



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
W: www.epa.ie
LoCall: 1890 33 55 99

Email to: bioeconomy@dcee.gov.ie

Department of the Environment, Climate and Communications
29 – 31 Adelaide Road,
Dublin,
D02 X285

17 August 2026

EPA Reference: EPAC-1626

Public Consultation on draft Bioeconomy Strategy 2026-2030

A cháirde,

The Environmental Protection Agency welcomes the development of Ireland's draft Bioeconomy Strategy 2026–2030, as a key part to contribute to a sustainable, circular bioeconomy that contributes to climate action, resource efficiency and waste prevention.

It is noted that earlier feedback provided by the EPA to inform the development of the strategy has been largely taken into account. However, your attention is drawn to comments under the following headings, which may be helpful in finalising the strategy:

1. Regulatory requirements

Regulation can provide certainty and clarity around circular use of bio-based materials via the by-product and end-of-waste regulatory mechanisms. It is important that any innovation and exploratory initiatives are undertaken in full compliance of regulatory requirements and associated guidance. The EPA welcomes the inclusion of targeted regulatory sandboxes as part of facilitating an enabling regulatory framework. However, the regulatory system for by-products

requires development so that the beneficial reuse of materials as by-products is maximised and waste prevention opportunities optimised. A further action under Section 1.4 Enabling Regulatory Framework is recommended to specifically address this challenge.

The draft strategy is focused on scaling up beyond research and pilot-scale activities. It is essential that the technical and administrative capacity to address regulatory requirements (e.g. decision-making and consenting processes) be put in place to adequately support the planned scale up.

The strategic opportunities, development pathways and key challenges are noted under each key sector. We draw your attention to the potential for national-level decisions under by-product and end-of-waste regulatory provisions. A sectoral-led approach to developing national-level decisions for suitable materials could achieve strategic waste prevention and bioresource valorisation. The EPA recommends that this opportunity be reflected in the development pathways and the targeted actions.

2. Awareness

Awareness initiatives could also include highlighting the opportunities within businesses to identify uses for production residues, thereby preventing loss as waste while achieving biowaste valorisation (addressed in section 4.2). As such, the EPA suggests that there could be a clear link between sections 2.4 and 4.2 of the Draft Strategy.

3. Bioeconomy as a climate solution

Section 4.1 refers to Marginal Abatement Cost Curves and research being undertaken by the EPA. We would like to clarify that DAFM is the lead funder of this research and as such should be reference in this regard.

In relation to Action 4.1.2, it is not clear to the EPA what is intended by “investigate the potential for including the bioeconomy in Ireland’s national emissions inventory”. National emission inventory includes all emission sources within the economy according to the guiding principles of reporting.

In relation to Action 4.1.3, DAFM is conducting such a programme as that referenced in the action, under Carbon Farming discussions.

4. Public Buyers

EPA is the lead Agency for several actions under the national Green Public Procurement policy 'Buying Greener' including Action 8 which requires *biobased options to be considered for inclusion in relevant national GPP criteria where appropriate*, and Action 13 which requires an *annual examination of the national GPP guidance and criteria to determine the need to update, having regard to new policy, legislation and EU GPP guidance, and the practical experience of public bodies applying the current guidance*.

The EPA’s 2025 examination of the GPP guidance and criteria considered biobased options for inclusion where appropriate. A new section 'GPP and the Bioeconomy - harnessing renewable natural resources' was added to the [national GPP guidance](#) document. This section notes that life cycle assessment data or independent third-party sustainability certification should be

requested to ensure that use of a biobased material is sustainable, as not all biobased alternatives (such as some biofuels) are always environmentally preferable. It also highlights that some national GPP criteria encourage or mandate the use of sustainable natural resources, for example the national GPP criteria for [Furniture](#) include an award criterion which allocates marks for the use of recycled, biobased or renewable materials.

