

Waste Action Plan for a Circular Economy Plan Submission February 2020

Introduction

The Environmental Pillar¹ welcomes the opportunity to make a submission on the Waste Action Plan for a Circular Economy. The Environmental Pillar is comprised of 31 national independent environmental non-governmental organisations (NGOs), who work together to create and promote policies that advance sustainable development.

Consultation Questions - Institutional Arrangements

How are the current institutional waste prevention and management arrangements working and how could they be improved in your opinion?

Currently, many waste prevention initiatives are run through EPA or through local authorities. While these various programmes are very effective, including Stop Food Waste, Free Trade Ireland, Reuse Month and Community Reuse Network Ireland (CRNI), all are under-funded and under-utilised. The Conscious Cup Campaign, funded by the Waste Regions, has also been very effective in getting out the information that disposable cups are not recyclable and difficult to manage and that the reuse opportunity is easy to adopt. Additionally, many of the government supported initiatives that actively achieved waste prevention have been discontinued, such as Green Business, Green Healthcare and SMILE. These programmes were effective in reaching individuals and companies to encourage behavioural change.

Many waste prevention programmes supported by local authorities are done on a community level on a small funding basis and within a short time-frame. These types of projects are very valuable to illustrate what works and what doesn't and what is effective, on a pilot basis. However, oftentimes, these valuable and effective pilots die as funding withers and we move on to the next project. We should build on the valuable expertise and experiences garnered through these pilots and move to share and develop successful initiatives to other communities through a national programme.

¹ Members of the Environmental Pillar: An Taisce; Bat Conservation Ireland; BirdWatch Ireland; CELT (Centre for Environmental Living and Training); Coastwatch; Coomhola Salmon Trust; Eco Advocacy; ECO-UNESCO; FEASTA; Forest Friends; Friends of the Earth; Global Action Plan Ireland; Gluaiseacht; Good Energies Alliance Ireland; Green Economy Foundation; Green Foundation Ireland; Hedge Laying Association of Ireland; Irish Peatland Conservation Council; Irish Seed Savers Association; Irish Whale & Dolphin Group; Irish Wildlife Trust; Native Woodland Trust; The Organic Centre; The Rediscovery Centre Ireland; Sonairte; Sustainable Ireland Cooperative (Cultivate); Sustainable Projects Ireland (The Village); Vincent Wildlife Trust; VOICE; Wildlife Rehabilitation Ireland; Zero Waste Alliance Ireland.

However, we do need to address government supported waste prevention initiatives strategically and set out the priorities the government and its citizens want to advance, whether it is by waste stream or by community action.

We have seen a huge shift in individual behaviour looking for zero waste solutions: Zero Waste Ireland Facebook page has nearly 15,000 members, there are package-free and refillable shops popping up throughout the country, new businesses have been established that upcycle and revamp old items, shoppers are now buying 2nd hand clothes and items and communities that have gone plastic-free are now investigating how to move towards zero waste.

However, there is very little support for their actions on the ground and few organisations who can offer guidance on how they can start their journey. It is so important that the government adopt strong policies to advance waste prevention actions, but it is equally important to financially support the activation of communities and individuals to make choices that support sustainable consumption and the priorities under SDG 12, Responsible Consumption and Production. Scotland and Wales both have Zero Waste offices to promote zero waste and the circular economy and helped finance the development of zero waste towns.²

Environmental Pillar member VOICE developed and managed Zero Waste Cashel in 2017-2018 in an 18-month pilot funded by EPA and the Southern Region Waste Management Office, but once funding ran out for this short pilot, action ceased in this community. Moving towards zero waste takes more than 18 months and there needs to be longer term support for these initiatives because effecting behaviour change, which is the key to waste prevention, takes time, resources and funding.

Another barrier to waste prevention initiatives is the liability issues whereby Repair Cafes, Reuse initiatives are hampered by the perceived risk associated with the reuse of an item.

3.7 Consultation Questions – Municipal Waste

What further measures should be put in place by Government, regulatory authorities (EPA, local authorities, etc.) and industry stakeholders in order to promote and incentivise waste prevention and improve proper segregation and recycling of waste by both households and businesses?

Incentivise Waste Prevention

Encouraging consumers and businesses to choose a more sustainable consumption pattern must be done using both a carrot and a stick. Shops, supermarkets and restaurants/cafes must make it easy and economically beneficial for consumers to make the sustainable choice. Producers must place items that are package-free or with packaging that is easily recyclable or compostable with easy to understand end of life instructions. Products themselves must be easily repairable with open-source repair instructions and once the product has reached the end of its life, it must be easily recyclable/compostable.

² <https://www.zerowastescotland.org.uk/blog/scotland's-zero-waste-towns-and-circular-cities>

Eco-design criteria for many high-tech items have been established in the EU and standards, including eco-labelling, and these criteria must be adopted for popular items bought by consumers.

How can we make it easy for the consumer? Mainstream the following actions in all supermarkets, shops and cafes. Right now, all these options are available in Ireland, but individuals have to make herculean efforts to shop sustainably.

- Allow the right to reuse and remove liability concerns. Currently, some supermarkets and food outlets will not allow shoppers to bring their own containers to buy meat, fish, cheese, deli meats and salads as well as drinks. Other countries have adopted legislation outlining this right to reuse, including France³ and Italy⁴.
- Encourage mainstay supermarkets/shops to offer bulk buying of goods and cleaning products with refillable containers. Italy has created a fund to support shops that offer refill options of up to €5,000 per shop, to install refill infrastructure. France also calls for a National target of 5% refillables packaging by 2023 and 10% refillables packaging by 2027.
- Address the liability concern around repair and reuse. Currently, there are many community groups that wish to run Repair Cafes, but are barred from doing so because they cannot get the insurance. There should be a right to repair, with the owner of the repaired item taking responsibility for the repaired item, relieving the repairer free from liability, when the item is repaired for free in a community initiative. This should not apply for commercial repair work.
- Additionally, remove liability for food donation to organisations such as FoodCloud to encourage supermarkets and other food shops to donate excess food. Such liability should be limited to areas where the donor is 'grossly negligent'. See the Good Samaritan Food Donation Act in the US.⁵
- Reduce the cost of an item when an individual brings their own container, as is the case with the Conscious Cup Campaign where participating cafes offer some form of discount to those patrons who bring their own cup.
- Reduce VAT rate to 0% for reuse or repair actions to bolster this service-based business, which supports the goal of moving towards a circular economy.

³ <http://www.assemblee-nationale.fr/15/ta/tap0385.pdf>

⁴ Art. 7

Measures to encourage bulk or draught products In order to reduce waste production and contain climate-threatening effects, neighbourhood and ((medium and large structure) trade operators referred to in Article 4, paragraph 1, ((letters d), e)) and f) 114, which provides for spaces dedicated to the sale of food and detergents, bulk or on tap, to consumers ((or for the opening of new stores that only provide for the sale of bulk products)) experimentally recognized an economic contribution to a lost fund equal to the expenditure incurred and documented for a maximum amount of 5,000 euros each, paid according to the order in which eligible applications are submitted, in the total limit of 20 million euros for each of the years 2020 and 2021, until the aforementioned resources are exhausted and provided that the container offered by the merchant ((is reusable and complies with the current regulations on materials in contact with food. 1-bis). Customers are allowed to use their own containers as long as they are reusable, clean and suitable for food use. The merchant may refuse the use of containers that he deems sanitionally unsuitable.))

⁵ <https://www.law.cornell.edu/uscode/text/42/1791>

Penalise Waste Creation Behaviour

- Charge shoppers for containers they use when buying products, where the loose, unpackaged item is available, i.e., for fruit and veg, dry goods and cleaning products. Increase the plastic bag tax and expand the tax to include all single-use plastic, compostable and paper bags, including bags used for bread, fruit and veg, and meat. Change the consumption paradigm where you buy the product, not the packaging. If consumers don't bring their own packaging, they have the option to purchase a recyclable or compostable container or rent one through a deposit/refund scheme.
 - For example, if a person wanted to buy a coffee, they could have the following options:
 - bring their own cup
 - if they forgot their cup, they could use one of the cafe's ceramic cups and consume on-premises or rent one through one of the burgeoning cup rental schemes such as RíCup or 2GoCup
 - Purchase a compostable take-away cup for €0.50 or €1, whatever levy the government determines is the appropriate level
- Reintroduce 'pay by weight' waste regime to both households and commercial enterprises to encourage the proper segregation of waste
- Mandate that waste companies enforce proper segregation similar to actions taken by Panda which refuses to take contaminated bins and takes photos and issues warnings to households not separating properly.
- Require the full implementation of the household food waste regulations 2012 to install organic bins to all households.
- Mandate that all commercial premises, including apartment buildings, install a three-bin system
- Enforcement of these initiatives must be fully funded and resourced.
- Increase significantly the fees that producers pay for placing unsustainable packaging onto the market through effective eco-modulation

What measures or practices are currently in place that could be improved?

Most households have a three-bin system, but confusion as to what goes into the bin and how it goes in is still rampant. MyWaste.ie has been a good source of information for those individuals seeking clarification. However, despite investment in advertisements, posters and social and traditional media, knowledge of the recycling list and how to manage household and commercial bins is still not as high as we would like. The government should invest in waste/recycling ambassadors to reach into communities, schools and businesses to increase public awareness and encourage positive action. Waste companies also need to step up to help with public awareness and use their existing communications with their customers to push how to separate their recyclables/organics. Many people now use more visual content for their information such as videos and vlogs. We reviewed several waste companies' websites, and none of them had good videos on how to recycle. An easy way to reach customers is by featuring a 'how to' video on their websites such as the one done by the Irish Times.⁶

⁶ <https://www.youtube.com/watch?v=sZZsBedy0CU&t=3s>

What other new measures or practices could be put in place?

