



PANEL REPORT
**MID-TERM EVALUATION
OF THE ENVIRONMENTAL
PROTECTION AGENCY'S
CIRCULAR ECONOMY
PROGRAMME 2021-2027**

Bridging the circularity gap from data
and policy to practice

A mid-term evaluation of the Environmental Protection Agency's Circular Economy Programme 2021-2027 was undertaken in 2025. Its purpose was to provide recommendations to the Environmental Protection Agency relating to the focus of the Programme for the remaining period to 2027 taking account of knowledge, lessons and insights from its operation to date and a horizon scan of policy and legislative drivers. The evaluation was led by a panel comprising Maria Graham (Chairperson, retired Assistant Secretary, Department of Housing, Local Government and Heritage), Mark Christal (Executive Director, Enterprise Ireland) and David Flynn (Director, Office of Environmental Sustainability, EPA).

This panel report on the mid-term evaluation includes information on the Circular Economy Programme, details of the evaluation process which included analysis and consultation with key stakeholders, and includes twelve recommendations setting out areas of the programme to retain or cease, renew or redirect.

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CHAIRPERSON'S FOREWORD

The Agency has played a vital and essential role over the years in promoting the circular economy and undertaking actions to drive its implementation in Ireland. Since its earliest involvement in managing the National Waste Prevention Programme, the Agency has been at the forefront of informing policy, by raising awareness, providing data and insights and evolving guidance and regulatory practices. To ensure the continuation of this agile and dynamic approach, it was important that the current Circular Economy Programme 2021-2027 provided for a mid-term evaluation to allow for any re-orientations and changes in emphasis required to meet the programmes objectives. The process of this evaluation has been very useful, in taking stock of achievements to date and taking account of the evolving policy and legislative landscape.

As part of this process, it was notable that the engagement with stakeholders reinforced the positive view of the Agency in this field. There was a common appreciation in particular for the data and insights, the participatory fora and the new approaches to regulation through by-product and end of waste, and mention was made of funding programmes which were a more prominent feature in the past. The importance of the Agency having a national and strategic role at this juncture was particularly highlighted.

Overall, stakeholders widely appreciated the opportunities for the Irish economy to embrace the opportunities of the circular economy, but they also recognised that work in some areas could be more impactful than others, particularly where Ireland had greater scope for action. This may be because in other areas, the EU position is not yet settled. Priority sectors, where Ireland can influence markets and outcomes include the built environment, agri-food, bioeconomy and packaging. Other priority sectors are in the development phase of circular economy policy but with growing importance include textiles, electronic products (reuse, repair and remanufacturing) and critical raw materials.

It is clear that across the priority materials included in the Circular Economy Programme there is an arc of development, where the Agency is initially the early mover – developing programmes which encompass gathering data, insights, advocacy and communication, funding pilot initiatives and then moving into more innovative regulatory approaches. As these policy areas develop, there is often a mainstreaming of the activities into the programmes of other bodies. Consequently, it is appropriate that the Agency refines its role and focus as these processes evolve.

The recommendations of the Panel reflect these considerations, pointing to areas where the Agency can have most impact to the end of the current programme in 2027 as a thought leader, early mover, and regulator for example. These recommendations will allow the Agency to support the development of policy and look forward to the preparation of the next circular economy programme (2028 +) which will be set in the context of the forthcoming second Whole of Government Circular Economy Strategy and wider EU policy and legislative developments.

I am grateful to my fellow panel members Mark Christal and David Flynn for their engagement with this work over 2025 and to the support of the Agency teams, for their expertise and enthusiasm, with a particular word of thanks to Warren Phelan and Fiona McCoolle who were critical to the development of this report.

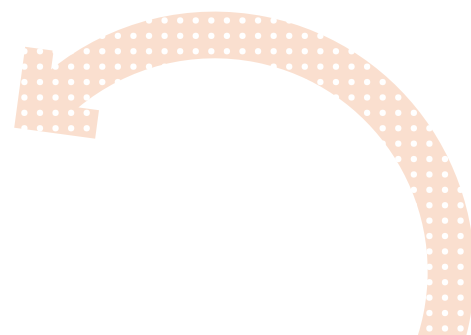
Maria Graham
Chairperson

February 2026



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INTRODUCTION TO THE MID-TERM EVALUATION

BACKGROUND

1. **The vision for a low carbon, circular economy at EU level is based on material resource efficiency, self-sufficiency, innovation and driving new competitive economic models. It is a disruptor model, driving a shift away from linear resource intensive economies to enduring circular models. In a circular economy, consumption of virgin raw materials is reduced, and waste is minimised by maximising the use, life and value of materials and products. It is a new economic paradigm which supports new competitive business models based on sharing, leasing, reusing, repairing, remanufacturing, refurbishing, and recycling of materials.**
2. At this juncture, Ireland's economy is primarily linear, underpinned by linear material flows from extraction through to production and consumption, with limited signs of a national transition to a circular model. The features of our carbon intensive economy include high rates of resource extraction, high material and product consumption, high waste generation and a weak circular economy infrastructure.
3. The challenges in transitioning to a circular economy are many and complex, requiring a system shift to new production and consumption business models with purchasing, financial and regulatory measures to incentivise and drive the change required. There is an urgent need to accelerate delivery to realise the economic, societal and environmental benefits of a circular economy.

EPA CIRCULAR ECONOMY PROGRAMME

4. Ireland's Circular Economy Programme (2021 to 2027) is a key driver for Ireland's move to a circular economy. The vision for the Programme, which is led by the EPA, is an Ireland where the circular economy ensures that everyone uses less resources and prevents waste to achieve sustainable economic growth.
5. The Circular Economy Programme represents the EPA's contribution to delivering Ireland's ambitions on the circular economy and provides *Leadership, Supports, Knowledge and Opportunity* to promote and amplify circularity in Ireland for business sectors, citizens and the public sector.
6. The Programme supports the Whole of Government Circular Economy Strategy and incorporates the National Waste Prevention Programme. The programme reflects EU and national policy priorities on the circular economy, including prioritising prevention activities aligned to the top tiers of the waste and food use hierarchies. The programme's activities also extend down the waste hierarchy to encompass recycling supporting the economic aspects of secondary material markets and bioeconomy.
7. The governance of the Programme requires a mid-term evaluation to be undertaken to evaluate its effectiveness, to check alignment to current policy; and to provide an assessment of the value generated. In line with the statutory requirement for national waste prevention programmes, the Circular Economy Programme will be revised within six years of the date of its publication in December 2021.

EVALUATING THE PROGRAMME

8. A mid-term evaluation of the Circular Economy Programme 2021-2027 was undertaken in 2025. Its purpose was to provide recommendations and actions to the EPA relating to the focus of the Programme for the remaining period up to 2027 taking account of the knowledge, lessons and insights from its operation to date.
9. The scope of the evaluation was the operational pillars and the priority areas set out in the Circular Economy Programme 2021-2027 strategic document. Resources, resource planning and programme finances were outside of scope.

10. In completing this evaluation, some guiding questions included:
 - a. Is the programme achieving its stated objectives?
 - b. To what sectors and materials is the programme adding most value?
 - c. To what extent is the programme now focused on the key priority waste materials?
 - d. Are current programmes of work and interventions still relevant?
 - e. What are the key barriers and challenges to the programme achieving its objectives and increasing its impact?
 - f. What sectors/areas of work has the programme potential to grow and enhance its impact and value?
11. The panel was required to present a concise report summarising the key findings of the evaluation and preparing clear recommendations, which identify:
 - i. Areas of opportunity to drive the circular economy, taking into consideration the roles and responsibilities of the EPA,
 - ii. Areas of opportunity to work with others and support their circular economy activities, and
 - iii. Areas of the programme to retain or cease, renew or redirect.

EVALUATION PANEL

12. The panel comprised of three members including a chair as follows:
 - > Maria Graham, Chair, (retired Assistant Secretary, DHLGH)
 - > Mark Christal (Executive Director, Enterprise Ireland)
 - > David Flynn (Director, Office of Environmental Sustainability, EPA)
13. The panel considered the views of the four Circular Economy Programme teams and key external stakeholders including the Department of Climate, Energy and the Environment, the Department of Enterprise, Tourism and Employment, the Department of Agriculture, Food and the Marine, Enterprise Ireland and the local authority sector. While it was intended to consult with the Department of Housing, Local Government and Heritage this was not possible to arrange within the consultation window.
14. As set out in the Terms of Reference, the panel have made recommendations on the focus and direction of the Circular Economy Programme for the remaining period to end 2027, aligned to Government policy, EU waste targets and legislation.



