

CRNI RESPONSE TO EPA CIRCULAR ECONOMY PROGRAMME

1.0 OVERVIEW

CRNI has been working with and supported by the EPA under the National Waste Prevention Programme for approx 8 years and in this period, has grown to represent 38 members with strong membership offerings, a wide communications reach, and delivers annual events as well as biennial conferences, has completed seven research projects and submitted countless policy papers. The network now employs two full time staff.

In this period, but particularly in the last year, there has been a significant build up in momentum putting prevention (including avoidance, reuse and repair), preparation for reuse (including repair and refurbishment) and supporting social actors at the heart of resource efficiency planning.

The European Circular Economy Action Plan 2.0, Waste Action Plan for a Circular Economy and cross sectoral developments like the <u>Climate Plan Interim Actions</u> and <u>Rural Development Policy 2021-2025</u> all show real ambition and signal a pivotal time for the circular and social economy. This programme is therefore particularly timely.

To realise this ambition in practical terms, we believe that a strategic mix of policy and financial incentives are required to ensure prevention and preparation for reuse are **better designed**, **more accessible, more affordable, more viable and more attractive than the alternative**.

We welcome the new expanded role for the EPA in helping to drive Ireland's move to a circular economy. In doing so, we recommend that:

- the top three tiers of the hierarchy are acknowledged and prioritised in line with the waste hierarchy in the CEP overall vision
- measures and campaigns under this CEP are coordinated and aligned with new plans, strategies and policies being developed at national and EU level
- the EPA continues to expand and grow funding to the sector, by connecting to funding streams for climate action
- the value of existing prevention activities providing a diversity of business models, particularly those delivered by social enterprise, be recognised and supported
- bulky goods be included as a priority area for the CEP
- targets to support prevention and preparation for reuse activities are the priority in delivering a more circular economy, specifically



- a kg/inhabitant reuse target that is linked to job creation, introduced within the next 2 to 3 years (potentially on an all island basis), accompanied by supports to the sector e.g. grants for reporting systems, training for the sector, support for the national roll out of ReMark
- a mandatory food waste prevention target of 50% by 2030 along with an interim target to drive progress, with a baseline year that is close enough to the proposed EU baseline year while being of sufficient quality.
- \circ a preparation for reuse targets to be introduced on a phased basis starting with 1% up to 3% within 3 years.
- any and all new targets (e.g. reducing per capita food waste, reuse and repair) are accompanied by clear linkages with other targets (e.g. sectoral targets, circularity ranking), clear lines of responsibility and accountability and clear review periods, corrective measures and consequences for failure to make progress
- ReMark be supported for roll out on a national basis as a potential game changer for the sector in Ireland, underpinning measurement and reporting on reuse, supporting circular procurement, facilitating all island collaboration and underpinning national circular economy branding.
- the potential for reuse to contribute to greenhouse gas emissions reporting should be explored, building on Q2Reuse data or methodologies where possible
- a coordinated approach is taken to national targeted behavioural change campaigns with consistent messaging used by all stakeholders
- a coordinated approach is taken to developing roadmaps between the CEP and the AGCES
- the minimum target for procurement of used goods (as proposed in the WAPCE) be introduced
- an approach that supports local suppliers in engaging in GPP is followed, including
 identifying and sharing local good practice examples, ensuring grants and funding are
 appropriately designed to support circular and social procurement, requiring public
 bodies to incorporate reuse policies into asset management and procurement,
 encouraging public bodies to address circular and social concerns at pre-tender stage
 and supporting social criteria e.g. weighted targets for Social Enterprise, reserve
 contracts
- circular procurement in the <€25,000 threshold tenders is monitored
- greater consideration and priority is given to products that have been or are being prepared for reuse in end of waste criteria
- representatives from the community reuse and recycling sector are included in any group to review national End of Waste decisions.

In relation to partnerships, we believe that **CRNI** is in the best position nationally to deliver a partnership to establish Ireland's Reuse & Repair Sector.

We also believe that the Rediscovery Centre is a leading innovator and knowledge centre in the Circular Economy and ongoing support for their work as a National Centre for a Circular Economy is crucial in underpinning this transition in Ireland.



2.0 FEEDBACK ON PROGRAMME PROPOSAL

2.1 Programme Vision and Remit

We welcome the broadening of the remit in the Circular Economy Programme.

A holistic approach to prevention, preparation for reuse and recycling activities will help connect and coordinate elements of the circular transition. For example, in developing a roadmap for EEE, measures supporting prevention (leasing, second hand sales), preparation for reuse (repair, refurbishment) and recycling (dismantling, recycling) need to be coordinated to ensure that the hierarchy is respected while at the same time the appropriate infrastructure is provided.

We welcome the greater focus on reuse and repair, but would note that, as these areas fall under the prevention tier of the waste hierarchy, they have always played an important role in the NWPP.

The use of language is important in signalling the correct and necessary focus for any policy or programme and in sharing an understanding of what a more circular economy means.