There is no mention of effluent, sewage or wastewater in the consultation call documents. These are all potential sources of nutrients and biomass, and the reuse of these is essential in any circular society. There is an abundance of technology which can support nutrient and biomass cycling, but this is not currently given enough space in the EPA Code of Practice and thus is not adopted by engineers seeking planning, nor by council planning offices seeking guidance on which systems they can permit.

What do you see as the barriers/enablers to these measures?

The main barriers are:

- liability for repair and reuse
- ease of use and ease of acquisition (mainstreaming buying in bulk and refillable containers)
- public education and narrowing the public awareness/individual action gap
- Producers placing too many unrecyclable/non-compostable items onto the market
- Shops using too much plastic packaging

Enablers:

- economic incentives to individual shoppers to shop without packaging and to use refill options
- grants to shops that install refill options
- more public engagement
- full installation of three bins in all households, commercial and business premises, schools and government departments

3.8 Consultation Questions – Household Waste

Is incentivised charging working in your opinion? Are households being financially incentivised to prevent waste and recycle correctly through the 3-bin system?

We do not have access to the statistics/data to determine whether incentivised charging is working. Additionally, the pay by weight scheme proposed by the government was never implemented, so it is difficult to determine whether household behaviour has changed. Lastly, waste companies still indicate that there is huge contamination of the recycling and organic bins.

However, we can extrapolate the success of pay by weight by looking at other jurisdictions, where pay by weight has shown to be very effective in increasing the recycling and organic collection rate and decreasing the material thrown in the residual bin. For example, the city of Parma, Italy was able to increase separate collection of waste, reduce residual waste per capita, and increase the effective recovery rate whilst simultaneously reducing the average household waste bill.⁷

⁷ <https://zerowasteeurope.eu/2018/02/cheaper-more-efficient-pay-as-you-throw-kerbside-collection/>

Would an incentive scheme which compared your performance on how you generate and recycle your household waste with your area / county etc change your waste management behaviour?

This type of 'nudge' effect has been effective on reducing energy use when community/ neighbourhood norms and information about how to reduce power usage is included on electricity bills. There have been studies done in the UK and Germany to look at the nudge effect in affecting behavioural change⁸

We would support a trial of this to see if it results in better waste separation and waste reduction. Such nudge efforts should also include a 'how to' recycle and reduce your waste either through an easy to understand infographic/leaflet included in the posted bill or through a link to a video from the on-line/text communication.

What role should Civic Amenity Sites (local recycling centres) play? Should there be a standard service across all Civic Amenity Sites (CAS), such as the waste streams they accept? Should CAS accept general waste or only recyclables? Should CAS be used to provide more reuse opportunities, e.g. areas dedicated to exchange and upcycling? If so, how should this be funded?

The role of a CA Site could be multi-purpose, depending on the footprint of the CA and available space for ancillary activities. At a minimum, CA Sites should take all recyclables, which is consistent with the recycling list. We have found great confusion among people during our recycling workshops who tell us that they are able to bring soft plastics to their CA Site, so why can they not place them in their recycling bins. They should also take WEEE, used paint/chemicals, textiles (those that are dirty/torn and unable to be reused), organic waste, bulky items and furniture. We also believe that these sites should take residual waste as well to prevent fly-tipping/littering. If a household does not want to have kerbside collection of their waste, they should have an easy avenue to bring their waste to a CA Site for proper disposal. Lastly, the fees to take such materials should be low to encourage the proper treatment of waste material and discourage fly-tipping and there should be a public awareness initiative to encourage the public to use this amenity.

CA Sites, if large enough, would be a great place to offer reuse opportunities, especially if people are bringing their broken furniture or old items. Artists or upcyclers could use these discarded items as raw material for their new products. However, a storage area must be provided for this and a covered workplace would be practical to encourage the work to be done on-site and visible to people bringing their old things. Sweden has been one of the leaders encouraging upcycling and providing venues for such actions. For instance, Alelyckan Re-use Park, Sweden offers people the option of donating items that may have another life, either through sale at a thrift shop or repaired or upcycled.⁹

⁸ <https://www.theguardian.com/sustainable-business/behaviour-change-energy-consumption>;
<http://wwwuser.gwdg.de/~cege/Diskussionspapiere/DP372.pdf>

⁹

http://www.ambiente.marche.it/Portals/0/Ambiente/Rifiuti/PW_Traduzione/030_Pre_waste_30_SE_Alelyckan_reuse_park_17_07_2012.pdf

Additionally, Sweden has a Recycling Mall, where everything sold in the shopping centre is either second-hand, repaired, upcycled or organic/local. This is a larger version of the Rediscovery Centre and offers a large space where artisans can upcycle and repair items.¹⁰

If room is made for such upcycling and repair activities, this could be a place for repair classes, swaps or other reuse activities. VOICE, along with other organisations, ran a Library of Things at the Dublin Food CoOp in 2017 during Reuse Month. It was well received and this type of initiative could be expanded upon and permanently located on a CA Site as well.

What can be done to improve recycling (including organic waste) in apartment complexes?

Current Situation

The most problematic area for separate collection of recyclables and food waste is in apartment, flat and multi-family dwellings. In most apartment complexes, residents do not pay for the waste and it is commonly believed there is no way to enforce rules to control usage of the facilities. Communal waste facilities offer the potential for greater efficiency in collection, however, unmanaged apartment bin storage areas endure what is known as the Tragedy of the Commons, where individuals act contrary to the common good and spoil the resource through their collective action.

Currently, residents in most apartment buildings do not have access to proper recycling and food waste collection facilities and hence all this waste currently goes into the single residual bin. Additionally, according to the waste industry, buildings that do have separate waste collection bins, the contamination levels are very high, making the recycling material less attractive in the recycling loop.

Nine percent of the country's population or 414,000 individuals currently live in apartments or converted houses, (CSO 2016 Census), which is double the amount in the 2011 Census (4% or 188,000 people).

In 2015, Ireland generated 1 million tonnes of food waste and 983,300 tonnes of packaging waste¹¹, averaging 80 kg of food waste and 213 kg packaging waste per person. This amounts to 77,500 tonnes of packaging waste generated by apartment dwellers, which is potentially recyclable and over 29,000 tonnes of food waste annually.¹²

¹⁰ <https://www.retuna.se/english/about-us/>

¹¹ <http://www.epa.ie/pubs/reports/waste/stats/wastepackagingdata2015/#d.en.63059>

¹² Each person generates 80kg food annually. www.stopfoodwaste.ie

| Types of Residence ¹³ | Nationally #units | Dublin #units | % units located in Dublin | Nationally #individuals | Dublin #individuals | % apt dwellers living in Dublin |
|----------------------------------|-------------------|----------------|---------------------------|-------------------------|---------------------|---------------------------------|
| Apartments (Blocks) | 172,000 | 105,000 | 61 | 364,000 | 231,600 | 63 |
| Converted Houses/other | 28,000 | 14,400 | 51 | 50,000 | 26,700 | 53 |
| Total | 200,000 | 119,400 | 60 | 414,000 | 258,300 | 62 |

To date, very little has been done in an Irish context to tackle effective waste separation systems in a multi-family living environment. In 2014, VOICE coordinated with Dun Laoghaire Rathdown County Council (DLR) in its Beacon South Quarter apartment food waste collection pilot programme to tackle behavioural change, but found it difficult to engage directly with residents and found lacklustre support from the management association and waste collection company.

Our sole communication with residents was through posters and leaflets. DLR convinced the waste management company to provide aerated food bins and the management company provided free biobags to residents. Signage around the bins was improved and with this three-month, limited access pilot, we were still able to achieve 25% diversion of food waste from the residual bin with relatively little contamination. We do not have information of whether the separation of food waste in the Beacon South Quarter is continuing. Since this pilot, there have been three other pilots:

1. Northwood Santry (Done through the EMR Office)

This pilot focused on both food waste and recycling. A survey was conducted of the residents about their knowledge and view on separating out recycling and composting. The Final Report has not been published yet, but the survey indicated that people wanted more information both in their apartments and bin storage area about 'how to' and most people were willing to separate their waste.

2. DCC Social Housing (Partnership between DCC and VOICE)

DCC is working with 47 apartment buildings to change their waste collection bins, introducing both recycling and composting bins.

¹³ <https://www.cso.ie/px/pxeirestat/Statire/SelectVarVal/Define.asp?maintable=E1001&PLanguage=0>

The Council has purchased recycling collection bags and food waste caddies and compostable bags for all residents that want to sort their waste. VOICE has run numerous workshops for residents informing them about what goes into each bin and why. The organisation also runs stands in buildings where the space allows. This pilot is ongoing.

The take up in proper sorting has improved dramatically, which is illustrated here:



3. VOICE/REPAK USE (Upgrading Shared bin Experience) Apartment pilot

VOICE received funding from REPAK in 2019 to conduct a recycling pilot in apartments and has identified 7 apartment buildings. There are 3 buildings in Dublin, 2 in Cork, 1 in Limerick and 1 in Galway involved in the pilot project. REPAK has commissioned a waste characterisation study for each apartment building, and VOICE is coordinating with the waste collection companies, apartment management companies and residents' associations to encourage better separation of recyclables.