EPA CIRCULAR ECONOMY PROGRAMME

BACKGROUND

15. **Ireland's National Waste Prevention Programme was established in 2004, managed by the EPA. Ireland was an early mover in Europe in developing a national waste prevention programme which later became a legal obligation for Member States by end 2013. The measures implemented under the programme were innovative and progressive, helping to raise the profile of prevention as the apex of the waste hierarchy delivering the most preferred environmental outcome. The programme was reviewed in 2018 with the recommendation to focus on national level strategic activities with high visibility, impact and influence.**
16. The EU set out its vision for a lower carbon and competitive Europe in the EU Green Deal and specific Circular Economy Action Plans (2015, 2020) identifying priority areas for action including:
 - > Packaging
 - > Plastics
 - > Textiles
 - > Food, water and nutrients
 - > Construction and buildings
 - > Electronics and ICT
 - > Batteries and Vehicles
17. The Government's national waste policy, A Waste Action Plan for a Circular Economy (2020), called to "*reconfigure the existing National Waste Prevention Programme to make it Ireland's Circular Economy Programme*" with the EPA identified as its lead.
18. The EPA published the first Circular Economy Programme 2021-2027 in December 2021 in conjunction with the Government's first Whole of Government Circular Economy Strategy. The vision of the programme was to move from a sole focus on waste prevention to a fully circular, materials-orientated programme with a focus on activities of scale, national level, and of high-impact. The current programme focuses on activities that support a transition to a circular economy within the seven-priority materials as identified in the EU Green Deal.
19. The Circular Economy Act published in 2022 places a statutory obligation on the EPA to establish a Circular Economy Programme. The next iteration of the programme will therefore be on a statutory footing and is to include national waste prevention programmes established by the Agency under the Waste Management Act 1996, as amended¹.
20. The Environmental Protection Agency's Strategic Plan 2022-2026 includes the following strategic outcomes:
 - a. *We influence the transition to sustainable production and consumption and*
 - b. *We are an effective voice for Ireland's environment.*
21. The priorities set out in the Strategic Plan to support Ireland's transition to a well-regulated and effective circular economy include:
 - > Providing timely data to inform decision-makers and policy.
 - > Implementing regulatory measures to reduce waste generation of priority materials.
 - > Mainstreaming green procurement across government departments and public agencies.
 - > Advocating for and regulating the transition to a sustainable food system.
 - > Identifying and responding to critical waste and circular economy capacity risks and infrastructure gaps.
 - > Proactively influencing policy by leveraging our expertise, evidence and research.
 - > Communication activities will be successful in translating our data, science and evidence in a relevant and impactful way to stakeholders.

¹ Section 27B of the Waste Management Act 1996, as amended, requires the Agency to put in place waste prevention programmes with a specific obligation to establish a national food waste prevention programme.

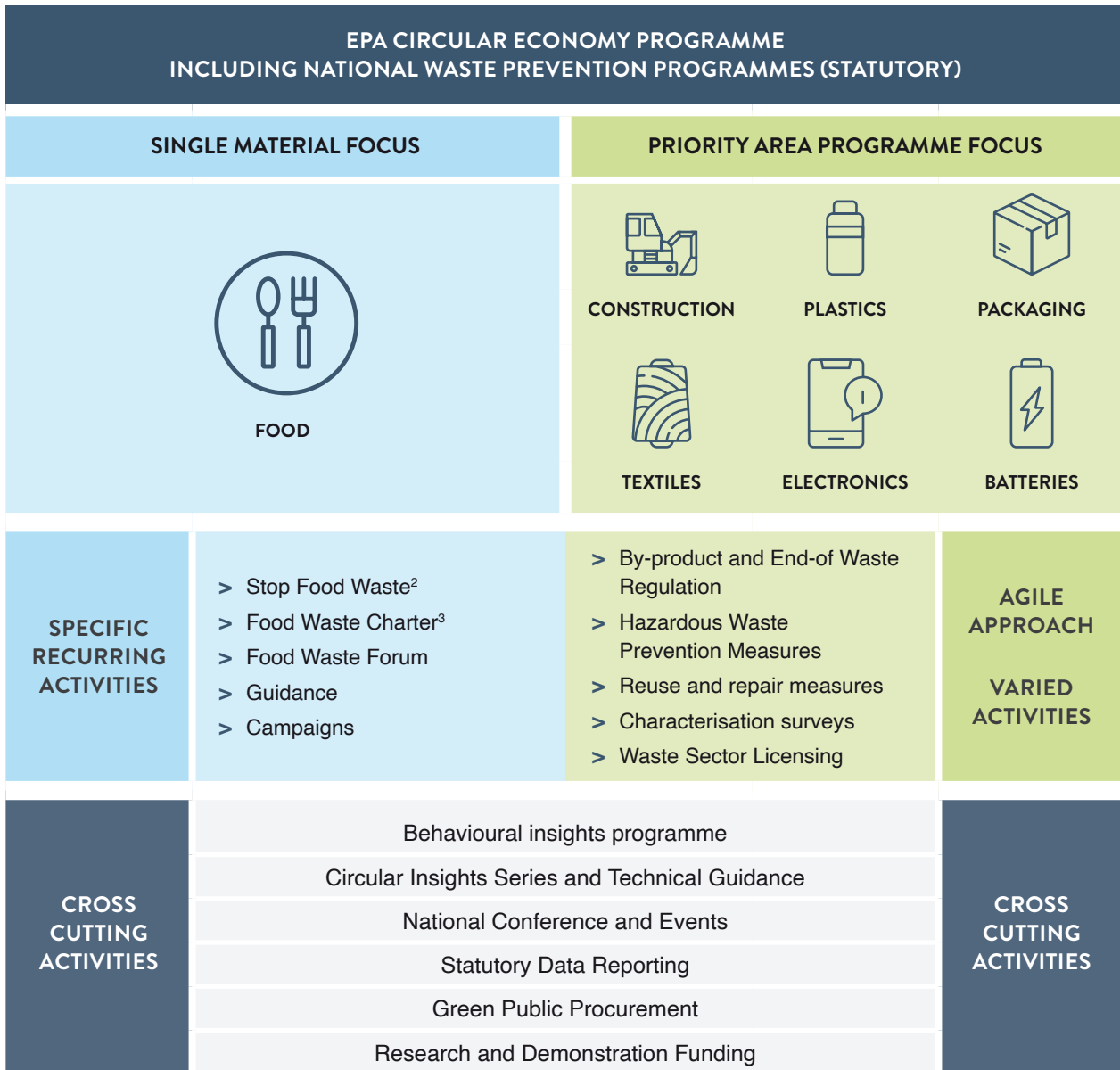
PROGRAMME DELIVERY MODEL

22. The Circular Economy Programme 2021-2027 sets out to play a central role in Ireland's transition to a resource efficient circular economy and its ambition is to:
- > Provide leadership,
 - > Maintain a competitive programme of supports,
 - > Implement actions that build knowledge, and
 - > Realise the enterprise opportunity.
23. The programme strategic document is based on a four-pillar operational structure under which specific activities are grouped. A sample of activities under each pillar are shown in **Figure 1**. The operational pillars generally cut across each of the delivery teams. The Agency takes a national lead on specific activities such as waste data reporting, end of waste and by-product regulation, supporting green public procurement implementation and food waste prevention, and for other areas supports delivery by working with key stakeholders to implement impactful measures.
24. There are seven priority areas identified for focus, and these are aligned to the European Green Deal (see paragraph 16). The activities of the Circular Economy Programme teams contribute to the measurement and prevention of priority materials through advocacy, insights, enabling tools, regulation and licensing.
25. The Circular Economy Programme delivery model encompasses the Agency's obligations to put in place waste prevention programmes. In response the programme delivers a broad range of specific and cross cutting measures to monitor, support and enable prevention, resource and material efficiency and greater use of secondary materials, see **Figure 2**.
26. In response to the Agency's specific responsibility to establish a national food waste prevention programme, the programme implements measures to support awareness, and reduce food waste generated by food and drink sector enterprises and households.

FIGURE 1: PROGRAMME PILLARS AND ACTIVITIES



FIGURE 2: CIRCULAR ECONOMY PROGRAMME DELIVERY MODEL



27. An agile and focused approach is taken to deliver tasks, driven by in part by policy direction and legislative responsibilities but also foresight of the future demands as the EU motivates Member States to improve circularity. Specific regulatory measures have been introduced through the programme, such as national by-product and end of waste criteria targeting high volume priority materials and wastes. In the first half of the current programme cycle there has been a focus on construction, packaging, plastics and food materials and waste, with a group of tasks implemented to prevent waste and support markets for secondary materials.

² Stop Food Waste is the national platform and campaign to reduce household food waste in Ireland.

³ The Food Waste Charter is a national voluntary industry agreement, led by the EPA to support Irish food and drink sector enterprises to reduce food waste.

FIGURE 3: PROGRAMME TEAMS AND CORE ACTIVITIES

REGULATION	WASTE AUTHORISATION	WASTE STATISTICS	IMPLEMENTATION
<ul style="list-style-type: none"> > By-Product (Regulation 27) > End of Waste (Regulation 28) > National Hazardous Waste Management Plan 	<ul style="list-style-type: none"> > Waste Sector Licensing > Article 11 > Historic Landfills > Certificate of Registration 	<ul style="list-style-type: none"> > National circular economy and waste data collation and statutory reporting > National Waste Characterisation Surveys > Forecasting 	<ul style="list-style-type: none"> > National Food Waste Prevention Programmes > Green Public Procurement > Behavioural Research > Circular Insights > Prevention Initiatives (Reuse and Repair/Construction) > Annual conference

PROGRAMME ACTIVITIES

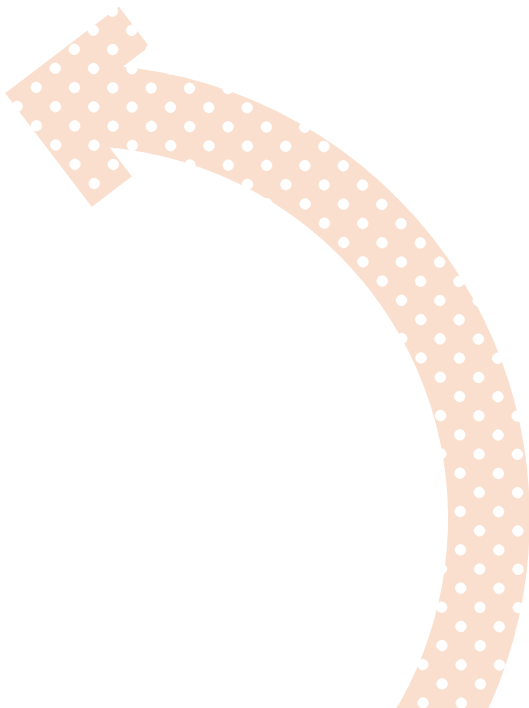
28. The Agency’s Circular Economy Programme structure has evolved since its establishment. It currently consists of four teams which are responsible for a wide range of statutory and non-statutory activities. The programme teams are as follows:

- > Circular Economy Implementation,
- > Circular Economy Regulation,
- > Circular Economy Waste Authorisation, and
- > Circular Economy Waste Statistics.

