

**CALL FOR EVIDENCE ON THE CIRCULAR ECONOMY STRATEGY FRAMEWORK  
RESPONSE**  
7 July 2021

**Introduction**

Sustainable NI is a charity that works with Northern Ireland's public sector to inspire, influence and inform action on sustainability and climate change. Through our network, we support and empower public sector collaboration to accelerate action on climate change and deliver a sustainable future for all.

We believe that a circular economy is a tool for reducing society's resource use and the resulting environmental impact, thus helping to create a more sustainable future. Any future CE strategy must focus on enabling:

1. A circular economy through sustainable production and product design.
2. A circular economy through sustainable ways of consuming and using materials, products and services.
3. A circular economy through toxin-free and circular ecocycles.
4. A circular economy as a driving force for the business sector and other actors through measures to promote innovation and circular business models.

Specific measures that we would like to see within a NI Circular Economy Strategy Framework, include:

- steering towards a situation in which products are designed to have a long lifespan;
- promoting greater use of toxin-free recycled materials in new products;
- strengthening the innovation and business climate so that more circular companies can grow;
- promoting the development of Northern Ireland's bioeconomy so that bio-based, renewable and sustainably produced raw materials can replace fossil-based raw materials in products and production processes provided they do not create adverse environmental or social impacts;
- improving consumer information to make it easier for individual consumers to make sustainable and circular choices in their everyday lives;
- making it simple and profitable for business operators and private individuals to share, repair and re-use products;
- contributing to resource efficiency, recycling and circular business models through public procurement;
- designing policy instruments that contribute to greater supply of and demand for circular products and services, and re-used and recycled materials;
- setting the requirement that both recycled and new materials are toxin-free; and
- promoting research, innovation and technological development in the areas of recycling, digitalisation and traceability.

We believe that virgin materials must be replaced as far as possible by resources used efficiently in circular flows. Consideration must be given to the need for virgin materials to enable the climate transition and recycling. The strategy must describe what materials will be prioritised in national action on the circular economy. All of these must be better used and taken care of than is the case today: plastic, textiles, renewable and biobased raw materials, foodstuffs, materials in the construction and property sector, and metals and minerals critical to innovation.

We are fully supportive of the EU Circular Economy Action Plan in this regard and support close alignment with it here in Northern Ireland.

## Response

**1. Can you provide any good examples of planned or delivered circular activities, innovations or solutions from Northern Ireland or elsewhere? If so, please provide details of where, when, the impact and any lessons learned?**

### Construction

- See case studies: [https://www.bitc.org.uk/wp-content/uploads/2020/09/BITC\\_Casestudiesdoc\\_AdvancingCircularConstruction\\_September2020.pdf](https://www.bitc.org.uk/wp-content/uploads/2020/09/BITC_Casestudiesdoc_AdvancingCircularConstruction_September2020.pdf)

### Tourism

- The Crowne Plaza in Copenhagen has a room heating system connected to the booking software. If a room is not booked, the heating is set at its minimum. This same hotel collects food waste in its basement and uses it to produce bio-gas.
- Philips Lighting has shifted from selling light bulbs to offering lighting-as-a-service. In so doing, customers, including companies active in the tourism sector, save money by paying only for the light they use.
- Another example is DSM-Niaga which now produces 100%-recyclable carpets that use 95% less energy and no water. A hotel that only uses these kinds of carpets is contributing to the circular economy.
- Many examples on how the tourism industry can adopt the circular economy concepts can be found in a handbook published by the Centre for Regional and Tourism Research, Denmark (Manniche et al. 2017)

### Bioeconomy

- Granville Eco Park use CNG powered trucks on site using 'biomethane' - a gas they produce through their Anaerobic Digestion (AD) process, utilising only food waste as a resource. Dubbed 'Smart Loop Lorries', the vehicles help create a full circle system.

### Food

- FareShare NI take unsold food from retailers and suppliers and redistribute it to vulnerable families across NI. Last year the charity supported c. 30k people in NI whilst redistributing 798 tonnes of food (see: <https://fareshare.org.uk/fareshare-centres/northern-ireland/>)
- Community initiatives such as Community Fridges. Cloughmills Community Action Team (CCAT) vision is to reconnect people with each other, their community and the natural world by developing a sustainable, fair and healthy food system. Part of the programme includes 'Share the Surplus' – to encourage and connect people with the surplus produce to share. Through this project in Cloughmills 3.6 tonnes of food was prevented from ending up as waste last year. CCAT also provides support and advice to other communities in NI setting up their own community fridges. (see: <http://www.cloughmills.org.uk/community-food-initiative>)

### Textiles

- Charity Shops including British Heart Foundation NI and East Belfast Mission each year divert over 500 tonnes from landfill, providing an opportunity for people to re-purpose belongings they no longer require whilst saving local authorities thousands of pounds in waste disposal costs.
- Extended Producer Responsibility (EPR) systems in France (e.g. Refashion, EcoMobilier) and elsewhere fund the full cost of collection, reuse/recycling and communications for certain items through an upfront charge at point of sale. This removes a lot of costs from councils or re-use organisations and creates economies of scale to drive new business opportunities in recycling and increase circularity.