VOICE has conducted a survey of the residents about their knowledge of recycling separation and barriers they face, also improving the common bin storage area and signage. The organisation is also designing posters about this initiative in common areas. Like the DCC apartment pilot, they have purchased reusable bags for residents to collect the recycling in their apartments.



This pilot does not educate about food waste separation as it was focused solely on recycling.

Another SME working to help apartment dwellers and buildings management companies put proper waste collection infrastructure in place is accessgreen, a business that focuses on improving common bin store areas, putting in CCTV cameras and installing barriers with a system that only allows residents to use the bin store through their mobile phones. The CCTV links in with the phone unlocking mechanisms so that if there is contamination of the bins or unacceptable items left behind, the person can be identified and fined.

We plan to develop a video for residents on the new systems adopted and run workshops within each apartment building. This pilot will be completed in March 2020, with a full report to follow.

3.9 Consultation Questions – Commercial Waste

How could pricing structures for commercial waste collection be improved to incentivise better segregation and recycling of waste? For example, should pay by weight be introduced for commercial waste?

Currently, many commercial premises have 1, 2 or 3 waste streams, but pay their waste management companies per lift rather than by weight. There is no incentive for them to properly segregate their waste under this payment arrangement or to reduce their residual waste. However, there are waste contractors that offer a pay by weight option and this should become mandatory and rolled out to all commercial premises, including apartments.

Under some anomaly, apartments are considered commercial entities rather than households and as such do not fall under the Household Food Regulations 2015¹⁴ and management companies and waste companies do not have to provide an organic waste collection service. This should be addressed and the government should mandate that all commercial premises (including apartment buildings) have a 3-bin system and be charged on a pay-by-weight basis.

What further incentives could be put in place to encourage business to recycle more?

While the main objective is to reduce all avoidable waste moving towards reusable options, the adoption of a Deposit Refund Scheme for drinks containers would encourage businesses to collect and recycle more of their aluminium cans, plastic and glass drinks bottles.

The Government could incentivise the installation of a 3-bin system through tax credits or grants, as long as the quality of their collected recycling and organic waste is certified by the waste management company to be free of contamination.

¹⁴ <http://www.irishstatutebook.ie/eli/2015/si/430/made/en/print>

Should a certification scheme be introduced for businesses to demonstrate that businesses are managing their municipal waste correctly (e.g. using the mixed dry recycling and organic waste bins properly)?

As mentioned above, this would be a good way to encourage the proper management of waste in a corporate setting and allow companies the 'bragging rights' of being platinum, gold, silver or bronze waste-free companies. There should also be a certification for those businesses that have adopted in-house initiatives to reduce their residual waste.

Additionally, like Health and Safety requirements and enforcement actions, businesses must prove that they have a 3-bin system and invest in proper training and attendance of their staff in how to manage their waste streams (including WEEE, textile and other waste streams). They can then post on their walls that their waste management and training certification is up to date.

Under the Building Energy Rating (BER) system, any house going up for sale must have a BER rating. Most home owners would like to have a high BER rating to encourage buyers to agree to a higher price. There are many businesses and individuals that are trained to conduct the BER inspection to issue the certificate, which is paid for by the homeowner. Similarly, the government could set out mandatory waste segregation criteria for different bands of certification and a pool of independent inspectors could go out to each business to evaluate their bin system, hold workshops with employees and issue a rating certificate. These waste inspectors would be trained and the companies would pay directly for their services.

This system would also be mandatory for apartment buildings.

4.7 Consultation Questions – Food Waste

What are the underlying causes of food waste in Ireland?

Roughly, $\frac{1}{3}$ of food waste comes from farms, $\frac{1}{3}$ from retail and $\frac{1}{3}$ from households. Stop Food Waste¹⁵ has outlined the causes for each segment, including from retail: kitchen waste, portions too big, plate waste, lack of measurement and from household: lack of planning, bad storage, buying too much, underuse of leftovers.

However, another big cause of food waste is the supermarkets' overuse of pre-packaged food items and multi-buy 'buy one get one free' options. Consumers are forced to buy more food than they need, seduced by a lower price, bagged items such as a bag of carrots where they calculate that it is less expensive for them to buy more and throw away unused items rather than buying what they need for a higher price per kilo. Lack of education and awareness on the implications of food waste on their outgoings and on the environment are also contributors to the high amount of food waste. Also, more people are strapped for time and find that the quickest way to feed their family is through convenience pre-prepared food. Cooking and home economics skills are wanting as well.

¹⁵ <https://stopfoodwaste.ie/>

Should Ireland introduce a national prevention target in advance of a possible EU target?

Ireland should be pushing for food waste reduction target as soon as possible.

How can Ireland become a 'farm to fork' global leader in food waste reduction?

Ireland produces many high-quality food items which should be promoted and marketed for home consumption. The best way to reduce the carbon footprint of food production is to shorten the supply chain and support community supported agriculture schemes and 'buy Irish' products.

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

FoodCloud has become Ireland's biggest food redistributor to charities, however, they could take in more food if supermarkets and food companies were relieved from potential liability, which can be done through legislation, see Good Samaritan Food Donation Act referred to above. Additionally, legislation could be adopted to mandate that all food businesses donate surplus food instead of disposing of it, such as was done in France.¹⁶

5.7 Consultation Questions – Plastic and Packaging Waste

How can we make it easier for citizens to play a role in delivering on our targets?

Whatever the government puts forward must be easy for the individual and make sense. Much of the burden also lies with the retailer/producer to offer more sustainable options. The Ellen MacArthur Foundation released a report encouraging any effort to make reuse easy.¹⁷

¹⁶ <https://www.npr.org/sections/thesalt/2018/02/24/586579455/french-food-waste-law-changing-how-grocery-stores-approach-excess-food>

¹⁷ <https://www.ellenmacarthurfoundation.org/assets/downloads/Reuse.pdf>

The four reuse models

Business-to-consumer reuse models differ in terms of packaging 'ownership' and the requirement for the user to leave home to refill/return the packaging.

Refill at home
users refill their reusable container at home (e.g. with refills delivered through a subscription service)

Return from home
packaging is picked up from home by a pick-up service (e.g. by a logistics company)

Refill on the go
users refill their reusable container away from home (e.g. at an in-store dispensing system)

Return on the go
users return the packaging at a store or drop-off point (e.g. in a deposit return machine or mailbox)

Awareness around the environmental impacts of plastic packaging and waste is huge, and consumers are angry with the amount of products wrapped in plastic, as illustrated in the number of people partaking in the Sick of Plastic 'Shop and Drop' days of action and communities that are trying to go 'plastic free'. Currently, there are 69 'Sick of Plastic' groups around Ireland and many 'plastic-free' communities and schools trying to go plastic free. Under ChangeX.org, there are 154 Plastic free 4 Schools and 61 Last Plastic Straw groups throughout the country. Even in the last week, Dun Laoghaire County Council passed its draft by-laws to ban single-use plastic,¹⁸ which exceeds all restrictions set forth under the EU Single-Use Plastic Directive.

There are several ways to make it easy for the consumer to make the right choice:

1. Make buying in bulk mainstream and encourage supermarkets/shops to install refill options for dry goods, spices, nuts and cleaning products through incentives (like the €5,000 grant in Italy). Ensure that buying in refillable containers is less expensive.
2. Mandate that supermarkets offer unpackaged fruit and veg at the same or discounted price to pre-packaged items so that customers pay for the convenience of buying products wrapped in plastic.

¹⁸ <https://www.irishtimes.com/news/environment/dun-laoghaire-council-proposes-fines-of-500-for-single-use-plastics-1.4171752>

3. Charge plastic levies at the till, similar to the plastic bag levy and expand this levy to all single-use bags and to-go plastic packaging, including disposable coffee cups and plastic clamshells. Create a consumer awareness campaign to go along with this approach to explain why the government is doing this, where the money goes and options on how people can avoid these levies (i.e., using a reusable bag, container, etc.)
4. Address the liability concerns and pass legislation allowing the 'right to reuse' to reduce the amount of plastic packaging used and encourage consumers to bring their own containers.
5. Encourage refill options both at home and in shops.¹⁹
6. Create a label to be affixed to all packaging stating in which bin the packaging goes.
7. Ensure that all plastic packaging is easily recyclable and increase face to face engagement with consumers on how to recycle correctly (clean, dry and loose) and easy ways to avoid plastic packaging.
8. Mandate that all retailers have signage and messaging to their consumers that loose is best and how to manage their plastic packaging at home and on the go.
9. When individuals are consuming food on-site, mandate that all food vendors offer reusable cups, plates, cutlery for in-house consumption. If the customer is taking the food/drink off-site, the first question from the business employee should be 'do you have your own packaging and can I fill it for you?' If the customer wants disposable packaging, they should pay for it or participate in a deposit/refund scheme and rent the container.
10. Legislate against 'greenwashing' and deceptive messages put out by companies/producers. For example, both in Ireland²⁰ and in other EU States²¹, some producers are now labelling their existing single-use plastic cups, plates and cutlery as reusable, urging consumers to wash them to use again. This deceptive practice must be stopped in its tracks.

Do waste collectors have a role to play?