29. The core activities currently delivered by the programme teams are shown in **Figure 3**. A more detailed list of activities carried out by each team is outlined in **Appendix 1**.

30. The delivery of statutory activities takes precedence in the programme and the organisation of teams reflects the scale of specific responsibilities. For example, the Agency currently has extensive statutory data reporting obligations which merits a specific team to ensure these are met.

31. Each year a work programme is prepared and sets out the key performance indicators and activities for each of the teams. The work plan deliverables are linked and contribute to the achievement of the strategic outcomes and priorities identified in the EPA’s Strategic Plan (see paragraphs 20 and 21).



CONSULTATION WITH KEY STAKEHOLDERS

32. **Consultation was a key aspect of the mid-term evaluation with internal and external engagements with staff and key stakeholders respectively.**
33. To inform and support the panel's work in completing the evaluation process, the EPA completed an analysis of the programme which included mapping current activities, a prioritisation review of the programme activities to focus the evaluation and a health-check on priority materials setting out distance to statutory targets. Further details are provided in paragraphs 77 to 79. This work helped to shape the discussion with stakeholders.
36. Each Senior Manager met with the panel in June 2025 to present on their team's reflections on the four guiding questions above, and to discuss the findings.
37. Key points from each programme team's engagements, relating to the two 'reflection' questions and 'looking ahead' question are summarised in **Figure 4**.

INTERNAL CONSULTATION

34. Online Town Hall meetings were held to update programme staff on the evaluation process at key junctures.
35. Each programme team held a workshop in May 2025 to complete a template with four guiding questions:
 - a. How is the team contributing to the programme's four stated objectives? (i.e. providing leadership on the circular economy, maintaining a competitive programme of supports; implementing actions that build knowledge and evidence base and realising the enterprise opportunity of a circular economy).
 - b. Reflection: Are current programmes of activities in your team (prioritised as amber and red) delivering desired impact?
 - c. Reflection: What are the key barriers and challenges to the team delivering its activities and increasing its impact?
 - d. Looking ahead: What sectors/areas of work has the team potential to grow and enhance its impact and value?



FIGURE 4: KEY POINTS FROM PROGRAMME TEAM ENGAGEMENTS

<p>WASTE AUTHORISATION</p> <ul style="list-style-type: none"> > Authorisations are linked to providing national waste recovery capacity. > A barrier is that current legislation doesn't support or enhance the regulation of circular activities. > Potential to contribute to revisions of legislation to support circularity of authorised activities. 	<p>WASTE STATISTICS</p> <ul style="list-style-type: none"> > Delivering the data as required but may not be having the desired impact on stakeholders and current targets not always measuring the 'right' thing. > A key challenge to delivery of data is the poor quality of data received from the waste industry. > Potential to provide more timely data through modelling and forecasting and collaboration with CSO and OEE.
<p>REGULATION</p> <ul style="list-style-type: none"> > Development of national criteria for construction materials has provided a template for other sectors. > A barrier is that current legislation is not sufficiently supportive of innovation and circularity. > Potential area is food waste prevention in bioeconomy sectors and waste prevention within the EPA licensed community. 	<p>IMPLEMENTATION</p> <ul style="list-style-type: none"> > Behavioural research and evidence and insights studies are informing waste prevention programmes, national policy and its implementation, and national communications campaigns. > A key challenge is funding innovation projects given EPA's regulatory role. > Potential to focus on new waste prevention programme activities in priority sectors, e.g. textiles.

EXTERNAL CONSULTATION

38. Key stakeholders were consulted as part of the evaluation with a focus on central and local government. The key comments and insights from these discussions are captured in the following paragraphs.

DEPARTMENT OF CLIMATE, ENERGY AND THE ENVIRONMENT

- 39. The Department of Climate, Energy and the Environment (DCEE) is the parent department of the EPA and the department with the policy responsibility for the circular economy. The panel met with DCEE on 30 May and the Assistant Secretary for Circular Economy and Resource Efficiency on 20 August 2025.
- 40. DCEE outlined the essential and effective role that the EPA has played in energising the circular economy. Their view is that the circular economy is becoming more important and more central to policy in Ireland due to climate risk to supply chains, international geopolitical risks and the growing importance of critical raw materials. DCEE highlighted the EPA's work in this area – such as mainstreaming green public procurement.

- 41. DCEE commented that the Government's and Department's priority going forward would be for any actions in the circular economy to be a support and driver for the mainstream economy.
- 42. Some major decisions by the EPA have been impactful and beneficial to the circular economy. This primarily relates to the EPA's work on by-product and end-of-waste. These decisions marked a philosophical shift by the EPA – a 'leap' by the Agency and this is acknowledged by the Department.
- 43. The key in continuing this journey is for the move from "waste" thinking to "materials thinking" to continue – with an emphasis on upstream prevention and diversion of materials away from a necessity as being treated as waste.
- 44. The key for the Department is to have the EPA operating in the national and strategic space. The EPA needs to continue to 'level-up' – continue its move from smaller, local activities to the big volumes/nationally important materials. A focus on enterprise-scale stakeholders (as in the food waste areas).

45. One of the most valuable roles of the EPA is when it uses its data to identify potential areas of material circularity that are untapped and to raise awareness and advance projects in these areas.
46. There is more potential for industrial symbiosis activities in Ireland, the EPA may have a bigger role in this in the future.
47. DCEE emphasised the importance of construction materials, given their volumes, and the need for trustworthy outlets and standards (e.g. perhaps a Q-mark for circular materials). There is also a need to educate the construction community (and funding institutions) about the benefits of no-demolition development.
48. On other materials, textiles is most likely to be a EU-scale intervention given the complexity of supply chains but the EPA's highlighting and pressure on this is welcome. Food and construction are probably the most impactful areas for work by the EPA's circular economy team at this time.
49. DCEE closed out emphasising the importance of EPA as a research-leader and as a generator of ideas to put positive pressure on all stakeholders to make the necessary changes.
52. Key areas from the local authority perspective included construction and demolition waste, facilitating the reuse and repair of materials, the role of waste materials in the new biomethane strategy, plastics, brownfield soil and stone, and textiles.
53. There was a detailed discussion about the new by-product national decision for greenfield soil and stone, and the benefit to local authorities' functions including for housing activation and delivery of infrastructure. The end-of-waste decision on road planings was also mentioned. This regulatory clarity is important to local authorities and the authorities would welcome more development in this area specifically on brownfield sites and material from special cases (e.g. Defective Concrete Blocks Grant Scheme in counties Clare, Donegal, Limerick, Mayo and Sligo).
54. The planned refurbishment of civic amenity sites was discussed, including the business case and their potential roles in repair and reuse. The need for a clear regulatory approach to these types of reuse and repair sites was discussed.
55. The CCMA also highlighted the utility of the EPA's Best Practice Guidelines for Resource and Waste Management Plans for CD projects, with the CCMA raising the prospect of making the guidelines mandatory and the prospect of the EPA providing training. Barriers to circularity in the infrastructure, commercial and residential building sector were briefly discussed including financial risk, need for wider sectoral education, the impact of building standards developed in a linear economy and the general material "acceptability" issues with secondary materials in the context where the quality of primary materials have resulted in substantial problems (e.g. pyrite and mica issues).

COUNTY AND CITY MANAGER'S ASSOCIATION

50. The County and City Management Association (CCMA) represent the local government senior management. The Panel met with senior representatives on 2 May 2025.
51. The CCMA recognised the important role of the EPA and the support provided to the local government sector across regulation, enforcement, advice and guidance. The CCMA and panel discussed the importance of clear roles and responsibilities across the delivery of the national Circular Economy Strategy and the associated coordination and governance arrangements. It was agreed that given the scale of activities underway that it is critical for all organisations to have clear mandates and efficient coordination structures in place. The potential for consolidating various groups involved in the circular economy was discussed, considering the range of different groups active in this area.
56. The CCMA emphasised the importance of the separate collection of the key waste streams – organic, hazardous waste, glass, textiles, etc. as the foundation for a circular economy. The role of monitoring and enforcement was also mentioned.
57. There was a discussion on the current waste capacity and infrastructure deficit in relation to waste and circular economy with EPA noting the prioritisation of applications which provide additional waste treatment capacity.