Throughout this consultation response we refer to activities according to the tier of the waste hierarchy in line with definitions from the Waste Framework Directive (EU) 2018/851.

Prevention is defined as measures taken before a substance, material or product has become waste, that reduce: (a) the quantity of waste, including through the re-use of products or the extension of the life span of products; (b) the adverse impacts of the generated waste on the environment and human health; or (c) the content of hazardous substances in materials and products;

This <u>includes</u> avoidance, reuse and repair activities, where **reuse** refers to any operation by which products or components that are not waste are used again for the same purpose for which they were conceived.

Preparation for reuse, the operation on the second tier of the waste hierarchy, is defined as *any* operation by which products or components that are not waste are used again for the same purpose for which they were conceived;

Finally, **recycling** is defined as any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes.

In the proposed vision for the Circular Economy Programme (CEP) we believe that each of the three tiers of the hierarchy should be acknowledged explicitly, and that the strength of wording should reflect the priority order in the hierarchy.



In this respect, we propose the following wording (proposed amendment in red):

A driving force for Ireland's move to a circular economy by business, citizens & the public sector, characterised by behaviours and business models that firstly design-out and prevent waste; then ensure preparation for reuse; followed by resource recycling as a last resort; and deliver sustainable economic growth.

On page 3 of the consultation document, prevention is highlighted as the primary approach "to be followed by: Re-Use & Repair; Recycling; Recovery (including energy recovery); and finally Disposal". On page 4 of the consultation document, it is stated that the remit of the programme will expand further down the waste hierarchy to encompass recycling, as well as reuse and repair.

We refer to the definitions above from the Waste Framework Directive which show that prevention as the first tier of the hierarchy includes reuse and repair of non-waste products. Non-waste reuse and repair are currently the only types of operation carried out in Ireland, given that there are no preparation for reuse centres in operation. In this regard, reuse and repair cannot be considered to be further down the waste hierarchy than prevention. On the other hand, preparation for reuse can be considered to be further down the hierarchy but higher in the hierarchy than recycling, and should be explicitly mentioned in relevant statements on pages 3 and 4.

We ask that language regarding prevention and preparation for reuse be clarified in the final Circular Economy programme.

2.2 PROGRAMME OBJECTIVES

2.2.1 Provide leadership on the circular economy to improve coherence and alignment of national, regional and local activities and ensure maximum impact

We welcome efforts to better coordinate and align various national, regional and local activities. As highlighted above there has been a significant build up in momentum in the past two years with many new plans, strategies and policies being developed at national and EU level.

As this evolves, it will be important to ensure policies, strategies and plans align and that measures and goals are coordinated.

As outlined in this response, particular care is needed for example to coordinate targets (see Section 2.4), branding and communications (see Section 2.6) and sectoral roadmaps (see Section 2.8.3) at national level between the proposed All of Government Circular Economy Strategy (AGCES), the Waste Action Plan for a Circular Economy (WAPCE), the National Waste Management Plan for a Circular Economy (NWMPCE) and this Circular Economy Programme (CEP).



It would also be helpful to have a clearer picture of how these important documents will tie together.

2.2.2 MAINTAIN A COMPETITIVE PROGRAMME OF SUPPORTS TO DRIVE THE CIRCULAR ECONOMY THROUGH PROVIDING INNOVATION GRANTS AND SEED-FUNDING TO NATIONALLY-RELEVANT INITIATIVES.

We fully support the current programme of competitive support that drives innovation. The annual nature of the Green Enterprise programme, alongside the new Circular Economy Innovation Grant Scheme, give important opportunities for social enterprises in particular to explore new business areas or expand their activities and provide a predictable funding pipeline for innovation and growth. Other community based funds such as the EPA supported Community Foundation circular economy grant are also very welcome in supporting grassroots activities.

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

This may facilitate access to larger funding allowances. 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. Examples of Circular Economy projects currently live under this programme can be found here">here.

In addition to grant schemes, we have proposed a suite of financial measures to more broadly support prevention and preparation for reuse in our response to the AGCES (attached) and as summarised in Section 2.10.

2.2.3 IMPLEMENT ACTIONS THAT BUILD KNOWLEDGE AND AN EVIDENCE BASE TO INFORM CIRCULAR ECONOMY DEVELOPMENT IN IRELAND, AND TO REPORT ON PROGRESS TOWARDS GREATER CIRCULARITY.

With policy and funding evolving quickly in this area, it is essential that any measures are backed by knowledge and an evidence base.

CRNI as part of its annual work plan strives to help mainstream community reuse, repair and recycling through policy advocacy and research. As outlined in Section 2.10, through our work at EU level and with our members we are able to identify research or policy needs based on an understanding of the barriers and future trends. Much of this has been facilitated through EPA research funding and we look forward to continuing to work with the EPA to support a knowledge and evidence base for the sector.

One area where further research is required is in mapping the management of particular product groups to identify where there is leakage from prevention into recycling or disposal and help plan infrastructure (see also Section 2.9) or policy measures to address this. Investment can then be made to help bring prevention activities for those products into the mainstream.



