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Sent: Thursday 10 June 2021 17:44
To: circulareconomy
Cc: Peter Burke
Subject: 210610 CCMA Submission to DECC on Circular Economy Strategy
Attachments: 210610 Submission to DECC on Circular Economy Strategy - June 2021.pdf

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Good afternoon,

Please find attached the submission to Department of Environment, Climate and Communications on the Circular Economy Strategy, prepared by the Local Authority Regional Waste Management Planning Offices on behalf of the County & City Management Association.

Please can you confirm receipt of this submission.

Kind regards,

Eleanor

Eleanor Ryan

CCMA Climate Action, Transport and Networks Committee

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dhéanfaí le do chórais ríomhaireachtaí.



**Submission to the Department of
Environment, Climate and Communications
on**

Whole of Government Circular Economy Strategy 2021-2022

prepared by the Local Authority Regional Waste Management Planning Offices

on behalf of the County & City Management Association

June 2021

Q	Question	Response
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?	<p>The three Regional Waste Management Plan Offices are in broad agreement with the five proposed objectives set out in the draft Strategy.</p> <p>While it is important that the public sector provide leadership on the Circular Economy, leadership can be provided simultaneously by different actors. The essential role of the private sector and of business in achieving a Circular Economy should be acknowledged in the objectives.</p> <p>Circular Economy transition requires continuous learning and capacity-building. An objective should be added that focuses on research and learning (both learning in an Irish context and also from international best practice) coupled with a mechanism or route to translate research and learnings into policy and practice.</p> <p>The disruption to norms caused by the Covid-19 pandemic has highlighted the vulnerability of global supply chains and also of the linear economy model in general. Local and simplified supply chains have proven to be more resilient during the COVID crises. Local and simplified supply chains are, coincidentally, a feature of circularity. Ireland's Circular Economy strategy should seek to build on the disruption caused by COVID-19 in a positive way to build a resilient sustainable system which proffers environmental, economic and social benefits.</p>
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?	<p>The draft Strategy is ambitious, particularly in its second objective to condense Ireland's circularity gap and achieve a rating of above the EU average. However, it needs to be ambitious as time is critical and the transformation of our economy and systems needs to happen quickly. While this second objective will be challenging, it will create the urgency we need to reach the targets and objectives set out both in the CAP and in the WAPCE.</p>
3	Should Ireland measure its progress in	<p>Yes, it is crucial to measure circularity if we are to track our progress in general terms but also to highlight areas and sectors that require particular attention, intervention or assistance. Measuring circularity progress relative to other countries in the EU is a valid approach. It is to be expected that other (or all) countries in the EU will be working towards improvements in their circularity too. Therefore, while</p>