The EPA recommends that, under Action 2.3.1, NSAI/TC 169 addresses life cycle assessment/independent third-party sustainability certification gaps (where they exist) for biobased materials. This evidence will support inclusion of biobased options in future updates of the national green criteria sets.

The EPA will continue to engage with DAFM and DCEE in relation to the annual examination of the national guidance and criteria, to ensure that they align with and include new bioeconomy policy, legislation and practical experience of public bodies.

5. Standards

The EPA recommends that section 2.1 of the draft strategy should state that any product that transitions from waste must be aligned with relevant product standards, to ensure confidence in the market for secondary materials.

The EPA is the competent authority for end-of-waste decisions in accordance with Regulation 28 of the Waste Directive Regulations (transposing Article 6 of the Waste Framework Directive). Our remit does not extend to the development or establishment of standards. End-of-waste decisions lean into and align with relevant existing standards, be it national, European or industry. The development of such standards rests with Government and/or industry. The EPA will engage, as appropriate, with the Technical Committee (TC) on the bioeconomy (NSAI/TC 169).

6. Alignment with key national plans and programmes

The Bioeconomy Strategy should be aligned with other key national plans and programmes e.g., National Biomethane Strategy, Common Agricultural Policy Strategic Plan, National Climate and Energy Plan, Waste Action Plan for a Circular Economy and the National Planning Framework. Your attention is drawn also to the National Food Waste Prevention Roadmap 2023-2025 and the Green Public Procurement (GPP) National Strategy and Action Plan 2024-2027. EPA submissions on these and other relevant published national strategies and plans are available to view on the EPA [website](#). The EPA's recent submission on Uisce Éireann's Draft National Bioresources Strategy and SEA Environmental Report can be provided on request.

7. Food Use and Waste Hierarchy

In relation to food waste, the importance of the Food Use and Waste Hierarchy and prioritising prevention measures over waste management measures should be acknowledged in the Strategy. A strong focus should be placed on applying the cascade principle, preventing waste in the first instance and for unavoidable food waste, ensuring that biowaste is used first for higher-value products before energy recovery or land application.

The EPA suggests that the Strategy should acknowledge the mandatory targets for food waste reduction which were introduced under the revised Waste Framework Directive and are to be

met by 2030. Measures to prevent food waste will be essential to support the State's requirement to reduce food waste.

It is recommended that Section E: Food and Other Organic Wastes (under Supporting Key Sectors) and the reference to “Food First” in the Guiding Principles highlight the importance of the Food Use and Waste Hierarchy and the mandatory food waste reduction targets.

For consistency with the principles of circular economy objectives and a 'prevention first' approach, we suggest that action E9 should be presented as action E1 to demonstrate prioritisation of this approach.

It would be useful to include a schematic within the Strategy showing the interlinkages with it and its dependencies on other plans and programmes.

8. Strategic Environmental Assessment

The Strategy should consider, as appropriate, the requirements of the Strategic Environmental Assessment (SEA) Directive, its implementing regulations (S.I. 435 of 2004 as amended) and the Habitats Directive, early in the plan-preparation process. We also refer you to the EPA Good Practice, S.I. No. 113/2022 - European Union (Good Agricultural Practice for Protection of Waters) Regulations 2022. The [SEA Screening Good Practice Guidance](#) is a useful resource to consider in this context.

9. Implementation of the Strategy

We note that the EPA is listed as a member of the monitoring partnership in its capacity as a key data provider. We look forward to early engagement about the scope of this role and associated data requirements.

It is indicated in the Draft Strategy that implementation will proceed on a phased basis. It will be important in the Final Strategy to identify clearly the phasing and timeframes associated with any EPA involvement and with each action, particularly given that there are 49 actions under the strategic objectives and a further 59 actions under the key sectors.

If you have any queries or need further information in relation to this submission, please contact Caitríona Collins, Circular Economy Programme, at c.collins@epa.ie.

Yours Sincerely,



Mary Frances Rochford
Programme Manager, Circular Economy
Office of Environmental Sustainability