12 November 2020

**Re: Deposit Return Scheme - Consultation on Potential Models for Ireland**

To Whom It Concerns,

Cork Chamber is the leading business representative organisation in Cork, proactively working to identify and progress developments that are facilitative of sustainable economic growth. Representing an employer base of close to 1,200 businesses and over 100,000 employees across the region, Cork Chamber is the largest business representation organisation in the south of Ireland.

This submission has been guided by our commitment to the UN Sustainable Development Goals. Five specific goals have been identified which we actively advocate for throughout our work;


Cork Chamber supports the implementation of a Deposit Return Scheme at national level, and recognises the utility of such a scheme in increasing recycling levels from the current estimate of 55% collection of Polyethylene Terephthalate bottles (PET) and aluminium beverage cans, to the 90% collection target by 2029. The adoption of a DRS is an expansion of Extended Producer Responsibility (ERP) which has proven a practical and logical step in reducing waste such as is accomplished via WEEE Ireland in the recycling of electronic goods.

The adoption of a DRS has the potential to play a key role by evolving from a cost recovery approach to one that also incentivises a transition to a circular economy, encouraging a reduction and reuse of material inputs and ensuring a flow of materials for recycling and recovery. Our planetary resources are finite, and it is incumbent on us all to play our part in reducing waste and transitioning to a low carbon economy and society. The avoided

greenhouse gas emissions that could be delivered through the introduction of a DRS where an estimated 90% return rate could reduce the tonnage of deposit-bearing containers that are landfilled or incinerated by 88%. This is significant.

In stating our support, we highlight the proactivity of businesses, and the benefit of certainty and a realistic timeline in aiding businesses to incorporate all changes and adapt at scale. Realistic timeframes, a comprehensive and a well-planned implementation strategy will prove critical in the success of a DRS scheme. The implementation timeframe must give manufacturers and suppliers sufficient lead time to adapt to new requirements, to change packaging labelling, and give consumers enough time to learn about how behaviours need to change.

We stress that businesses and especially SMEs cannot be penalised as part of this transition and must be supported to adapt as is the mainstay of a Just Transition for all. Businesses must be supported in updating production methods, materials and processes with this underpinned with an emphasis on designing out waste at source. Supporting the updating of knowledge, skills, and business operations to embrace and incentivise eco-design, to make products more environmentally sound, reuse and recycle must be recognised as an essential element of this transition. Eco-design can play a significant role in ensuring that the total environmental impact of a product decreases and waste prevention is stimulated. A DRS scheme can be a key element in transitioning to an increasingly sustainable production and consumption model, promoting resource efficiency, high-quality recycling, substitution, use of secondary raw materials and the production of sustainable goods. As a result, it has a role to play in improving the environmental performance of products throughout their life cycle, while meeting industrial and consumer needs.

A successful transition must be underpinned with much enhanced education and awareness raising on the lifecycle impacts of waste, coupled with the business opportunity of recovery and reuse. It is crucial that all government funded education and skilling programmes where appropriate integrate waste prevention, eco-design, bioeconomy and circular economy knowledge and upskilling coupled an emphasis on the UN Sustainable Development Goals.

**Cork Chamber include answers to the following questions posed:**

**Q. The Report recommends a centralised, operational model for Ireland. Do you agree with this recommendation?**

In the Cork Chamber submission to the Waste Action Plan for a Circular Economy in February 2020 (Appendix 1) we support the opportunity to improve waste reporting through a centralised database. Through such a model there is scope to ensure enhanced oversight and monitoring to inform where ancillary actions might be needed in the short, medium and long term. This should be transparent to the public with a specific category on waste recovery to promote engagement with the principles of the waste reduction. We therefore support the adoption of a centralised model as the best approach, as due to the centralised implementation and operation of this model, it should lead to more clearly defined ownership and transparency of performance. By managing the scheme through a single industry consortium, it will be possible to deliver operational requirements more effectively. A single scheme administrator will ensure

uniformity, leadership and accountability, all of which could be diluted by multiple administrators.

By having a centralised model, with national and regional reporting, we will be able to better assess the impacts and review the areas for improvement with subsequent corrective actions being formulated. With the goal to reduce waste, increase recycling and to reduce greenhouse gas emissions, it is important that there is a formalised periodic assessment of the scheme to ensure its efficacy.

**Q. Are there other models you believe could work in an Irish context?**

[1]Dansk Retursystem, the operating company of the Danish deposit and return system, is a non-profit organisation established in 2000 with the main goal of creating and maintaining a circular business model in Denmark.

The scheme traditionally incorporated PET bottles, aluminium cans and glass bottles. In 2020 the scheme was expanded to incorporate juice and concentrate bottles. In recognising we are at the initial stage and there will be scope to expand the scheme in the future, we do still however question the exclusion of glass from a DRS scheme. This would negate the need for a domestic glass recycling bin.

We also question the limit on container sizes capped at PET plastic beverage bottles up to 3 litres in volume and suggest the exclusion of a limit like this, instead matching the pricing to the litre volume. For example in Denmark it is a greater than/ less than 1ltr differentiator e.g. DKK 1 for glass bottles and cans less than 1 litre, DKK 1.5 for plastic bottles less than 1 litre and DKK 3 for any packaging between 1 and 20 litres.

There is a significant benefit from a behavioural change and waste elimination perspective by including the widest possible range of packaging, with all material types – and container sizes – included. With the exclusion of those materials that pose hygiene or contamination issues.

**Q. The DRS study proposes a deposit per container of €0.20. Do you think this is appropriate? If not should it be higher or lower or should different deposit rates apply depending on container size?**

We emphasise that any cost increase to the consumer, and though refundable must take account and consideration of a broad base of socioeconomic variables and incomes so as to protect consumers and businesses. Strong thriving communities are underpinned by a strong economy at local and national level, it is therefore crucial that businesses are facilitated to achieve a just transition that safeguards employment and economic activity. We need to ensure that structures are in place that support business, communities, and all socio-economic circumstances.

For reference, in Denmark the rate is less[2] at DKK 1 for glass bottles and cans less than 1 litre, DKK 1.5 for plastic bottles less than 1 litre and DKK 3 for any packaging between 1 and

[1] https://stateofgreen.com/en/partners/state-of-green/news/denmark-expands-its-deposit-and-return-system-to-increase-recycling/

[2] https://www.xe.com/currencyconverter/convert/?Amount=1&From=DKK&To=EUR

20 litres. Through we emphasise the necessity of gauging a viable rate for the Irish scheme via an evidenced based socio-economic assessment.