The study¹ last year commissioned by the EPA on post consumer textile flows found that over 100,000 tonnes of used textiles are recovered or sent to landfill each year from household, commercial and industrial sources. This compares with approx. 10,000 tonnes being reused locally and roughly 40,000 tonnes being exported for reuse.

This information is essential in determining the need for additional infrastructure. 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 reuse², it would save 33,250 tonnes carbon³.

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.

Similar mapping exercises would be useful for other product groups such as furniture, EEE and bicycles.

2.2.4 Realise the enterprise opportunity by supporting new business models; promoting resource efficiency; and retaining material value through enhanced use of secondary/recycled materials

Moving toward a more circular economy will require transformative changes to the way citizens and businesses engage with goods and services. This clearly requires an exploration of different approaches to circular business models.

We are pleased to count within our membership a broad range of circular business models including:

- **lending** services (Cloth Nappy Library Ireland, Carrickmacross Toy Library)
- redistribution (FoodCloud, ReCreate Ireland)
- **sharing** (WeShare)
- refill incentive schemes (Refill Ireland, Conscious Cup Campaign)
- **digital** (thriftify)
- **educational** (Cloth Nappy Library Ireland, Diversion Green, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green and Native Events)
- reuse (Back2New, Camara Education, East Belfast Mission, Gateway to Limerick, Habitat for Humanity, Irish Charity Shops Association, Northside Community Enterprises, the Rediscovery Centre, Rehab Recycling, Tech2Students)

¹ Due for publication shortly. Figures provided can be determined from data in the public domain.

² Approx. reuse rate at charity shops based on stakeholder interviews through Q2Reuse

³ 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



- **repair** (Cork Community Bikes, CycleSense, Renew Enterprises, An Mheitheal Rothar, the Rediscovery Centre)
- **upcycling** (Attention Attire, Back2New, Deaf Enterprises, Kingdom Furniture Revamp, Revamp 3Rs, IRD Duhallow Furniture Revamp, the Rediscovery Centre, Roscommon Women's Network, the Upcycle Movement) and other services.

These are outlined in further detail in Annex A. We believe that the success of these business models should be recognised and further supported to realise their full potential.

The work of the Rediscovery Centre, in partnership with the EPA, with the Circular Economy Academy has also proven very valuable in supporting emerging circular economy activities. From this work at least four new members have joined CRNI in the last year as established social enterprises in reuse or repair.

It is noted that, through the Q2Reuse research project⁴ funded by the EPA, CRNI alongside CTC and the Rediscovery Centre have mapped out all reuse operators involved in second hand goods. This found that the majority (just under 50%) identified as not for profit entities or social enterprises, highlighting the important influence of not for profit operators in the reuse sector.

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 and National Centre for a Circular Economy is pioneering many areas from research to the roll out of paint reuse 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 capabilities – both projects funded through the EPA Green Enterprise programme.

This highlights the value of recognising and supporting the range of business models and innovation already being delivered by the sector, particularly through the social enterprise model.

With each new business model opportunity there can also be challenges or unanticipated consequences. For example, the European network RREUSE also recommends a cautious approach to product-as-service models, "where producers keep the ownership of the product or the responsibility for its performance throughout its lifecycle", which are mentioned throughout the CEAP as a solution to encourage producers to manufacture longer lasting products. Though promising, these models can potentially backfire in a context where cheap virgin materials and low labour costs remain a reality in manufacturing countries. They could also be used by manufacturers and retailers to develop monopolies on repair activities, posing severe risks on the independent repair sector. Retailers may also end up competing with subscription models providing the widest choice of products and the most flexible services, exerting even more pressure on resources.

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⁴ http://www.rediscoverycentre.ie/research/g2reuse/



RREUSE proposes that safeguards 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.

2.3 PRIORITY AREAS - INCLUSION OF BULKY GOODS

The priority areas proposed for the CEP include packaging, plastics, textiles, food / water / nutrients, construction and buildings, electronics and ICT and batteries and vehicles. We propose that bulky goods should also be included as a priority area on this list for the following reasons:

• Circular Economy Action Plan

The EC Circular Economy Action Plan (CEAP) gives priority to product groups including electronics, ICT and textiles **and also to furniture** and high impact intermediary products such as steel, cement and chemicals.

• Waste Action Plan for a Circular Economy

Furniture and mattresses are highlighted in the WAPCE under the heading "household bulky goods" in Chapter 5 on Municipal Waste. Key issues arising in the management of bulky goods include illegal dumping and a lack of infrastructure for storage. The commitments in this Chapter related to bulky items include:

- requiring public bodies to incorporate reuse policies into their asset management and procurement plans (also relating to GPP).
- introducing appropriate reception facilities (for bulky goods) at civic amenity sites
- promoting circular economy design principles for the domestic furniture and mattress industry.
- introducing a ban on bulky waste from landfill.

Chapter 16 on Extended Producer Responsibility of the WAPCE also commits to examining the feasibility of introducing further EPR arrangements for bulky waste including mattresses.

