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CC: Les Carberry, Principal Officer

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Public Consultation on the Proposed Publication of the Circular Economy Strategy (EPAC-2021)

Dear Philip,

Thank you for the opportunity to comment on the draft Circular Economy Strategy. The development of this strategy is a welcomed development for what will be a significant driver of the transition to a carbon neutral economy and opportunity for sustainable economic growth.

In 2020, the EPA published the latest State of the Environment Report: "Ireland's Environment - An Integrated Assessment". This publication provides a detailed account of the overall quality of Ireland's environment; the pressures being placed on it; and the societal responses to current & emerging environmental issues. The assessment found that the overall quality of Ireland's environment is not what it should be, and the outlook is not optimistic unless we accelerate action. The report identifies the need for national & sectoral action; and full & early implementation of plans & programmes.

National Policy

The State of the Environment Report identified the need for an overarching national environmental policy position that integrates and delivers across multiple related strategies, plans and programmes. This recognises that environmental issues and challenges such as waste management, climate change, air quality, water quality and biodiversity cannot be looked at in isolation as they are complex, interconnected and need to be tackled in an integrated way. The forthcoming Circular Economy Strategy should address such integration in its preparation and implementation.

Circular Economy

Designing out waste & keeping materials in use longer will target the 45% of emissions associated with production of goods and food. The circular economy has a critical role to play in achieving climate targets at national and global levels.

Ireland has reached a plateau in relation to waste management; to further deliver the necessary waste prevention and circular economy ambitions will be a challenge. The latest waste statistics indicate that waste generation is increasing in many waste streams, including municipal, C&D waste, hazardous waste, WEEE and ELVs. The link between economic growth, consumption levels and waste generation has not been broken.

Municipal and packaging waste recycling rates have stagnated or declined but improved segregation of kerbside bins could bring about significant improvement in rates. Landfill and waste to energy recovery in Ireland is at capacity and the county is highly dependent on export markets to residual, recyclable and hazardous waste. We also need to build in resilience to Ireland's waste management capacity in the event of emergencies.

The strategy should seek to drive and support the transition to circularity at all stages of product lifecycles to incentivise ecodesign, reuse & repair; increase recycling; and extract the maximum resource value from residual waste. Implementing the policy initiatives articulated in the Waste Action Plan for a Circular Economy will be central to delivering the systemic changes needed and should be reflected strongly within the final version of this strategy.

The circular economy presents an opportunity for a 'green recovery' to rebuild our economy, generate new jobs and respond to climate change. As we emerge from the global pandemic, a 'green' stimulus and implementation of ambitious policies and measures that support the circular economy can deliver Ireland's current and future commitments to a climate-neutral economy and climate-resilient society by 2050.

The EPA welcomes the inclusion of the National Circular Economy Programme within the strategy and its continued central role in Ireland's circular transition. As it outlines, the new Programme, will look beyond waste management, to promote circularity as an economic model and to enhance coherence and alignment among national, regional and local activities. It will provide for a competitive programme of circular economy supports through innovation grants, sponsorships and seed-funding. The Programme will also improve national knowledge and provide an evidence base to inform circular economy development in Ireland. The EPA looks forward to working with your Department in this regard.

Strategic Environmental Assessment

You should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment Directive (S.I. 435 of 2004, as amended) and the Habitats Directive, early in the strategy preparation process.

We also refer you to the EPA Synthesis Report on Developing A Strategic Environmental Assessment (SEA) Methodologies For Plans And Programmes In Ireland (and the pre-screening check contained within) to assist you in considering whether SEA is required for the Plan.

<https://www.epa.ie/publications/monitoring--assessment/assessment/synthesis-report-on-developing-a-strategic-environmental-assessment-sea-methodologies-for-plans-and-programmes-in-ireland.php>

This submission reflects the key findings of EPA assessments, data and insights and puts forward priority measures that have been identified for consideration in the development of the Circular Economy Strategy. Links to these documents are included in Appendix I, which should also be considered as part of the EPA submission.