Importantly, different materials have different costs to recycle and different market values. The net cost of collection and the recyclability of the container must be fully accounted for in the rate. It is important for a differential deposit amount to be charged based on container size. These values must be clearly set by the scheme administrator and detailed accordingly within the legislative framework. This is commonplace in DRS models across Scandinavia, such as those in Denmark, Finland and Norway.

[3]The value of unredeemed deposits should be retained by the scheme administrator to fund ongoing costs (such as improving infrastructure and communicating with consumers to drive greater recycling participation).

**Q. Consumers need to know about a DRS long before it becomes operational – do you have any suggestions as to how best the introduction of a DRS can be communicated to the public?**

[4]As stated in the October edition of Circular, a DRS scheme will have maximum utility and impact when it is easy to use, with return points for deposit redemptions located in easily accessible locations. Redemptions should not only be performed via retailers and return vending solutions, but also through integration with existing extended producer responsibility (EPR) infrastructure (at civic amenity sites for example). Where necessary infrastructure is limited, capital funding should be provided by the government.

A scheme should be designed in way that encourages and facilitates the use of emerging technology, such as app-based technology. Also using innovative partnerships between government agencies and bodies e.g. in [5]Beijing plastic bottle recycling via a vending machine at transport hubs can pay for your subway ticket. This raises awareness of plastic recycling and adds a value to this commodity, transitioning waste to a valuable raw material. The subway machines accept used water bottles as payment. "Once entered in the recycling machine, the bottles are first scanned so that their value is calculated depending on the plastics' quality and number. In return, the machine issues a public transportation credit or extra mobile phone minutes. Most of them are placed in high-traffic or touristy areas, such as the Temple of Heaven, which sees as many as 60,000 people pass by daily."

Importantly, retailers must be supported to ensure the inclusion of Reverse Vending Machines or manual take back schemes are cost neutral for the retailer. A retailer must be compensated to give the vending machine a prominent location, and where no vending machine exists the retailer must still be compensated for the floor space capacity and additional service delivery in supporting the scheme.

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[3] https://www.circularonline.co.uk/opinions/designing-a-world-leading-deposit-return-scheme/

[4] https://www.circularonline.co.uk/opinions/designing-a-world-leading-deposit-return-scheme/

[5] https://www.thecivilengineer.org/news-center/latest-news/item/1599-in-beijing-plastic-bottles-can-pay-for-your-subway-ticketIn%20Beijing,%20plastic%20bottles%20can%20pay%20for%20your%20subway%20ticket

Cork Chamber shares your commitment to developing a sustainable Ireland. We emphasise the value of public consultations and welcome future opportunities to engage on this and associated topics. We highlight the opportunity to engage with private sector business representation and believe this to be instrumental to facilitate fully representative discussions of future pathways and actions that are informed via ground up engagement.

Yours sincerely,

Michelle O'Sullivan
Senior Public Affairs Executive

**Appendix 1**:

Waste Action Plan Consultation
Waste Policy & Resource Efficiency
Department of Communications, Climate Action and Environment
Newtown Road
Wexford
Y35 AP90

21 February 2020

**Re: Submission to Waste Action Plan for a Circular Economy**

To Whom It Concerns,

Cork Chamber is the leading business organisation in Cork, proactively working to identify and progress developments that are facilitative of economic and sustainable growth. Representing an employer base of close to 1,200 businesses and over 100,000 employees across the region, Cork Chamber is the largest business representation organisation in the south of Ireland.

This submission has been guided by our commitment to the UN Sustainable Development Goals. Five specific goals have been identified by the Irish Chamber Network which we are actively advocating for throughout our work;

The submission responds to the topic of waste in a circular economy, however it must be noted that dramatic reduction in the generation of waste at the point of production, to an eventual point of zero waste must be front and centre of any plan to attain a circular model.

## 2. Institutional Arrangements

**Improving current institutional waste prevention and management arrangements**
Cork Chamber believes there is an opportunity to enhance the training for circular skills through curriculum development and integration with existing government funded structures that support business and communities i.e. Local Enterprise Offices, Skillnet, Public Participation Networks.

**Other comments:**
It is critical that businesses are supported to make this transition to a circular economy model. Strong thriving communities are underpinned by a strong economy at local and national level and the transition to a circular economy holds opportunities for communities and businesses to thrive, though facilitation and support is needed at the outset.

it is therefore crucial that businesses are facilitated to achieve a just transition that safeguards employment and economic activity. We need to ensure that structures are in place that support business, communities, and all socio-economic circumstances. The appointment of a Just Transition Commission to address the challenges and realise the opportunities nationally is crucial, and a logical step to address the suite of policy and regulatory framework changes and enhancements, and facilitative market structures and supports which are needed to realise the vast opportunity associated with the Circular Economy.

As a representative voice of business, we highlight the need for certainty amongst businesses, to plan and to grow sustainably. Business needs policy and regulatory clarity and a facilitative framework to anticipate and plan accordingly to adapt business practices to adopt new production methods/ materials, and change consumption patterns and behaviours. To this end, to accelerate our transition nationally we strongly believe facilitating businesses to make the switch to alternative production methods and materials should be the priority focus. Government must through a Just Transition Commission work with businesses to identify alternatives, enhance the support for Research Development and Innovation to increase the affordability and accessibility of business to update production methods/ materials and to upskill/ reskill staff.

Business must be supported to incentivise bio-economy alternative. Added to this, there should be support for education, awareness, reskilling and training opportunities nationally on packaging design and the opportunities to design practical packaging which minimises waste.

## 3. Municipal (Household & Commercial) Waste

- **Consultation Questions – Municipal Waste**

**Promoting and incentivise waste prevention and improving proper segregation and recycling of waste**
**Education and awareness raising**
In primary, secondary and third level there should be classroom workshops promoting and incentivising waste prevention and the correct segregation and recycling of waste.

These could be developed by the Regional Waste Management Planning Offices (RWMPO), with a structured format promoting circularity and reuse, upcycling as well as waste prevention. This could be run in a train the trainer style to ensure longevity with the RWMPO's training key individuals in educational institutions to deliver this training periodically. Like the Voice Recycling Ambassador Programme[6], this could be instrumental in developing awareness from an early age and especially relevant where the educational institution does not engage with the Green Flag[7] programme for schools and universities.

It is essential that such training programmes are promoted at national, regional and local level to raise awareness of these programmes as avenues for engagement and local community workshop facilitation. Such workshop providers should be funded adequately to promote these workshops as currently there is a low level of general knowledge that such workshops exist.

In Cork Chamber we also believe there is an opportunity to integrate training in the circular economy with skills and training programmes run through Local Enterprise Offices, educational curricula in Universities, Institutes of Technology, Community Colleges and continuous education facilitators such as Skillnet Ireland, and lifelong learning facilitators.