DEPARTMENT OF AGRICULTURE, FOOD AND MARINE

58. The Panel met with senior representatives of Department of Agriculture, Food and Marine (DAFM) on 1 August 2025.
59. DAFM complimented the openness, support and expertise of the EPA team especially in relation to food waste.
60. The importance of timely and accurate data, statistics and insights was emphasised by DAFM as well as clear national positions on the definitions such as the distinction between “food waste” and “food loss” and the importance of having data as part of the policy-making process. The role of the EPA as expert advisors and making decisions on national issues such as definitions of food waste and food loss are important to DAFM and the sector especially so that there is a clear and well-understood regulatory framework.
61. DAFM find the EPA research and insights on circular economy particularly useful. An example was the research on food loss and waste from farming, fishing and aquaculture which was directly applicable to policy on food loss at a farm level. Research highlighted and quantified a problem of edible food that is being rejected by buyers for other reasons. This led to projects with growers and retailers as well as a project with FoodCloud on diverting edible rejected food back to the human food chain. On the research side DAFM emphasised the importance of ensuring a close link between the National Bioeconomy Action Plan and the Circular Economy Programme.
62. Programmes such as Origin Green and the Food Waste Charter were highlighted as important interventions with some potential for mandatory targets for sectors or individual businesses as part of the forthcoming Waste Framework Directive mandatory food waste reduction targets.
63. The importance of the end-of-waste and by-product designations was emphasised. These can be better used by industry, but regulatory clarity is important to bioeconomy sectors such as food and forestry to encourage enterprises to maximise bio-product value while also delaying or diverting material away from becoming a waste.
64. DAFM suggest that there are ample funding streams for businesses and that regulatory information and support is what is needed to support innovation. Guidance and information on regulatory pathways and potential flexibilities for innovation would be valuable across all priority waste streams.
65. Green public procurement should have a greater emphasis on the bioeconomy, on growing the demand-side and on encouraging bio-products. Where possible procurement should seek to give an equivalence between bio-products and traditional carbon-intensive products (while recognising that market and product specification rules is beyond the EPA’s immediate remit).
66. Regulatory requirements are complex and roll across multiple agencies. A clear pathway through the various regulatory requirements would help enterprises bring new innovative products to market or implement more circular manufacturing practices.
67. DAFM recognise the numbers of groups already in existence but would encourage more space for stakeholders and enterprises to meet, connect and learn about the bioeconomy and the circular economy.
68. DAFM outlined the impact of recent economic and trade changes on Irish enterprise and that circular economy actions will need to be sensitive to the pressures on business due to the international trade headwinds. When encouraging circular economy actions, DAFM suggest emphasising the cost and competitiveness benefits.



DEPARTMENT OF ENTERPRISE, TOURISM AND EMPLOYMENT

69. The Panel met with senior representatives of Department of Enterprise, Tourism and Employment (DETE) and Enterprise Ireland (EI) on 8 September 2025.
70. DETE recognise the effective role of the EPA in the circular economy space while also noting that other organisations have moved into the circular area policy space. However, the role of the EPA remains important.
71. DETE commented that awareness of circular economy currently remains at a low level in the enterprise sector. Opportunities are not yet being realised in full and markets are small. Innovation is growing but is presently at a low level.
72. For circular economy to grow in the enterprise sector the value of circular solutions to business needs to be understood and tangible.
73. DETE have carried out research on supports for SMEs and the EPA was identified in the top five agencies in terms of providing fiscal supports. Streamlining of supports is another area which business has identified as access can be a barrier. Clarity on the role of the EPA in the financial support space would be useful.
74. DETE's circular economy priorities are the transposition of the Ecodesign for Sustainable Product Regulation which aims to improve the sustainability with the focus on ten product groups. Preparation of the plan to implement the requirements of the regulation is underway.

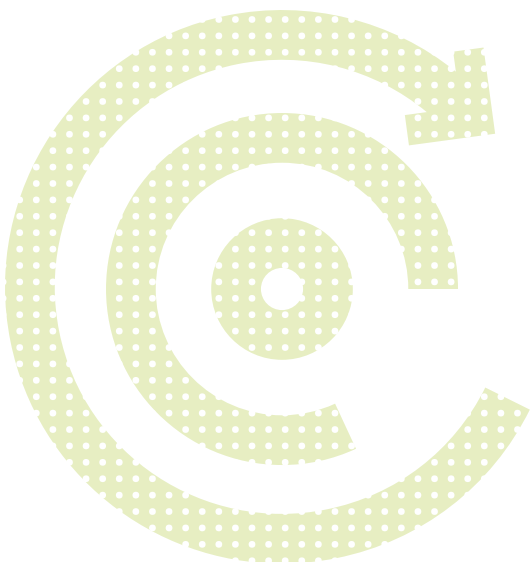
ENTERPRISE IRELAND

75. EI presented on their sustainability commitments and identified future proposals to help accelerate circular economy innovation across enterprise sectors for the EPA to consider. These include:
 - a. Develop a Hub to provide one-stop shop designed for circular economy businesses of all sizes. A Hub where you can easily find and learn about the range of government support programmes available to Irish businesses looking to develop and bring bio-based and circular economy solutions to market.
 - b. Introduce an enterprise toolkit tailored to Circular Economy such as Climate Toolkit to help companies increase their Circular Material Use Rate (CMUR) and increase supply chain resilience and reduce GHG emissions.
 - c. A cross-agency regulatory sandbox programme to assess project feasibility and provide regulatory advice would be a valuable proposition for industry and help speed up the process to realise circular economy projects.
 - d. Remanufacturing offers new business models with substantial environmental benefits and is an important emerging competitive area for Irish manufacturing business. A market research study identifying opportunities, business models and interventions would help to support business.



HIGH LEVEL ANALYSIS

76. **To inform the panel's evaluation, the EPA completed a valuable high-level analysis of the programme and its activities as follows.**
77. Current activities were mapped and tagged against both the programme's pillars and the seven priority materials. A prioritisation of the activities was then undertaken, to focus the evaluation process. Statutory activities were *out of scope* for the review whereas activities where significant policy/legislation change was signalled were *in scope*. Current activities where some change is signalled in relation to policy/legislation were *optional* for evaluation.
78. A health-check on the programme's priority materials was prepared, detailing activities supporting circularity for each material and aligned to circular economy touchpoints (raw materials through to residual waste), setting out the latest data and distance to target information (e.g. statutory targets). This provided a valuable sense check on the progress made to reduce waste, increase recycling and reuse activities.
79. A horizon scan for the seven priority materials was also undertaken. This analysis, set out the key drivers, such as EU and National legislation and policy, and headline impacts (targets and obligation). This valuable forward-looking activity highlights a specific direction of travel for materials with a focus shift to prevent and reduce waste, through enabling and embedding circular solutions, see **Appendix 2**.



CURRENT POSITION OF CIRCULAR ECONOMY IN IRELAND

80. As presented in the EPA's State of the Environment Report 2024, Ireland has an environmentally damaging linear economy characterised by the overconsumption of materials and goods with growing volumes of waste and greenhouse gas emissions.
81. While recycling tonnages are increasing, these increases are being cancelled out by the growing amount of waste generated. Based on current data trends there is a high risk of Ireland not meeting mandatory recycling targets, particularly for municipal waste, packaging and waste plastic packaging. A summary of Ireland's progress against key statutory and national targets is included in **Appendix 3**. The challenge for Ireland is to reverse these trends and significantly reduce waste production.
82. Ireland's national capacity to collect and treat waste is vulnerable and underperforming, with an over-reliance on other countries to treat our recycling materials, general municipal and hazardous wastes.
83. Systemic change is needed to accelerate the transition to an accessible, fair and affordable circular economy. Effective regulation, incentives and enforcement are required to influence businesses and consumers to adopt best practices in production, supply, purchasing, use and reuse of goods, products and services.
84. One of the major challenges is that the circular economy is starting from a low baseline. The Circular Material Use Rate (CMUR) measures the circularity of materials in the economy and refers to the share of the total amount of material used in the economy that comes from recycled waste. In 2023, Ireland's material circularity rate was 2.3%, while the average circularity rate in the EU was 11.8%. Research suggests that there is significant scope to improve Ireland's material circularity by reducing the extraction of natural resources (for agriculture and built environment sectors), encouraging greater material efficiency and use of secondary (recycled) materials.

POSITION AND ROLE OF THE PROGRAMME

85. The EPA was a frontrunner in the development and establishment of waste prevention programmes since the early 2000s. This approach has continued with the Agency's Circular Economy Programme an early mover and enabler, delivering innovative initiatives and resources to support waste prevention and wider circular economy policy implementation. Examples include EoW and by-product national criteria for construction materials, supporting Green Public Procurement implementation, establishing food waste prevention programmes, collaborative 'early mover' partnerships and provision of innovation funding.
86. The Programme has a clear role and remit, given the statutory functions of the EPA in relation to waste sector licensing, end-of-waste and by-product regulation, production of national circular economy and waste statistics and establishment of waste prevention programmes. The next iteration of the Circular Economy Programme, as referenced in paragraph 19, will have a statutory footing.
87. The Circular Economy Programme is a leader in providing evidence and insights to inform policy and other activities (circular economy and waste statistics, national waste characterisation studies, circular economy behavioural research and a Circular Insights Series).
88. Through the programme, the Agency has been a leader in advocating for circular economy, through national events (including the annual national circular economy conference, Food Waste Forum and Green Public Procurement in Practice events), delivering national awareness campaigns (Stop Food Waste), input to national policy development, and participation in national and EU expert groups.
89. A strength of the programme has been its collaborative leadership, bringing together stakeholders to share knowledge and deliver actions through partnerships, networks and voluntary agreements (National Hazardous Waste Management Plan Working Group, National Waste Data Network, National Reuse and Repair Network, Food Waste Charter).