Yours sincerely,



Laura Burke
Director General

Public Consultation on the Proposed Publication of the Circular Economy Strategy (EPAC-2021)

Question 1. Do you agree with the draft Strategy's proposed key objectives? In your view, are there further or alternative objectives that should be included?

- The EPA welcomes the objectives set out however the strategy would benefit from setting out the vision of social, economic and environmental development that it aims to deliver.
- It is suggested that the role of Government as a leader is included as a strategy objective. An associated target for Green public procurement should be addressed within the strategy as a circular economy action that is underway and will be a key driver for embedding circularity across multiple sectors.
- The transition to a circular economy will present opportunities but also challenges to individuals and business which will cause varying degrees of burden and may be met with resistance. It is suggested that the strategy be explicit on the intention to identify, understand and work to overcome the barriers to implementing a circular economy. The use of "improve their lives" phrase within objective No.3 should be removed.
- Objective No.5 could be strengthened by expanding scope to identification of levers as well as barriers to implementation. It is also suggested that technological barriers be included within the list of barriers to be addressed.

Question 2. Do you agree with the overall level of ambition set out in the draft Strategy? If not, is further ambition needed or is the draft Strategy overly ambitious?

- The overall ambition of the strategy could be increased by presenting the Circular Economy as a national economic model in its own right. The strategy should explicitly address circularity in the context of Ireland's major economic sectors, along with highlighting local and social enterprise opportunities. The strategy should aim to support and enable economic transformation by driving deep change within and across sectors and setting a high level of national ambition.
- It is suggested that the strategy promotes the circular economy not as an alternative resource use model but a global transition that Ireland must engage with as a market leader in the provision of goods and services. Examples of where Ireland is already doing this include our Agri-food industry through engaging in the bioeconomy e.g. whey products, pharmaceutical and waste and resource sectors. Reference should be made to the transition that is already happening across global markets as international companies respond to consumer preferences and drive consumer demand.
- It is suggested that the strategy be more specific within the commitment to its overall target – currently the strategy sets out that "by the 2030 Ireland's ambition is to significantly improve its circular material use rate (in both absolute terms and in comparison with other

EU Member States) so that our national rate is above the EU average by the end of this decade". The articulation of the specific rate we are aiming for would provide greater clarity across-Government and a clear direction of travel for all stakeholders.

- The challenge for Ireland in meeting new and ambitious waste targets and the cross sectoral nature of meeting these challenges should be reflected more strongly within the document.
- The development of more detailed actions in future evolutions of the strategy will bring greater clarity to the scale and impact that this strategy seeks to deliver across various sectors.

Question 3. Should Ireland measure its progress in achieving a more circular economy relative to its European Union peers? If not, what alternative benchmark should Ireland adopt and why?

- Progress comparison with European peers is a useful measure of Ireland's move to a circular economy due to shared legislative drivers and product standards across EU member states, as well as a common market for goods and services. Ireland is part of a wide range of European networks and working groups addressing waste and resource use and the circular economy that will continue to support our transition to circular economy. Work is underway at EU level to develop National and Sub-national indicators for the circular economy, which will assist Ireland in its monitoring and reporting.
- In 2017 the EPA commissioned "[A Review of Current Priorities and Emerging Issues in European Waste Policy](#)" which highlights progressive actions of EU leaders in moving to a circular economy. These include Targets for Waste, Resource Efficiency and Related Areas; Regulatory Measures and Taxes, Levies and Fiscal Measures eg in Flanders there are bans on landfill and incineration of recyclable waste; France there is an obligation by law for food retailers and distributors to donate unsold goods and also a requirements on vehicle repair professionals to use second hand parts instead of new ones; and in Finland there is a lower VAT rate for repair services. This is linked in Appendix 1 for your consideration.
- Due to the international nature of the supply chains it will be helpful for Ireland to learn from EU and International 'best practice' e.g. explore how the Netherlands, achieved a rate of 28.5% of circular material use rate, compared to Ireland at 1.6% and an EU average of 11.9%.
- The strategy would benefit from a section on monitoring and reporting progress in this area and to commit to establishing national reporting on circularity.
- The Waste Action Plan for a Circular Economy recognises the growing need for waste data that is accurate, timely and relevant for policy makers and regulators. This should be reflected in the Circular Economy Strategy to support informed policy decisions, monitor policy implementation and for target reporting. The Circular Economy Package gives rise to demands for new types of data and information to evaluate progress in reducing waste generation and maximising the reuse of material. Additional progress indicators of Ireland's transition will also be required e.g. based on material flow proportions (e.g. secondary material as a percentage of national material flow accounts); economic/employment dividend; resources conserved; and carbon avoided.
- To strengthen and improve the national governance arrangements around waste data collection, validation, sharing and integration in a coordinated way, the EPA, supported by