Mattress Working Group

The EPA has facilitated a mattress working group since 2017 to exchange information and knowledge on end-of-life mattress waste management and recycling in Ireland, provide evidence for policy and support mattress recycling social enterprises in their circular economy ambitions.

Through this work a comprehensive report on mattress arisings, management and measures needed to overcome key barriers was completed. Although not published, this provided an important evidence base to build on. Following on from this, CRNI is tasked in our 2021 workplan to investigate the opportunity for an EPR scheme for mattresses in Ireland, following the suite of other Member States pursuing this option.



To assimilate this work, inform policy and align with EU and national priorities, we believe that bulky goods should be included as a priority area for the CEP.

2.4 TARGETS

It is proposed that an early task for Circular Ireland would be the development of quantitative targets, in close collaboration with DECC, to provide direction and allow progress to be tracked.

2.4.1 Proposed Targets

CRNI welcomes the commitment to introducing targets and has been advocating for targets for reuse, food waste prevention and preparation for reuse for some time as further elaborated below.

It is essential for a clear, effective approach to driving prevention and preparation for reuse that any and all new targets are accompanied by clear linkages with other targets (are complimentary), clear lines of responsibility and accountability and clear review periods, corrective measures and consequences for failure to meet targets.

Currently there are multiple plans and policies in which targets are mentioned, including:

- the Regional Waste Management Plan Lead Authorities NWMPCE, which is due to implement targets for reuse, repair, resource consumption and reduction of contamination levels according to the WAPCE. CRNI included in its recent consultation response⁵ to this plan a detailed outline of the opportunity for and potential design of such targets.
- the DECC's AGCES, which proposes material circular use rate targets and priority waste prevention targets for Circular Economy Sectoral Roadmaps
- this CEP, describing quantitative targets as noted above

Of the targets proposed in the CEP we warmly welcome targets for reducing per capita food waste to below EU averages and reuse and repair metrics, in-line with emerging European Commission requirements.

Regarding Ireland's positioning in EU circularity rankings, we would like to flag our concern that this could downplay the role of prevention and preparation for reuse and lend more focus to recycling. This is because the circularity material use rate is a measure of secondary material (rather than product) use and would not explicitly reflect any contribution of prevention or preparation for reuse.

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

⁵ https://crni.ie/content/uploads/2021/05/CRNI National-Waste-Management-Plan-for-a-Circular-Economy.docx.pdf



through recycling. RREUSE has been calling for a separate target (or target within a target) for preparation for reuse but to date, only Spain has seen the introduction of specific targets in this area.

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.

REUSE TARGET

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

The European Prevent Waste Coalition paper 10 Priorities to transform EU waste policy called for, as the top priority, ambitious and binding waste prevention and reuse⁶ targets. The CIWM⁷ found a key barrier to reuse in the UK and Ireland was a lack of targets or legislation to drive the sector. Introducing quantitative targets for reuse now would put Ireland in a leadership position and prepare the sector for the introduction of targets under the Waste Framework Directive from 2024.

A kg/inhabitant reuse target that is linked to job creation should be introduced.

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

REUSE TARGET - MEASUREMENT

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

Ireland is currently leading the way in developing a methodology for measuring reuse through the EPA funded Q2Reuse project⁸. Led by the Clean Technology Centre (CTC), in collaboration with the Rediscovery Centre, Community



⁶ Defined as any operation by which products or components that are not waste are used again for the same purpose for which they were conceived - and as scoped for Ireland through the Q2Reuse project

⁷ CIWM report, Reuse in the Uk and Ireland - a "State of the Nations" report for the CIWM, 2016, available at https://www.ciwm.co.uk/ciwm/news-and-insight/reports-and-research.aspx

⁸ See http://www.rediscoverycentre.ie/research/q2reuse/ for more information



Resources Network and the Eastern Midlands Waste Region, this project aims to develop methodologies for the qualitative and quantitative assessment of the reuse sector that reflects EU quidance but is tailored to the Irish market.

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

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

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

REUSE TARGET - ALL ISLAND OPPORTUNITY

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

The opportunity for all island approaches to targets for reuse should be explored.

REUSE TARGET - ADMINISTRATIVE BURDEN

Requiring the sector to measure and report reuse activity toward a target would add an administrative burden to some already struggling enterprises. Support will be crucial to underpin a reuse target including financial instruments or grants for data collation.

Recommended supports include financial support to establish an appropriate reporting system, training for the sector on reporting and supporting the national roll out of ReMark, which requires data reporting in return for credibility, marketing and promotion of participants.

⁹ Recently established by CRNI with funding from DAERA



2.4.2 FOOD WASTE PREVENTION TARGETS



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

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

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

FOOD WASTE PREVENTION TARGET - MEASUREMENT

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 developed¹⁰ in Ireland, it has not been widely adopted to date across the supply chain.

Nonetheless, a baseline year should be selected for an Irish target that is close enough to the proposed EU baseline year while being of sufficient quality.

