REDISCOVERY CENTRE

POSITION PAPER

Public Consultation on the EU Circular Economy Act

1.0 Introduction

The Rediscovery Centre is the National Centre for the Circular Economy in Ireland. For the past 21 years the Centre has been leading Ireland's transition to a circular economy and a low-carbon, sustainable future. Based in Europe's first circular economy demonstration centre in Ballymun, Dublin, the Centre acts as an innovation hub, delivering education, conducting research and enabling policy and collaboration to support engagement with the Irish public.

This response is informed by our expertise as prevention, reuse and repair practitioners, through our four social enterprises which focus respectively on textiles, furniture, paint and bicycles, building capacity and skills in circular methods. Since 2015, the Rediscovery Centre has reused 1,000kg of textiles, 21,600 kg of furniture, 22,000kg of bikes and 81,000kg of paint. This has led to an estimated saving of 315,000kg carbon emissions.

Our response is also informed by our policy and research work at European and national level, and by our education and communications programmes which we lead as the National Centre for the Circular Economy. These include our Circular Economy Academy, which has provided one-to-one mentoring for 20 social enterprises. Our Education Team has reached 215,000 students through more than 4,000 workshops between 2012-2025 with circular economy focused workshops. Our Research Team has led key national and EU-funded projects such as the EPA-funded A Critical Analysis of Ireland's Circular Material Use Rate (CAIR), Qualifying and Quantifying the Reuse Sector in Ireland (Q2Reuse), and the LIFE+ funded Working with Industrial Spaces to Exemplify Reuse (WISER LIFE).

At a policy level, our staff hold active roles on nationally important policy advisory bodies including the *Textiles Advisory Group, Waste Advisory Group, National Reuse and Repair Network,* and we continually engage as stakeholders and advisers to national government committees and as coordination group members to the *European Circular Economy Stakeholder Platform.* At the community level, RDC collaborates with social enterprises and NGOs through networks such as *Community Resources Network*

Ireland (CRNI), the *Irish Environmental Network*, and as members of *RREUSE* - Europe's largest circular social enterprise network.

More recently, the Rediscovery Centre has led the establishment of Ireland's **Circular.ie communications platform**, which aims to better analyse, understand, and stimulate circular behaviour through targeted market research, and supporting effective public engagement via clear communications.

2.0 Summary

The Rediscovery Centre welcomes this opportunity to contribute feedback on the EU Circular Economy Act, which will provide an important guide and driver in accelerating the EU's progress towards a Circular Economy. It builds on our experience informing and working with Ireland's Circular Economy Act, introduced in 2022 and one of the first such Acts to be introduced among EU Member States. This legislation now provides a statutory basis for our circularity targets - especially for reuse - as well as enabling the introduction of a national Circular Economy Fund.

We are encouraged to see within the Call for Evidence a **frank acknowledgement that European Union progress towards a circular economy has been too slow** over the last decade, and that accelerating this progress is the main challenge that the Act seeks to address. We welcome the stated intention to focus on **harmonisation of interpretations and implementation of existing legislation** across member states.

We further welcome the intention to **address e-waste** and **increase the proportion of secondary raw materials** utilised across the EU. However, we submit that the Call for Evidence **places excessive focus on measures to enhance collection and recycling**, without acknowledging that the core issue hampering the EU's move towards a circular economy is the excessive consumption rates of our citizens and governments. We strongly recommend an increased focus within the Act on **measures to reduce consumption rates** throughout the EU. **Prevention, repair and reuse** should be **emphasised over recycling** throughout the proposed Act. Improving the EU's circularity rates and reducing our impact on the environment through tackling consumption rates and increasing reuse will have the added benefit of **reducing the EU's reliance on imports**, **enhancing material security** across the Union.

The Rediscovery Centre welcomes the proposed focus on improving the design and application of Extended Producer Responsibility (EPR) schemes, and efforts to stop

items coming to market that are difficult to reuse or recycle. However, we further recommend **more inclusive governance of EPR schemes** that includes not only producers, but also the non-profit sector and other key stakeholders who are involved in the design and implementation process. In line with our above recommendations, EPR schemes should also **prioritise funding for steps higher on the waste hierarchy - i.e. prevention, reuse and repair** - over recycling. And in line with the harmonising intent expressed in the Call for Evidence, we would welcome a **harmonisation of EPR pricing and standards** across member states, as outlined in Section 4.3.

We strongly recommend the introduction of **more effective circularity metrics and targets, including separate targets for consumption reduction, repair, reuse and preparation for reuse, particularly in relation to EEE / WEEE**. These targets should prioritise actions higher in the waste hierarchy, as contained in the Waste Framework Directive.[1] Targets should also be supported by **appropriate data collection requirements** for member states which go beyond measuring consumption and waste management. We note that Implementing Decision (EU) 2021/19, which introduced the obligation on all EU Member States to report quantities of material reused, is now a requirement for all states every 3 years. These data have not yet been integrated with existing Material Flow Accounts data from Eurostat.

We recommend that reuse data collected under Commission Implementing Decision (EU) 2021/19 be integrated into the Eurostat database as a matter of priority. Feedback from the associated quality-check reports should be systematically used to enhance the consistency and comparability of data across Member States. In parallel, steps should be taken to incorporate reuse indicators into the EU Circular Economy Monitoring Framework, ensuring coherence across waste and circular economy **reporting** systems.[2]

Finally, in order to support the measures proposed above, we recommend the provision of **dedicated and sufficient financial mechanisms and funding streams** to ensure the viability of prevention, repair and reuse initiatives across the EU. This includes the maintenance and expansion of current initiatives that have helped to support circular economy measures, such as the LIFE Programme, Interreg Programmes, and Horizon Research programmes. The existing taxation and subsidy regime should be reviewed at an EU level in order to identify and phase down aid to activities that work contrary to

[1] 02008L0098-20180705 - EN - EUR-Lex
[2] Reuse Reporting obligations for EU Member States.

climate change mitigation and the circular economy transition.[3] The transition to a circular economy can only be successful if it is supported with proportionate investment and resources.