Furthermore, the Rediscovery Centre[8] in Ballymun, Dublin is an excellent visual representation of the circular 'cradle to cradle' model of reuse. There is an opportunity to replicate such centres and education facilities regionally. Cork Chamber believe there is an opportunity to host such a facility in Cork, Ireland's fastest growing city region. This could facilitate a Circular Economy Academy for businesses, students, and the public.

Education will be key to ensuring long-term embedded change and support for a circular economy.

**Waste disposal/ recovery/ recycling infrastructure**

Regionally and nationally, Ireland has critically underinvested for decades in waste disposal, composting, recycling and waste recovery infrastructure. There is a gargantuan gap in waste infrastructure in Ireland and this must be addressed. Funding[9] must be allocated to fund infrastructure deficits. Our current model of exporting waste must be curbed immediately. As well as the unsustainable and environmental consequences of such policies, we are exporting valuable resources which should be reused, recovered or upcycled here nationally. We are exporting raw materials which could be valuable if the correct waste infrastructure was available, accompanied by appropriate market supports and stimulus, policy and regulatory framework were in place.

The delivery of education and awareness raising across all of society e.g. in classrooms, in businesses and for consumers, to support circular economy models/ social enterprises and projects to inform and educate business to design out waste. There must be greatly enhancedgovernment support for research development and innovation for example to increase the access to, and affordability of bio-based materials for businesses.

**New measures or practices**

**Centralised database/ and league table**

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[6] https://voiceireland.org/rap/

[7] https://greenschoolsireland.org/

[8] http://www.rediscoverycentre.ie/

[9] https://www.corkchamber.ie/wp-content/uploads/2020/01/20191211-Submission-to-Environmental-Levies-Consultation-FINAL.pdf

We believe there is an opportunity to improve waste reporting using a centralised database with all responsible organisations and local authorities feeding data into this and in doing so improving the real time information thereby informing where there are ancillary actions needed in the short to medium term.

This should be transparent to the public and with a specific category on waste recovery to promote engagement with the principles of the circular economy. A competitive league table displaying waste recovery by county and region could form part of this and be linked to a national online platform sharing information on business raw materials, by-product materials and inputted by businesses and linked to a market mechanism.

**Repair services and shops at local level as well as enhanced ERP**
Services and shops that repair everyday items should be supported in our local communities. Currently we are seeing services such as cobblers become less and less viable and close their doors. It is crucial that such services are supported and encouraged at local level as forming the backbone of a strong everyday reuse/ repair approach at consumer level and are a necessity in promoting circular.

**Regulatory and market barriers**
There are regulatory and market barriers. A Just Transition Commission for business, to include a Commissioner overseeing the circular economy must be set-up to support business in changing their consumption and material use production cycles, while driving engagement across the business community, educational institutions and at broader community level.

For example, in the case of waste to energy recovery, Government must support the development of a market structure to support anaerobic digestion, through regulatory and infrastructure support and subsidy support at the outset. There is significant potential for a market in biomethane to become self-sustainable over time offering a diversified revenue source within the agricultural sector while supporting a net zero carbon fuel. The efforts of Gas Networks Ireland to increase the ratio of fully renewable biomethane in the national gas grid, and the efforts of Eirgird to decarbonise electricity sources through the development of the interconnector to mainland Europe must be supported in our national efforts to cut emissions.

Cork Chamber believes a subsidy to support biomethane production is a feasible option in national efforts to decarbonise the national grid. There is already commonplace in Europe and a staple of economic activity in Northern Ireland. Indeed, many Irish producers transport biomethane produced in ROI to Northern Ireland to avail of the market model and price point. Developing a subsidy structure in Ireland would be hugely beneficial to aid efforts to decarbonise our economy.

In addition, a domestic feed-in tariff would encourage domestic prosumers and encourage microgeneration and must form part of a suite of measures in decarbonising our economy.

There are opportunities associated with the Circular Economy through for the development of a national platform sharing production/ material by-products for commercial repurposing. A progressive digital platform whereby businesses are encouraged through a market structure could be instrumental to incentivise the reuse and repurposing of materials, decreasing waste, incentivising collaboration while also encouraging natural clusters of complementary businesses across all sectors and sizes.

**Skills/ Training**
To realise the opportunity of a circular economy, it is crucial that Government supports business in this transition with support for research, development and innovation, and

reskilling/ training programmes. The UN Sustainable Development Goals and circular economy awareness should be incorporated at every available opportunity.

**Climate Finance**
The importance of climate finance to Ireland's transition to a low carbon economy is crucial, with an overall national target to reach net zero carbon emissions by 2050, the growth of sustainable investment opportunities and portfolios is key to achieving our transition. Climate finance through responsible investment is pivotal to Ireland meeting commitments under the Paris Climate Accord, and to achieving our responsibilities to meet the global Sustainable Development Goals. We need accelerated market engagement with Climate Finance.

There is significant opportunity for Ireland to diversify and strengthen investment and asset portfolios. Government support to accelerate a shift in private financing investment options to sustainable investment portfolios, and the national banking sector to increase their overall percentage and availability of green funds to private homeowners and businesses would be welcome.

- **Consultation Questions – Commercial Waste**

The Waste Characterisation campaign report completed by the EPA in 2018 highlighted the commercial sector as having the starkest issues as regards contamination in bins, with 70% of material in the general waste bin where it could have been diverted to mixed dry recycling or organic bins.

**Pay-By-Weight**
It is apparent that a mechanism is needed to incentivise a widespread change in practices and behaviour and Cork Chamber acknowledges the utility of a 'pay by weight' charging structure. We highlight the need for certainty amongst businesses to plan and grow sustainably. Business needs policy and regulatory clarity and a facilitative framework to anticipate and plan accordingly to adapt business practices.

While we acknowledge and support the necessity to introduce a 'pay by weight' charging structure, we in parallel highlight the dire need for waste recovery and recycling infrastructure to support a thriving circular economy. We highlight the opportunity for an online platform for raw material/ bye-product selling, market stimulus structure to support this, education and awareness, skilling in product design (to design-out/ minimise waste), and much enhanced investment in research, development and innovation.

Business must be encouraged and supported to change organisation-wide behaviours, and we highlight that the pay-by-weight charge should not be overly onerous and should take account of the business sector, operational constraints and business size. We highlight that business is under increasing pressure to evolve their businesses to adapt to a low carbon economy and therefore new measures must be balanced.

We support the introduction of a new Extended Producer Responsibility (EPR) scheme in Ireland as timely to encourage a change in practices, placing responsibility with producers to design products to minimise packaging and life cycle environmental impacts and to accept legal, physical and/or socio-economic responsibility for environmental impacts that cannot be eliminated by design. Such costs can be minimised where materials and products are managed in an environmentally effective manner throughout their life cycle. EPR has the potential to play a key role, by evolving from a cost recovery approach to one that also incentivises a transition to a circular economy.