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

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

¹⁰ Available for download at https://ctc-cork.ie/news/ctc-food-waste-report-published-by-epa/



2.4.3 Preparation for Reuse Targets

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

CRNI has strongly advocated¹¹ targets for preparation for reuse in line with recommendations in the EPA research report¹² by University of Limerick, with a focus on IT equipment and large Household Appliances (LHA). These must be introduced through conditions in the Ministerial approval that the compliance schemes operate pursuant to Regulation 33 of S.I. 149/2014.

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

2.5 Branding

It has become more important than ever to ensure a coordinated approach to circular economy communication and awareness building, with the involvement of an increasing number of stakeholders including CRNI members (the Cloth Nappy Library Ireland, FoodCloud, ReCreate, the Rediscovery Centre, Rethink Ireland, WeShare, The Useless Project, Diversion Green, Native Events), DECC, the EPA, the Regional Authorities and NGOs including VOICE, the IEN and others.

We welcome a national branding that connects these stakeholder efforts to communicate and showcase the circular economy. Further consideration of how Circular Ireland could provide or complement this overarching national 'brand' - in addition to covering projects and initiatives delivered and funded by the Programme - would be helpful.

The development of a national circular economy online platform, as flagged in the AGCES, will be valuable in connecting nationwide circular economy initiatives. The EPA also proposes in this consultation to host Circular Ireland webpages with programme knowledge outputs and links to other main stakeholders. A close connection between these pages and the national online platform would be valuable. We would also welcome efforts to involve and build on the expertise in organisations like CRNI members when developing the Circular Ireland annual conference and best-practices.

The AGCES refers to expanding national circular economy branding in a manner "analogous to a certification mark" in the next iteration of the Strategy. Thanks to EPA Green Enterprise funding, ReMark¹³, 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, and highlighting the social and environmental benefits of the goods.

13 https://www.crni.ie/re-mark/

¹¹ See also our submission to the Waste Action Plan for a Circular Economy at https://crni.ie/key-policy-areas/

¹² 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



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 a series of videos¹⁴. When the pilot finished in March 2019, the final report recommended that ReMark be further developed and rolled out throughout Ireland and Northern Ireland.

We believe that ReMark could be a game changer for the sector in Ireland, underpinning measurement and reporting on reuse, supporting circular procurement, facilitating all island collaboration and underpinning national circular economy branding.

This will require Exchequer support in order to build and develop the mark and facilitate its roll out at national or all island level.

2.7 CLIMATE LINKAGES

As highlighted in the CEP consultation, prevention and preparation for reuse 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%¹⁵. The European RREUSE¹⁶ network estimates that reuse or preparation for reuse of just 2% of additional waste currently generated in the EU could help reduce CO2 emissions by 5% while supporting around 400,000 jobs¹⁷. A WRAP UK study has also also shown that by increasing the reuse of key household products 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 as well as end of life management.

Accounting for these savings is complex due to the global nature of supply chains in manufacturing and distributing consumer goods and the local nature of carbon accounting. However, strengthening this link would help demonstrate the negative upstream impacts of production and distribution of the goods we use on a daily basis and strengthen the role of the circular economy in the Climate Action Plan. The introduction of a target for reuse in Ireland will provide an opportunity to improve measurement and reporting could be used as a basis for developing carbon reporting on this sector.

We propose that this potential for reuse to contribute to greenhouse gas emissions reporting should be explored. We are keen to support the EPA in measuring and reporting on this connection, based on findings from Q2Reuse and through RREUSE, to show our global carbon

15 https://www.circularity-gap.world/2020

¹⁴ https://www.crni.ie/re-mark/

¹⁶ 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.

¹⁷ See https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/



footprint and connect savings from local action in prevention or preparation for reuse with national carbon accounting.

2.8 OPERATIONAL PILLAR #1 - ADVOCACY, INSIGHTS & COORDINATION

2.8.1 Policy Insights

At this time with the pace of policy evolution at national and EU level it is more important than ever to provide an evidence base for policy decisions.

We therefore welcome the policy support function within the national circular economy programme and look forward to contributing to this where possible. CRNI has been active in identifying and carrying out necessary research, through the EPA Green Enterprise and STRIVE programmes, that can provide and support this evidence base. As for above, we believe that key stakeholders, in addition to any specialists involved in commissioned studies, should be involved in developing informed positions particularly given the special nature of the Irish resources sector¹⁸.

As highlighted above, the current research programmes and funds are highly valuable in providing insights in relation to upcoming barriers or policy change.

2.8.2 AWARENESS

Raising awareness is complex and involves both providing information (to raise awareness), delivering behavioural change and providing an outlet for that change, which is the desired outcome of awareness raising. The contribution this programme can make toward behavioural insight will therefore be highly valuable.

We fully support a coordinated approach as proposed in the consultation to national targeted behavioural change campaigns with consistent messaging used by all stakeholders, involving collaboration with the Regional Waste Management Plan Lead Authorities, the programme's strategic partnerships with organisations such as the Rediscovery Centre and the public-facing MyWaste portal.