## Electricals

- Creation of reuse/repair hubs in towns across NI - sustainability centre in the heart of community with space to provide a home for a repair cafe, tool library, a place for the community to share and swap resources, and a visible town centre venue to use to deliver more projects in future (see: <https://www.countytimes.co.uk/news/19290322.new-use-found-former-llandrindod-wells-burger-bar/>)
- Repair Cafe Belfast - using experienced volunteers to undertake repairs of small electrical items. During the pandemic they undertook online mending events. (see: <https://repaircafebelfast.wordpress.com/>)
- Belfast Tool Library (BTL) - Promote DIY, making and repair skills through the sharing of tools
- 4rs - repair and refurbishment of small electrical items. During pandemic refurbished over 200 laptops, supporting digitally excluded young people in the region (see: <https://www.facebook.com/4rsnew2you/>)

## Packaging

- Zero Waste North West supported setting up a Useless shop in Derry City Centre indoor market (online since Covid Restrictions). Products sold are free from packaging. <https://zerowastenw.org/use-less-shop/>
- Refill NI - reduction in single use plastic bottles by promoting publicly available water and working with businesses and local authorities across NI to identify and create opportunities for the public to refill. Online tap map which public can access to learn where nearby to refill water bottles <https://refillni.org.uk/>

## Key learnings

- Commitment and time devoted by voluntary, community groups and social enterprises to establish and run. A challenge for these organisations is ensuring their time and resources are used to best effect. Need to ensure funding and support easily accessible and multi year funding available.
- Availability of a skilled workforce being able to undertake repair work
- Having spares easily and cheaply available
- Learning from Belfast Tool Library - certain DIY branded electrical power tools/equipment are not built for repeated use - planned obsolescence by manufacturers
- Importance of working in collaboration and cooperation. Willingness to share learnings and best practices by local authorities, social enterprises, community and voluntary organisations, across NI and as a Shared Island approach has provided support for further reuse and repair activities to start and grow. Recent example of 4rs collecting bikes on behalf of Zero Waste North West (ZWNW), who then repaired them. East Belfast Mission through their many years of experience repairing bikes supported ZWNW by providing a repair checklist and details of where to get competitively priced spare parts.
- Legislation and cost prohibiting reuse and repair activity - During lockdown other councils were keen to follow the example of 4Rs on refurbishment of laptops but due to items being designated as waste once in recycling centre and prohibitive cost of waste transfer licence, unable to pursue. Designation of waste needs to be reviewed.
- The 'Circular Economy strategic framework' from the Department for the Economy must work in tandem with policy initiatives within DAERA (both on DRS and Green Growth Strategy) to ensure wider policy objectives are achieved in a coordinated fashion.

## **2. What are the current barriers to circularity or increased circularity in Northern Ireland?**

- Lack of awareness, education and promotion of CE and the benefits of CE across all sectors of NI (governmental, businesses and public). Also a lack of understanding of the waste hierarchy within CE and correct definition of terms e.g. preparation for reuse is a separate activity from recycling and needs to be promoted as such.
- Having a full understanding of the resources flow within Northern Ireland. Only in mapping all activity can it be identified current circularity (and in what areas - reuse, recycling, prevention), where are the opportunities, identify the barriers and solutions worked upon and implemented.
- Policies and incentives supporting linear economy e.g. VAT on retrofit of existing house and 0 VAT on new build
- Waste transfers licences prohibiting items being repaired and reused once designated as waste, unless organisation has waste transfer licence which can be prohibitively expensive
- Skills gaps to meet the demands of increased circularity.
- UK is the 4th largest textile waste producer in Europe in 2020. Need to move consumers away from the messaging of Fast Fashion
- Textiles which are donated can be of low quality and too low value to put on sale and need to be disposed of. This can be a cost to organisation collecting and sorting and can disincentivise greater collection.
- Lack of infrastructure to support separate collection of products, sorting and redistribution for repair and repurposing.