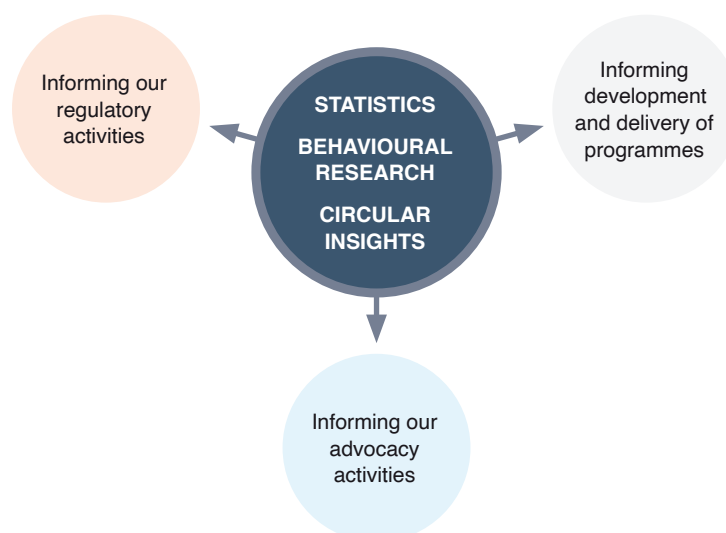
90. Programme staff are recognised as national experts. Many innovative initiatives developed and delivered through the Programme have been called out as exemplars at EU and global level (e.g. food waste prevention by UNEP and national end-of-waste and by-product regulation by the Ellen MacArthur Foundation). Engagement with international networks such as the European Environment Agency's EIONET, or the EU Food Loss and Food Waste Platform, are providing opportunities to share best practice but also to bring back learnings to the wider Irish policy context.
91. As circular economy policy has developed, the number of government and state-funded non-government organisations operating in the space has increased both at national and local levels. There are also an increasing number of private companies and foundations moving into the space to harness the potential commercial opportunities that a transition to a circular economy provides. It is important for the Agency to reflect on these changes and redirect its role where relevant.

EVOLUTION OF ACTIVITIES

92. There has been an evolution of activities within the programme since it commenced in early 2022. A focus of programme delivery has been moving to interventions of national scale with impact. Some changes have been internally driven (for example partnerships concluded following a defined funding agreement) while other changes have been driven by external factors, such as new national programmes being established, for example Signpost Programme, displacing the need for existing EPA programmes such as Smart Farming.

93. Several funded partnership initiatives ceased since 2021, as set out below. The connections with these organisations has sustained and the programme continues to have ongoing engagement through participation in their steering groups and national networks:
- > Funding for CIRCULÉIRE, Rediscovery Centre and Community Resources Network Ireland transitioned to a central funding model under DCEE.
 - > Smart Farming ceased following an evaluation of the programme including reviewing its position in relation to agri-sustainability programmes that had been introduced by the State since its inception, with significant funding, scale and reach.
 - > Partnerships with Community Foundation for Ireland and the Irish Universities Association ceased following the conclusion of defined partnership programmes.
94. Waste sector licensing, encompassing a number of authorisation regimes, was brought into the programme in 2023, recognising the potential for sharing knowledge and evidence from the regulation, statistics, and implementation teams to help enhance circularity in licensing.
95. In relation to Innovation and Demonstration grant-aid funding, a decision was made to pause Green Enterprise (with last funding call in 2022) recognising the introduction of new funding schemes for circular economy activities including DCEE's Circular Economy Innovation Grant Scheme. The decision also took account of the challenges that the Agency faces in balancing its role as a regulator of industry with potential grant funding innovation from the same enterprises. Similarly, local authority grant-aid funding has evolved to support regional/national projects (vs local projects) which have potential to deliver at scale and focussing on priority areas such as C&D and reuse and repair.
96. Other national programmes have also been reimagined. The Food Waste Charter has evolved from a voluntary initiative for the grocery retail sector, extending its reach to include food and drink sector enterprises across the whole supply chain, with two government departments (DAFM and DCEE) and five State Agencies committed to supporting its implementation. The Stop Food Waste programme is now grounded in evidence from behavioural science research with 44% of people aware of the programme.
97. As circular economy policy has developed since 2020, Circular Economy Programme activities are being embedded as deliverables in national policies and plans including the National Food Waste Prevention Roadmap, Climate Action Plans and Buying Greener.
98. The Programme has grown its data and evidence activities. Statistics, behavioural research and circular insights produced by the programme are central to informing policymakers and the Programme's evolving activities as depicted in **Figure 5**. Data and research provide both baseline evidence and evidence for impact (post-policy or -programme implementation).

FIGURE 5: CENTRALITY OF DATA/EVIDENCE TO CIRCULAR ECONOMY PROGRAMME



FORESIGHT – WHAT’S COMING AND HOW ARE WE POSITIONED?

99. Since the Circular Economy Programme commenced there have been several EU and national policy, economic, political and technological developments. A summary of these developments is provided in the following paragraphs and accompanied by a horizon scan of circular economy policy, legislation and targets for priority materials in **Appendix 2**.
100. At national level, a Second Whole of Government Circular Economy Strategy will be published in 2026. Within the framework of the Whole of Government Strategy, sectoral Roadmaps will be published by DCEE in 2026, for Circular Textiles and Circular Construction. An updated National Food Waste Prevention Roadmap covering the period 2026-2028 will be published (DCEE and DAFM). The Circular Economy Programme will have a role in implementation of actions under these Roadmaps along with other key stakeholders.
101. The material efficiencies brought about by circular economy implementation have the potential to reduce greenhouse gas emissions, and there are links in climate and circular economy national policies and plans.
102. At EU level, the Commission’s circular economy policy focus is on competitiveness, resilience, security of supply, and the harmonisation and simplification of rules.
103. The European Union’s *Clean Industrial Deal* (February 2025) includes a circularity focus, aiming to reduce waste and extend the life of materials by promoting recycling, reuse, and sustainable production. Maximising EU’s limited resources and reducing overdependencies on third-country suppliers for raw materials is crucial for a competitive and resilient market.
104. The EU is preparing a *Circular Economy Act* to strengthen circular economy policies across all Member States and accelerate an EU-wide circular transition, ensuring efficient use and reuse of scarce materials, reducing global dependencies, and creating high-quality jobs. The ambition is to have 24% of materials circular by 2030. It is expected that the new law will focus on making circular practices more competitive and create market demand for secondary raw materials as well as establishing a single market for waste. It is likely the Circular Economy Act will be negotiated during Ireland’s Presidency of the Council in 2026.
105. The *Packaging and Packaging Waste Regulation (EU) 2025/40*, adopted in December 2024, sets ambitious targets for reducing packaging waste (by 2030, 5% reduction in packaging waste, 10% reduction by 2035, 15% reduction by 2040). It also establishes targets for re-usable packaging by 2030 and 2040 and mandates minimum recycled content in plastic packaging for those same years. New reporting obligations will require data on market placement. Additionally, the Regulation sets overall packaging recycling targets of 65% by 2025 and 70% by 2030, with specific targets for different material streams. The EPA has been designated as competent authority responsible for implementation of certain obligations under the Directive relating to data provision. This function sits with the Circular Economy Waste Statistics team.
106. The *European Critical Raw Materials Act 2024* aims to increase EU resilience by reducing dependencies on imports of critical raw materials from single country suppliers and promoting supply chain sustainability and circularity. The EPA has a statutory role as the Single Point of Contact for the processing and recycling stages of critical raw materials. This function sits with the Circular Economy Waste Authorisation team.

107. The *Revision of the Waste Framework Directive*, targeting textiles and food waste prevention and management, must be transposed into national law by Summer 2027. This revision is introducing extended producer responsibility for textiles, mandatory food waste reduction targets for certain sectors by 2030 and will require the evaluation and adaptation of the national food waste prevention programme by October 2027. The EPA has been designated as a competent authority responsible for co-ordination of measures to prevent food waste (along with DCEE and DAFM). This function sits with the Circular Economy Implementation team.
108. The *Eco-Design for Sustainable Products Regulation* and the *Right to Repair Directive* support circular economy/waste prevention in product design, consumption and use. DETE is the lead government department for policy implementation of this legislation. To support and inform legislative and policy implementation, the Circular Economy Programme is building relationships with DETE and the agencies under its aegis.
109. The *Strategy for a Competitive and Sustainable EU Bioeconomy* was published in November 2025. The Strategy aims to boost innovation and support enterprise in their transition to circular and sustainable production and consumption. The next National Bioeconomy Action Plan will reflect the requirements of the new EU strategy (DAFM and DCEE).
110. In December 2025, the EU published its 8th *Omnibus Package* containing six proposals with the aim of simplifying environmental legislation across several areas to achieve greater competitiveness.
111. Given the dynamic nature of circular economy policy, the Circular Economy Programme will need to be forward looking and be cognisant of where it can add value, and pivot and position the programme into key areas where it has a role and remit (regulation, evidence, advocacy) when needed.