As highlighted above, we are keen to facilitate the national roll out of ReMark and explore alignment with the national branding effort and would welcome support for this as a potential game changer for the sector in Ireland.

We have also identified in Section 2.2.2 and in more detail in our AGCES submission attached a number of measures we believe are required to complement awareness and behavioral change efforts to improve the accessibility, affordability and viability of prevention and preparation for reuse activities.

¹⁸ e.g. the majority of actors in second hand goods are non profit, the waste management market is privatised meaning different incentives apply for householders, etc.



2.8.3 ROADMAPS AND REPORTING

We are keen to see target driven and coordinated roadmaps developed to provide certainty around the implementation of new policies, strategies and programmes.

One concern raised in our response to the AGCES consultation is the lack of clear targets or ambition in the proposed first strategy.

We believe that a sense of urgency is needed in all Government policy and strategy, underpinned by a plan for concrete actions and timeframes.

The AGCES proposes delivering actions through standalone Sectoral Circular Economy Roadmaps, which are set out in Annex 3 of the consultation. This addresses construction, transport, agrifood and consumer goods. However, roadmaps proposed in the CEP are expected to initially focus on food waste and plastics.

Further clarity is required in relation to how various roadmaps will align.

We welcome the proposal to set timeframes for these roadmaps. In addition, we would like to see commitment to producing progress reports. In the absence of progress reports, policy ambition is weakened due to a lack of information or repercussions for failure to make progress.

We believe it should be explicitly stated that any roadmaps will be accompanied by a review of progress against the stated aims and that strong and corrective measures will be taken where progress is not being made.

Wider discussion to help inform the corrective measures should be facilitated, if required. A strong precedent has been set recently in terms of progress updates in Ireland's *Rural Development Policy 2021-2025*, which commits to committee oversight and biannual progress updates on the implementation of the policy.

Finally, we would welcome an opportunity to contribute to monitoring and reporting protocols. It would be interesting to also follow European Topic Centre work on monitoring frameworks for a circular economy, building on the Oko-Institut and Plan Institut webinar in March 2021 on *New Data Streams for Circular Economy Monitoring*. This may provide a more comprehensive and in depth assessment of Ireland's position in relation to key sections of the circular economy.

Based on our experience with the Q2Reuse project and data collection from our membership, we look forward to supporting and contributing to this work.



2.9 OPERATIONAL PILLAR #2 - INNOVATION & DEMONSTRATION

2.9.1 Green Enterprise

CRNI has carried out five Green Enterprise projects and is currently involved in a sixth project on Circular Textiles.

As highlighted in Section 2.2.2, we believe this programme is extremely valuable in helping to advance circular activities by facilitating research and practical demonstration.

2.9.2 Green Public Procurement

We welcome the focus on GPP and the role it can play in stimulating the market for new circular goods and services.

The WAPCE proposed to set a minimum target for procurement of used goods and we would welcome the implementation of and monitoring of this goal in collaboration with DECC. We also welcome an approach that supports suppliers in engaging in GPP and have been working with our members to facilitate this engagement.



In 2018/9, we supported a consortium of members in a green and social procurement project to furnish a vacant office space (see here for details). The NWCPO issued a request for quotation for the Delivery, Assembly & Installation of Upcycled Furniture to their new office space in Tullamore in April 2019. A consortium of CRNI members was awarded this project including the Rediscovery Centre, ReMark-accredited Back2New and CRNI. Collaboration Ireland assisted with the initial project management.

The project involved fitting out 16 work stations, two meeting rooms, a canteen and chill out room, a lobby and an outdoor seating area with 100% preloved and upcycled furniture. In total, 97 items of furniture were provided, from 10 x different suppliers saving approx 2.6 tonnes CO2.

Findings from the NWCPO project have been developed into an <u>infographic</u> and detailed <u>case</u> <u>study</u> and summarised on a page dedicated to Green and Social Procurement <u>here</u> and a procurement directory <u>here</u>. Along with observations from the Bulky Item Reuse¹⁹ Green Enterprise project, the main challenges identified were issues of scale, negative perceptions about second hand goods, complex logistics, short lead in times and lack of flexibility in specifications.

We have identified the following opportunities to support local suppliers:

¹⁹ https://crni.ie/bulky-items-reuse/



- identify and share good practice examples to demonstrate the opportunities for prevention and preparation for reuse in procurement and support the roll out of ReMark.
 CRNI has been working on good practice examples from its membership to complement the EPA roll out of GPP guidance and aims to facilitate market dialogue with member suppliers in the coming months.
- ensure grants and funding are appropriately designed 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.
- require 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. This allows public procurement to include the social and environmental costs of the use, repair, recycling and disposal of a product or service and not only the cost of its acquisition.
- encourage public bodies to address circular and social concerns at pre-tender stage and design tenders that facilitate the small scale of social enterprises and others in the prevention and preparation for reuse sector (lots, consortium approaches)
- encourage social criteria e.g. weighted targets for Social Enterprise in public procurement and/or reserve contracts and/or providing social economy actors active in environmental services with 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.