Throughout the following sections below, we outline our various recommendations in detail, structured under the headings which have been provided in the Commission's *EU Circular Economy Act Questionnaire*.

3.0 General Questions on the Circular Economy

3.1 Shift the entire focus of the Act to align with the waste hierarchy – emphasise prevention, repair, reuse, and remanufacturing ***above*** recycling and waste management

The Rediscovery Centre welcomes the focus outlined in the Call for Evidence on increasing uptake in the use of secondary raw materials (SRMs) throughout the EU. However, we submit that the Call places excessive focus on measures to enhance collection and recycling of waste, while failing to acknowledge that the core issue hampering the EU's move towards a circular economy is the **excessive consumption rates** of our industries, citizens, and governments.

As such, our primary recommendation is that targets be established for **prevention, repair and reuse in addition to recycling** throughout the proposed Act in line with the waste hierarchy. Such a focus will improve the EU's circularity rate and reduce our collective impact on the environment. Reduced consumption and increased reuse brings the added benefit of **reducing the EU's reliance on imports**, **enhancing material security** across the Union.

An important step in this process is for the EU Commission to complete the actions required in the Waste Framework Directive Article 9(9) - "*examine data on re-use provided by Member States in accordance with Article 37(3) with a view to considering the feasibility of measures to encourage the re-use of products, including the setting of quantitative targets. The Commission shall also examine the feasibility of setting other waste prevention measures, including waste reduction targets.*" We are not aware of any public outputs from this process to date, but these would represent an important knowledge base for establishing reuse targets.

[3] This has now been adopted as an objective in Ireland's draft *Whole of Government Strategy for a Circular Economy 2026-2028*.

There is a strong case for introducing new targets that prioritise prevention (including reuse and repair) and preparation for reuse. This is outlined in a joint paper by European based NGOs entitled *Waste Framework Directive review: Why we need waste prevention targets now,*[4] which argues for quantitative waste reduction targets. Targets are an essential step in addressing market failure, which arise due to a failure to recognise externalities. They are instrumental in driving the repair and reuse sector's expansion.[5] The renewable transition was realised thanks to strong targets, underpinned by operational subsidies, and has been so successful that renewable energy has become mainstream. The same logic should be applied to prevention, repair and reuse.

RECOMMENDATION #1:

In order to align with the waste hierarchy and foster a truly Circular Economy, we strongly recommend **a shift in focus throughout the proposed Act**, from emphasis on measures to enhance recycling and waste management, **to a prioritisation of measures to accelerate prevention, repair and reuse activity.**

This includes requiring that EU member states establish statutory targets for consumption reduction, reuse, and repair within a defined timeline.

3.2 Specific barriers to the uptake of secondary raw materials

The Call for Evidence notes that:

> *"The supply and demand of secondary raw materials is insufficient or imbalanced, both in terms of quantity and quality. This low uptake… has both regulatory and economic causes: the price of the secondary raw materials is often higher while their quality is often lower. As a result, they cannot compete with the primary raw materials without targeted economic incentives, a conducive legislative framework, and strong verification and compliance mechanisms. Additionally, the single market for secondary raw materials and waste is fragmented, which puts burden on economic operators and prevents circularity and economies of scale from unfolding."*

[4] ECOS, EEB, RREUSE, Zero Waste Europe, Recycling Netwerk, *Waste Framework Directive review Why we need waste prevention targets now*, 2022, available here

[5] CIWM report, Reuse in the UK and Ireland - a "State of the Nations" report for the CIWM, 2016, available here

A 2023 report[6] by the European Environment Agency identifies **specific barriers to the proper functioning of secondary raw material (SRM) markets**, that resonate strongly with our experiences of seeking to promote and support a circular economy in Ireland. The main barriers identified are four-fold:

1. **A lack of trust in a dependable and homogeneous material stream**
   In Ireland, policy and industry discussions in relation to the use of SRMs from the construction and demolition sector have often focused on the perceptions and risks associated with the quality of SRMs from this sector. Quality Assurance is particularly necessary in the Irish context where there have been a number of high profile failings in the quality of primary materials used in domestic construction – see for example the Pyrite and Mica block defect scandals.[7] Similarly, based on our ongoing research *Barriers and Enablers to a Circular Economy Transition in Ireland* funded by Ireland's Environmental Protection Agency (EPA), we have observed significant barriers in the tyre remanufacturing market, largely due to perceptions that remanufactured products are inferior – in spite of regulations and quality assurance processes in place that ensure they meet the same safety standards as new tyres.[8] As such, significant work is needed to ensure quality assurance processes are in place and enforced, but also - where relevant - to effectively communicate to the public and businesses in relation to the high standards that such products meet as part of these processes.

2. **Reluctance to invest in potentially expensive technologies that could better integrate SRMs into various production processes**
   Such barriers should be identified and examined to understand potential financial mechanisms to support expansion of circular technologies, as this need will vary by sector.

3. **A lack of credible, in-depth and relevant information on SRM markets made available to market shareholders.**
   Implementation of the Digital Product Passport element of the *Ecodesign for Sustainable Products Regulation* should help to address this barrier as its primary goal. As observed in our work on retreaded tyres, absence of information about the first-use life of a given tyre has been claimed to be a

[6] European Environment Agency (2022). *Investigating Europe's secondary raw material markets*, European Environment Agency (EEA) Report 12/2022
[7] Detail on Irish Government remediation schemes for houses affected by pyrite or mica is available here.
[8] https://unece.org/DAM/trans/doc/2007/wp29/ECE-TRANS-WP29-2007-07e.pdf

barrier to use, and damaging to perceptions of the remanufactured product in this case.