## **3. What are the key opportunities to increase or encourage circularity?**

- A coordinated approach taken to messaging/awareness of CE to national targeted behavioural change campaigns with consistent messaging used by all stakeholders. Highlight the interconnectivity of CE, Climate change, biodiversity loss, plastic pollution - so understanding in delivering increased CE in NI, multiple economic and environmental benefits achieved. This messaging needs to communicate the difference between recycling and preparation for reuse and that preparation for reuse delivers greater economic and environmental benefits. New policy initiatives such as Deposit Return Scheme, and Green Growth Strategy along with review of other policies including Carrier Bag Levy provide opportunity to promote and reinforce benefits of CE for NI.
- Funding to support existing and new projects including reuse and repair hubs. These hubs support development of infrastructure to provide central locations where items are left, sorted, repaired/repurposed and then resold.
- <https://www.southwalesargus.co.uk/news/19311698.library-things-maker-shed-coming-caldicot-hub/>
- Understanding the skills required to develop a Circularity Economy including those required for repair, repurposing, recycling, redesign and remanufacture and then mapping the skills gap within NI. Training programmes developed in collaboration with FEs, universities to meet this need.
- Measures and campaigns under this CESF are coordinated and aligned with new plans, strategies and policies being developed at national, UK and also account taken of activity in Ireland as part of Shared Island approach.
- The value of existing prevention activities providing a diversity of business models, particularly those delivered by social enterprise, be recognised and supported. Funding to include information and mentoring support for CE social enterprises and community organisations.
- A mandatory food waste prevention target of 50% by 2030 along with an interim target to drive progress

**4. What interventions (e.g. programmes or policies) should be explored to overcome barriers and maximise opportunities? Please identify no more than three and provide a rationale for each.**

- Green Public Procurement - NI's public procurement budget is 3 billion annually. Directing spend towards products, services and training can help kick start, promote and provide growth opportunities for the CE. Need to put representative of CE on the public procurement board so CE can be built into the procurement strategy
- Funding continues to expand and grow to this sector and also connecting to funding streams for climate action. Wales has invested heavily and provided substantial funding to this sector and has recycling rates of over 65% and ambition to be zero waste by 2050  
<https://gov.wales/wales-takes-action-circular-economy-funding-upcoming-reforms-plastic-and-moratorium-large-scale>
- The top three tiers of the hierarchy are acknowledged and prioritised in line with the waste hierarchy in the CESF overall vision. Targets to support prevention and preparation for reuse activities are the priority in delivering a more circular economy, Rational is it will drive activity to these areas which offer greater environmental and job opportunities than other CE activities. General Scheme for Circular Economy Bill 2021 being introduced in Ireland will provide the statutory framework for the Department's Circular Economy Strategy, the EPA's CE Programme and various other measures including a requirement that targets are introduced for the use of reused and repaired products and materials (see: <https://www.gov.ie/en/publication/89838-circular-economy-bill-2021/>)

**5. What realistic, but ambitious targets do you think we can set to increase circularity within this focus area for the next 5, 10, 15 years?**

- Targets need to reflect the scale of the problem and the scale of the opportunity. Need to understand NI baseline across all CE types of activity before 5, 10 and 15-year measures can be put in place.
- Wales has set a target of being a zero-waste nation from 2050 and Northern Ireland should have a similar ambition with circularity a key driver in delivering.
- Certain activities within the CE provide greater benefit and emphasis needs to be put on prevention and preparation for reuse and given specific and weighted targets.
- One target which could be implemented is local councils to develop partnerships with reuse organisations in their area that can support repurposing of textiles, electricals and other other items which are in a high-quality condition, and which have been left either at recycling centres or collected. This would result in less unnecessary products going to landfill, reduction in costs for local government and generate revenue for organisations collecting and reselling. Recycling centres targets could be set at 5 years 10%, 10 years 20% and 15 years 30% for preparation for reuse.

**6. Any other comments?**

- Create a Ministerial Position with responsibility for Circular Economy (as per Republic of Ireland - Ossian Smyth Minister of State with Special Responsibility for Communications and Circular Economy) -
  - Within NI government and across department it will provide visibility and focus on this area with specific targets set, measurement and annual reporting apportioned
  - Externally (within NI) - opportunity to build awareness, educate public and develop the understanding of the importance of the circular economy for NI and opportunities it will create
  - Externally (internationally) - Awareness of NI's commitment to this area and opportunity for minister and department to engage with other global actors engaging in CE to share learnings and best practices.
- Campaign to tackle the narrative of convenience. In one report people now value convenience so highly that 60% of people surveyed across 23 markets say they would actually pay more for convenience. Businesses use this marketing message which promotes instant gratification of convenience but fails to acknowledge activity, resources and cost used to create that

convenience product and then the inconvenience and cost in disposing of waste which this item will generate.

- The call for evidence for the CESF asks for feedback for material flows. Looking at materials is more indicative of recycling than prevention or preparation for reuse activities which focuses on products. Important to ensure attention and support is given to the top tiers of the waste hierarchy as they provide greater environmental benefit than recycling and also create more local jobs (GAIA's Zero Waste and Economic Recovery report highlights that reuse creates 200 times as many jobs than those in landfill and incineration activities, whilst recycling only produces 70 times)