**Further incentives to encourage business to recycle more**

Cork Chamber supports the introduction of a new Extended Producer Responsibility (EPR) scheme in Ireland as timely to encourage a change in practices, placing responsibility with producers to design products to minimise life cycle environmental impacts and to accept legal, physical and/or socio-economic responsibility for environmental impacts that cannot be eliminated by design. Such costs can be minimised where materials and products are managed in an environmentally effective manner throughout their life cycle. EPR has the potential to play a key role, by evolving from a cost recovery approach to one that also incentivises a transition to a circular economy.

**Suggested models:**

The mandated product take-back approach could include the following:

1. Product take-back mandate and recycling rate target:
   This would make it mandatory for the manufacturers and/or retailers to take back end-of-life (EOL) products and sets specific recycling targets. These requirements are often met by forming a 'producer responsibility organisation, PRO', a collective effort by the industry to fulfil the EPR obligations of the member companies.
2. Voluntary product take-back mandate and recycling rate targets:
   This would require a purely voluntary approach for the take back with no penalties for not meeting the targets.
3. Mandatory take-back and targets with a tradable recycling scheme:
   In addition to mandating take-back and setting recycling targets, this would allow trading of credits among producers to meet the required targets.

**The economic instruments include the following:**

1. 'Advanced recycling fee (ARF)', which imposes tax on the sale of the product to cover the cost of recycling EOL products. Fees are assessed per unit of the product and are charged at the point of sale either separately or assessed upstream on producers and incorporated into the retail price.
2. 'Recycling fee combined with recycling subsidy', which uses the revenue generated from either the ARF or post-consumption recycling fee to subsidise the recycling process. Revenue generated can be used in several ways. It is either used to subsidise the upstream producer's activity of getting the waste recycled or cost of managing the waste including the infrastructure cost.
3. 'Deposit refund system (DRS)' combines tax on the product consumption (the deposit) with rebate or refund when the EOL product is returned for recycling or environmentally friendly disposal. The deposit sum of the commercial cost of the product and the environment cost associated with recycling. The mechanism encourages reduction and reuse of material inputs and ensures flow of materials for recycling and recovery

**Advantages of EPR:**

1. Creation of a sustainable production and consumption policy:
   EPR is a key element in implementing a sustainable production and consumption policy, promoting resource efficiency, high-quality recycling, substitution, use of secondary raw materials and the production of sustainable goods. As a result, it will improve the environmental performance of products throughout their life cycle, while meeting industrial and consumer needs
2. Incentives eco-design:

With the introduction of EPR, producers will be encouraged to incorporate changes in the design of products in order to be more environmentally sound. This will make products easier to dismantle, reuse and recycle. In this way, the total environmental impact of a product decreases and waste prevention is stimulated.

3. Full internalisation of environmental costs:
   The full internalisation of environmental costs allows for the financing of a sustainable and economically efficient management of waste. The environmental costs, at the least, include costs for pollution prevention and the collection, recycling and treatment of waste. These environmental costs should be incorporated into the price of products. Consequently, the consumer, and not the taxpayer, bears all costs related to the waste they have produced, which is more socially fair.

**Certification scheme to demonstrate that businesses are managing their municipal waste correctly (e.g. using the mixed dry recycling and organic waste bins properly)?**
Yes, this could be useful with independent verification and spot-checks.

**Other comments:**
Currently we live in an 'out of sight, out of mind' society when it comes to waste, and a successful transition must be underpinned with much enhanced education and awareness raising on the lifecycle impacts of waste, coupled with the business opportunity of recovery and reuse. It is crucial that all government funded education and skilling programmes where integrate the circular economy and UN Sustainable Development Goals and the opportunity therein. There is an opportunity in Ireland to transition via the adoption of an online platform to buy and sell raw/ by-product materials.

## 4. Food Waste

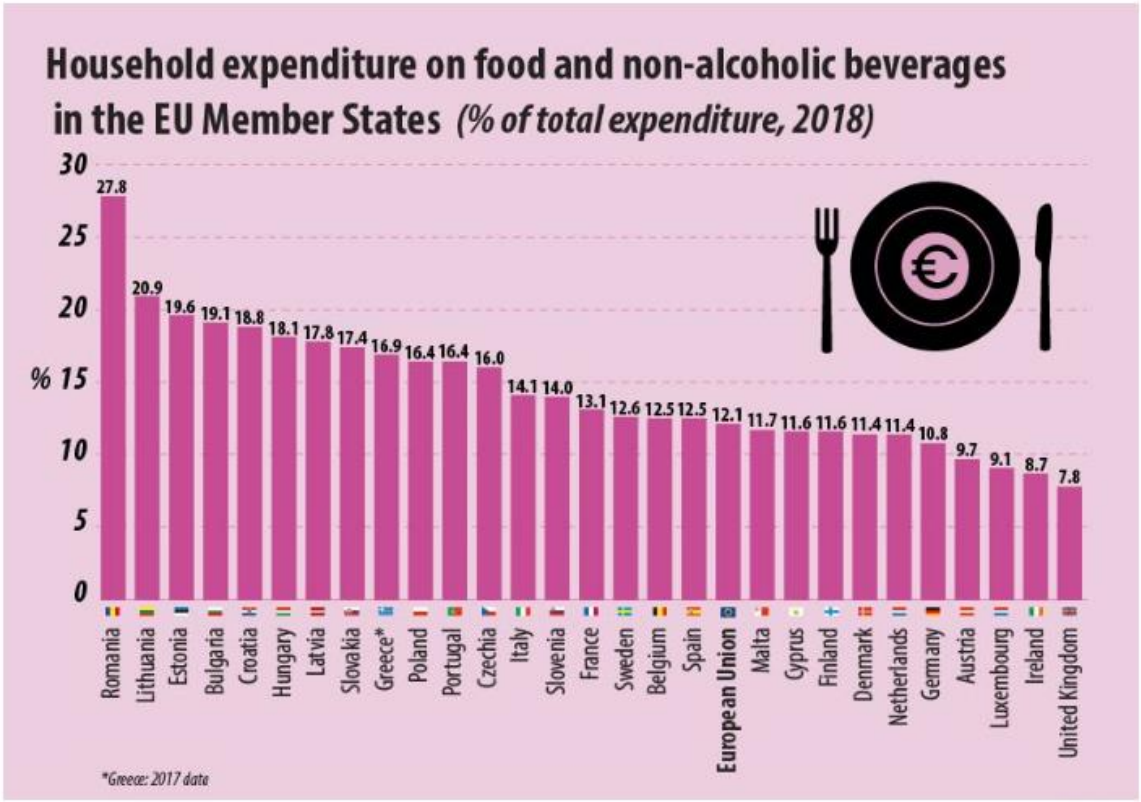
### Underlying causes of food waste

Though much work is being done through initiatives such as Stop Food Waste[10] , Ireland has a striking food waste problem, with over one million tonnes of food waste disposed of each year. Of this, it is estimated that 1/3 comes from households with a cost of between €400 and €1000 per year to an individual household. It is estimated that approx. 60% of this is avoidable food waste, and 20% is potentially avoidable.