Of course...they need to increase the messaging to their customers about what is recyclable and how to do it. They need to include videos on their websites and messaging in texts and emails. Customers need constant information to achieve behaviour change.

What is the role of retailers?

Retailers should have Point of Sale information about where to put their packaging and how to do it. Additionally, they should also encourage customers to bring their own containers and offer loose items at a competitive price. They also have to ensure that the packaging they use is easily recyclable/compostable. Like Lidl, they can also take back unwanted packaging.

¹⁹ <https://www.weforum.org/agenda/2019/07/reusable-plastic-packaging/>

²⁰ <https://www.woodiespartyzone.ie/ShowProducts.aspx?PageId=3413>; <https://www.partycity.ie/product-detail.aspx?ProductID=CLEAFORK1>

²¹ <https://www.plasticsoupfoundation.org/en/2019/08/a-minus-point-for-plus-supermarket/>

Retailers and Manufacturers who ship their products to customers (individuals or businesses), including retailers from other countries (including Amazon), must make significant efforts to reduce their single-use packaging and pay for the introduction of such secondary packaging onto the marketplace. Efforts must be made to adopt reusable shipping packaging alternatives such as Repack²²

What is the role of manufacturers?

Manufacturers must first look at methods to provide their products without packaging, including secondary and tertiary packaging and plastic wrap, and then ensure that their products and packaging are easily recyclable/compostable and label their packaging with how to manage their packaging and products at the end of life.

Is there a role for voluntary measures (individual or by sector) and if so, what might they be? Are there targets other than EU that we should be striving towards?

No, voluntary measures do not work fast enough with only the most engaged of businesses leading the way.

Is the introduction of eco modulated EPR fees sufficient to eliminate excessive or difficult to recycle plastic packaging? If not, what other measures are necessary?

Eco modulated fees must be established and be punitive enough to move manufacturers/producers towards more sustainable products. Currently, producers of plastic and aluminium containers pay Repak per tonne of material placed on the market. The fees charged to producers of plastic packaging in Ireland are at the bottom of EU countries with similar voluntary compliance schemes for packaging waste. See table below:

| Country | Plastic per tonne (€) | Aluminium per tonne (€) |
|-----------|-----------------------|-------------------------|
| Germany | 1,296 | n/a |
| Austria | 670 | 450 |
| Poland | 600 | 300 |
| Estonia | 410 | 260 |
| Spain | 377-482 | 102 |
| Luxemburg | 343 | 148 |

²² <https://www.originalrepack.com/>

| | | |
|----------------|-----------|-----------|
| Netherlands | 355 | 573 |
| Lithuania | 311 | 113 |
| France | 238 | 61 |
| Portugal | 228 | 164 |
| Czechoslovakia | 216 | 82 |
| Belgium | 199 | 138 |
| Serbia | 153 | 282 |
| Italy | 140 | 52 |
| Latvia | 133 | 68 |
| Bulgaria | 130 | 100 |
| Slovenia | 112 | 79 |
| Cyprus | 106 | 21 |
| Ireland | 89 | 83 |
| Greece | 66 | 9 |
| Slovakia | 45 | 27 |

Source: European Commission²³

The EU Waste Directive²⁴ confirms the 'polluter pays principle' whereby the original waste producer must pay for the costs of waste management. It also introduces the concept of 'extended producer responsibility'. This may include an onus on manufacturers to accept

²³ http://ec.europa.eu/environment/waste/pdf/final_report_10042012.pdf. Page 105-6

²⁴ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste

and dispose of products returned after use. In Ireland, the government created REPAK as the Packaging EPR Scheme, to comply with the requirements that “by 2025, EU countries should ensure that producer responsibility schemes are established for all packaging. Producer responsibility schemes provide for the return and/or collection of used packaging and/or packaging waste and its channelling to the most appropriate waste management option, as well as for reuse or recycling of the collected packaging and packaging waste. These schemes will need to comply with some minimum requirements established under the Waste Framework Directive (2008/98/EC).”²⁵

However, in Ireland, EPR fees only go towards subsidising our recycling infrastructure, including collection of household recycling bins, supplying and servicing bottle banks and subsidising the recycling collection industry. As we all know, much of the packaging placed on the market is not and never will be recycled and must be treated as residual waste and either landfilled or burned.

REPAK does not subsidise the collection of packaging waste collected in the organic bin or in the residual bin for any municipal waste. Additionally, they are not required to subsidise the collection of street bins, street sweepings or litter collection. Producer fees should subsidise all of these actions.

Even with considerably higher fees, however, there is a danger that certain kinds of packaging will continue to be produced in Ireland as they are still perceived as the most practical option and in certain contexts, such as luxury products, price does not play a very strong role in consumer decision-making.

To ensure that the production of plastics whose content is derived from fossil fuel will definitively be phased out in Ireland, we therefore recommend also implementing an ‘upstream’ cap-and-permit system for all fossil fuel imports to Ireland.

Climate science indicates that the supply of fossil fuel to Ireland needs to be reduced by 7-8% per year until such time as fossil fuel imports are eliminated altogether. Under a cap-and-permit system, fossil fuel importers would need to buy permits from the government in order to be entitled to sell their product on the Irish market. The amount of permits available would be gradually reduced from year to year, until they reach zero. This would send a clear signal to plastic producers that the supply of the raw material required for producing fossil-fuel-based plastic packaging in Ireland is being completely phased out.

²⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:l21207>

6.6 Consultation Questions – Single Use Plastics

What measures could be considered to reduce the amount of single use food containers we use, taking the provisions of the Packaging Directive into account? Should a ban on non-reusable cups be explored?

The Single Use Plastic Directive (SUPD) banned ten single-use items that had a significant environmental impact and where there were readily available alternatives. While we feel that a significantly high latte levy would impact consumers and nudge them to use reusable cups, a complete ban on single-use cups would also have an immediate effect and is allowable under the SUPD where the establishment of market restrictions (completely or for certain applications only) are allowed on food containers and cups. We would completely support the ban on non-reusable cups as reusable ones are readily available. This ban should also apply to cold drinks that are sold in shops, theatres and other venues and cups that are sold in bulk either through wholesale or retail environments.

The 'right to reuse' should also be enshrined in Irish law, allowing consumers to bring their own containers, at their own risk, when buying products, and any liability on producers/retailers should be limited to grossly negligent behaviour, which must be proven by the person who brought their own container.

Retailers (restaurants, shops, cafes, etc) should offer reusable items before placing anything in a disposable container and all food consumed on-site should be placed in a reusable container, using reusable cutlery. Compostable alternatives should only be offered for takeaway food/drink where it is difficult to adopt a reusable container, but a levy should be imposed on such items. Additionally, if compostable packaging/cutlery is on offer, there must be a compost bin collection on-site and adequate signage informing customers to place these items and left-over food in organic bins.

As mentioned previously, consumers should focus on buying the products, not the packaging, and if they want the single-use packaging, they must pay a price for this container. This could be done through a levy, where the product is pre-packaged or purchase arrangement where customers pay extra for a container when the food is ordered and placed into the container. Street organic bins should be in place to collect compostable packaging and food. As with all new initiatives, there needs to be an orderly rollout with an effective and impactful public awareness campaign.

Additionally, customers should be offered the opportunity to 'rent' a container through a deposit refund scheme. A reusable to go food container pilot is now underway at University College Cork.²⁶ There are other initiatives in the Netherlands and Switzerland²⁷ adopting this approach and the environmental group, Recycling Netwerk in the Netherlands is working with Deliveroo in Hasselt, called Deliveround, to pilot reusable containers that will be delivered and old containers collected in reverse logistics.²⁸

²⁶ <https://voiceireland.org/project-work/recircle-ireland.php>

²⁷ <https://www.recircle.ch/>

²⁸ <https://recyclingnetwerk.org/deliveround/>

Lastly, individuals, businesses or community groups that purchase disposable cups, plates and cutlery for personal, social or business use should also be subject to the levy when they buy these products in bulk. This levy should be placed on prepacked items for non-retail use as well.

Are there measures already in place that could be strengthened by legislation – for example, obligating retailers to give a reduction to consumers who use re-useable ware?

Currently, the Conscious Cup Campaign²⁹ encourages individuals to use their reusable cups whenever they purchase beverages in cafes/shops and they have mapped cafes that offer some form of economic incentive, whether it is a discount, double loyalty points or a donation to a charity. To date, there are over 2,000 listed participating shops/cafes; this does not include many entities that offer discounts and are not mapped. If a latte levy is adopted, then a mandated discount is not needed.

There are a few shops in the Dublin area that offer a discount to customers for bringing their own containers for foodstuff. Marks and Spencers in the UK offer a 25p discount to customers who purchase takeaway meals in their own reusable containers.³⁰

However, it has been confirmed through a study done by Cardiff University for Bewleys, that an incentive alone is not as effective as it is in conjunction with a levy. It states that their "...field experiment explored how the use of reusable coffee cups could be encouraged by easily implementable measures." It found that through clear messaging, the provision of reusable alternatives, and financial incentives, the use of reusable coffee cups can be increased by (on average) 2.3 to 12.5%.