SUMMARY OF EVALUATION

112. **The mid-term evaluation process has provided a valuable opportunity to take stock of the role and position of the programme, to review the evolution of its activities since 2021 and to identify how the programme is positioned in relation to current and forthcoming circular economy policy and legislative drivers.**
113. It is intended that the recommendations will provide clarity to the programme teams, and to key external stakeholders, regarding the direction of activities to the end of 2027 and provide a base for developing the next programme (2028+) which will have a statutory footing. The consultation with key stakeholders internal and external also provided an opportunity to hear views on the impact of the programme to date and reflections on where the EPA can have the most impact into the future given its role and responsibilities.
114. It is clear from the evaluation, and in particular the engagement with external stakeholders, that the EPA plays an important role in Ireland's circular economy transition by providing trusted data and evidence to support policy making, industry decisions and public engagement, as well as through its role in regulation and establishing waste prevention programmes and initiatives. High impact areas called out relate to regulation for circularity (end-of-waste and by-product regulations), being an early mover, targeting high volume priority materials and a thought leader.
115. In the regulatory space, the importance of end of waste and by-product designations was emphasised, particularly the national criteria for construction materials. These decisions support introducing secondary materials to the market end-of-waste regulation) and waste prevention (by-product regulation), both central to circular economy transition.
116. The Agency has a strong history of being an early mover – initiating early action in areas where little or no action had previously occurred. The value of this was recognised by key stakeholders. Examples include supporting the implementation of green public procurement and establishing waste prevention programmes and early-mover partnerships. Waste prevention will have an increased policy focus with statutory reduction targets introduced for food and packaging and there is potential to grow and enhance impact and value in these areas. The Circular Economy Programme should continue to act as a driver of innovation, a source of authoritative guidance and a leader in collaborative initiatives particularly as a thought leader and early-mover.
117. Clear emphasis was placed by stakeholders on the importance of the EPA's support through the provision of data, behavioural insights and raising awareness of the circular economy. The timely provision of data is key to maximise its impact and value.
118. Key barriers and challenges to achieving the Programme's objectives identified through the evaluation included that current legislation is not sufficiently supportive of innovation and circularity, the poor quality of waste data received from the waste industry (which impacts on timely data provision) and the challenge of moving from evidence to intervention.
119. It is also clear that with the evolution of circular economy policy, government bodies, State agencies and other organisations active in the area has grown. The evaluation has highlighted that delivery of high impact interventions requires a collective approach. The EPA should continue to work with others supporting their circular activities, growing its connections and engaging with new public and private stakeholders where relevant.

120. To maximise the impact of its work the EPA should focus on areas where the Agency's statutory role means it is well-placed to deliver the greatest environmental, societal and economic benefits. For the circular economy, this means prioritising high-volume materials and sectors with statutory targets and activities that align with Ireland's climate and circular economy objectives.
121. The Circular Economy Programme has made good progress in meeting its stated objectives across the themes of leadership, supports, knowledge and opportunity. Current programmes of work are in general still relevant, and many have a statutory basis. The evolution of the programme activities since its inception has ensured its activities are strategic and impactful. The evaluation process will inform the continued evolution and direction of the programme to the end of its current term.

RECOMMENDATIONS

122. Against this background, the panel has made 12 recommendations, dealing with the themes (i) priority materials (ii) role of the EPA as a thought leader (iii) role of the EPA as an early mover (iv) regulatory role focus (v) programme activities and (vi) looking forward. These are set out in the following paragraphs, with recommendations to retain, cease, renew or redirect activities where relevant.

PRIORITY MATERIALS

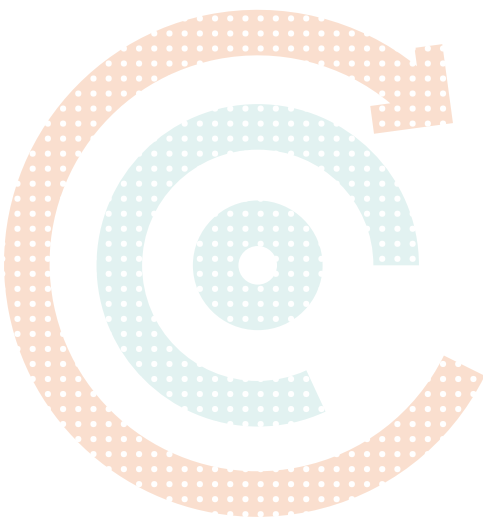
123. The EU is prioritising materials with the greatest potential for circularity as part of its sustainability, competitiveness and resilience strategies. These include the seven priority areas of the EU Green Deal and Critical Raw Materials. Policies aim to conserve resources, cut waste and recover valuable materials from end-of-life products through recycling. Binding targets for some of these materials ensure they are embedded in national waste prevention and management plans. The Circular Economy Programme should ensure that its priority areas align with EU priority areas.

RECOMMENDATION #1

It is recommended that the Programme **RETAINS** its seven priority areas which align to EU priority areas and includes Critical Raw Materials as a new priority area.

Maintaining the existing seven priority areas provides for flexibility within the Programme to adapt its activities to emerging policy focus areas. The addition of Critical Raw Materials reflects the EPA's new role as national Single Point of Contact for processing and recycling projects and the increased focus on critical raw materials under EU circular economy policy.

124. The EPA should focus its efforts on priority materials where its statutory role offers the greatest opportunity to improve Ireland's circularity based on usage volumes, economic importance, waste generation and proximity of statutory targets.



RECOMMENDATION #2

It is recommended that the Programme **RENEWS** its focus on certain priority areas given the EPA's statutory roles and opportunities for impact.

Construction and Buildings: Recognising that this sector generates the largest volume waste (9 million tonnes) and material circularity is low, this should be a top priority for EPA interventions.

Food: It is recommended that food waste prevention remain a priority for the CEP recognising the new EU food waste reduction targets to be met, the EPA's recent designation as a competent authority for co-ordination of implementation measures (along with DAFM and DCEE). The focus of the EPA's work should be on waste prevention in sectors where there are mandatory targets (manufacturing and processing, retail, restaurants and food services, households) and targeting sectors with high volumes of food waste.

Packaging and Plastics: It is recommended that packaging, including plastic packaging, remain a priority material for CEP as meeting packaging recycling targets is at risk, in particular plastic packaging. The new Packaging and Packaging Waste Regulation requires new waste reduction targets and requirements for reuse and refill to be met. There are opportunities for EPA to work with key stakeholders to support packaging waste prevention initiatives.

Textiles: The EPA should retain its role in relation to the provision of statutory data requirements, conducting waste characterisation studies and behavioural research to inform policy. An extended producer responsibility scheme for textiles will be introduced by 2028.

THOUGHT LEADER

125. The EPA has played a strong role in shaping knowledge about Ireland's circular economy by providing trusted data and expert insights. To maximise impact, the Agency should continue to produce timely, high-quality, evidence-based content that informs decision-makers and drives circular economy action. This should include concise briefing notes for policymakers, research reports and case studies that translate data into actionable messages.
126. Content should be visually engaging and tailored to segmented audiences. The EPA should put a priority on decision-makers in central government and local authorities, industry and key stakeholders across those sectors handling key materials. Delivery should use audience-appropriate channels (in-person seminars, webinars, workshops and digital platforms). The impact of the communication should be measured.
127. There are now multiple agencies and bodies communicating about the circular economy (including DCEE, Circular.ie, Local Authorities through mywaste.ie). The EPA should carve out a distinct niche by focusing its communications on EPA evidence, national statistics, end-of-waste and by-product regulatory guidance and practical insights

that support implementation. Collaboration with research units and government networks will strengthen reach and credibility and will avoid duplication of efforts.

128. The EPA should enhance its engagements with DETE, DHLGH, Enterprise Ireland and other relevant Agencies given the roles of these departments in relation to enterprise, construction and infrastructure policy.
129. The Agency should continue to engage with relevant organisations at a European and International level, sharing experiences and good practices from Ireland.

RECOMMENDATION #3

The EPA should **RETAIN** its advocacy and education work on the circular economy producing timely, high-quality, evidence-based content for key audiences, national and international, on priority materials. This should include policymaker briefing notes, research reports, case studies and talks delivered through various audience-appropriate channels.

EARLY MOVER

130. The EPA has been an early mover in delivering insights, guidance and national waste prevention programmes that support under-developed areas of circular economy policy. The EPA has also been an early funder of organisations piloting their circular economy platforms or activities. In some cases, EPA initiated programmes were taken over and scaled by organisations with a role and remit in the sector. This foresight and innovation are important activators in Ireland's transition to a circular economy.
131. The Programme should take a more deliberate 'life-cycle' approach to its activities by targeting under-represented sectors or materials and by planning each activity or intervention entry point, monitoring success and exit-point. With multiple agencies and bodies funding circular economy activities, the Agency should avoid duplicating the efforts of other agencies or Departments and design interventions focused on non-funding support and interventions.

RECOMMENDATION #4

It is recommended that the EPA **RETAINS** its early mover and innovator role in under-represented sectors and materials. The expertise of the programme in developing targeted resource efficiency and waste prevention approaches should be applied to support the reduction of current waste volumes for material streams in its priority areas.

REGULATORY ROLE FOCUS

132. The circular economy policy area is one of opportunity for enterprises to innovate, develop new circular products and services, and access new markets. It can help support competitiveness and productivity. The EPA can play an important role supporting circular enterprise projects by sharing its regulatory knowledge. There is an opportunity for the EPA to strengthen collaboration with enterprise agencies and other relevant bodies to establish cross-agency regulatory support for new technologies and solutions in sectors such as construction, bioeconomy, and manufacturing.

133. The EPA has regulatory responsibility for the delivery of national waste prevention programmes with a particular emphasis on food. It has been a leader in delivering national prevention programmes meeting statutory obligations. This expertise is needed to deliver national level impact targeting high volume polluting wastes.

RECOMMENDATION #5

It is recommended that the EPA **RETAINS** and **REDIRECTS** its delivery of measures to support industries to adopt circular and bioeconomy solutions for key materials. This includes strengthening connections between material producers, secondary material processors and commercial end-users. The EPA can do this by providing clear guidance on pathways to achieve end-of-waste and by-product decisions and engaging through dedicated industry focused events.

134. The EPA in its regulatory role can provide regulatory certainty through decision making and guidance to enterprises and industry operating in circular economy and bioeconomy sectors (e.g. through end-of-waste and by-product decisions). By-product decisions can prevent generation of waste and production residues and realise significant product and production savings.