4. **Competition with cheap virgin materials**
   From ongoing research we are carrying out in relation to tyre retreading and plastics recycling, it is evident that the import of cheaper virgin materials[9] and/or products[10] poses significant competition to the market for SRMs and secondary products. Stakeholders consulted across both the tyre and plastics value chains as part of our research on *Barriers and Enablers to a Circular Economy Transition in Ireland* indicated that remanufactured tyres and recycled plastics face strong price competition from cheaper virgin materials imported from third countries. An examination should be carried out into the policy options that might fully reflect the environmental impact of new products and/or reward the material savings of secondary raw materials.

RECOMMENDATION #2:

In order to increase the supply and demand of secondary raw materials (SRMs), we **recommend the introduction of measures within the Act to**:

a) Support **development of robust quality assurance and standards,** which will in turn foster confidence in SRMs. These efforts should be accompanied by support for targeted communications to assure the public and businesses on the quality of SRMs;

b) Improve **understanding of the financial barriers** to investing in technologies associated with b**ringing priority secondary raw materials back** into circulation;

c) Fully **develop and implement digital product passport**s to make secondary material and product information readily available to brokers and end-users;

d) Examine **policy options that might fully reflect the environmental impact** of new products and/or reward the material savings of secondary raw materials.

[9] https://www.petcore-europe.org/images/2024/Argus_Recycled_Polymers_2024-12-20.pdf
[10] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202500058

3.3 Economic incentives to boost the EU circular economy

Consumer surveys in Ireland (most recently the 2025 EY Future Consumer Index[11]) consistently show price as one of the most important factors influencing purchasing decisions. At the same time, the Waste Framework Directive (WFD) requires Member States to prioritise waste prevention, reuse, and repair over recycling, energy recovery, and disposal. It also highlights the need to phase out subsidies inconsistent with the waste hierarchy.

As a first step, Member States should be required to identify and review existing subsidies and financial supports that favour lower hierarchy activities (e.g. recycling or disposal) — including those embedded within Extended Producer Responsibility (EPR) schemes. These subsidies should then be reformulated to incentivise prevention, reuse, and repair instead.

A range of fiscal instruments can support higher-order circular activities, including:

- Modulated EPR fees based on circularity performance, such as durability, repairability, and recyclability;
- VAT reliefs and repair bonuses for repair services;
- Tax benefits for donations (e.g. Gift Aid);
- Additional taxes and on less-durable/disposable items and subsidies for reusable alternatives;
- Reduced commercial rates for reuse and repair enterprises.
- Additional import levies on non-recyclable or non-compostable materials;
- Others presented in Annex IVa of the Waste Framework Directive[12]

Ireland's Circular Economy and Miscellaneous Provisions Act[13] provides a model for delivering supports to circular economy actions through its Circular Economy Fund. This fund supports:

- Grant schemes for communities, social enterprises, and businesses;
- The EPA's Circular Economy Programme, which promotes systemic transformation;
- Promotion and research of best practice in surplus food donation and redistribution;
- A fund to support environmental advocacy groups.

[11] EY (2025) *'Irish Consumers: Price Sensitivity and Trust in Retail. What Matters Now — Price, Trust and the Rise of the Selective Irish Consumer.*' EY Future Consumer Index, May 2025. Available here [Accessed 8 October 2025].
[12] Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste
[13] Number 26 of 2022 Circular Economy and Miscellaneous Provisions Act 2022, available here.

The design and delivery of financial instruments is critical to their effectiveness.[14] Mechanisms should be tailored to the needs of circular businesses, for example through low-interest loans for enterprises in financial distress.

Increasing reuse and repair activities not only keeps materials in circulation and reduces carbon emissions, it also creates up to 200 times as many jobs as disposal or incineration given equal quantities of material.[15]

We welcome the proposal to improve the design and implementation of EPR schemes, particularly efforts to prevent products from entering the market that are difficult to reuse or recycle. However, consistent with our core recommendation in Section 3.1, EPR funding should prioritise prevention, reuse, and repair over recycling.

In addition, in line with the harmonising intent of the Commission's Call for Evidence, we support a harmonisation of EPR pricing structures and performance standards across Member States (see Section 4.3).

Finally, **EPR schemes should be designed to actively incentivise circular products and penalise environmentally harmful products**. Specific mechanisms that disincentivise environmentally harmful products, such as "Ecomodulation", should be used to maximum effect - whereby a high Environmental Management Cost (EMC) is levied on products that are more expensive to manage when they reach End-of-Life. Similarly EMC funds can be diverted to businesses dealing with the relevant material in a manner aligned with the waste hierarchy.

RECOMMENDATION #3:

In terms of economic incentives to boost the circular economy, we recommend the CE Act support the following:

a) Identification and **reform of subsidies** (including within EPR schemes) **that currently prioritise lower waste hierarchy activities,** and redirect support toward prevention, reuse, and repair.
b) Targeted **fiscal incentives that prioritise prevention, reuse and repair**;

[14] Organisation for Economic Co-operation and Development (OECD). (2021). *Measuring distortions in international markets: Below-market finance* (OECD Trade Policy Papers No. 253). OECD Publishing.
[15] GAIA (2021) *'Zero Waste and Economic Recovery: The Job Creation Potential of Zero Waste Solutions.'* Global Alliance for Incinerator Alternatives. Available at: https://www.no-burn.org/zerowastejobs/ [Accessed 8 October 2025]

c) **Additional grants for circular economy research**, the establishment and scaling up of circular initiatives, and promotion of best practice;
d) Prioritising through EPR schemes **prevention, reuse, and repair**;
e) Design of EPR schemes **in such a way as to incentivise circular product design**, for example via ecomodulation of fees.

