charitable groups across Ireland and the UK, with over 28 million meals equivalent helping charities save money on their food bills. FoodCloud exists first and foremost to reduce the environmental, social and economic impact of waste in the food supply chain. In the first instance they focus on redirecting surplus food in the food supply chain from disposal to consumption by people. They work with the food industry to help partners reduce their production of surplus food in the first place. Visit food.cloud

HABITAT FOR HUMANITY RESTORE

Habitat for Humanity works beside families to build, renovate or repair their home. Through their ReStores, Habitat provides access to low cost home improvement materials, delivers skills based employability and learning programmes and diverts tons of material from landfill. In addition, their Kitchen Rescue programme gives a new home to old kitchens. By working alongside local companies, Kitchen Rescue reaches out to customers who would consider donating their good quality, used kitchen to the Habitat ReStore. Habitat provides a service to kitchen donors and, by removing kitchens carefully, will rescue them for resale. Through this and their shops, Habitat for Humanity raises funds to support long-term partner programmes in some of our world's poorest communities. Habitat for Humanity is due to open a store in Ireland in the coming year. Visit habitatireland.ie

RECREATE IRELAND

ReCreate Ireland makes art materials and educational supplies affordable and accessible to every sector of the community for all kinds of creative purposes, achieved by salvaging clean, reusable materials from business and distributing to members for free in unlimited quantities. The project is based around the concept known as Creative Reuse which encourages the public to reuse materials that would normally be thrown away in all kinds of creative and inventive ways.reuses unwanted materials as art & educational supplies. They source clean, end of line, surplus and unwanted materials and items from business all over Ireland. Then they collect, sort and supply these materials as arts and crafts materials and educational play resources for early years, primary/secondary schools, individual artists and students, families, community and special needs groups. Membership is open to anyone and gives unlimited access to materials. ReCreate Ireland is based in Dublin. Visit recreate.ie

REFILL IRELAND

Refill Ireland is an environmental project aiming to make Irish towns and cities tap water refill friendly for everyone while on the go. They locate and encourage the creation of locations where filling a reusable water bottle for free from an increasing number of refill stations becomes an easy to do everyday habit helping hydration and ultimately protecting our environment from bottle waste. Their aim is to substantially reduce the amount of, and dependence on, consuming our drinking water in single use plastic bottles. Their "tap map" on

their website or app helps people find over 1300 local businesses where they can refill their own water bottle for free. Visit refill.ie

THRIFTIFY

thriftify connects charity shops with consumers who care, helping to bring about a sustainable fashion movement while growing funding for great causes. They are an online double-sided marketplace that helps charities realise the true value of unsold donated stock, including books, CDs, console games and fashion. They have taken all of the complexities and challenges of selling online and combined them to create the charity retail platform, which is available to charity retailers and other ethical enterprises who want to sell online. The software makes it simple for volunteers working in charity shops to decide whether the item could get a better value on the thriftify platform and to upload it. Visit thriftify.ie

CIRCULAR INNOVATION

As highlighted in Section 2.12, our members are pioneers and drivers of research and innovation. Many of our members already listed above are innovating in, for example, new tech solutions, new material reuse (e.g. paint through the Rediscovery Centre) or upcycling (tent and festival materials with Attention Attire, wetsuits with the Upcycle Movement), or are carrying out important research into circular practices (business models, reuse measurement and much more via the Rediscovery Centre), remanufacturing (An Mheitheal Rothar) or upcycling and training (Roscommon Women's Network). Below are some additional examples of how our Members are engaged in innovation through recycling.