the National Waste Collection Permit Office has established a National Waste Data Network. The EPA's National Waste Statistics web resources publishes the latest national waste data, while the Ireland's Environment section of the EPA website publishes a range of key waste and environmental indicators. We are continually expanding the waste and indicator data available on our website and are pleased to engage further.

Question 4. Would you rate Irish public awareness of the circular economy as high, medium or low? And how important do you think raising public awareness is to further develop the circular economy?

- A 2020 Eurobarometer survey highlighted that the two measures that are seen by Irish citizens as potentially the most effective at tackling environmental problems are (1) changing the way we consume (33%) and (2) changing the way we produce and trade (31%). This indicates that while individuals may not be familiar with the term “circular economy” there is increasing public appetite for its principles. This is also evidenced by citizen-led sustainability initiatives and growth and use of circular business models at national and global level (products and services).
- Initiatives to increase public awareness of the availability, environmental and economic benefits of the circular economy are important to drive increased demand and support for such initiatives and enterprises.
- The move to a circular economy requires transformative system changes while public awareness plays an important role in informing consumer choices and driving circular demand. The systems change needed will be implemented by business and industry. Awareness and engagement activities among business, industry, finance providers, investors and other market stakeholders are critical and requires strong strategic attention.

Question 5. What are the most effective awareness raising measures that could be taken under the Strategy?

- The strategy identifies the National Circular Economy Programme and its continued central role in Ireland's circular transition. Behavioural insights have been identified as a foundation of the draft Circular Economy Programme, providing evidence to inform policy, behavioural change interventions and awareness campaigns. This will include:
 - baseline information studies
 - national surveys on behaviours and attitudes
 - analysis of waste characterisations and national waste data

These will facilitate ongoing engagement across Irish business and society and support national targeted behavioural change campaigns with consistent messaging used by all stakeholders. A number of these will be delivered annually focusing on key materials, behaviours or businesses. These will be led by the EPA in collaboration with the Regional Waste Management Planning Offices engaging at a community level to disseminate and promote national guidance on the circular economy.

Building on EPA experience, the Programme will promote education and awareness at all levels of society, including the formal education system and professional CPD programmes, but also the public sector. This work will be achieved through direct EPA actions and through the programme's strategic partnerships. The programme will also engage with DECC and the RWMOs to support the public facing MyWaste portal by providing content to raise awareness on waste prevention including household food waste.

Question 6. Are you satisfied with the proposed stakeholder engagement arrangements in the draft Strategy? Which additional stakeholders (if any), not already part of the Waste Action Group, do you think should be included in the Strategy's implementation?

- The objective for inclusion is important and the forums referred to in the document are welcomed. The explicit intention for collaboration and support is positive. Notwithstanding this there is scope within the strategy to reflect other levers and drivers for this transition e.g. policy, regulation, taxation and market forces which will see various actors taking their own lead.
- Inclusion of a schematic of the various stakeholder groups and the interplay between them would be helpful within the strategy document. Further outline of the relationship between the Circular Economy Working Group and the Circular Economy Advisory Group would also be beneficial.
- It is suggested that the strategy document incorporate sections under which key stakeholders can identify themselves e.g. Government Leadership; Business Leadership; The citizen/individual; waste and resource management; research; data and evidence, knowledge and skills development and workforce planning and eco-design.
- Stakeholders: It may be useful to strengthen identification of players on the 'economy' side, who will be critical in mainstreaming this economic paradigm – e.g. D/Finance.