3.4 Measures to raise awareness and encourage a change of mindset among the broader public and economic operators towards a more circular economy

Research in the Irish context has shown that awareness of the term 'circular economy' is rising year on year, from 25% of Irish people in 2021 to 55% in 2024.[16] The Rediscovery Centre, supported by the Irish government has recently initiated the establishment of Ireland's **Circular.ie communications platform**, which aims to improve understanding and awareness of the circular economy in Ireland, and facilitate engagement with local circular initiatives. As outlined in Ireland's draft Whole of Government Strategy for a Circular Economy 2026-2028[17] (under consultation) this platform includes four connected pieces of work and demonstrates a comprehensive strategy for circular economy communications:

1. **The development of a National Gateway Platform[18] (now live)** – a low carbon digital platform with associated branding, PR, social media and other assets that build capability for service users.
2. **Campaigns** developed in collaboration with stakeholders and underpinned by evidence-based research, behaviour change frameworks and service design principles.
3. **Cultivating Communities of Practice** to develop the capacity of community partners to communicate and engage citizens at a small and large scale.
4. **Research & Insights** to inform all work and to ensure activities are evidence based. Our core research programme aims to capture and deepen

[16] Boland, A., McCarthy, J., Downey, C., and Miller, S. (2024) *Understanding sociodemographic differences among the Irish audience in relation to circular economy behaviours and attitudes: A synthesis report.* Circular.ie. Published as part of the Rediscovery Centre's *Circular Economy Communication Insights Series*, funded by the Department of Climate, Energy and the Environment
[17] Draft *Whole of Government Circular Economy Strategy 2026-2028*, available here
[18] https://circular.ie/

understanding of the Irish public's evolving understanding, perceptions, motivations and barriers to action relating to circular living.

Other such initiatives should be encouraged across the EU at a national or sub-national level.

While increased awareness and knowledge of the circular economy helps to drive behavioural change,[19] **it is important to note that continued research is needed to understand how different types of awareness and knowledge translates into behaviour change, and how this process might vary in different demographic groups or contexts.**

Moreover, **people are unable to change certain behaviours for which structural changes are required in order to make the circular choice accessible and affordable**. Encouraging the public towards behaviours which remain unattainable due to systemic barriers may result in disengagement with the circular economy. As such, ongoing work is needed in order to identify structural barriers to circularity in people's everyday lives and the enablers that might overcome such barriers. A good example is the list of 47 actions compiled by Ireland's Joint Oireachtas Committee that may address specific structural barriers to the circular economy.[20]

RECOMMENDATION #4:

1. Encourage EU **Member States to establish national programmes for increasing awareness and behaviour change** in line with circular economy;
2. The implementation of such **initiatives should be underpinned by evidence and monitored** in order to continue building knowledge of how awareness and knowledge translate into behaviour change;
3. Identify **structural barriers to behaviour change** and work toward non-awareness/behavioural focused interventions in relation to these.

[19] Liu, P., Teng, M., and Han, C. (2020) *How does environmental knowledge translate into pro-environmental behaviors?: The mediating role of environmental attitudes and behavioral intentions,* Science of The Total Environment Vol. 728. https://doi.org/10.1016/j.scitotenv.2020.138126

[20] Joint Committee on the Environment & Climate Action (2024), *Report on the Circular Economy*, Houses of the Oireachtas, available here

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4.0 Waste Electrical & Electronic Equipment (WEEE)

4.1 On the need for 'preparation for reuse' targets alongside recycling/collection targets

As noted in the Call for Evidence, Waste Electrical and Electronic Equipment (WEEE) is the fastest growing waste stream in the EU. In the case of Ireland, a number of barriers and potential enablers to implementing effective action to address this waste stream have been identified. In the context of WEEE in particular, **diverting products from disposal or even recycling** toward other pathways such as **repair, reuse, or preparation for reuse**[21] can conserve large amounts of energy, while also keeping the Critical Raw Materials embedded in these products in use for longer.[22]

In relation to EPR schemes in particular, research has identified the following points have been identified as **barriers to preparation for reuse of WEEE**.[23]

1. The absence of measurement and distinct targets for both a) preparation for reuse, and b) recycling of WEEE;
2. The lack of a requirement to promote reuse as a precondition in approving Producer Responsibility Organisations (PROs);
3. Reuse not being prioritised at collection sites for household WEEE;
4. PROs and governing bodies not being required to grant preparation for reuse organisations access to WEEE;
5. A lack of public awareness of the benefits of reusing WEEE;
6. Non-requirement for the reporting of all movement by mass, of used EEE and WEEE in and out of reuse and recycling centres.

RECOMMENDATION #5:

To address the barriers to preparation for reuse outlined above, we recommend the introduction of the following measures within the proposed CE Act:

1. A requirement that **separate targets for preparation for reuse for WEEE** are introduced;

[21] A waste management process - prior to the necessity for recycling.
[22] McMahon, K., et al. (2019). *Enabling preparation for re-use of waste electrical and electronic equipment in Ireland: lessons from other EU member states*. Journal of Cleaner Production 232: 1005–1017. https://doi.org/10.1016/j.jclepro.2019.05.339
[23] ibid.

2. A requirement that **PROs promote repair and reuse**, as a precondition to their approval, and as part of their continued status;[24]
3. A requirement that **reuse is prioritised at civic amenity sites** and collection points;
4. A requirement that **PROs give preparation for reuse organisations access** to WEEE;
5. Support for initiatives to **increase public awareness of the benefits of WEEE reuse**;
6. A requirement for r**eporting of all movement by mass of used EEE and WEEE in and out** of reuse and recycling centres.

4.2 Importance of encouraging greater durability and reparability of EEE

The EU's Circular Economy Action Plan and Ecodesign for Sustainable Products Regulation both identify technological planned obsolescence as a key barrier to extending product lifetimes, including through the repair and reuse of electrical/electronic equipment.[25] While current EU policy emphasises the recovery of critical raw materials (CRMs) from waste electrical and electronic equipment (WEEE) to strengthen supply security, an equally important and complementary approach is to reduce demand for CRMs by extending the lifespan of EEE through better design, repairability, and reuse.