### Below-cost-selling

In 2019, Eurostat[11] in a survey of household consumption revealed that Ireland spends the second least amount on food and non-alcoholic drinks out of all EU member states. Cork Chamber recommends Government must be proactive in ensuring a consultative process and broad stakeholder engagement to ensure a fair price system acknowledging the embedded energy of food production, supporting sustainable food production. Below-cost-selling undervalues the energy, water, and production/growing hours by which the production of food embodies. This practice was banned in Ireland until 2006 and is still banned in countries such as France, the world's most food sustainable[12] country.

[10] https://stopfoodwaste.ie/
[11] https://ec.europa.eu/eurostat/web/products-eurostat-news/-/DDN-20191209-1
[12] https://www.weforum.org/agenda/2018/11/france-is-most-food-sustainable-country-u-s-and-u-k-faltering




**Tax breaks for charitable donations**

In Ireland there is a growing number of retailers and food producers donating unsold food to charities such as Food Cloud[13]. To encourage more food donations, a tax break could be introduced, as is the practice in France[14]. France has been listed as number one in international Food Sustainability Index 2018 and which among other factors can be attributed to the aggressive approach to tackling food waste.

[13] https://food.cloud/

These countries have the best food sustainability

Based on rankings from the Food Sustainability Index, 2018

| | Country | Score (out of 100) |
|---|---|---|
| 1 | France | 76.1 |
| 2 | Netherlands | 75.6 |
| 3 | Canada | 75.3 |
| 4 | Finland | 74.1 |
| 5 | Japan | 73.8 |
| 6= | Czech Republic | 73.5 |
| 6= | Denmark | 73.5 |
| 8 | Sweden | 73.4 |
| 9 | Austria | 73.3 |
| 10 | Hungary | 72.5 |

Source: Economist Intelligence Unit and the Barilla Center for Food & Nutrition Foundation

The country introduced legislation in 2016 requiring supermarkets to redistribute leftover food to charities as part of a set of proposals published in 2015 against food waste. Furthermore, in an EU commissioned report on the *Redistribution of surplus food: Examples of practices in the Member States*[15]*, EU Platform on Food Losses and Food Waste, May 2019,* France appears particularly active in incentivising engagement with food charities through the inclusion of a tax break of 60% of the donated value of food which is donated to charities. This is caveated with a cap of 0.5% of the company turnover. If the tax break is not fully used during its first year because of the cap, it may continue over the next five years. The value of the donated food is equal to its net book value, meaning its original cost minus its depreciation.
As stated on pg. 66 of this EU report, "*this tax credit system* is *referred to in the guidelines created for retailers on food redistribution to charitable organisations. Article 238 bis of the General Tax Code also applies when the company provides delivery and storage of foods for donation, considering the service delivery or storage as a gift. Charities have also broken new ground in the extension of tax incentives for donations made by agricultural producers to new sectors. Associations began to collect dairy produce from 2013 and then eggs and processed fruit and vegetables from 2014 and 2015. They are now working with the authorities to include the meat sector in particular. 16 food charities are certified at the national level to receive food donations and thus to deliver tax certificates that allow donors to benefit from a tax break."*

This is a particularly innovative model to incentivise engagement with charities and to dramatically cut food waste, and one which we believe could be replicated in Ireland.

**Best-before-dates**

All retailers should be encouraged to sell, at lower prices, food that is past the 'best before' dates, but before the 'use by' dates. Furthermore, retailers should be supported to ensure that 100% of own-brand, fresh produce and in-store packaging is recyclable, reusable or compostable as is the example set by Musgraves[16].

Supporting social enterprises such as Foodcloud which use data driven platforms to engage retailers to reduce food loss encouraging potential food surplus/ or waste to be redirected to

[15] https://ec.europa.eu/food/sites/food/files/safety/docs/fw_eu-actions_food-donation_ms-practices-food-redis.pdf
[16] https://www.irishtimes.com/business/retail-and-services/musgrave-puts-climate-action-front-and-centre-with-new-sustainability-strategy-1.4105946

meet a social need should be a priority. We encourage Government to investigate the French model of tax incentives to encourage retailers and producers to donate food surpluses etc to charities.

**Other comments:**
Ireland needs a progressive policy and regulatory framework to support a thriving circular economy. For example, there is a huge opportunity to produce energy from food waste.

**Food waste to energy**
Across Europe and further afield, Biomethane technology is commonplace. Cork Chamber has been advocating since 2016 for the adoption of CNG to biomethane public bus fleet. Biomethane is a low-carbon, methane-based transport fuel produced from anaerobic digestion giving effect to national waste policy, driving towards an efficient circular economy in converting waste streams to energy, while increasing domestic energy security, diversity and resilience. Biomethane as a fuel is particularly suitable to heavy vehicles such as buses and HGVs. The capability to transition a CNG fleet to Biomethane (biogas) and to hydrogen fuel in the future and with no/minimal technology retrofit to fleet or refuelling infrastructure maps a considerable opportunity in affecting an emissions reduction pathway from short to medium term, to long-term. It brings considerable GHG emission and transport pollutant reductions through the increase in percentage of biogas in the gas grid, to zero emission with hydrogen in the future. Gas Networks Ireland are currently investigating the potential of the national gas grid to distribute hydrogen and research in this area should be supported. In Nottingham alone, the double-decker bus fleet is powered entirely by biomethane. Nottingham City's transport fleet of 53 bio-gas double deck buses doubled in size in 2019 with the addition of a further 67 buses. Further examples in Lille, Stockholm, Reading and Lisbon to name but a few cities that have opted to implement waste to energy policy and in doing so adopting a net carbon neutral bus fleet. It is important to factor in that methane gas has 28 times the global warming impact of carbon dioxide, when biomethane is used as a transport fuel it is 28 times better than letting it escape into the atmosphere as methane. This is a crucial reuse of methane and one which we should not ignore nationally from a climate action as well as economic, resilience, energy security perspective.