7. What do you see as the major economic and/or social co-benefits of moving towards a more circular economy in Ireland, so that environmental improvements also provide economic and social opportunities, and vice versa?

- The circular economy will shape national, European and global business models as a viable market response to environmental and climate challenges. The circular economy is at the core of the transition to a low-carbon economy; and has a critical role to play in achieving climate targets at national and global levels.
- In terms of an all of Government response additional to DECC the strategy should explicitly address the fiscal, enterprise, research and education Government Departments. Key drivers include the European Green Deal, Regulatory Reform for a Circular Economy, Climate Action, post Covid recovery, Waste Action Plan for a Circular Economy and Global Market Responses.
- The circular economy presents an opportunity for a 'green recovery' to rebuild our economy, generate new jobs and respond to climate change. As we emerge from the global pandemic, a 'green' stimulus and implementation of ambitious policies and measures that support the circular economy can deliver Ireland's current and future commitments to a climate-neutral economy and climate-resilient society by 2050.
- In addition to reducing wastage and environmental impact, the strategy should also articulate the business case for circularity as a source of economic innovation and growth. 'Circular Business Models' (CBMs) are characterised by reduced consumption of natural resource input to deliver fundamentally different ways of using/selling goods and services. CBMs allow companies to reduce dependence on increasingly scarce & costly natural resources; turn waste into additional revenue; and develop new customer value propositions.

- Accenture¹ define CBMs across five strands which could be used as a framework within the strategy to outline this opportunity:
 1. Circular Supplies: Provide renewable energy, bio based- or fully recyclable input material to replace single-lifecycle inputs
 2. Resource Recovery: Recover useful resources/energy out of disposed products or by-products
 3. Product Life Extension: Extend working lifecycle of products and components by repairing, upgrading and reselling
 4. Sharing Platforms: Enable increased utilization rate of products by making possible shared use/access/ownership
 5. Product as a Service: Offer product access and retain ownership to internalise benefits of circular resource productivity
- The burden of the transition to a circular economy should not fall in an unbalanced way on the public sector to provide associated supports. The strategy should look at creating an environment that supports the transition across the public and private sector which include the necessary market certainty, data and evidence, regulatory efficiencies and supports the role of both public and private investment.

Question 8. What do you see as the major regulatory barriers to the further development of the circular economy in Ireland? In answering this question please feel free to address economy-wide issues or those affecting your sector in particular.

- Circular economy techniques often involve altering resource flows towards the reuse/recycling of products, components or materials after their initial productive life. Much of this is traditionally regarded as waste and its movement is tightly regulated. There is a challenge to accommodate innovation and trialling of new options and processes without compromising critical human health and environmental protections. The EPA will develop its responses in this area through its wide regulatory experience including that related to end-of-waste and by-products and market surveillance and chemicals & the Non-toxic Environment.
- Circular economy does not mean de-regulation. However, regulation must be proportionate and not act as a barrier to adopting circular economy practices. The technical and administrative delivery of regulation needs to be sufficiently resourced to meet the expectations and needs of the economic sectors and stakeholders that are making every genuine effort to develop options to support and drive and functioning and effective circular economy.

Question 9. What do you see as the major non-regulatory barriers to the further development of the circular economy in Ireland? In answering this question please feel free to address economy-wide issues or those affecting your sector in particular.

- Significant improvement in national recycling rates could be achieved through improved waste segregation. The EPA's most recent national municipal waste characterisation study in 2018 found that over 20% of material in the household recycling bin should not be there and that packaging material in the recycling bin is now less clean now than it was ten years ago. Two-thirds of the plastic waste that ends up in our bins is not currently being targeted by Ireland's recycling list.

¹ 1 The Circular Economy Handbook, 2020, Lacy, Long & Spindler

While there has been a significant reduction in organic waste in the household residual bin thanks to the introduction of the brown bin, still only 43% of Irish households now have a brown bin and about half of household organic waste is still being disposed of in the 'wrong' bins (i.e., the recycling or residual bin). In the commercial sector, almost 70% of the content of the residual waste bins could potentially be diverted either to recycling or to brown bins.