Many of the factors that determine the longevity of electrical and electronic equipment (EEE) are decided during the design phase. Measures such as those contained in the proposed *Ecodesign for Sustainable Products Regulation (ESPR)* are therefore broadly supported by Right to Repair Europe. In addition to requiring that products be designed for disassembly and repair, further efforts are needed to ensure that producers provide independent and community repairers with access to spare parts at reasonable prices, and that repair manuals and product specifications are readily available to all third party repairers.

[24] Key provisions are laid out in the Waste Framework Directive and supplementary legislation.
[25] European Environment Agency (2024), *Product lifespans - monitoring trends in Europe*, Web report no. 16/2024, available here

RECOMMENDATION #6:

To strengthen implementation of the Ecodesign for Sustainable Products Regulation (ESPR), we recommend the introduction of measures to ensure that **producers provide third-party repairers with reasonably priced spare parts and open access to repair information**.

4.3 On harmonisation of EPR pricing

As highlighted by RREUSE,[26] EPR fee calculation processes differ significantly across Member States. We support RREUSE's recommendation that the harmonisation of EPR fee calculation would *"streamline administrative processes, increase consistency, and improve fairness across actors."* We further support RREUSE's recommendation that a standardised methodology for calculating fees should *"clearly identify cost components and data sources, while recognising the different operational realities of reuse and recycling."*

As proposed by RREUSE, a **dual-fee structure** could be introduced as follows:

- A competitive base fee set by Producer Responsibility Organisations (PROs);
- A modulated fee managed by national clearing bodies, adjusted according to product sustainability criteria.

These criteria should be *"**harmonised at the EU level**, whereas the **actual fees should account for local conditions**."*

RECOMMENDATION #7:

In order to streamline administrative processes, increase consistency, and improve fairness across actors, we support RREUSE'S recommendation that **EPR fee calculation should be harmonised across member states**, utilising a standardised methodology. As proposed by RREUSE, a **dual-fee structure should be considered** in order to properly take account of specific local conditions.

[26] RREUSE (2025). *Feedback on the Simplification of administrative burden in environmental legislation.* RREUSE response to the European Commission's call for evidence regarding the simplification of administrative burdens in environmental legislation. Available here. [Accessed 17 October 2025]

We further endorse the following Zero Waste Europe recommendations[27] on designing EPR to finance circularity:

- *Mandate EPR to finance the waste prevention, repair, and reuse stages of a product's lifecycle, with the amount necessary to achieve the relevant policy goals and targets.*
- *Introduce binding targets for waste prevention and reuse (in addition to recycling) for the relevant product streams to be achieved with the funding of EPR schemes.*
- *Define the meaning of cost-coverage for non-waste-related activities (e.g, prevention, reuse, and repair) in order to delineate the limits of producer responsibility.*
- *Review the governance of EPR schemes not only to ensure harmonisation and oversight of PRO performance but also, in particular, where they address upstream measures, to ensure that municipalities, social enterprises, reuse organisations, and recyclers have a seat at the table in scheme design and decision-making.*

RECOMMENDATION #8:

We endorse the following Zero Waste Europe recommendations on EPR:

- Mandate EPR to finance waste **prevention, repair, and reuse stages**.
- Introduce **binding targets for waste prevention and reuse** for the relevant product streams to be achieved with the funding of EPR schemes.
- Define the meaning of **cost-coverage for non-waste-related activities** in order to delineate the limits of producer responsibility.
- Review the governance of EPR schemes not only to ensure harmonisation and oversight of PRO performance but also, in particular, where they address upstream measures, to **ensure that municipalities, social enterprises, reuse organisations, and recyclers have a seat at the table** in scheme design and decision-making.

[27] Zero Waste Europe et al. (2025). *Beyond waste management: EPR to finance circularity*. Joint letter to the European Commission calling for measures to unlock the untapped potential of Extended Producer Responsibility (EPR) as a driver of prevention, reuse and repair in the EU. Available here. [Accessed 21 October 2025]

5.0 Single Market Barriers for Circularity

5.1 Importance of shifting the focus of EPR targets

The current focus of many existing EPR schemes is on paying for waste management after the product has been discarded. While this is a key measure for reducing pollution, EPRs should be designed with the primary intention of **preventing waste generation**. The targets set by governments that guide the actions of PROs are crucial in this regard. PROs should be enabled to take a lifecycle view of products, whereby:

1. They discourage single use, non-durable, difficult to repair, difficult to recycle products from entering the market with much higher eco-modulation of fees;
2. A portion of the capital raised through EMC costs is diverted into consumption reduction efforts, such as in the case of the development of packaging free supply chains, the development of reusable packaging, and the reduction of packaging needs;
3. Reuse and preparation for reuse targets should be enacted that are separate from collection or recycling targets. The latter should be structured as a percentage of waste collected should be prepared for reuse. And audit should be carried out for specific product categories to establish what a realistic percentage target preparation for reuse should be.
4. A final change to EPR targets should be to move from tonnage-based targets to impact-based targets such as CO_2 savings, job creation, and extended product lifespans. These would more accurately reflect the environmental and social benefits of reuse.[28]

RECOMMENDATION #9:

In order to better align with the waste hierarchy, we recommend that EPR targets should focus not on quantities material collected for recycling, but rather on **overall waste reduction** (e.g. impact-based targets such as CO_2 savings, job creation, and extended product lifespans). Such a shift in focus would incentivise interventions higher in the waste hierarchy, such as **waste prevention, reuse, and repair**.

[28] RREUSE (2025) *RREUSE'S call for a right to reuse in the WEEE Directive*. Position Paper, August 2025. RREUSE, Brussels. Available here. [Accessed 8 October 2025]

As recommended by RREUSE et al.,[29] as a general point EPR schemes should **prioritise reuse and repair before recycling**, ensuring full cost coverage for these activities, and including financial support for social economy actors.

6.0 Demand & Supply of Secondary Raw Materials

6.1 On the integration of 'circularity' in public procurement criteria

According to the European Court of Auditors,[30] public procurement of goods and services amounted to c.€2 trillion, or 14% of the EU's GDP, as of 2023. However, the **effective integration of circular principles** in national public procurement strategies requires further research and EU-level guidance.