BOUNCEBACK RECYCLING

Bounce Back Recycling is a recycling company whose aim is to divert mattresses and furniture away from landfill. They provide a quality service for companies, councils & householders to recycle their unwanted waste rather than send it to landfill. They work with a number of local authorities across the country, and many retail outlets to improve the recycling rates across the west of Ireland. With the lack of mattress recycling alternatives in the west Ireland, they have established themselves as a leader in the field and have carried out research into applications for materials recovered from mattresses. They reclaim and recycle; cottons, polyester, woven pad, metal and foam. Each material has its own varying commercial use. All recycled mattresses benefit various industries e.g. steel manufacturing, textile manufacturing and carpet manufacturing. This in turn creates gainful employment and reduces high dependency on landfill. After running several successful mattress amnesty events together, they approached Roscommon County Council about providing bulky waste containers at four of their Civic Amenity Sites. Since launching in 2020, and despite successive Covid-19 lockdowns, 400 bulky items have been diverted to recycling this way. Bounce Back Recycling is located in Galway City. Visit bouncebackrecycling.ie

BRYSON RECYCLING

Bryson Recycling delivers high quality, efficient and cost effective recycling services across the UK and Ireland. At the core of everything they do is the triple bottom line; social responsibility, environmental sustainability and economic viability. They are continually looking for ways to improve our recycling services and focus on ensuring that the materials they collect for recycling are of a high quality to be recycled locally. They use this approach as it benefits the local environment and economy and helps to support local jobs. They provide a kerbside box collection service to more than 170,000 households in Northern Ireland and commercial collection service to more than 440 businesses and schools. This is facilitated by innovative collection trucks, which contain multiple separate compartments to allow for more efficient separation of recyclable materials at the point of collection and a clean recyclate stream. Their state of the art MRF (Materials Recovery Facility) plant in Mallusk is used to sort mixed materials collected in wheeled bins from 278,000 homes in Northern Ireland. 35 percent of their materials are recycled in Northern Ireland with over 80 percent staying in the UK. Visit brysonrecycling.org

ECOMATTRESS RECYCLING

Eco Mattress Recycling was set up as the first mattress recycler in Ireland and also as a Social Economy Enterprise. Their mattress recycling processes provide valuable hands-on work experience to people on back to work training programs. They employ a deconstruction process that separates all the materials contained in mattresses and bed bases. They are left with steel springs, foam, cloth and wood and develop markets for the waste derived from deconstructed mattresses. The wood is cut and packed as kindling and the springs, foam, cloth are baled and sent to companies who are fully permitted and specialise in the further processing of these materials. Visit ecomattressrecyclingireland.com

RECYCLEIT

Recycle IT was set up as the first social enterprise in WEEE recycling in Ireland. They are the only Community Electronic Recycling Social Enterprise in Dublin, Kildare and Wicklow providing a neighbourhood, community and business collection and drop off service for all types of waste electrical and electronic equipment. Recycle IT endeavours to support people living and working in communities including householders and place an emphasis on individual needs. The service reduces the volume of electrical and electronic waste going to landfill and helps increase environmental awareness amongst householders, community groups, schools and businesses. Recycle IT will take any electrical items with a plug or a battery. This includes dual purpose business and household appliances like computers, monitors, printers, TV's, washing machines and dishwashers. Recycle IT will also recycle small battery-operated devices like electric toothbrushes, mobile phones and pocket radios. Each year collection services are

offered to approx. 100,000 homes and organisations in Dublin and the surrounding areas. Recycle IT work in partnership with WEEE Ireland and in association with South Dublin County Council. Visit recycleit.ie.

USEL

Usel operates a Circular Economy business model that contributes to the wider Circular Economy through the recycling of mattresses, carpet, furniture, plastic, cardboard and waste electrical items. Usel is Northern Ireland's only mattress recycling provider diverting over 1000 tonnes of waste from landfill every year. They collect mattresses from council recycling centres, bed retailers and hoteliers across the province and bring them back to our licenced facility. 96% of each mattress is recycled, the remaining 4% is sent to energy from waste. In addition, Usel is creating employment opportunities for people with disabilities and health related conditions within its recycling operation. Visit usel.co.uk/u-recycle

Please contact Claire Downey at info@crni.ie for any additional details to facilitate case studies on our Members' work.