"The study suggests that a charge may be more effective than a discount. These results are in line with *prospect theory*, which suggests that people are more sensitive to losses than to gains when making decisions. A charge on disposable cups (a loss) is therefore more likely to produce behaviour change than a discount on a reusable cup." (Emphasis added)³¹

A local law in Berkeley, California passed last year encouraged the use of reusable items in the following ways:

- mandates only reusable foodware be used by restaurants for on-site dining (imagine McDonalds and Starbucks won't be able to serve in disposables on-site)
- charges \$0.25 for take-out disposable cups
- accessory foodware items for take-out (straws, lids, stirrers, utensils) only available on request
- mandates all take-out single-use foodware must be compostable in the City's waste system (they already banned polystyrene in 1989!)

²⁹ <https://consciouscup.ie/>

³⁰ <https://www.independent.co.uk/life-style/food-and-drink/marks-spencer-discount-market-place-restaurant-reusable-container-a9028876.html>

³¹ <http://orca.cf.ac.uk/99366/1/Coffee%20cup%20summary%20report%20-%20Poortinga%20%28FINAL%29.pdf>

- establishes grant funding and technical assistance to help businesses convert to reusable foodware

As a result, two other cities in California enacted similar ordinances: Watsonville and San Anselmo.

Now there is a similar but stronger measure under consideration in San Francisco which (if enacted) will:

- mandate only reusable foodware be used by restaurants for on-site dining (imagine McDonalds and Starbucks won't be able to serve in disposables on-site)
- charges \$0.25 for take-out disposable cups **AND food containers**
- mandates all take-out single-use foodware must be compostable in the City's waste system
- says that online food ordering is subject to the mandatory cup and container charges, AND requires that customers can only be given accessory foodware items (straws, lids, stirrers, condiment packages, napkins, utensils, etc) only provided if the customer requests them- there has to be an "opt-in" place to click on the app or website
- MANDATES that food vendors also provide a reusable option at no charge to the customer for take-out cups and containers. This supports 'producer responsibility' as customers shouldn't always have to carry reusable food containers and cups with them- they should be available free of charge when customers make their take-out order. A deposit can be charged to ensure that the customer returns the cup or container.

Do retailers have a role to play in exploring viable reusable food containers for on the go consumption?

Yes, of course. Everyone should investigate options that reduce single-use packaging and investigate innovative solutions happening around the world. There are new businesses popping up every day designing reusable take-away containers that meet health and safety standards.

Are there additional products that are suitable for consumption reduction?

- The purchase of new items -- encourage the repair sector and address the liability issues where such repairs are done for free at Repair Cafe events. Also apply 0% VAT to bolster this industry and make it more affordable.
- Avoidance of plastic packaging where foodstuffs that can be purchased in bulk in supermarkets where customers can use their own containers such as:
 - pasta, rice, spices, nuts, sugar, dry fruit
 - meat, fish, deli, salads
 - fresh fruit and veg
- Bringing own container to refill:
 - cleaning products
 - personal care products (shampoo, soap, etc)

- Refillable drinks containers. Adopt a DRS for plastic and glass drinks bottles and aluminium cans and offer a refill option for plastic and glass bottles like they have in Oregon.³²
- Promotion of reusable menstrual products such as reusable pads or MoonCup.
- Promotion of reusable wet wipes over disposable ones.

What data is necessary for measuring consumption reduction of these specific products and any new products suggested?

We would need the cooperation from business to provide baseline data, which could be made a requirement under law. In terms of disposable cups, cutlery and containers, each retailer could install a special button at the till that records each time they sell a container, charge a levy or sell the product in a reusable container. This data would be submitted to DCCAIE each month or submitted, like the plastic bag tax, along with VAT returns.

The role of levies in reducing our consumption is well documented. However, in the case of plastic bags the levy was applied to a commodity which had previously been available for free. Given the range of prices involved for commodities sold in SUP food containers and beverage cups, do you believe a levy would affect behavioural change?

When the plastic bag levy was first imposed, it was a nominal tax of €0.15, which has since been increased. However, this levy had a dramatic impact on individual behaviour as the plastic bag consumption went from an estimated 328 bags per capita to an estimated 14 bags per capita in 2014.³³ It didn't matter whether the consumer bought €5 of products or €150 worth, the bag levy stayed the same. It is now considered bad behaviour if shoppers buy or use thin single-use plastic bags.

Currently, takeaway containers are free and it shouldn't matter if the product with the container is worth €1 or €15. If consumers behaviour is similar to what happened with the plastic bag levy, a levy on containers should change norms. However, as it is more difficult to carry around a container, the levy should be higher, say around €0.40 to affect change, or should be staggered according to the price of the item purchased. Under the WEEE Directive, a recycling fee is charged to consumers on all electrical items, with some fees visible and some not. However, these fees are normally based on a per kg, per chemistry basis. For example, a fluorescent light bulb has a much higher fee than a LED light bulb. In terms of fees for takeaway containers, there could be three bands with different fees according to the size and material. For example, PET or other rigid plastic container, mixed material (sandwiches or take-away boxes) and soft plastic bags (bread rolls/pastries).

Are there other SUP items that cause litter and for which there are sustainable alternatives available, which Ireland should consider banning?

The Government could consider banning the following items:

- Condiment sachets such as ketchup, mustard, sugar cubes, jam, milk/creamer jiggers
--Sustainable option: condiments can be provided in dispensers and milk can be poured from bottles or jugs

³² <https://www.bottledropcenters.com/buy-refillable-containers/>

³³ <https://www.dccae.gov.ie/en-ie/environment/topics/waste/litter/plastic-bags/Pages/default.aspx>

- Lollipop sticks/plastic sweet sticks -- Sustainable option: make from cardboard
- Sweet and chocolate wrappers -- Sustainable option: go back to paper/foil options.
- Release of balloons and Chinese Lanterns
- Provision of disposable plastic water bottles daily to school-provided meals (Deis Schools).
- Free give-away of plastic drinks bottles/drinks pouches in public areas (French law)
- The selling of disposable water bottles in public spaces/events. (San Francisco law)³⁴
- Disposable containers, cups (including the lids) and cutlery are banned, whatever their material may be, when the meals are served on-site in eating establishments. (French law)
- Contractual clauses ordering the supply or use of plastic bottles in festive, sporting or cultural events are forbidden. (French law)
- Plastic wrap around fresh fruit and veg -- France's new law dictates that packaging made of plastic, at least partially, that wraps fresh, unprocessed fruits and vegetables which are displayed in retail spaces are banned. This ban does not apply to:
 - lots weighing 1.5 kilo or more
 - fruits and vegetables posing a risk of deterioration when they are sold in bulk (listed by decree)³⁵
- Plastic herbal tea bags -- Sustainable option: paper (France has banned these in their new waste and circular economy law³⁶)
- Free plastic toys in children's meals (again, passed in France)
- Plastic confetti (passed in France)

Is there sufficient supply of recycled plastic content to achieve this ambition of 30% recycled content in plastic bottles?

There is a concern that there will not be enough rPET to meet the 30% recycled content requirement under the SUPD. The quality of rPET for drinks containers and other food grade packaging must be of high quality to allay health and safety concerns. Coca Cola, once a company most associated with fighting the adoption of deposit refund schemes throughout the world, are now supporting DRS systems in the UK to ensure the quality of rPET.³⁷ Plastic PET bottles collected through a DRS are known to be of higher quality as they are collected in a single stream and not contaminated by other plastic polymers or other materials.³⁸ We understand that Wellman International, a PET recycling company located in Ireland, does not accept rPET from Irish Material Recycling Facilities as the rPET is not clean

³⁴ <https://www.theguardian.com/environment/2017/jun/28/how-san-francisco-is-leading-the-way-out-of-bottled-water-culture>

³⁵ https://www.zerowastefrance.org/wp-content/uploads/2020/02/20200205_synthesis-of-the-current-and-forthcoming-bans-on-disposable-products-in-france.pdf

³⁶ https://www.zerowastefrance.org/wp-content/uploads/2020/02/20200205_synthesis-of-the-current-and-forthcoming-bans-on-disposable-products-in-france.pdf

³⁷ <https://www.coca-cola.co.uk/blog/why-not-commit-to-putting-more-than-50-percent-recycled-plastic-into-bottles>; <https://www.letsrecycle.com/news/latest-news/coca-cola-to-increase-rpet/>

³⁸ <https://www.governmenteuropa.eu/deposit-return-schemes-plastic/91699/>

enough. They import rPET flake from the Netherlands which they turn into rPET fibre. They support the introduction of a DRS in Ireland.

We recommend the adoption of a DRS in Ireland both to battle our litter problem, but also to improve our recycling rate and develop our market share of clean rPET.

Can our current co-mingled collection model be enhanced in order to deliver a collection rate of 90% for PET beverage containers?

The purpose of adopting a 90% separate collection of plastic bottles was threefold: 1) reduce litter; 2) increase collection levels and 3) ensure a clean recyclable material. Even if our current structure is able to achieve a 90% collection rate, there would be huge contamination of the material. However, we don't believe that we will be able to achieve 90% with our current model as we are losing much of the 'on-the-go' bottles in street bins and lost into the environment. Currently we are collecting nearly 70% with a very well-established kerbside and civic amenity system. We are trialling an 'on the go' recycling street collection pilot in Dublin this year, which will give us a good understanding of waste disposal behaviour of individuals out and about and their willingness to separate their plastic bottles and aluminium cans in public street bins.

Would you use a segregated bin just for the responsible disposal of single use PET containers?

In the home, many individuals do not want more than 3 bins, especially where there is little storage space both in the home and to store a 4th bin outside. If a 4th bin were to be introduced, we believe that a better approach would be to place plastic and metal in the 3rd bin and paper/cardboard in the 4th bin to protect paper from contamination.