Circular Public Procurement (CPP) is a **key measure to de-risk circular business models**. The knowledge that demand will remain high for several years enables circular businesses to invest in equipment or upgrades to their facilities which will in turn improve the quality and viability of their product offerings.

In our view, the proposed Act should include measures to **encourage the necessary shift in the focus of public procurement** - away from Value For Money, to prioritise the transition to a greener, more innovative and circular economy. This means ensuring that Circular Procurement is the default approach to public procurement.

In Ireland and throughout much of the EU, the circular economy is still an emerging field of activity. As such, the majority of enterprises supplying circular goods and services tend to operate at a small to medium scale, and many goods and services are delivered by social enterprises or charitable organisations. As such, we recommend that Circular Procurement be **particularly prioritised at sub-threshold level (<€50k)**, where there are significant opportunities for SMEs and social enterprises to contribute to the circular economy and advance social considerations.

Supporting Circular Public Procurement as a default for sub-threshold procurement would grow the market for circular goods and services, reduce risk to contracting authorities by providing opportunities to pilot innovation on smaller projects, and

[29] RREUSE et al. (2025). *The EU Circular Economy Act: A Key Opportunity for Sustainable Resource Use, Long-Term Competitiveness, and Strategic Resilience*. RREUSE et al, Letter to the European Commission, 1st August 2025. Available here.

[30] European Court of Auditors (2023) *Public procurement in the EU: Less competition for contracts awarded for works, goods and services in the 10 years up to 2021*, ECA Special Report 28/2023, p.6. Available here.

generate interest and highlight the wide range of opportunities for CPP at this scale across organisations.

We further recommend the introduction of targets, with timelines, for the **public procurement of used goods**. **Quality marks** such as Ireland's reuse accreditation scheme 'ReMark', should also be supported to drive confidence in and uptake of used goods by contracting authorities.

In order to track progress toward Circular Public Procurement ambitions, we would welcome continued and expanded capture and reporting of data via **CPP monitoring and reporting**, expanding where possible to include <€50k tenders and social impact. However, it is of crucial importance that further requirements on those tendering - particularly social economy actors and SMEs - do not create further barriers to entry for procurement processes.

In terms of policy initiatives, Ireland's Office of Government Procurement (OGP) **framework for the procurement of refurbished laptops** provides a best practice case study in circular procurement.[31]

In general, a focus on market engagement and **building relationships between suppliers and buyers** would facilitate realistic solutions that are readily available, foster competition, innovation and growth, and identify risks and issues involved. The '*Circular Procurement Transformation Guidance*' from the ProCirc Interreg project[32] sets out valuable guidance for market engagement. As above, any such engagement should also take into account smaller scale suppliers of goods and services.

RECOMMENDATION #10:

To summarise, there are a number of specific areas in which national governments would benefit from EU direction and example, clarifying how circularity can best be integrated in Green Public Procurement strategies.

In particular, we recommend that the proposed Act include the following:

- Measures to encourage a shift in the focus of public procurement - away from Value For Money, to **prioritise the transition to a circular economy**. Circular Public Procurement must ultimately become the default.

[31] Department of Public Expenditure, Infrastructure, Public Service Reform & Digitalisation (2024), *Ministers Donohoe and Smyth welcome new procurement arrangement for remanufactured laptops*, Government of Ireland, available here

[32] https://northsearegion.eu/media/22600/procirc_cpt-guidance_web.pdf

- Particular prioritisation of Circular Procurement **at sub-threshold level (<€50k)**, where there are significant opportunities for SMEs and social enterprises to contribute to the circular economy and advance social considerations.
- The introduction of **targets, with associated timelines**, for the public procurement of used goods.
- Support for **Quality Marks** such as Ireland's 'ReMark', to drive confidence in used goods among contracting authorities.
- Increased capture and reporting of data via **CPP monitoring and reporting**, expanding where possible to include <€50k tenders and social impact.
  (NOTE: Such expansion must not create additional barriers to entry for social economy actors and SMEs in public procurement processes).
- As set out in the ProCirc guidance, measures to increase focus on **market engagement** and **building relationships between suppliers and buyers**.

6.2 On the potential value of minimum bio-based content targets

Within the context of driving demand and supply of secondary raw materials, the potential introduction of **minimum bio-based content targets** warrants specific consideration of:

a) the **key uses of bio-based materials;** and

b) the **nature and sourcing of bio-based feedstock**.

Additional areas for consideration include current binding requirements for minimum recycled content, public procurement, standards and price interventions. **Alignment of the Circular Economy Act with the EU Bioeconomy Strategy** is also important for policy coherence.

Bio-based materials are derived from biomass and have the potential to reduce greenhouse gas emissions by replacing fossil-based materials and carbon fixation. Such materials can be utilised in pharmaceutical products, food and feed, plastics, chemicals, energy generation and construction. The introduction of minimum bio-based content targets has the potential to stimulate investment in technologies and infrastructure needed to achieve sustainable use of bio-based secondary raw materials. Sustainable bio-based materials must be derived from circular, diverse and regenerative systems. Minimum bio-based content targets should **distinguish between**

primary and secondary biomass feedstock, **promote cascading use of biomass** and **target specific sectors that use bio-based secondary raw materials**.

Learnings from the introduction of **binding requirements for minimum recycled content** by the 2019 Single-Use Plastics Directive for a range of products (EU, 2019a; EC, 2020a) should inform the development of minimum bio-based content targets. Recycled content requirements ensure that producers buy secondary raw materials regardless of price, increasing demand for such materials and supporting investment in recycling. Unintended consequences of minimum bio-based content targets along the bio-based value chains should be carefully assessed, monitored and addressed. Public procurement levers, standards and price interventions are also needed to drive demand and supply of bio-based secondary raw materials.