RECOMMENDATION #6

It is recommended that the EPA **RETAINS** and **RENEWS** its portfolio of national and single case by-product decisions. Construction, bioeconomy, packaging and textile materials should be priority focus areas for national scale decisions given current and upcoming legislative drivers.

PROGRAMME ACTIVITIES

DATA

135. The EPA plays a pivotal role in producing circular economy and waste statistics for Ireland. This role is expanding with reporting responsibilities growing and increased demand for timely environmental, market and economic metrics of Ireland's circular economy. Indicators which measure the impact and value of the circular economy are growing in importance in recognising the value of circular approaches particularly for the enterprise sector.

RECOMMENDATION #7:

It is recommended that the EPA **REDIRECTS** its statistical approaches to data compilation using tools such as forecasting and modelling to produce timely data reports. It is recommended that the EPA continues to build strong linkages with the CSO and other data bodies to support efforts to develop sector specific datasets where needed.

GREEN PUBLIC PROCUREMENT

136. The EPA has been pivotal in advancing green public procurement in Ireland. The EPA will continue in its evidence role (which aligns to EPA core functions as a trusted provider of environmental data) in delivering the relevant actions in Buying Greener, which contribute to reducing environmental impact and fostering a circular economy. The continued mainstreaming of green public procurement will see a greater use of green criteria in national frameworks as managed by the Office of Government Procurement (OGP) who will take the lead role in this area.

RECOMMENDATION #8

The 2025 Programme for Government commitment sees the OGP taking on the primary role in embedding GPP across the public sector. It is recommended that the EPA **REDIRECTS** its focus on GPP activities post-2027 to activities which it can best serve such as gathering data, evidence and reporting.

INNOVATION AND DEMONSTRATION FUNDING

137. The Circular Economy Programme has provided innovation and demonstration funding through Green Enterprise and competitive calls issued to local authorities. These have provided seed funding for lighthouse or demonstrator projects. There have been some challenges in funding innovation projects, given EPA's regulatory role. Also, other organisations moved into circular economy innovation grant-aid funding (e.g. DCEE's Circular Economy Innovation Grant Scheme, CIRCULEIRE) since the Programme's inception and there are now more supports from State enterprise agencies to support circularity. The role of the EPA as a grant-aid provider is now reducing as other sources of funding approach full maturity. It is recommended that CEP work with the relevant State organisations to support the design of enterprise funding to embed circular business models through start-ups, micro-enterprises, SMEs and industry.

RECOMMENDATION #9

It is recommended that the EPA **CEASES** its role as a grant-aid provider as other sources of funding approach full maturity. The EPA will work with the relevant State organisations to support and design enterprise funding to embed circular business models through start-ups, micro-enterprises, SMEs and industry.

BEHAVIOURAL RESEARCH

138. The EPA has been to the fore in the development and delivery of a circular economy behavioural research programme. The quantitative and qualitative research has provided insights into behavioural and attitudes relating to materials (food, textiles, plastics, packaging, construction) and circular living activities (reuse and repair). These insights have informed policy, statutory reporting, provided evidence for behavioural change programmes and are informing the messaging of national communication campaigns. Behavioural change to support circularity also can support climate action, therefore collaboration with those conducting climate research should be a primary focus.

RECOMMENDATION #10

It is recommended that the CEP **RETAINS** its role in circular economy behavioural research and builds on the work done to date which has informed EPA and other programmes.

REUSE AND REPAIR

139. Reuse and repair are key waste prevention activities and are supported through sustainable product design, extended producer responsibility and on-the-ground activities led by social and commercial enterprises. The CEP-led National Reuse and Repair Network 2024-2026 is providing opportunities for cross-sectoral engagement (with approx. 20 national-level organisations), through biannual meetings and monthly updates.

RECOMMENDATION #11

A review of the National Reuse and Repair Network and its impact should be undertaken at the end of its current term in 2026 with a focus on measuring its impact to date and the potential to support activities to develop at scale. This will inform the decision as to **RENEW** or **CEASE** the network.

LOOKING FORWARD

140. With a short time to prepare the next circular economy programme (2028+) emerging themes will need to be considered with stakeholders including digital transformation, circular business models, producer responsibility, leveraging public procurement, circular materials in urban development, finance measures, addressing data gaps and the economics of circular economy. Cognisance will need to be taken of the role envisaged for the EPA under the next whole of Government Circular Economy Strategy to be published in 2026.

RECOMMENDATION #12

It is recommended that preparations for the next Circular Economy Programme commence post the mid-term evaluation process by publishing an issues paper based on the evaluation outcomes and to commence discussion with DCEE, DAFM, DETE and other key stakeholders.



APPENDIX 1:

KEY ACTIVITIES DELIVERED BY EACH CIRCULAR ECONOMY PROGRAMME TEAM

WASTE AUTHORISATION

- > **Waste sector licensing** – assessing applications and issuing industrial emissions licences, Integrated Pollution Control and waste licences.
- > **Certificates of registration** – issued to local authorities for waste recovery activities (e.g. bring banks)
- > **Certificates of authorisation** – issued to local authorities for historic landfill sites
- > **Critical Raw Materials** – acting as the national Single Point Of Contact (SPOC) for the processing and recycling stages of critical raw materials.
- > **Article 11 determinations** – Determinations, made by the EPA, regarding the type of waste authorisation, if any, is required for an activity.
- > **Maintaining waste capacity register**

REGULATION

- > **By-Product (Regulation 27)** – single case and national decisions
- > **End of Waste (Regulation 28)** – single case and national decisions
- > **National Hazardous Waste Management Plan 2021-2027** – development of this statutory plan, delivery of actions and monitoring its implementation through hosting a national working group.
- > **Bioeconomy** – engagement (through national representative groups) and supporting other key stakeholders on implementation of bioeconomy solutions.

WASTE STATISTICS

- > **National circular economy and waste statistics.** Collation of data for EU statutory and other reporting obligations. 18 statistical data releases (mainly annual reporting obligations). Reporting on Plastics Own Resource.
- > **National waste characterisation studies.** Delivery of national waste characterisation for municipal waste (household and non-household) and other waste streams as necessary to inform statistical reporting and policy implementation.
- > **National Waste Data Network:** Hosting network of central and local government to support waste data collation and compilation.

IMPLEMENTATION

- > **National Food waste prevention programmes:** Food Waste Charter (voluntary food and drink sector initiative), annual networking event (Food Waste Forum), Stop Food Waste (consumer-facing programme).
- > **Green Public Procurement:** Annual reporting on GPP implementation by Government Departments, publication of national guidance and national criteria sets for priority sectors, publication of case studies, hosting biennial *GPP in Practice* events.
- > **Behavioural and Circular Insights:** Circular economy behavioural research programme (focus on priority materials) and Circular Insights Series (studies to provide evidence to inform policy).
- > **National Reuse and Repair Network:** Hosting network of national-level organisations to share knowledge and collaborate on scaling reuse and repair.
- > **Innovation and Demonstration Funding:** Grant-aid funding to support pilot and demonstration projects for priority areas.
- > **National EPA Circular Economy Conference**

ACTIVITIES DELIVERED ACROSS ALL PROGRAMME TEAMS

- Development of guidance, hosting webinars and other supports for stakeholders
- Participation in EU and national and EPA working groups
- Public engagement through presenting at events

APPENDIX 2:

HORIZON SCAN FOR LEGISLATION AND POLICY DRIVERS FOR THE PRIORITY MATERIALS OF THE PROGRAMME AND CURRENT PROGRAMME ACTIVITIES RELATING TO EACH PRIORITY MATERIAL