What role can an Extended Producer Responsibility Scheme play in delivering on these targets?

As mentioned previously, producers/retailers placing plastic packaging on the market pay very little for the management of their packaging. They currently pay €89/tonne, which equates to one tenth of one cent per container, on average.³⁹ These fees must increase with producers under an EPR scheme financing the establishment and roll-out of a DRS.

³⁹ Calculations were determined through the following methodology. Plastic bottles are charged €89.16 per tonne and there are around 76,900 bottles/tonne with an average weight of 13 g/bottle. Of course, weights for the different sizes of bottles are not the same, but we don't have the data to calculate the number of smaller vs. Larger containers. This is a rough estimate for calculation purposes.

7.7 Consultation Questions – Circular Economy

What are the areas with greatest potential for transformation in Ireland under the Circular Economy?

According to Community Reuse Network Ireland (CRNI), the potential for job creation in the Circular Economy covers a broad range of skills and wide geographic distribution including rural areas and areas of economic and social deprivation.⁴⁰

Skills include trade and craft (e.g. carpentry, upholstery), industry (e.g. health and safety, forklift / van driving, waste management systems), retail, business management and life skills (e.g. team work, first aid).

Due to the labour-intensive nature of reuse / recycling, these jobs and training opportunities will be new or net additional jobs. This is due to the labour involved in repairing, upcycling or deconstructing the highly diverse and complex mix of products that are returned via reuse and recycling loops.

Community reuse and recycling operators create these jobs and develop these skills for individuals or groups that are long-term unemployed, people with disabilities, ex-offenders, people from drug rehabilitation and disadvantaged communities—such as members of the Traveller and Roma community— thereby promoting equality. These employment and training opportunities can help lift people out of poverty, enter the job market and learn new skills that can support career progression. The personal impact of these services on trainees can be seen through CRNI’s video, *Inclusive Communities at Work*, found on CRNI’s videos page: <https://www.crni.ie/videos/>.

Many of these operators address poverty and social inclusion by providing refurbished or reused goods at affordable prices and in some cases, at a significant discount. This enables low-income families to meet their needs without incurring debts or making do without essential items. By creating volunteer opportunities, they help to address social exclusion by offering a sense of community, purpose and belonging to those who are lonely or otherwise excluded. There is a proven positive impact of volunteering. According to a Volunteer Ireland study, the impact of volunteering on the health and well-being of the volunteer, 55% of respondents to an online national survey of volunteers stated that their mental health and well-being had increased following their volunteering experience. It is notable that volunteers often also progress into part-time or full-time employment within the same organisation.

What measures are required to increase understanding of Circular Economy principles and their uptake by relevant actors?

The European *Prevent Waste Coalition*, of which RREUSE is a member, recently published a paper *10 Priorities to transform EU waste policy*. This calls for all products under the scope of the Ecodesign Directive to be circular in design through reparability and durability

⁴⁰ See *Moving Towards the Circular Economy in Ireland*, a study for the National Economic and Social Council (NESCC) by Dr Simon O’Rafferty

requirements. Similar design rules must also be set for product categories not covered by the Directive, notably textiles and furniture.⁴¹

To support this work, we encourage the enhanced involvement of the design and manufacturing community in the implementation of this Circular Economy plan and connecting this community with operators handling their products at reuse or recycling stages. For example, mattress recyclers can demonstrate the types of designs that hamper opportunities to recover materials for recycling or reuse (including in particular pocket springs and triple stitched designs). Excellent design resources are also available through for example, the Ellen MacArthur Foundation.⁴²

It is also important to communicate more circular design to consumers and enable them to make more informed choices and drive behavioural change. To support this, we encourage the Government to contribute to European Commission efforts to develop consumer labelling showcasing the durability and reparability of products including non-energy products.

What might be a meaningful national waste reduction target and how could it be achieved?

We concur with CRNI's submission in this area.

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

An effective way to encourage the uptake of reuse and repair activities is to introduce a 0% VAT for Prevention and Preparation for Reuse activities

According to a European Commission Eurobarometer report⁴³, 77% of European citizens would be willing to have their goods repaired but hardly ever do because it is too expensive for them to do so. Re-use and repair activities need to be made cheaper in order for Europe to keep the value of products and prevent wasting resources.

In order to rebalance costs to align better with the resource efficiency objectives we propose that repair and sale of second hand and refurbished goods should be subject to 0% VAT.

Measures to encourage repair are required under Article 9.1(d) of the revised WFD as follows:

Article 9(1)(d): Member States shall take measures to prevent waste generation. Those measures shall, at least: (d) encourage the re-use of products and the setting up of systems

⁴¹ <https://www.rreuse.org/10-priorities-to-transform-eu-waste-policy/>

⁴² <https://www.circulardesignguide.com/methods>

⁴³ Flash Eurobarometer 388, ATTITUDES OF EUROPEANS TOWARDS WASTE MANAGEMENT AND RESOURCE EFFICIENCY, https://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf

promoting repair and re-use activities, including in particular for electrical and electronic equipment...

In its list of supplies of goods and services to which reduced VAT rates may be applied, the current VAT Directive includes the *'supply of goods and services by organisations recognised as being devoted to social wellbeing by Member States and engaged in welfare or social security work'*. Several Member States have granted social enterprises the opportunity to offer reduced VAT rates for their services or the sale of their goods where their activities contribute to social welfare, social inclusion and the move towards a circular economy.

In the immediate term, therefore, social enterprises in Ireland could be afforded reduced VAT for prevention, preparation for reuse and recycling activities. More broadly, we support the RREUSE position on applying different VAT rates in accordance with the waste hierarchy, as follows:⁴⁴

- Repair: 0 % VAT should be applied on the cost of the labour of repair, maintenance, upgrade services on products such as furniture, electronic and electrical equipment, construction materials, bicycles, shoes and leather goods;
- Sales of second-hand goods: 0 % VAT should be applied on the sale of second-hand goods as VAT was already paid once during the purchase of a new product;
- Collection services: collection services provided by social enterprises that preserve the re-use potential of the collected products should be subject to a 0 % VAT rate;
- Recycling: the sale of recycled material or material to be recycled should be entitled to a reduced VAT rate, in order to promote a market for quality recycled materials.

This would give a strong and direct signal to consumers about the impact of consumer goods and provide opportunities for consumers to make savings through better environmental choices.

We also agree with CRNI that an introduction of tax rebates on donated goods would support and encourage the reuse of goods.

One difficulty many business-to-business prevention / reuse operators experience is encouraging businesses to pass on unwanted items for reuse. In many cases, businesses are more likely to discard than reuse due to the low cost of disposal in skips, short term inconveniences such as limited storage and while there are no incentives to effectively drive

⁴⁴ See RREUSE comments on EU VAT rule proposals http://www.rreuse.org/wp-content/uploads/Position-paper-on-VAT-proposal_29-September-2018-FINAL.pdf

reuse. Worse still, the accounting system may actively discourage such donations as products cannot be written off if they are donated for reuse.

To address this, we support the introduction of **tax rebates on donated goods**. A very effective scheme rebate has been put in place in New York City whereby donors complete the value of a donation in accordance with a reference document and submit their claim to the relevant body. While the system works differently in Ireland (e.g. the tax rebate goes directly to the charity claiming the donation) a mechanism to channel some benefit back to the donor would encourage a flow of donations.

8.7 Consultation Questions – Citizen Engagement

What campaigns would better assist householders and businesses in preventing and segregating waste properly?

VOICE created and ran the Recycling Ambassador Programme (RAP) in 2018, which was funded by DCCAE and the three waste regions. We had 30 ambassadors throughout the country running 700 workshops, reaching 25,000 people in every corner of the country, informing them about the new recycling list and how to recycle properly. We ran workshops with community groups, government departments, sports organisations, businesses and festivals. Wherever groups met, we were there talking about recycling.

While mywaste.ie is a great resource for those individuals and companies wishing to learn more about recycling, we estimate that the majority of people do not know this website exists. In many of our workshops, we ask participants whether they have heard of the recycling list or mywaste.ie. Most people haven't seen or heard about this campaign, even two years into the launch of the new recycling list, countless posters and ads around bus shelters and rail stations and radio interviews.

We still receive numerous requests from both communities and companies for help to understand how to manage their waste. We still run these workshops, but unfortunately, we have to charge a fee for our time. While we don't mind charging companies, we do regret charging communities, although we have a vastly reduced rate for them. Our topic has expanded to include waste prevention and organic waste separation in addition to how to recycle.

We believe that face to face engagement with people works wonders and the workshop participants share this information with their colleagues, family members and friends. However, while effective, it is a costly way to get the message across. We calculate that reaching each participant (not considering the knock-on effect of individuals sharing this information with others) was €12 per person. However, as this campaign needed investment in website design, promotional material and survey printing, we believe that if it was continued, it could be done for €8 per person in the future.

Sharing information on how to properly sort your bin through social media, traditional media and PR does result in a lot of shares, views and reach, but as we know with behaviour change, there is a huge gap between awareness and action.

WRAP UK has conducted numerous campaigns to build public awareness around recycling and to increase recycling rates, but as indicated by these case studies, significant funding went into these campaigns, including the funding of door to door canvassers to answer questions about recycling and kerbside bins.⁴⁵ Changing behaviour requires significant investment and a multi-year campaign. Websites, ads and social media hits do not achieve as much as face to face engagement.