- EPA national waste statistics show high levels of municipal and packaging waste is sent for energy recovery. While this waste management option is preferred over disposal to landfill, there is a risk that it may disincentivise extraction of recyclable materials from residual waste.
- The strategy should support timely implementation of actions set out within the Waste Action Plan to improve waste segregation by households and businesses and broadening of the scope of what can be recycled by Irish households and businesses.
- Recent years has seen the trend for products to be offered at relatively low initial selling costs based on driving frequent products replacement. This can be driven by marketing and fashion stimuli; by design approaches that form barriers to repair; or even through deliberate planned obsolescence. Through supporting a reversal of this trend items that can no longer be used or repaired, items can be dismantled to recycle the components in the product and/or the materials it is made from. Through careful segregation and processing, these wastes can then be safely returned to manufacturers as a cost-effective raw material stream.
- A lack of knowledge and understanding amongst the general population regarding the impact of their consumer and waste management choices as well as the desire for “new” and accumulation of products.
- Poor understanding of national material flows and absence of a national inventory of secondary materials flows. A national critical raw material strategy (i.e. what materials are key to economy – will assist identifying the opportunities for 2^o materials); pivoting the waste industry to become a resources industry.

Question 10. How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?

The Irish Government’s annual public sector purchasing accounts for 10% to 12% of GDP. This provides the public sector with significant influence over the provision of more resource-efficient, less polluting goods, services and works within the marketplace. A wide range of international policy instruments reference sustainable or green public procurement (GPP) as an important tool in effecting environmental change. Recent GPP-related policies at the national level include the following⁶:

- Waste Action Plan for a Circular Economy: Ireland’s National Waste Policy 2020-2025
- Climate Action Plan 2019: To Tackle Climate Breakdown
- Circular 20/2019: Use of Environmental & Social Considerations in Public Procurement
- The Local Authority Climate Charter
- 2020 Programme for Government: Our Shared Future
- The EPA, through the National Waste Prevention Programme, is an advocate and actor in this area and, in particular, has:
 - Updated EPA guidance on GPP which will be published in 2021

- Developed an upskilling programme for procurers and specifiers
- Developed measuring and reporting system for Government departments
- Developing a training programme for suppliers (2021)

Question 11. What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?

- The EPA recommends that “leading by example” and, in particular, green public procurement be a cornerstone for innovation and demonstration to stimulate a critical mass of demand for more sustainable goods and services, while reducing the environmental/carbon impact of providing services. Large scale infrastructural and construction projects could be early leaders and drivers in this regard. Timely implementation of mandatory green public procurement for public sector organisations is necessary.
- Government can leverage a circular economy approach and influence behaviour change through multiple activities: clear policy signals, legislation, development of secondary material standards, national targets, economic levies, restrictions on placing on the market, improved labelling, extended producer responsibility, and incentivising new circular economy business models and initiatives to reduce consumption of single-use items.
- Timely and consistent implementation of legislation and policy that supports the circular economy that gives clarity to industry and consumers.
- As set out within the strategy circularity roadmaps for key waste streams should be developed and implemented. It is suggested that an initial focus on: *Food Waste* and *Plastics*. These roadmaps should be target-driven and will articulate specific objectives and activities to be undertaken to achieve positive change for the identified sector.

Question 12. Which sectors do you think can make the biggest contribution to making Ireland’s economy more circular?

- The Circular Economy presents opportunities and economic returns that transcend all levels of Ireland’s economy and will be a foundation for economic and social development in the next decade. While all levels of the economy are referenced within the document in its current structure it places a stronger emphasis on individual awareness and action through for example repair, reuse, a focus on remanufacturing and activities linked to social enterprises. The strategy would benefit from calling out the role and opportunities of the CE in Large industry and manufacturing, Small and medium enterprises, service sector, social enterprises etc.
- Focus areas should be aligned to key priority economic sectors which also have a high resource use and waste footprint and potential for circularity across their supply chains including the **construction** and **food, drink and bioeconomy sectors**. **Manufacturing** is a significant component of Ireland’s economy, and highly relevant to circularity as it presents an opportunity for reducing operational costs, influences the circularity of the and can engage with new opportunities through re-manufacturing.
- Overall the commercial sector (including hospitality and retail) can do significantly better in the management and segregation of its waste as discussed above as well as the packaging.