RECOMMENDATION #11:

Any introduction of minimum bio-based content targets should be based on an **assessment of bio-based value chains**. In addition, the following factors should be given due consideration:

- Alignment of the Circular Economy Act with the EU Bioeconomy Strategy.
- Ensure a distinction [in targets] between primary and secondary biomass feedstock.
- Promote the cascading use of biomass.
- Target specific sectors that use bio-based secondary raw materials.
- Apply learnings from the introduction of binding requirements for minimum recycled content.

6.3 On the need for local handling, sorting and processing facilities within member states

As outlined above, we recommend prioritising within the proposed Act reducing consumption at an EU level. This includes ensuring the implementation of the Ecodesign for Sustainable Products Regulation and efforts to affect awareness and behaviour among the general public. Alongside these approaches, **proactive planning and investment** is needed to develop waste prevention facilities that will underpin this change and accelerate the transition. In order to support the circular economy by enabling local reuse and recycling of materials, reducing reliance on imports, and

mitigating supply disruptions caused by geopolitical events, we recommend inclusion within the proposed Act of **measures to encourage the creation of local handling, sorting and processing facilities within member states**. Specific infrastructural components for will include:

- Sorting infrastructure and warehousing;
- Logistics channels including kerbside and fixed point collection systems;
- Door to door repair services;
- Refill stations and washing systems;
- Closed loop return systems;
- Equipped reuse and repair workshops;
- Circular reuse shopping centres;
- Reuse and lending outlets in public spaces like libraries and town halls;
- Lending retail outlets;
- Online platforms with repair manuals, instruction guides and/or locational guides of reuse and repair outlets and refill stations

This focus on prevention infrastructure would help to embed the principle of prevention (including reuse and repair) in playing a central role in the Act implementation, in line with the circular economy ambitions and targets.

Establishing such infrastructure can also reinforce the supply chain and enhance economic security. Recent research indicates that the transition to a green economy requires a significant increase in the availability of materials like lithium, copper, and cobalt for batteries, solar panels, and other green technologies, increasing the urgency to secure a stable and local supply.[33] A Research Ireland funded project *A Wasted Transition* on which the Rediscovery Centre is collaborating with Dublin City University is exploring the challenges and opportunities associated with the repair and decommissioning of such infrastructure and technologies.

Securing such supply through the development of domestic processing capabilities **reduces the import reliance of member states**, which in turn can enhance economic autonomy, particularly for strategic materials essential for national security and clean energy goals. Furthermore, localised processing capabilities will **lower the EU's carbon footprint**, since extracting and processing virgin raw materials is energy-intensive and

[33] Murtaza, A. et al. (2021) *Critical Raw Materials for Ireland for a Resource-Efficient Circular Economy (CIRCLE)*, EPA Research Report No.478, available here

has significant environmental impacts, including 18% of the bloc's greenhouse gas emissions.[34]

In addition, the treatment of waste, both hazardous and non-hazardous, is an ongoing geopolitical and ethical problem for the EU. The export of waste from the EU to the Global South has been shown to have had detrimental impacts in many cases.[35] The EU's waste shipment regulations are becoming increasingly stringent[36] adding to the impetus to:

- Reduce consumption;
- Increase the rate of repair and reuse;
- Establish appropriate infrastructure in EU member states for collecting, sorting, reuse, repairing, and as a last resort recycling materials.

Developing a viable circular economy framework across the EU entails **creating local infrastructure for collecting, sorting, reusing and repairing and where this is not possible, treating, and recycling materials** from sources like batteries and construction waste. This approach can also boost local economies, since investment in processing facilities **creates local jobs** and **contributes to the development of indigenous infrastructure**, supporting a more resilient and sustainable economy.[37]

RECOMMENDATION #12:

In order to better enable local reuse and recycling of materials, we recommend the following measures to support the creation of native material processing facilities within member states:

- Undertake proactive planning, investment, and implementation in relation to both structural changes (policy) and efforts to change attitudes and behaviours (communication).
- Prioritise investment in consumption reduction and waste prevention infrastructure in line with the Waste Hierarchy - prevention, reuse and repair

[34] European Environment Agency (2023). *Accelerating the circular economy in Europe: State and outlook in 2024*, European Environment Agency (EEA) Report 13/2023

[35] Cotta, B. (2020) *What goes around, comes around? Access and allocation problems in Global North–South waste trade*. Int Environ Agreements 20, 255–269. https://doi.org/10.1007/s10784-020-09479-3

[36] European Commission (2024), *New Regulation on waste shipments enters into force,* Directorate-General for Environment, available here [Accessed 5 November 2025]

[37] Probst, L. et al, (2016). *Sustainable supply of raw materials: Optimal recycling,* European Commission Business Innovation Observatory, Case Study No.60

- Identify and promote mechanisms through which Member States can fund Infrastructural investment such as the Cohesion Fund and the European Regional Development Fund (ERDF). Investment could be conditioned on measurable progress in circular economy capacity.
- Additional support could come via the Innovation Fund and the European Investment Bank, offering grants or low-interest loans for waste prevention projects.

7.0 Improving Waste Management & Circular Processes

7.1 On DRS, household behaviour, role of EPR fees, potential barriers to efficient waste management systems in Ireland

Research carried out by the Rediscovery Centre as part of the Circular.ie communications project has identified a need for greater understanding of household behaviours in the Irish context. This research[38] proposed the following recommendations relating to household behaviour:

- There is a need for more robust baseline consumption data comparing consumption between sociodemographic groups, as this allows for a clearer assessment of the effectiveness of interventions such as communications campaigns or behavioural nudges.
- There is a need to collect more than only self-reported data on household behaviours. Data that are based on observed behaviours or quantification of specific material outcomes - e.g. number of products repaired, number of customers purchasing reused products - provide a more accurate picture of what is actually happening in practice.
- Study designs should be pursued which not only collect data on current household behaviours, but also experimentally test the effectiveness of interventions to change behaviours.