We also believe that the message has moved beyond 'how to recycle'. What we found in our engagement with individuals during RAP was that they often asked why are we stuck with so much packaging that is not recyclable?

This conversation would then move on to ways to avoid the accumulation of such material through waste prevention actions. Also, since the introduction of the new recycling list, many communities have started to become 'plastic free' towns or 'conscious cup' areas, and other communities are looking to become 'zero waste' towns.

We recommend an investment in developing capacity for communities to find the tools they need to start their journey towards zero waste. This type of movement not only improves proper waste segregation, but it moves whole communities, including their residents and businesses towards waste prevention and to embrace the circular economy through innovative social enterprises such as sharing initiatives (Library of Things, Dublin Bike, GoCar, WeShare), repair cafes/businesses, leasing businesses and industrial symbiosis (SMILE). Many communities do not have the knowledge or tools to start this journey and we recommend that investment be made to support facilitators who can help these communities.

Should this be funded by Government or should the sector play a role in funding campaigns?

If the Government concludes that we need to support communities to start their zero waste journey to not only get their bins sorted but to take active measures to reduce their waste, this type of public engagement and activation should be financially and legislatively supported by the Government, like the programmes in Scotland.⁴⁶

If the Government determines that we just need to get proper bin management through a national, top-down campaign, this should be a joint venture between Government, the producers of the waste and waste management companies, who benefit financially from a cleaner waste stream.

A dual approach would also be effective in pushing the zero waste message to communities ready to start their journey and a public awareness campaign to individuals still struggling to understand how to sort their bins.

⁴⁵ <http://www.wrap.org.uk/content/behavioural-change-local-fund-case-studies>

⁴⁶ <https://www.zerowastescotland.org.uk/blog/scotland's-zero-waste-towns-and-circular-cities>

Waste Collectors have a condition in their permits to maintain on-going communication with their customers in accordance with their customer charter. Do you agree that collectors are giving sufficient information to their customers in relation to separating waste into the 3 bins?

In a nutshell, no. Currently waste collectors list what they accept in their bins in many different ways. Some list the items, some use the recycling list images and some contradict the list from mywaste.ie. There should be uniformity among the waste collectors in the images on their website and what they collect. These images, along with videos about how to recycle, should be front and centre on websites to make the information easily accessible.

Also, many waste companies at the end of 2018 placed recycling list hangers on bins. Some companies later hung organic bin hangers. I don't know how effective these were and whether householders kept them or referred to them when managing their waste. Panda's policy of photographing household bins seems to be effective as a stick measure to warn households that they have contaminated their bins. Often to achieve behaviour change, a carrot and stick approach is effective.

However, we believe that there are many missed opportunities in the communications between waste companies and their customers. Many companies send texts or emails to remind householders to put out their bins. These texts could also include recycling messaging about putting in materials clean, dry and loose. They could also state to put soft plastics in the residual bin. There are many creative ways to communicate a simple message.

Lastly, like electricity bills that contain the average kw usage in the neighbourhood to nudge behaviour, a similar approach could be applied to waste bills.

Do you think information stickers for bins showing what's accepted in each bin should be rolled out to all households?

We don't know how effective these would be as by the time an individual takes the waste out to their bins, the material has been already sorted in the house (usually in the kitchen). Additionally, as bins are outside exposed to the elements, it is unknown how long the stickers will last. Perhaps a better approach, and one taken under RAP, is the provision of fridge magnets so that if there is a question in the sorting, individuals can refer to the images on the magnet. In apartment buildings, we offered free reusable recycling bags with the recycling images and message on the side, as most kitchens in apartments are small and the area unsuitable for a second bin.

9.7 Consultation Questions – Construction and Demolition Waste

What incentives could be introduced to increase the use of recycled materials?

Should levies be applied to the use of virgin material where a recycled material is available as an alternative?

We recommend a tax of up to €2.50 that would be levied on each tonne of sand, gravel, crushed stone and other aggregates extracted from the ground or lifted from the surface and used in construction. Such material is exempt from any royalties or similar payment structure under the Minerals Act.⁴⁷

The way aggregates are produced and consumed have wide ranging negative effects in terms of carbon emissions from extraction, processing and transport. Similarly, there are detrimental effects on water quality through runoff of sediment, on biodiversity and the natural landscape. Lastly, local communities can suffer from noise, dust and particulate matter and through increased number of heavy trucks damaging roads and causing slow traffic. The environmental and societal costs of this industry are externalised with the industry bearing little responsibility for extracting a natural resource in Ireland.

Why do we propose an aggregates levy in Ireland? Because of the aggregates levy in the UK, there has been a black economy where Irish aggregate has been sold up in the North to avoid the aggregate levy. Adopting a similar levy in the Republic will equalise market factors and reduce the amount of aggregate crossing the border. Additionally, the imposition of this levy will encourage the recycling of construction and demolition waste (3.2 million tonnes in 2014) and reduce the amount of waste being landfilled. Lastly, there are many unregistered quarries extracting aggregate and this levy will bring them into the regulatory regime and tax net.

The levy in the UK has:

- Encouraged the recycling of aggregates and construction and demolition (C&D) waste. The UK has the highest percentage of C&D recycling in the EU, with 25% of waste being reused in construction.⁴⁸ Not only is this an excellent example of the circular economy, but it also reduces the amount of C&D waste arising from 18 million tonnes in 2008 to 3 million tonnes in 2012.
- Reduced the CO₂ emissions associated in the manufacturing of new cement.
- Reduced the number of new quarries with their associated traffic movements and emissions. (Typically quarries result in heavy trucks on fragile local road networks not designed for it.)
- Assisted in regulating quarries (i.e., take on illegal operators via the tax net)
- Raised revenue from a very resource-intensive sector and boost the Environment Fund following the ‘polluter pays principle.’

⁴⁷ Note: the rate is based on the £2.00 rate applied in N. Ireland and GB. There the aggregates levy was adopted in 2002.

⁴⁸ http://ec.europa.eu/environment/enveco/resource_efficiency/pdf/economic_analysis.pdf

County councils, which regulate and oversee quarry activities, have begun to impose development contribution levies on quarries in their planning permission to offset some of the external impacts arising from mining. However, these levies do not impact quarries already under operation. We propose to extend a national levy to address the environmental and society costs incurred from all mining activity. Currently there is legislation moving through the Dáil consolidating statutes that control the extraction of minerals in the State. Under this legislation, the State receives royalties for valuable minerals. We argue that the same could be true for aggregates, which is a valuable, non-renewable resource.

Some may argue that this levy will adversely affect the construction of new houses. As each new house uses, on average, around 300 tonnes of aggregate⁴⁹, this levy would cost builders only around €600-750 per house. This is not a big ask seeing that quarrying activities adversely affect the surrounding environment.

Introduction of a levy would also be a financial incentive to use more environmentally friendly timber-frame construction for house building, where aggregates constitute a much smaller part of the raw materials.

Recommendation: The Environmental Pillar recommends a €2.50 charge levied per tonne of aggregate, some of which should be earmarked for remediation of quarry sites and environmental degradation. An aggregates levy could be expected to yield €80m a year (EEA, 2010 Appendix 1, which equates to €2.50 charged on 32m tonnes p.a.

10.7 Consultation Questions – Textiles

What measures would best support the successful collection of household textiles?

Clothing bought in any given year will last for 3.37 years on average before it is discarded or passed on. Large volumes are therefore wasted - while an estimated 12,000 tonnes of textiles are reused locally in Ireland via charity shops, a much larger portion is either exported to second hand markets (unknown quantity via textile recyclers) or discarded in recycling and residual waste bins (approx. 80,000 tonnes household and 20,000 tonnes non-household).

While there is growing awareness of the impact of the fashion industry, particularly with the European Commission setting textiles as a key priority area for the draft Circular Economy Action Plan 2.0, significantly more work is required.

⁴⁹ Quarries and Ancillary Activities Guidelines for Planning Authorities, April 2004, Department of the Environment, Heritage and Local Government

The following measures are required to support the sustainable consumption of textiles by the general public:

- First and foremost, a concerted effort to build awareness about the impact of textiles on global systems and encourage consumers to reduce their consumption.
- Secondly, the introduction of separate collection of textiles will see increasing volumes of textiles enter the second-hand market. This is not a sustainable solution unless there is increasing local demand for those textiles. Driving the demand for second-hand textiles is therefore key in enhancing the flow of textiles locally.
- Thirdly, poor quality textiles are in many cases unsuitable for reuse. We need to encourage better design and engage consumers to prioritise good quality items in purchasing new goods, to ensure a longer life and longer-term circularity of those items.
- Finally, and particularly to support the objective to separately collect textiles, education will be required on the importance of sending textiles for reuse (and how) over placing them in the residual waste bin.

With regards to separate collection we recommended the following:

As noted in Chapter 10.4 of the consultation, significant volumes of textiles are poorly segregated or downcycled leading to loss of value for reuse and upcycling. The negative impact on reuse in Ireland of exporting quality textiles is also highlighted. It is also noted that a reliance on export markets can also expose Ireland to market fluctuations as has been seen for the plastics industry and more recently for textiles, as receiving African markets are pushing for bans on the import of low-quality second-hand clothing.

