



Headquarters, PO Box 3000  
Johnstown Castle Estate  
County Wexford, Ireland  
Ceanncheathrú, Bosca Poist 3000  
Eastát Chaisleán Chaile Sheáin  
Contae Loch Garman, Éire  
T: +353 53 916 0600

F: +353 53 916 0699

E: [info@epa.ie](mailto:info@epa.ie)

W: [www.epa.ie](http://www.epa.ie)

LoCall: 1890 33 55 99

Department of Enterprise,  
Trade and Employment  
23 Kildare Street, Dublin 2, D02 TD30

Email: [managementsupport@enterprise.gov.ie](mailto:managementsupport@enterprise.gov.ie)

15<sup>th</sup> May 2025

EPAC Reference No-0825

**Re: Department of Enterprise, Trade and Employment Statement of Strategy 2025-2028**

A Chara,

The EPA welcomes the opportunity to submit its views on the Department of Enterprise, Trade and Employment's (DETE) Statement of Strategy for the period 2025-2028. We recognise the critical role that your department plays in shaping Ireland's economic landscape and ensuring sustainable development. In this context, EPA makes the following suggestions for the integration of environmental considerations into your Statement of Strategy.

#### *Policy Position on the Environment*

The EPA, in the State of the Environment report 2024 (SOER<sup>1</sup>), recommended that there be a National Policy Position on the environment. Delivering on this Policy Position can assist with the alignment of policies to deliver win wins for climate, pollution prevention and biodiversity and highlight areas where there are trade-offs or tensions between these environmental goals and/or economic and social priorities. The EPA suggests that the interactions, synergies and trade-offs

---

<sup>1</sup> [State of Environment Report](#)

between the environment and economic development of the sectors under your remit be considered and reflected in the Statement of Strategy.

### *Intensifying Climate Action*

The SOER sets out that Ireland has modernised and prospered since joining the EU. The report highlighted that Ireland's growing economy and population are increasing the pressure on the environment and future prosperity and health are threatened unless we better protect our environment. The continuing development of Ireland's economy is set against the climate crisis and the need to continue to lower our carbon emissions. EPA projections indicate that Ireland is not on track to meet its national or EU 2030 emissions reduction targets. In this context, the EPA strongly recommends that DETE's strategy continues to emphasise the importance of climate action and sustainability and suggests that your Statement of Strategy reflects the need for intensified action to decarbonize the sectors under your department's remit.

### Circular Economy Development

Circularity is essential for a sustainable and resilient economy. Promoting a circular economy in Ireland can reduce carbon emissions, enhance resource efficiency, and create new markets for services and goods. There is significant potential for circular enterprises in sectors like construction, food, drink, and biopharma-chem. Ireland's economy, however, is currently mostly linear, lacking circular supply chains and infrastructure, making it reliant on other countries for material management. Achieving a circular economy is challenging and requires support for refurbishment, reuse, repair, and recycling activities. To foster a circular economy, the EPA has identified a need to invest in infrastructure, implement new European legislation to support circular growth and offer incentives to promote best practices in production, supply, purchasing, use, and reuse.

Furthermore, the recent appointment of a new Minister of State for small business and the circular economy, creates a new opportunity for DETE and the Department of the Environment, Climate and Communications to collaborate closely in this area to support businesses to take advantage of the benefits that come from implementing circular economy principles. In this context, EPA suggests that your Statement of Strategy consider and reflect how your department can best support the development of the circular economy within the context of economic development.

### Green Public Procurement

The Government's policy on Green Public Procurement (GPP) 'Buying Greener: The GPP Strategy and Action Plan 2024-2027' was published in April 2024 and aims to drive the implementation of green and circular procurement practices across the public sector. The EPA considers that it is vital that the public sector in Ireland continues to lead by example in implementing GPP through the inclusion of green criteria in procurement. The EPA notes the improvement in this context by DETE as reported in the EPA Monitoring Report of GPP among Government Departments<sup>2</sup>. Further, the Climate Action Plan 2025 highlights the requirement to specify low-carbon construction methods and low-carbon cement material as far as practicable as per DETE guidance for directly procured or supported construction projects. Given the importance of this area and the scope and remit of the

---

<sup>2</sup> [Green Public Procurement Monitoring & Reporting by Government Departments](#)

activities of DETE and its agencies, the EPA suggests that GPP should be well considered and committed to in the Statement of Strategy.

#### *Chemicals and Dangerous Substances*

Your department has a very important role in ensuring that Ireland has a strong chemicals and dangerous substances regulatory framework and in the engagement activities undertaken to do so. In this context, the EPA looks forward to continued work with DETE on measures to prevent chemicals from impacting the quality of the Irish environment and public health. Measures to improve the management of the life cycle of chemicals will reduce the effects of chemicals in use now and will seek to ensure that chemicals produced in the future do not negatively affect human health or the environment. Given the role of your department under REACH, and the Department of the Environment, Climate and Communication's role under POPs and other chemicals-related legislation, your Statement of Strategy could assist with integration across government on chemicals management. The EPA recommends that the Strategy continues to recognise the importance of your department's lead role in ensuring that Ireland has a strong chemicals and dangerous substances regulatory framework.

#### *Sustainable Tourism*

Considering the expanded remit of your department, the new Statement of Strategy will now cover the tourism sector. Consequently, the strategy should recognise the environmental impact of promoting increased visitor numbers. It should recognise the need for adequate and appropriate wastewater, waste & drinking water services and sustainable transport infrastructure to be put in place to service any development associated with tourism projects, in the interests of protecting both the environment and public health. The strategy should also emphasise the importance of integrating environmental considerations into tourism development to maintain long-term ecological balance and community well-being, as highlighted in the recently published Tourism Policy Framework 2025–2030.

The EPA looks forward to continued collaboration with DETE to ensure that Ireland's economic development aligns with our environmental goals. We believe that the recommendations outlined in this submission will contribute to a more sustainable and resilient future for Ireland. If you require any additional information concerning points raised in this submission, the EPA would be happy to meet with the relevant team to discuss further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Laura Burke', followed by a period.

Laura Burke

Director General