In 2018/2019 the Department of Transport, Tourism and Sport conducted trials of low emission bus technologies in Cork and Dublin. Within the summary results from these trials it was concluded that hybrid-electric buses run on biodiesel and gas buses run on bio-CNG offer the greatest potential contribution towards Ireland's renewable energy transport targets to 2030. Cork Chamber continue to actively support the Energy Cork proposal[17] for Ireland's Greenest Bus Fleet which advocates for the conversion of the public bus fleet to biomethane (biogas). This proposal identifies the opportunity for Cork as a location of scale, with a fleet size of 120 buses and with one central refuelling station for the public bus fleet in Cork City at Capwell (which has already undergone significant infrastructural groundworks for CNG/biogas refuelling capability) to transition to low emission technology. There is an opportunity now to transition to low emission fuel and technology cutting our GHG emissions while converting waste to energy and motivating broader public behavioural change.

## 5. Plastic and Packaging Waste

### The role of citizens in meeting recycling targets

Currently 2/3 of plastic packaging is not on the current recycling list. Citizens must be enabled to fulfil their role in meeting our recycling targets for plastic and packaging waste. Without the

[17] http://www.energycork.ie/index.php/portfolio/irelands-greenest-bus-fleet/

appropriate infrastructure nationally, there is an enormous disconnect between the potential recycling that could be attained and what can be feasibly achieved with improved recycling behaviours due to the infrastructure constraints. As previously addressed, there needs to be increased emphasis on education and awareness raising events, and information portals. Mywaste.ie has been very widely welcomed and is a very positive initiative. Though the continued support of community level workshops through organisations as Voice Ireland [18] is key, while there is also a need to increase the prominence and awareness of these workshops.

**Role of waste collectors**

Waste collectors have a role to play in proactively educating customers on recycling lists and the provision of compost bins with clear guidelines.

A recent report Rethink [Y]our Waste: Local and Regional Perspectives European Committee of the Regions Trainees 2019-20 suggests best practices (overleaf).

[18] https://voiceireland.org/

Cork Chamber
Advancing business together

# RETHINK: ACTION

**Throughout our project research, we have come across a number of common actions and initiatives pursued by those towns, cities and regions showing best practice in waste management. Here are some examples of ways to Rethink [Y]our Waste...**

## DOOR-TO-DOOR COLLECTION

Door-to-door collection is implemented in a number of ways across the EU, from one bin (only collecting residual waste) to up to six separate bins or sacks. Strict separate collection contributes to increased recycling rates. Among collection methods, door-to-door collection systems result in the highest capture rates and yields of recyclables. In Milan (IT), a door-to-door scheme helped to increase recycling rates from 34.5% to 48.5% in only three years.

## PAY-AS-YOU-THROW (PAYT)

Pay-As-You-Throw (PAYT) schemes are a way for local authorities to increase recycling rates and reduce residual waste collection from households. With fees determined by weight, households are charged according to the amount of waste they actually produce. By making residents financially responsible for their waste, results show that there is an overall decrease in waste produced and an increase in recycling. In Cascais (PT), a PAYT scheme is being introduced, whereby residents use an access card to open a locked bin. The region is a popular tourist resort, and the scheme aims to boost its rate from 13 % to 30 %

## COMMUNITY COMPOSTING SCHEMES

Schemes promoting better composting help to reduce the volume of waste sent to landfill. There exist a number of composting methods ranging from individual composting for households to local composting plants which can be installed in densely populated areas. In the province of Pontevedra, Galicia (ES) a comprehensive and community-based system for decentralised composting has been successful in composting over 2,000 tonnes of bio-waste, following the roll-out of the project to more than two-thirds of the province's municipalities.


Source: file://ccfs01/folders/Michelle/Desktop/Y%20Factor%20Report%202020%20(1).pdf

**Other targets apart from EU that we should be striving for**

As a representative voice of business, Cork Chamber in our submission to the 2019 Environment Levies[19] consultation, highlighted the need for certainty amongst businesses, to plan and to grow sustainably. Business needs policy and regulatory clarity and a facilitative framework to anticipate and plan accordingly to adapt business practices to adopt new production methods/ materials, and change consumption patterns and behaviours. To this

[19] https://www.corkchamber.ie/wp-content/uploads/2020/01/20191211-Submission-to-Environmental-Levies-Consultation-FINAL.pdf

end, to accelerate our transition to a low carbon economy and circular consumption model nationally we strongly believe facilitating businesses to make the switch to alternative production methods and materials should be the priority focus. Government must through a Just Transition Commission for business, and the circular economy work with businesses to identify alternatives, support Research Development and Innovation, and to increase the affordability and accessibility of business to update production methods/ materials and to upskill/ reskill staff.

To successfully achieve a complete transition to non-plastic alternatives, we urge the inclusion of a nationally agreed date banning common unrecyclable plastic packaging materials and containers. We urge this be considered in the medium term (within 3 to 5 years) with measures, supports and activities undertaken immediately to support a transition to bio-economy alternatives. The date to ban such items must be agreed and committed to, decided upon through collaborative engagement with the business community. This is the starting point with concurrent focus on supporting businesses transition, to ensure alternatives are affordable, incentivising producers to adopt alternative production methods. To ensure the alternatives are affordable and attractive to consumers, producers must be incentivised.

**Opportunities for EPR already covered on page 6.**

Government leadership will be key to developing a harmonised, science-based approach to packaging alternatives, education on design, and bioeconomy opportunities.

## 6. Single Use Plastics

**Measures to consider**

As expressed in the above section, Cork Chamber believe that to successfully achieve a complete transition to non-plastic alternatives, we urge the inclusion of a nationally agreed date banning single use plastics. A levy on takeaway containers is appropriate but must be adopted in tandem with a suite of measures to support food businesses transition from single-use plastic containers. Cork Chamber proposes in the case of food/ catering businesses there should be a priority focus on the adoption of alternative biomaterials for containers, and the increased affordability of compostable containers for food businesses, with many established brands already existing e.g. Vegware. There should be an emphasis in supporting businesses to make this transition, in making alternatives more affordable and to support businesses to offer the consumer a price reduction where a consumer brings their own container (depending on the outlet type). However, where hot food is concerned, we must be cognisant of food hygiene issues, and support takeaway businesses to stock affordable alternatives as the most appropriate step forward.

The practicality of reusable food containers must be investigated and may be dependent on hygiene/ health and safety concerns. This may be dependent on the food outlet/ food product and therefore those service providers that are unable to consider this option must not be penalised and should be supported to make the full transition to compostable container options.

A nationally agreed date for an all-out ban on single use plastic packaging materials would give certainty to producers and motivate a product redesign and materials reengineering. Ireland needs to be ambitious. Setting a date to ban certain types and styles of packaging gives certainty to business.

Furthermore, food packaging levy could increase operating expenses for a producer or make products more expensive for a consumer, therefore the support to make a change in materials packaging and design would be more equitable to support a just transition.