It is important that the local second-hand clothing retailers (like charity shops) are central to any future separate collection scheme to ensure maximum local reuse. Some options for prioritising local second-hand clothing retailers while extending the separate collection network are outlined below:

- A condition could be introduced to waste collector permits to provide for the separate collection of textiles in partnership with local second-hand retailers (e.g. charity shops). Those partners would provide a regular (but less frequent than the food waste or recycling bin) kerbside collection service using textile bags as has been demonstrated in the UK. In this option it would be important to manage any potential interference by bogus collectors.⁵⁰
- In addition, or alternatively, separate collection could be supported by an increase in textile banks that are connected with local charities. To further support local reuse, Local Authorities should prioritise banks that direct textiles to local second-hand retailers (e.g. charity shops) when procuring textile banks for Civic Amenity Sites (“Resource Parks”) or on public land.

⁵⁰ https://www.wrap.org.uk/sites/files/wrap/Textiles_Guide_CS_Bexley.pdf

A number of Member States are reviewing the option of EPR schemes for textiles in view of the mandatory separate collection requirement set out in the Waste Framework Directive.

EPR schemes can lead to unintended consequences particularly when introduced into an already well-established reuse sector. If an EPR scheme is considered for textiles it must be very carefully designed to support local reuse, especially the existing network of second-hand outlets dominated by social enterprises / charities. It should also be modulated to favour higher quality single-material garments and discourage multi-material fast fashion goods.

Have you any other comments or suggestions on how you would like to see Ireland transition to a more resource efficient and circular economy by improving our waste management practices?

We need investment into proper independent peer to peer academic research into our textile production that stem from larger fashion companies.

Ireland needs to rethink its textile waste streams and look at how we can reuse more materials and close the textile loop here in Ireland and stop exporting our problems to other countries. We need a textile recycling centre here in Ireland to take and repurpose those textiles that are too worn or damaged to be donated or sold for reuse.

Globally the fashion industry is looking to create a loop that is similar to the food chain where we can trace a garment back to the farm. This will take some time and coordination, but Ireland needs to join the conversation and start taking our textile waste seriously. The time is now to start to effect change between now and 2030.

15.7 Consultation Questions – Extended Producer Responsibility

How could modulated fees be best introduced to drive change and transform our approach to waste in line with modern, circular economy principles?

The best solution arising from modulated fees would be to design out unsustainable practices to reduce waste creation. Current fees are based on weight and the current trend among packaging producers is to lightweight their packaging. While this has reduced the CO2 emissions associated with transporting the products due to lighter weight, it has made it more difficult to recycle or reuse the packaging at the end of its life. Perhaps, instead of basing the EPR scheme fees on weight of packaging, it should look at the number of items and recyclability/reusability of the item. As plastic film is so thin, a tonne of crisp packets would represent around 200,000 bags (at 4 g per empty packet) and at the current rate of €89/tonne, that would be .0045 of one cent paid for the management of the empty pack. There is absolutely no incentive for the producer to change practices under this fee system. Conversely, if the EPR fees are based on the item and charge .01 cent a pack, that would amount to €2,000 per tonne. This would get the attention of the producer to change the design of their packaging to a more sustainable choice.

Is there a role for voluntary agreements with industry?

No, voluntary agreements don't work as there is no stick to force behaviour change as economic concerns always trump environmental concerns in the business arena.

What mechanisms will bring the entire supply chain and waste management systems together to share solutions?

Creating an active technical working group bringing together the producers, packaging designers, environmental experts and the waste industry is essential to find sustainable cradle to cradle solutions. This should not just be a talking shop with many presentations, but should be an ongoing brainstorming action-based group which could be subdivided according to sector and special packaging needs, sharing ideas and finding solutions.

We need to ensure that the background economic context for all decisions made along the supply chain and in the waste management sector is conducive to sharing solutions, including of course green innovation. Despite many good intentions on all sides, at present (as implied above) economic forces are still pressurising actors all along the chain to avoid fundamental changes in their practices and therefore, in practice, to neglect environmental concerns.

This is a cross-departmental matter rather than one which the DCCAE can be expected to address in isolation. Nonetheless, we bring it up here as it affects the DCCAE's ability to achieve its goals regarding the circular economy (and indeed, its other goals as well), and so is important both to take into consideration in its own policy and to broach in discussions with colleagues from other departments.

The economic forces which we consider to be problematic include:

1. An over-commercialised and over-leveraged financial sector; this is in contrast to the situation in countries such as Germany and Norway, which have strong public/community banking sectors. The stability of the large commercial banks in Ireland tends to be prioritised above longer-term - but nonetheless vital - environmental and social considerations, including the transformation of the economy from linear to circular. This situation is not set in stone and can be changed, drawing from examples elsewhere.
2. Taxation which encourages speculative activity rather than investment in the real economy. Many of the recommendations in this submission involve the introduction or increase of levies. This is just one (positive) example of taxing resources rather than labour. In a similar vein, the replacement of the existing property tax with a land value tax could help to ground the economy, curbing speculation on property and redirecting investments towards productive activities.

While the existing Irish property tax financially penalises property owners who improve their property (for example by making it more energy efficient), land value tax focusses solely on the value of the land underneath the property. It would take some of the pressure off land values in urban areas, making it easier to warehouse products closer to their point of retail sale. This in turn would smooth the transition away from just-in-time logistics, which not only have a large transportation-energy footprint, but which also encourage problematic over-packaging since they require the speedy delivery over long distances of relatively small quantities of goods in an easily-transportable format.

There are also some cultural phenomena which feed into the factors listed above:

1. An exaggerated focus on competition and the unnecessary imposition of precarity on many individuals and businesses. It is difficult to be relaxed enough to share solutions to challenges arising from the transition to a circular economy when you are constantly pressured into thinking of other companies within your sector solely as rivals, and when your own financial stability is contingent on proving yourself “better” than the others. This situation could be alleviated with the introduction of measures such as a universal basic income and/or universal basic services.
2. Faulty measures of success. Despite increasing scepticism on the part of many governments worldwide and much of civil society regarding the notion that GDP growth is an accurate measure of progress, it is still widely assumed in both policy and business circles to be a fundamental goal.

The DCCAE’s description of the circular economy rightly states:

“For the past 250 years, economies in the developed world have been based on a continuous growth model that relies on a steady supply of inexpensive natural resources. However, this approach is coming under increased pressure as a result of social and environmental concerns.

A linear economy built on the principles of ‘take, make and waste’ is not sustainable and alternatives need to be found.

However, it then goes on to state:

“In a circular economy, growth is separated from the use of scarce resources through production models based on long life products that can be renewed, reused, repaired, upgraded or refurbished.”

[Source: <https://www.dccae.gov.ie/en-ie/environment/topics/sustainable-development/circular-economy/Pages/default.aspx>]

The presence of the word “growth” in the sentence above highlights a glaring contradiction. Where there is no absolute limit on resource extraction, there is no guarantee that converting to a circular economy will actually stop problematic primary production. As with energy efficiency, there is a rebound effect (which has been called “circular economy rebound”) [source: <https://onlinelibrary.wiley.com/doi/abs/10.1111/jiec.12545>] - more efficient recycling and reuse can actually lead to an increase in overall primary production.

This is one of the reasons why we need upstream limits on resource extraction, such as the outright banning of certain products and the cap on fossil fuel imports that is described above.

If such limits are imposed, we may find that we end up with an economy that circular but that is not expanding [see for example <https://eeb.org/decoupling-debunked1/>]. Indeed, the economy may well contract in absolute terms for a while before reaching a steady - and circular - state.

We need to recognise that that scenario could actually be perfectly liveable - perhaps even a distinct improvement on the present one - provided that it is anticipated and that measures are put in place to make such an economy as fair and stable as possible.

20.7 Consultation Questions - Green Public Procurement (GPP)

What are the barriers to public authorities using GPP?

There is a lack of buy-in from public procurers for the various government departments and agencies and there is a lack of understanding in how GPP works and how GPP factors are incorporated into procurement decisions. GPP must be made simple for procurers with set formulas and policy mandates, such as forbidding the purchase of single-use plastics.

Some simple actions government agencies can take include:

- Ban the purchase and use of any disposable single-use cup, plate, cutlery (plastic, recyclable or compostable). Reusable options must be provided.
- Use purchasing power to curtail the use of any disposable single-use cup, plate, cutlery at events sponsored/funded by the government, such as conferences, meetings and events.
- Find sustainable reuse container/drinks options for the provision of food in DEIS schools.
- Ban the sale of bottled water in government organisations and offer refill options
- Used furniture must be the first choice when kitting out office space...have a platform for intergovernmental exchange of office supplies.
- Ban the ripping out of appliances and kitchens in social housing each time a new resident moves in. Replacing items should not be the default option, it should only be done where the condition of the kitchen is uninhabitable or uncleanable.

21.7 Consultation Questions - Household Bulky Waste

What supports do consumers require to prevent bulky waste?

There should be easy access to the removal of bulky waste and a ban of such to be disposed into landfill. All civic amenity centres should accept bulky waste and county councils should have the ability to have call out services to collect such items.

There is a litter lout culture in this country where the 'man with the van' or individual would rather fly tip large items rather than take to be appropriately managed.

Are consumers willing to pay more to ensure appropriate end-of-life disposal for these products?

There should be a fee placed on new items to fund the collection and disposal of all bulky waste, such as mattresses, furniture, carpets, appliances, among others. Items identified for such a fee should be based on the most common items fly-tipped or sent to landfill.