Finally, it is important that, as highlighted in the consultation, the uptake of GPP is monitored. We note the AGCES consultation refers to monitoring the frequency and value of green criteria in public procurements over €25,000. However, it is noted that the capacity of suppliers in the reuse and repair sector is typically small and would be below this threshold.

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



2.10 OPERATIONAL PILLAR #3 DELIVERING THROUGH PARTNERSHIPS

A common theme throughout this consultation response and our response to the AGCES consultation has been collaboration. This proposed partnership approach in the CEP is therefore crucial in ensuring current plans, strategies and programmes are effective.

2.10.1 ESTABLISHING IRELAND'S REUSE AND REPAIR SECTOR

Our network is funded through the current NWPP and we strongly value our long term relationship with the EPA. Our remit is to support Ireland's community reuse, repair and recycling sector through providing knowledge, networking and promotion of our members, and carry out policy advocacy and research to help mainstream the wider sector and overcome barriers. We have recently led the development of a network in Northern Ireland (<u>Northern Ireland Resources Network</u>), through DAERA funding, with the purpose of establishing the reuse and repair sector in Northern Ireland.

We believe that CRNI is in the best position nationally to deliver a partnership with the EPA to establish Ireland's Reuse & Repair Sector.

We are the only national network supporting repair, reuse and recycling actors, and therefore are well-positioned to establish the reuse and repair sector in Ireland in line with national, European and international objectives. This includes the Waste Framework Directive objective to "promote reuse including through the establishment & support of reuse and repair networks, such as those run by social enterprises ...".

Our **38 members** are leaders and innovators in the circular economy and represent at least 38% of all second hand retail outlets in Ireland as well as other innovative reuse activities per Annex A. 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. The impact of this work in 2020²⁰ is shown below.

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²⁰ which was significantly affected by closures due to Covid-19 restrictions





This compares with member impacts in 2019 as shown below.



A directory of members is provided on our website²¹ and in Annex 1 below.

We understand that developing a national reuse and repair culture and overcoming barriers to the take-up of pre-owned/refurbished goods and product repair will involve a strategic mix of policy and financial incentives that ensures prevention and preparation for reuse **are better designed**, **more accessible**, **more affordable**, **more viable and more attractive than the alternative**.

We work extensively with our members, our European networks and policy makers to build our knowledge of the latest trends and innovations, and to identify and recommend pathways to overcome these barriers which are highlighted in our policy consultation responses, and addressed through research and activities within our work plan.

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²¹ crni.ie/directory



CRNI is a member of the European network <u>RREUSE</u>, sitting on the board, executive committee and holding the Vice Presidency position and is a member of the European campaign <u>Right to Repair</u> and <u>ECOS</u>, the international NGO advocating for environmentally friendly technical standards, policies and laws. In Ireland, CRNI sits on the EPA's <u>National Waste Prevention Committee</u>, the Department of Environment, Climate and Communications' <u>Waste Action Plan Advisory Group</u>, and the EPA's mattress working group. The network also contributed to the Department of Rural and Community Development's Awareness Strategy Sub-Group for the <u>National Social Enterprise Policy</u>, the <u>Community Services Programme Review</u> Consultative Forum and the <u>Circuleire</u> Green Procurement working group.

Some examples of research that we have identified and carried out to fill knowledge gaps, overcome barriers and anticipate future policy and trends include:

- Developing a methodology to qualify and quantify reuse this topic was proposed to
 the EPA by CRNI as necessary to help underpin quantitative targets. It was included in a
 STRIVE research call and became the two year <u>Q2Reuse</u> project, led by CTC with
 partners Rediscovery Centre and CRNI. This work is required to both understand the
 reuse sector in Ireland and support the introduction of a reuse target, which the WAPCE
 now commits to doing in advance of any EU targets.
- Developing a quality mark for reuse CRNI proposed and led this EPA Green Enterprise
 project to help overcome negative perceptions of second hand goods. The AGCES now
 proposes to implement a certification market, which ReMark²² can deliver, as part of the
 national branding exercise (see also Section 2.5).
- Piloting methodologies to separately collect and manage textiles in Ireland CRNI proposed and is leading this <u>Circular Textiles</u> EPA Green Enterprise project to identify solutions to the separate collection and local management of textiles. This is designed to inform Irish policy makers on how best to meet the Waste Framework Directive requirement to introduce separate collection systems in 2025.
- Circular and Social Public Procurement CRNI put together a consortium including the Rediscovery Centre and Back2New in response to an RfQ from the National Waste Collection Permit Office to fit out an office space with 100% upcycled furniture. The aim of this was to test a live circular and social public procurement project, and identify barriers and opportunities for the sector in GPP. A comprehensive case study and high level findings are provided on our webpage here. The project won Green Procurement of the Year Award at the National Procurement Awards in 2020.

We have also identified a suite of policy measures necessary to establish Ireland's reuse and repair sector, develop a national reuse and repair culture and overcome barriers.