Question 13. Do you broadly agree with the policy areas listed for future development in the draft Strategy? If not, which areas would you remove/add to the list?

- The need for policy coherence is clearly articulated and in the document. Full & early implementation of the strategy will be necessary for Ireland to realise the environmental, market and social advantages of the circular economy.
- Consider including 'Training' in the context of 'life-long' formal and non-formal learning as a policy area to ensure the skill set and appetite for circular economy evolves and develops over time and in line with changing circumstances and technological advancements.
- The policy commitment does not include a commitment to funding Research & Development to support the development of the circular economy in Ireland (other than enterprise support). R&D will play an important role in leading development of novel materials and processes to enable circular production. Research in the digital space is necessary to harness new technologies and smart devices to assist further implementation of products-as-a-service models.
- The strategy is silent on eco-labelling for goods and services and associated life cycle analysis which play important roles in awareness raising and assist purchasers making sustainable decisions.
- As set out in the response to Question 3, the Waste Action Plan for a Circular Economy recognises the growing need for waste data that is accurate, timely and relevant for policy makers and regulators. This should be reflected in the Circular Economy Strategy to support informed policy decisions, monitor policy implementation and for target reporting. It is suggested that the strategy policy section include a data and market intelligence commitment to include a national raw materials strategy. This should be followed by analysis of international supply chains and vulnerabilities with assessment of the role of potential secondary sources to meet demand.
- Roadmaps: This list is missing plastic and food waste which are included as priority waste streams in the Waste Action Plan for a Circular Economy. A roadmap on WEEE could also be helpful in terms of re-energising national efforts on reuse and repair within this well-regulated and well-funded waste stream. It is suggested that the potential actions are not listed within this strategy so as to not create an impression that these are pre-determined.
- Linkage to water as a circular resource should be considered – Ireland has some world-class work underway in this area².

Question 14. Any other comments-

- **Current circular economy initiatives:** The EPA welcomes the inclusion of the National Waste Prevention Programme in this section of the document and acknowledgement of the contribution of the Programme. It is suggested that the new Circular Economy Programme is linked-in at top-level as the coordination channel for implementation of the ambition in the strategy. Given the importance of waste in the circular economy concept the regional/national Waste Management Plans could be listed next to illustrate that the state is

putting the policy and regulation framework in place to activate Ireland's waste streams as potential inflows to a circular economy. The Rediscovery Centre and Circuleire (which are funded by DECC/NWPP) could then be shown as strong national-level examples of the commitment and support already shown by government to the Circular Economy.

- **Communications:** It is suggested that demonstration is treated separately to communications. The demonstration aspect is critical and could be given due prominence by a heading and some detail on how demonstrators could be activated – through the Circular Economy Programme and also through enterprise support agencies; local authorities and others. The public-private partnership approach used by Circuleire could be noted as a good way forward in terms of engaging companies on the circularity agenda.
- **Actions:** Are placed throughout in the text and some are in Annex 3 - consolidating into one table with owners to drive accountability and timelines would bring additional focus.

Appendix 1:

Links to EPA publication and resources relevant to the Draft Circular Economy Strategy

Ireland's Environment - An Integrated Assessment 2020

<https://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/>

EPA submission on Waste Action Plan for a Circular Economy

[Submissions & Position papers | Environmental Protection Agency \(epa.ie\)](#)

National Waste Statistics Summary Report for 2018

[National waste statistics | Environmental Protection Agency \(epa.ie\)](#)

National Waste Statistics portal

<http://www.epa.ie/nationalwastestatistics/>

EPA Waste Characterisation Studies [Waste Characterisation | Environmental Protection Agency \(epa.ie\)](#)

A Review of Current Priorities and Emerging Issues in European Waste Policy

<https://www.epa.ie/publications/research/waste/Report-Web-Version.pdf>