**Non-reusable cups**

Firstly, Cork Chamber proposes that all single-use disposable, non-compostable or non-recyclable cups be banned nationally, with a ban date being agreed in collaboration with business. Business needs certainty and can adapt to certainty. A levy would be applied to single use compostable, recyclable cups as a single-use levy.

Secondly, we propose the adoption of a nationally supported cup swap scheme, supported through the Environment Levy and which works to protect all cafes, food outlets to achieve this transition from single use disposable cups in an equitable and fair way. Such a scheme should have regional oversight and be adaptable locally to incorporate regional/ or City branding e.g. Pure Cork branding to support local tourism initiatives. With the application of a scheme nationally and with oversight regionally, the involvement of all cafes, food outlets with the nationally, and regionally branded 'cupswap' scheme, with uniform branded cups should require the participation of all business in a location that are interested to participate in a 'cupswap scheme', ensuring an equitable approach for all, and a workable scheme at scale. Otherwise, a model of multiple larger café or food outlet chains with branded cups and a branded scheme would put smaller and independently owned cafés/ food outlets at a competitive disadvantage and make such a scheme untenable. We must protect the diversity of our café/ food outlets offering, and a workable scheme should be devised in collaboration with business representatives.

**Coffee cup levy**

In the transition period during which a cupswap scheme is being agreed and initiated, a levy of 25c on disposable single-use compostable and recyclable cups could be the most applicable in encouraging behavioural change, though we emphasise that any increase must take account of the most applicable levy in consideration of a broad base of socio-economic variables and incomes so as to protect consumers and businesses. In relation to cupswap models, there are already models in operation for example the 2GoCup[20]. This scheme for example supports circular consumption and has a very simple operating model, requiring a deposit for a cup, and then offering a return of this deposit upon return of the cup or a fresh cup when ordering a takeaway beverage.

A deposit could vary between €1 to €5 depending on the overheads of producing the cup. If all café and food outlets in a location were participating in this scheme we could see a significant drop in waste nationally and at an ambitious scale. Finally, we need to be ambitious and opportunities do exist to transition more definitively to alternative models. Business must be supported through this transition, with business playing a key role in changing societal consumption norms.

A price reduction is commonplace now in Cork and amongst Cork Chamber member cafes etc with a discount of 20c most common for those using a reusable cup.

Cork Chamber member cafes and food outlets do commonly stock compostable cups. Compostable cups are ideal in theory, though completely without function and utility if not deposited in a compost bin for end of life composting. Therefore, we strongly call for the Government to ring-fence a proportion of the environment fund/ and specifically the single-use coffee cup levy to fund the necessary infrastructure for waste collection and industrial

[20] https://www.2gocup.ie/

composting which is severely lacking currently, and which will support the efforts being made by businesses to move to more eco-friendly alternatives. Currently, the efforts of businesses and the extra expense businesses absorb when purchasing eco-friendly alternatives are wasted as regionally and nationally, we do not have an adequate waste disposal, composting or waste recovery infrastructure in place. There is a gargantuan gap in waste infrastructure in Ireland and this must be addressed. Furthermore, we highlight the varying level of product standards in relation to compostable cups and highlight the need for standards and a certified compost friendly quality mark to be adopted by all producers of compostable cups in Ireland, and for this to be a requirement on products in the Irish market.

To motivate a shift in consumption patterns, the price differential between the two options should be displayed clearly, with pricing clearly displayed without the levy and with the levy clearly incorporated on signage as an additional charge for using a disposable cup.

A levy should decrease the need for businesses to purchase disposable, compostable or recyclable cups, while a cup swap scheme with a standardised cup would support the flexibility of 'grabbing a coffee on the go' while promoting an affordable and flexible reusable alternative. If a customer forgets to bring their reusable cup on an occasion, the customer can pay the deposit and get that deposit returned again upon return of the cup, avoiding single-use waste.

All levy funds raised via such a levy on disposable items must be funnelled back into supporting businesses to adapt practices, adopt new practices and to support social enterprises with business models based on the recycling, upcycling, and repurposing of waste streams such as the [21]Rediscovery Centre paint workshop.

## 7. Circular Economy

### Circular Economy/Waste

As outlined in the Cork Chamber submissions on the public consultation on the **Long-Term Strategy on Greenhouse Gas Emissions Reduction[22] , Cork Chamber** believe there is a vast opportunity in the area of energy resilience and domestic supply through the acceleration of the production and supply of biomethane for energy generation through anaerobic digestion using food waste/ farm waste, giving effect to current national waste policy. Through a strong market stimulus and Government supports through policy and incentives, this has the potential to be a thriving circular opportunity and could be realised in the short to medium term. Given Ireland's dependence on energy imports, it is critical that we increase diversity and resilience in energy supply. We must increase the domestic supply to meet current and future expected demand.

While waste reduction and elimination must be prioritised, unavoidable wastes that cannot be recycled in a sustainable manner can be safely and effectively treated by the waste-to-energy (WtE) process. This form of waste technology has the added benefit of producing electricity and heat while ensuring that such unavoidable wastes are transformed into useful and valuable resources which can thereafter contribute to a circular bio-economy. The implementation of the Waste Framework and Landfill Directives have been instrumental in diverting waste away from landfill which is regarded as the least desirable and most environmentally detrimental tier of the waste hierarchy. The "waste hierarchy" ranks waste management options according to what is best for the environment. It gives top priority to

[21] http://www.rediscoverycentre.ie/

[22] https://www.corkchamber.ie/wp-content/uploads/2020/01/20191204-Submission-on-Long-Term-Strategy-on-Greenhouse-Gas-Emissions-Reduction-002-FINAL.pdf

preventing waste in the first place. When waste is created, it gives priority to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill and incineration without energy recovery). The Regional Waste Management Plan (WMP) 2015-2021 is in line with the principles of the circular economy. It addresses the need for an additional 300,000 tonnes per annum treatment capacity for residual municipal waste. This additional capacity would help to achieve a key objective of improving self-sufficiency in waste treatment, reducing the amount of waste being transported to Leinster or exported abroad for treatment. The extent of capacity determined reflects the predicted needs of the residual waste market to 2030 at the time of preparing the waste plan. Against the backdrop of a growing population (and with Cork, Limerick and Waterford projected to be amongst the fastest growing locations in the State over the next 20 years), it is essential that Government supports the objectives in the WMP as well as any updates to the plan.

