

**From:** [Mark Kelly](#)  
**To:** [circulareconomy](#)  
**Subject:** Consultation Submission  
**Date:** Friday 11 June 2021 15:40:23  
**Attachments:** [WholeofGovernment\\_CircularEconomyStrategy\\_Consultation2021\\_MarkKelly.pdf](#)

---

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,

Please find attached my submission in relation to the Proposed Publication of the Circular Economy Strategy.

Many thanks,

Dr. Mark Kelly

Department of Building and Civil Engineering

Galway-Mayo Institute of Technology

Tá an ríomhphost seo faoi réir an tséanta seo leanas atá le fáil ag [Séanadh Ríomhphost GMIT](#)

This email is subject to the following disclaimer available at [GMIT Email Disclaimer](#)

# Whole of Government Circular Economy Strategy

## Consultation 2021-2022

Submission by Dr. Mark Kelly,  
Department of Building and Civil Engineering  
Galway-Mayo Institute of Technology  
Build360 Research Group Lead

[Mark.Kelly@gmit.ie](mailto:Mark.Kelly@gmit.ie)

---

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 objectives outlined include:

- To provide the initial framework for the actions to enable the realization of that policy, and to promote public sector leadership in adopting circular policies and practices.
- By 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.
- To raise awareness amongst households, businesses, communities, and individuals about the Circular Economy and how it can improve their lives.
- To support and promote increased investment in the Circular Economy in Ireland, with a view to delivering sustainable, regionally balanced economic growth and employment.
- Identifying the economic, regulatory and social barriers to the development of the circular economy in Ireland, and the development of solutions, will be an ongoing priority.

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?

I take it that the overall ambition is encapsulated in objective 2:

'By 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.'

This is not overly ambitious. When you consider Ireland's demographics, we should be aiming to become an international leader following Finland's lead, which states: 'Finland aims to become a global pioneer in a world in which our economic competitiveness and well-being can no longer be based on the wasteful use of natural resources. Rather than offering

products, the foundation for earnings will be services, the recycling of products and intelligence-based digital solutions. Finland has a golden opportunity to become a pioneer and shift the focus of competitiveness to a carbon-neutral circular economy and low-emission solutions.'

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

Yes, but a consistent and transparent methodology needs to be developed.

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

Low-to-medium. The public do have a clear understanding of waste, recycling, second-hand etc., so the foundational principles are there; they just need to be framed within a circular mindset. Raising awareness is important but it cannot be based on a knowledge-deficit approach. Awareness raising only goes so far. Anecdotally, there seems to be an appetite for action and behaviour change, which needs to be supported and nurtured.

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

I think through all levels of education from primary school up to higher education would be a good place to start. Circular economy principles could be embedded into the Green Schools and Green Campus programmes in a coherent manner nationally. Businesses across all sectors need to step up and demonstrate their real commitment to sustainability. Raising the profile and supporting social enterprises and community-based organizations has a real value.

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?

I am not sure the stakeholder engagement arrangements are clear within the document. I assume that the indicative roadmaps for the listed sectors will be the next step after the publication of the strategy. For the built environment sector, higher education representatives who are embedding circular built environment principles into the curriculum and developing new programmes should be involved as well as active researchers who are collaborating with industry. We are launching a M.Sc. in Circular Economy Leadership for a Sustainable Built Environment in September 2021, which is funded under HCI Pillars 1 and 3. We have embedded circular economy principles as a core part of our undergraduate programmes and are leading an EPA project exploring circular economy principles across the built environment value chain, working in collaboration with several key industry stakeholders.

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?

From the built environment perspective, the basic principle of recognizing the built environment as a resource or materials bank will present significant opportunities to move away from the linear economy and can be used in an integrated approach to address the significant societal issues of our time i.e., housing, homelessness etc.

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.

There are significant barriers across the built environment sector, some of which include:

- Cultural – too quick to demolish, which does not recognize the inherent value and utility of the existing built environment.
- Myopic focus on energy – the primary focus of low-energy design is to address the operational energy requirements, which does not take into account the resource and human capital that has gone into existing buildings and infrastructure and the embodied footprint of development. A more holistic approach is urgently needed.
- Reluctance to specify secondary or recycled materials due concerns about quality protocols, warranties, liability etc.
- The traditional contractual arrangements do not encourage collaboration and transparency i.e., hyper-competitive and adversarial.

There are many others.

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.

There is a lack of drivers from a planning and client point of view i.e., there is no requirement to embed circular economy principles as a planning condition. This flows down along the supply chain. Each local authority should have a requirement where developments must clearly demonstrate why they are not retaining existing infrastructure and buildings. The public sector needs to take a leadership role on this.

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

Green Public Procurement is key and there should be a mandatory requirement across all developments in the public sector.

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

The Government or Public Sector as a client should aim to become a circular economy leader by embedding circular economy requirements across all their developments. This will directly influence the private sector as they respond to these requirements.

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

Every sector can make a contribution; but the main ones would include the built environment, retail, and food.

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?

Yes, but there are synergies i.e., the construction and demolition sector, circular design, digital services, manufacturing, and business models all relate to the built environment.

14. Any other comments?

A holistic approach is required when transitioning towards a circular built environment. Currently, there are a lack of drivers in the early phases i.e., planning, client requirements, design etc., to catalyze this transition. All stakeholders should be required to embed circular economy principles across the value chain. The recent Circular Planning Statement requirement in London is an excellent example of how the public sector can take a lead to drive the circular economy agenda. The strategies listed below are all excellent ways to prevent waste and reimagine the built environment as having value and utility.

- Increased use of offsite design and manufacture
- Modular building design
- Refurbishment and retrofitting of existing stock
- Tackling dereliction and bringing stock back into occupancy
- Increase use of Construction & Demolition Waste as a secondary construction material

There is also a complementary twin transition in relation to digital transformation and this can be harnessed to exploit the synergies between digitalization and the circular economy.

The Department of Building and Civil Engineering in GMIT are launching a M.Sc. in Circular Economy Leadership for a Sustainable Built Environment in September 2021. This is funded under HCI Pillar 1 and 3. It is an output of the HCI Pillar 3 funded 'Digital Academy for a Sustainable Built Environment' or DASBE project.

In addition, the Department is also aiming to launch a M.Sc. in BIM and Digital Leadership in October/November 2021.

The Department is also leading an EPA-funded research project, Build360, which is testing circular economy principles on several selected projects in collaboration with the Southern Waste Region, Limerick 2030, John Sisk and Son, Carey Building Contractors, the OPW and the DAA.

We have also been co-facilitating an EPA-funded six-week course entitled 'Implementation CDW and Resource Management Best Practice to move towards a Circular Built Environment' with the Southern Waste Region for local authority staff.

We have also been co-hosting the CitA, CIOB, IGBC and GMIT webinar series 'Transitioning towards a Circular Economy for the Built Environment'.