Clean Industrial Deal (90% NET Reduction in Greenhouse Gas Emissions) Industrial Emissions Directive 2.0 (Reduce key air pollutants by 40% Improve resource efficiency and circularity at industrial facilities) EU Circular Economy Act (Proposed - Develop and Grow Markets for Secondary Materials)							
Priority materials:	Packaging	Plastics	Textiles	Food, Water & Nutrients	Construction & Buildings	Electronics & ICT	Batteries & Vehicles
Key drivers including New & Future Legislation	Packaging & Packaging Waste Regulation (EU) 2025/40 (adopted Dec 2024)	Packaging & Packaging Waste Regulation (EU) 2025/40 (adopted Dec 2024)	Waste Framework Directive revision (entry into force Oct 2025)	Waste Framework Directive revision (entry into force Oct 2025)	EU Waste Framework Directive (national SI in place)	EU Critical Raw Materials Act Regulation (EU) 2024/1252	Batteries Regulation (EU Critical Raw Materials Regulation also applies)
Headline impacts: Targets & obligations	Packaging waste reduction targets: 5% by 2030; 10% by 2035; 15% by 2040 Re-usable packaging targets in 2030 and 2040 Minimum recycled content (plastic packaging) in 2030 and 2040 New reporting obligations (placed on market data)	Packaging waste reduction targets: 5% by 2030; 10% by 2035; 15% by 2040 Re-usable packaging targets in 2030 and 2040 Minimum recycled content (plastic packaging) in 2030 and 2040 New reporting obligations (placed on market data)	Introducing Extended Producer Responsibility for Textiles Ban on the destruction of unsold clothes and footwear	Introducing food reduction targets: 10% in manufacturing & processing; 30% in retail, hospitality and households by 2030 Introducing food waste prevention programme measures	70% recovery target by weight selective demolition	By 2030, extraction capacity is capable of producing 10% of union's annual consumption of strategic raw materials recycling capacity is producing 40% of the annual consumption of SRMs EPA is SPOC for processing and recycling projects	Waste collection targets: for portable batteries – 45% by 2023, 63% by 2027 and 73% by 2030; for LMT batteries – 51% by 2028 and 61% by 2031 target for lithium recovery from waste batteries of 50% by the end of 2027 and 80% by the end of 2031 Recycled content 6% for cobalt, 85% for lead, 6% for lithium and 6% for nickel by 2031
Key drivers including New & Future Legislation		Single Use Plastics Directive (national SI in place)	Eco-design for Sustainable Products Regulation & Right to Repair	EU Bioeconomy Strategy	Energy Performance of Buildings Directive	Eco-design for Sustainable Products Regulation	Eco-design for Sustainable Products Regulation
Headline impacts: Targets & obligations	Packaging recycling targets 65% by 2025/70% by 2030 (target for recycling of all packaging). Also individual targets for material specific streams.	Separate beverage bottles collection for recycling, 77% by end 2025, 90% by end 2029 Recycled plastic content in PET bottles, 25% by start 2025, 30% by start 2030 New EPRs (tobacco, balloons, wet wipes, fishing gear)	Framework Legislation broad scope includes clothing and footwear products new requirements to improve design & env performance of products digital product information passport reporting and market surveillance	A new EU bioeconomy strategy was published in Nov 2025	Binding Targets to Increase the Energy Performance of national residential building stock by 16% by 2030 by 20-22% by 2035 national renovation plans	Framework Legislation broad scope includes energy related products new requirements to improve design & env performance of products digital product information passport reporting and market surveillance	Framework Legislation broad scope includes energy related products new requirements to improve design & env performance of products digital product information passport reporting and market surveillance
Key drivers including New & Future Legislation		Own Resource - Non-Recycled Plastic Packaging Waste (EU) 2023/595				Right to Repair Directive	Right to Repair Directive
Headline impacts: Targets & obligations		Economic penalty of 80c per kg of unrecycled plastic packaging charged every year (~€200M)				Increase repair and reuse of goods both within and outside the legal guarantee manufacturers obliged to repair goods covered under ESPR	Increase repair and reuse of goods both within and outside the legal guarantee manufacturers obliged to repair goods covered under ESPR
Key Policy Drivers:	Second Whole of Govt Circular Economy Strategy Programme for Government 'Securing Ireland's future'	Second Whole of Govt Circular Economy Strategy Programme for Government 'Securing Ireland's future'	Second Whole of Govt Circular Economy Strategy New National Policy Statement on Textiles and Circular Textiles Roadmap New Delivery Plan for Extended Producer Responsibility for Textiles Programme for Government 'Securing Ireland's future'	Second Whole of Govt Circular Economy Strategy New National Food Waste Prevention Roadmap 2026-2028 (replacing 2023-3035 Roadmap) Programme for Government 'Securing Ireland's future'	Second Whole of Govt Circular Economy Strategy New National Circular Construction Roadmap Programme for Government 'Securing Ireland's future'	Second Whole of Govt Circular Economy Strategy Programme for Government 'Securing Ireland's future'	Second Whole of Govt Circular Economy Strategy Programme for Government 'Securing Ireland's future'
Headline impacts: Targets & obligations	Reuse and consumption targets to be set	Reuse and consumption targets to be set	Reuse and consumption targets to be set New EPR scheme for textiles	Reuse and consumption targets to be set under Roadmap, EPA leading various actions relating to data reporting, awareness programmes (e.g. Stop Food Waste), revised Food Waste Charter, innovation & research	Reuse and consumption targets to be set	Reuse and consumption targets to be set	Reuse and consumption targets to be set
	↓	↓	↓	↓	↓	↓	↓
Priority materials:	Packaging	Plastics	Textiles	Food, Water & Nutrients	Construction & Buildings	Electronics & ICT	Batteries & Vehicles
Current Circular Economy Programme activities		Financial reporting - Plastics Own Resource		Food Waste Prevention Programmes (Stop Food Waste, Food Waste Charter)	Best practice guidelines for resource & waste management plans for C&D projects (EPA, 2021)		
	Circular economy and waste statistics	Circular economy and waste statistics	Circular economy and waste statistics	Circular economy and waste statistics	Circular economy and waste statistics	Circular economy and waste statistics	Circular economy and waste statistics
	National waste characterisation	National waste characterisation	National waste characterisation	National waste characterisation	National waste characterisation	National waste characterisation	National waste characterisation
	Data studies supporting statistical reporting	Data studies supporting statistical reporting	Data studies supporting statistical reporting	Data studies supporting statistical reporting	Data studies supporting statistical reporting	Data studies supporting statistical reporting	Data studies supporting statistical reporting
	Green Public Procurement	Green Public Procurement	Green Public Procurement	Green Public Procurement	Green Public Procurement	Green Public Procurement	Green Public Procurement
	Behavioural insights programme	Behavioural insights programme	Behavioural insights programme	Behavioural insights programme	Behavioural insights programme	Behavioural insights programme	
	Circular Insights Series	Circular Insights Series	Circular Insights Series		Circular Insights Series	Circular Insights Series	
	National Reuse and Repair Network	National Reuse and Repair Network	National Reuse and Repair Network		National Reuse and Repair Network	National Reuse and Repair Network	
	End-of-waste Regulation 28	End-of-waste Regulation 28	End-of-waste Regulation 28	End-of-waste Regulation 28 (e.g. sludges)	End-of-waste Regulation 28		End-of-waste Regulation 28 (e.g. tyres)
				By-product Regulation 27	By-product Regulation 27		
	Innovation funding - local authorities - support for reuse and repair projects	Innovation funding - local authorities - support for reuse and repair projects	Innovation funding - local authorities - support for reuse and repair projects		Innovation funding - local authorities - support for implementation of best practice guidelines in C&D projects	Innovation funding (local authorities - reuse and repair)	
	Green Enterprise - Innovation for a Circular Economy	Green Enterprise - Innovation for a Circular Economy	Green Enterprise - Innovation for a Circular Economy	Green Enterprise - Innovation for a Circular Economy	Green Enterprise - Innovation for a Circular Economy	Green Enterprise - Innovation for a Circular Economy	Green Enterprise - Innovation for a Circular Economy
	Waste sector licensing Certificates of Registration Historic Landfills Article 11 queries						
	National and EU Networks and Technical Working Groups						
	Hosting national events including annual Circular Economy Conference						

APPENDIX 3:

DISTANCE TO KEY CIRCULAR ECONOMY AND WASTE TARGETS

Material/Waste Stream	Target (reference year)	Current IE Rate (reference year)	Target Type
Circular Material Use Rate (CMUR)	>12% (2030)	2.3% (2023)	National (Whole of Government Circular Economy Strategy)
Reuse	>20kg/person/year (2030)	10.6kg/person/year (2021)	National (National Waste Management Plan for a Circular Economy)
Total Waste (ambition)	<2.7 tonnes/person/year (2030)	3.0 tonnes/person/year (2022)	National (National Waste Management Plan for a Circular Economy)
Construction and Demolition annual waste generation	<7.92 M tonnes (2030)	9 M tonnes (2023)	National (National Waste Management Plan for a Circular Economy)
Municipal recycling rate	>50% (up to 2025), >55% (2025)	42% (2023)	EU (Waste Framework Directive 2008/98/EC)
Packaging recycling rate	>55% (up to 2025), >65% (2025), >70% (2030)	59% (2023)	EU (Packaging and Packaging Waste Directive 94/62/EC)
Plastic packaging recycling rate	>22.5% (up to 2025), >50% (2025), >55% (2030)	30% (2023)	EU (Packaging and Packaging Waste Directive 94/62/EC)
Ferrous metal packaging recycling rate	>70% (2025)	66% (2023)	EU (Packaging and Packaging Waste Directive 94/62/EC)
Aluminium packaging recycling rate	>50% (2025)	40% (2023)	EU (Packaging and Packaging Waste Directive 94/62/EC)
Reusable transport packaging or sales packaging	>40% in a reuse system (2030); >70% (2040)		EU (Packaging and Packaging Waste Regulation 2025/40)
WEEE collection rate	>65% (2019)	43.6% (2023)	EU (WEEE Directive 2012/19/EU)
Portable batteries collection rate	>45% (2023), >63% (2027), >73% (2030)	49.2% (2023)	EU (Batteries Regulation 2023/1542)
Light means of transport batteries collection rate	51% (2028), 61% (2031)		EU (Batteries Regulation 2023/1542)
Construction and Demolition Waste material recovery rate (non-hazardous waste, other than soil and stone)	>70% (2020)	72.72% (2023)	EU (Waste Framework Directive 2008/98/EC)
End of Life Vehicles reuse and all recovery rate	>95% (2015)	98.74% (2024)	EU (ELV Directive 2000/53/EC)
End of Life Vehicles reuse and recycled rate	>85% (2015)	91.64% (2024)	EU (ELV Directive 2000/53/EC)
Municipal landfill disposal rate	<10% (2035)	14% (2023)	EU (Landfill Directive 1999/31/EC)
Single Use Plastics separate beverage bottles collection	77% (2025); 90% (2029)		EU (Single Use Plastics Directive 2019/24/EC)

Caveats on the table:

- > This table does not include all statutory targets, including those for minimum recycled content in packaging materials or products.
- > Some packaging recycling rate targets, which are currently not at risk, are not included (wood, metal, glass, paper and cardboard).
- > Battery recycling efficiency targets from the Batteries Regulation 2023/1542 are not included (e.g. lead-acid batteries, lithium-based batteries).
- > WEEE recovery targets are not included, these are currently being met.
- > Food waste reduction targets are not included, as a reference year for the reduction is yet to be confirmed.
- > Most reusable packaging targets (first targets set for 2030) are not included.

TO FIND OUT MORE:

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