[38] Boland, A., McCarthy, J., Downey, C., and Miller, S. (2024) *Understanding sociodemographic differences among the Irish audience in relation to circular economy behaviours and attitudes: A synthesis report.* Circular.ie. Published as part of the Rediscovery Centre's *Circular Economy Communication Insights Series*, funded by the Department of Climate, Energy and the Environment

- Care should be taken when promoting circular behaviours to the public to ensure that significant structural or systemic barriers do not exist. Encouraging actions for which significant barriers exist - such as cost and access - can create frustration in the audience.

RECOMMENDATION #13:

- Member States support behavioural insights, as is being delivered through circular.ie, to improve at national or regional level the effectiveness of communications and public engagement for circular living.

7.2 On the importance of improved data collection processes

Much of the focus of the current consultation is on the management of waste and obtaining End-of-Waste (EoW) status for materials and products that become waste. However, in our view this approach is misguided and places emphasis far too low on the waste hierarchy. The Waste Framework Directive (WFD) - the guiding framework for regulating waste management in the European Union - supports our assertion in this regard. The WFD explicitly states that **prevention of consumption, reuse, and repair should be prioritised** before waste management emerges as an option. This principle has also been elaborated upon at length by many EU institutions, including the EEA.[39]

The Rediscovery Centre was involved in an EPA funded project *Qualifying and Quantifying the Reuse Sector in Ireland.* This project delivered a robust methodology for measuring the flows of products that are reused in a given economy through data collection from reuse operators. In line with Article 37(3) of the revised Waste Framework Directive of 2018,[40] this approach provides a feasible and transferable method for measuring reuse of products that could be recommended as an accompanying measure to the establishment of reuse targets. Indeed, Ireland has established reuse targets of 20kg per person per year by 2030.[41]

The Circular Material Use Rate (CMUR) is an example of a metric that is built upon the best available data - recycling and domestic material consumption rates - as a proxy

[39] European Environment Agency (2024). *Product lifespans - monitoring trends in Europe*. European Environment Agency (EEA) Web Report no. 16/2024

[40] Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste

[41] Local Government Ireland, *National Waste Management Plan for a Circular Economy 2024-2030,* Volume II, Policy Responses and Actions, available here.

for circularity at national and EU level. However, in order to more accurately reflect, measure, and implement initiatives aimed at accelerating the circular economy, **data relating to reuse and repair activity prior to waste management processes must be collected and made publicly available through Eurostat's online resources**. Indeed, the absence of such data from the CMUR metric, for example, means that a country's CMUR is most easily improved by increasing the recycling rate - not by reducing consumption, increasing reuse, or increasing repair.

We recommend that reuse data collected under Commission Implementing Decision (EU) 2021/19 be integrated into the Eurostat database as a matter of priority. Feedback from the associated quality-check reports should be systematically used to enhance the consistency and comparability of data across Member States. In parallel, steps should be taken to incorporate reuse indicators into the EU Circular Economy Monitoring Framework, ensuring coherence across waste and circular economy reporting systems.[42]

RECOMMENDATION #14:

- Standardised collection of data is needed across the EU.
- Member States should be required to compile and submit data for **mass, number and type of products reused and repaired** to Eurostat.
- The Q2Reuse project has developed a methodology for measuring reuse that should be looked at in terms of applicability to other member states.
- These data should be integrated with other Eurostat datasets, standardised, and be made publicly available.

8.0 Conclusion

The Rediscovery Centre welcomes the ambition of the proposed EU Circular Economy Act and the opportunity to contribute insights drawn from over two decades of hands-on experience in implementing circular practices across Ireland. The transition to a circular economy represents one of the most critical levers available to the EU to deliver environmental, social and economic resilience. To achieve its goals, however, the Act must place prevention, reuse and repair — not recycling — at its core.

[42] European Commission Implementing Decision (EU) 2021/19 on *Reuse Reporting obligations for EU Member States*, available here.

We therefore reiterate five core principles that we believe should underpin the final Act:

1. Reducing consumption, prevention or waste, repair and reuse should be prioritised over recycling throughout the proposed Act.
2. The Act should introduce more effective circularity metrics and targets, including distinct targets for reuse. Member States should be required to collect and report comprehensive circular economy data that go beyond simple measures of consumption and waste management. Established examples and methodologies for setting and measuring reuse targets already exist across the EU and should inform this process.
3. The Act should address specific barriers in secondary raw material (SRM) markets, including through reform of market supports and the design and operation of Extended Producer Responsibility (EPR) schemes.
4. Public awareness and engagement should be strengthened through coordinated national, regional, and local initiatives, supporting behaviour change and participation in circular practices.
5. Incoming regulations, including the Ecodesign for Sustainable Products Regulation (ESPR), are of critical importance. Their implementation should be adequately resourced and supported at Member State level to ensure effectiveness and compliance.
6. In relation to EPR schemes, the Act should promote inclusive governance, a stronger focus on waste prevention, harmonised Environmental Management Cost (EMC) calculation methodologies, the financing of prevention, reuse, and repair activities, and clear, consistent definitions of key terms across Member States.
7. To support the measures outlined above, the Act must be accompanied by dedicated and sufficient financial mechanisms to ensure the long-term viability of prevention, repair, and reuse initiatives. This includes public procurement policies that prioritise circular goods and services through appropriately designed tendering processes.
8. The introduction of bio-based material targets should be underpinned by a comprehensive assessment of relevant supply chains to ensure sustainability and avoid unintended impacts.

9. Member States should be required to proactively develop local sorting, handling, and processing infrastructure, supporting circular material flows and reducing dependence on imports or waste exports.

These measures represent practical proposals for delivering a more circular EU economy. By embedding prevention, repair, and reuse at the centre of the Circular Economy Act, the EU can move beyond waste management towards a systemic transformation of production and consumption. The Rediscovery Centre stands ready to contribute its experience and expertise to help shape and implement an Act that delivers measurable environmental, economic, and social benefits across all Member States.