This consultation response, as well as all of our recent policy work, demonstrates the significant value we place on policy engagement, a keen understanding of the areas of

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²² https://www.crni.ie/re-mark/



prevention and preparation for reuse as well as a solutions based approach to implementing policy. This year alone we have made submissions to the Recovery and Resilience Facility Plan, EU strategy for Sustainable Textile Roadmap, Shared Island Consultation on Climate and Biodiversity Challenges, and the Pre Consultation for a National Waste Management Plan for a Circular Economy. In 2020, CRNI made or contributed to 18 policy consultations at European and national level involving over 180 recommendations.

Our key policy recommendations to help ensure that prevention and preparation for reuse activities **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 introducing targets for reuse, food waste prevention and preparation for reuse, creating a framework in the upcoming Circular Economy Bill and coordinating with other plans, tracking progress and taking corrective actions to ensure they are met,
- ... by supporting 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 setting ambition to establish a minimum number of reuse centres per head of population throughout Ireland (as recently seen in Greece)
- ... 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.

- ... 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

For further information on our activities in 2020 please see here. Through our 2021 workplan we also:

- have surveyed our membership for impact data and report on overall levels of reuse, repair, recycling, carbon savings, job creation, training supports, social value, customers, turnover and educational reach of our members as shown above. This work is complemented by and builds on findings from the Q2Reuse project.
- are involved in and help to disseminate the Green Enterprise Programme through our past projects, and its benefits to our members
- support awareness through our membership and wider network as highlighted in Section 2.8.2
- support green procurement efforts through engaging our members in procurement, facilitating market dialogue and sharing case studies to build on the pilot project described above.

We look forward to discussing this exciting opportunity with the EPA further.

2.10.2 Supporting the National Centre for a Circular Economy

The Rediscovery Centre is a valued member of the CRNI network and we work in close collaboration with the Centre in research, policy advocacy, events and communications.



We are currently collaborating on the <u>O2reuse</u>, Circular Textiles and recently collaborated on the Nature and Extent of Post-Consumer Textiles. The Rediscovery Centre was also central in delivering the NWCPO Green and Social Procurement project described above.

As described in Section 2.2.4, the Rediscovery Centre's Circular Economy Academy has seen at least four new members join CRNI in the last year as established social enterprises in reuse or repair. The Academy is very important in enabling startup projects to orientate and become viable in this challenging and complex area.



In 2020, we collaborated on two EU-wide campaigns including the Right to Repair "Repair Heroes" campaign in October and RREUSE's "On the Road to Mannheim" campaign about social enterprise resilience in December.

We also collaborated on events, inviting the Rediscovery Centre to participate in a <u>webinar</u> on Reuse and the Circular Economy post-Covid in April and contributing to the <u>webinar on Green Procurement</u> in November coordinated by the Rediscovery Centre for Green Leaf Limerick.

We believe that the Rediscovery Centre is a leading innovator and knowledge centre in the Circular Economy and ongoing support for their work as a National Centre for a Circular Economy is crucial in underpinning this transition in Ireland.

2.11 OPERATIONAL PILLAR #4 REGULATORY FRAMEWORK FOR CIRCULARITY

2.11.1 END-OF-WASTE & BY-PRODUCTS

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 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.

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 <u>here</u> 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, felt or coconut fibres 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.

2.12 GOVERNANCE

We support efforts to facilitate collaboration with DECC on programme development & delivery and to ensure alignment between programme activities and national circular economy strategy.

We welcome the proposal to review the effectiveness of the programme and assess the value generated by the programme. As highlighted in Section 2.8.3, progress reports are essential to ensure policy implementation is effective.

We believe that CRNI is well placed to contribute to the Circular Economy Steering Committee through expertise in driving the transition to a Circular economy, for reasons outlined above. We would recommend building on the previous NWPC that increased engagement and collaboration between participants is facilitated between meetings.

While CRNI makes efforts as a network to connect with other stakeholders on the committee and in the wider sector, a centralised portal or communication tool would help to build and strengthen any new committee and ensure that action-focussed sub-groups are effective.



BUSINESS MODELS - CRNI MEMBERSHIP ANNEX A:

3.1 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 <u>deafenterprises.ie</u>

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.

3.2 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 <u>gatewaytoeducation.ie</u>.

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 <u>icsa.ie</u>

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 <u>nce.ie</u>

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/trinitvaccess/tech2students.

fashion. They have taken all of the complexities and challenges of selling online and combined

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



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

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.

3.3 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.

WE**S**HARE



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.

3.4 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 Nappy Library 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 <u>clothnappylibrary.ie</u>

3.5 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 **E**VENTS



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 <u>nativeevents.ie</u>

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 <u>rediscoverycentre.ie</u>.

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

3.6 REFILL, RESCUE AND REDISTRIBUTION

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

FOOD CLOUD



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 <u>refill.ie</u>

3.7 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 <u>recycleit.ie</u>.

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 <u>usel.co.uk/u-recycle</u>

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