**De-carbonising Heat & District Heating**

The National Planning Framework listed district heating (DH) as one of the key enablers for the future growth of Cork. However, there are regulations currently in place that are prohibitive, yet they will need to be addressed if DH is to become a viable heating alternative to fossil fuel sources. Guidance is therefore required from the Department of Communications, Climate Action and Environment to address the fact that waste heat is not recognised as a solution to reduce carbon. Recoverable or 'waste' heat is an unavoidable by-product of thermal power production and many large industries. However, current policy does consider this as low carbon solution. DH, and many other low-carbon energy solutions, have only been able to grow and take a foothold in markets where there are effective carbon taxes, meaning low-carbon solutions are competitive and economically attractive. It is very difficult for DH to compete with the low costs of fossil-based heating fuel, especially when the upfront investment cost of DH infrastructure is considered. The recast Renewable Energy Directive recognises district heating systems as an important infrastructural technology to facilitate the increase of total conversion efficiencies.

**Bioeconomy opportunities**

This is a growing area with many success stories such as the Carbery, Barryroe CoOperative Farmers, Biorefinery Glas[23] project. This project uses a small-scale biorefinery to optimise the use of grass by separating it into a spectrum of co-products for ruminants, non-ruminants and for the food chain, improving resource efficiency. In this project alone, farmers will demonstrate new business models, using an automated and lowcost biorefinery. This project has the potential to be replicated across Ireland, addressing fodder and emissions challenges whilst adding value. This is a growing area with vast potential to increase resource efficiency and dramatically decrease waste. Cork Chamber believes there is a significant opportunity in supporting this sector.

## 8. Citizen Engagement

As referred to earlier in this document, we believe there is an opportunity for more community engagement and workshops around waste recovery, recycling and upcycling as well as circular usage and economy opportunities. We believe updated information to household could be beneficial as there have been changes over recent years in what can and cannot be recycled which has caused confusion. Proactively addressing this by increasing information availability, and the continuity of supports for information and awareness events is important.

[23] https://www.agriculture.gov.ie/media/migration/research/bioeconomy/BIGProgressReport050919.pdf

## 9. Construction and Demolition (C&D) Waste

**Measures to action**

To unlock the circular consumption opportunities in the construction industry, actions must be implemented to unblock existing barriers, in tandem with the development of a market for recycled/ recovered materials.

Currently there is minimal reuse of materials in Ireland owing to regulatory uncertainties and the lack of clear guidelines. Construction and demolition waste must be reframed as a raw material. This requires a supportive regulatory framework and the application of a market stimulus package to get engagement with the circular model of consumption and recovery. Cork Chamber in consultation with the Construction Industry Federation (CIF) highlights the opportunity for a secondary material market to create demand for reused/ recovered materials and recommends the development of supportive incentives to get widespread participation amongst the construction sector with the recovered materials. To ensure a thriving circular economy in C&D, mechanisms and accreditations are recommended we highlight the opportunity to develop robust industry standards for materials to increase the uptake and trust from a consumer/ contractor perspective. Funding for research, development and innovation in the development of new materials and applications is an opportunity for the construction sector, especially with regard to the development of non-hazardous materials to replace hazardous materials in the construction sector, in the long term ensuring the potential circularity/ recycling/ reuse of materials. Finally, the development of a materials passport system to capture maintenance, reuse and recycling potential will increase the pre-demolition identification of reusable and recyclable construction products. This would be hugely beneficial to aiding audits of buildings to register the type and volume of materials in the existing building(s).

**Existing measures to improve**

Though there has been a recent increase in threshold limits for waste facility permits for soil and stone, the capacity of facilities to accept soil and stone is severely constrained. With the level of construction increasing, the opportunities to reclassify soil and stone waste as a by-product and the application of End of Waste decisions on crushed concrete must be prioritised.

The reclassification of soil and stone where appropriate as a by-product is positive however currently there is insufficient clarity within the construction sector on the EPA guidelines that accompany this. Currently there is a lengthy advisory period of 10 weeks to determine if a reclassification is appropriate.

To develop an agile circular economy in C&D, Government must increase the resources of the EPA to review these requests within shorter timeframes.

**End of Waste**

An improved process, clarity and timeframe for End of Waste decisions is crucial for the construction sector in reclassifying what would previously have been classified as waste. This is particularly significant for the reuse of crushed concrete from demolition sites in road construction. The application of End of Waste criteria and successful decisions on this will move this waste up the waste hierarchy for recycling and take pressure off existing infrastructure for disposal and recovery infrastructure. Increasing resources within the EPA to process these applications is pivotal and would greatly alleviate pressure on these facilities. A timely decision-making process to review End of Waste applications and bring this to decision stage is essential, as such funding to increase the resources for the EPA to progress and speed up the application to decision stage is crucial.

## 11. Waste Management Infrastructure

Cork Chamber has included commentary throughout this submission, and which are relevant to this section and consultation questions. We see a critical need to increase infrastructure provision for waste management, recycling, recovery and prevention through training/ skills and education awareness raising.

## 12. By-Products

Cork Chamber has included commentary throughout this submission, and which are relevant to this section and consultation questions.

## 15. Extended Producer Responsibility (EPR)

Cork Chamber has included commentary throughout this submission, and which are relevant to this section and consultation questions.

## 17. Waste Data & Waste Flows

There is an opportunity for enhanced and timely reporting to pull together and capture data from the EPA, DCCAE, the Producer Register and the waste compliance schemes (such as REPAK, WEEE Ireland, ERP, ELVES, Irish Farm Plastics, Repak ELT).

Product and waste could be tracked from the 'placed on the market' PoM figures provided by Producers and traced through tack-back, recycling, recovery. As many of the waste streams are exported, the inclusion of export and shipping figures as part of that review could give valuable insights into leakage of waste.

Self-complying organisations that operate in the area of waste management should be monitored independently on an ongoing basis to ensure uniformity in approach and accuracy of data, where penalties can ensue for non-compliance.

## 18. Research and Innovation

Cork Chamber has included commentary throughout this submission, and which are relevant to this section and consultation questions.

Furthermore, Cork Chamber highlights the innovative nature and the strong entrepreneurial composition of Ireland's business community. Support for innovation and new thinking will be key to accelerating the potential of a circular economy.

## 22. Bioeconomy

Cork Chamber has included commentary in section 7 of this submission. The bioeconomy holds vast potential for Ireland and should be actively supported.

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Finally, Cork Chamber reiterates the call for the establishment of an overarching Just Transition Commission for Business to incorporate a Commissioner overseeing the development of a thriving circular economy.

We emphasise the value of public consultations and welcome future opportunities to engage on this and associated topics. We highlight the opportunity to engage with private sector business representation and believe there are practical benefits in this approach. We believe that this is instrumental to facilitate fully representative discussions of future pathways and actions that are informed via ground up engagement.

Yours Sincerely,

**Michelle O'Sullivan**
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**Cork Chamber**