	<p>achieving a more circular economy relative to its European Union peers? If not, what alternative benchmark should Ireland adopt and why?</p>	<p>measuring circularity in absolute terms is important, benchmarking against other countries will give us in Ireland a clearer picture of how we are and should be progressing. It will also help to indicate which countries we can learn from in relation to any particular criteria where we are struggling.</p> <p>The OECD Circular Economy Cities Synthesis Report points out the role of measurement of circularity not just in evaluating progress but also in raising awareness, making the case for circular economy and triggering further actions (https://www.oecd-ilibrary.org/sites/16f47a98-cn/index.html?itemId=content/component/16f47a98-cn#section-d1e19250)</p> <p>The EU Monitoring Framework for the Circular Economy (2019) can provide a solid foundation for measuring Ireland's progress. However, we would suggest building on this indicator over time to tailor it to the Irish context (eg. by including criteria for the sectors set out in the WAPCE and the Draft Strategy) and to improve its usefulness by adding criteria that gauge reuse and waste minimisation/diversion from landfill.</p>
4	<p>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 developing the circular economy?</p>	<p>From our experience, the awareness and understanding of Circular Economy among the general public in Ireland is low. In some ways, this is not surprising as the meaning of the term 'circular economy' is not immediately apparent and requires explanation.</p> <p>Although promoting the Circular Economy in arenas such as business, industry, policy making and academic institutions is key, it is also important to raise awareness among the public so that as citizens and consumers, individuals, families and communities can make life style and other decisions that favour circular solutions, services and products over linear ones.</p> <p>Further, a moderate to high degree of public awareness would help to provide public support for budget allocation to promote circularity and also for political decisions that may need to be made (eg phasing out of high emissions industrial process and fossil fuel energy generation or the introduction of financial disincentives such as a latte levy etc).</p> <p>Finally, the link between Circular Economy and Climate Change is not always well understood by the public. Approximately 45% of Climate Change emissions arise from our use of land and materials and so transitioning to a Circular Economy will help to tackle Climate Change. Making this link clear for the public will help to emphasise the importance of a Circular Economy.</p>
5	<p>What are the most effective awareness raising measures that could be taken under the Strategy?</p>	<p>The concept of developing and using a National Circular Economy brand has a lot of merit and could be a very effective way of raising awareness and gaining understanding among the general public. It could also be an important and effective means of engaging businesses that are not yet thinking about Circular Economy and sustainability. Businesses we have worked with stressed the need for a national campaign on Circular Economy to reach a foundational level of knowledge about the CE concept across society.</p> <p>In communicating the national brand, we would suggest the following for communicating with the public:</p> <ul style="list-style-type: none"> • Using a national advertising campaign using traditional and new media • Using audience segmentation, develop and deliver a National Advertising Campaign for various target audiences, • Using a 'sold not told' approach to the communications, ie sell the concept to people, rather than tell them what they 'should' do • Commissioning some media programmes about Circular Economy or features on existing general interest and business media programmes

- Extensive social media campaign to socialise the National Circular Economy brand
- Stress the social and economic benefits of CE in addition to the environmental benefits

Business and enterprise constitute a vital component of a CE. According to EPA/IBEC research carried out in 2018 just half of Irish-based companies have an awareness and understanding of CE (<https://www.ibec.ie/connect-and-learn/media/2019/08/14/new-ibec-survey-shows-just-half-of-businesses-understand-the-circular-economy>). From our experience of promoting CE to businesses, awareness and understanding still appear to be relatively low. Further, even where awareness and understanding exists, businesses find it difficult to get the information and support required to plan the integration of circularity into their business model.

Training and education for business in Circular Economy is vital. This should include both basic and advanced levels of training. As businesses progress through their Circular Economy 'journey' they may need specific information and support on particular aspects such as packaging, supply chains, collaboration, industrial symbioses and Green Public Procurement etc.

From the training that we have been doing with businesses, we know that they want practical advice. For example, they want to know the types of tender criteria that can make a real difference to sustainability or how to ensure a design brief that will close material loops. They may need guidance about where to start or may have started and do not recognise the circularity in their current actions. There are a number of existing CE training courses available (including the MODOS course developed as a collaboration between the Regional Waste Management Planning Offices and the Dublin CC LEO). Really it does not matter which training a company chooses, but it is important that investment is made in ensuring that training is readily available, especially for SMEs/micro-enterprises. It is also important to ensure that the training is of high quality and is offering the correct information to businesses. Businesses who try and fail to implement CE measures, particularly if this involves expensive change that does not work, will be reluctant to try again or continue the process of transition. Therefore, it is important that they receive the correct information and the correct support.

In terms of raising awareness and understanding among businesses, and from the work we have done with businesses on CE, we would recommend the following:

- Work with or partner with business resources, such as Enterprise Ireland, SkillNet, LEO offices and Chambers of Commerce to roll out training and CE information
- Partnerships with specific sectors in raising awareness and understanding within those sectors could be explored
- Deal with industry or sector-specific barriers by hot-housing businesses in workshops dealing with those issues
- Build a library of sectorial CE case studies that prove the potential for the implementation of CE models and for the (positive) effect on both the business's bottom line and to highlight the resource savings in respect of our planetary ecological ceiling
- In addition to training, other resources and information sources need to be available. These could be developed along sectorial lines eg see the Circular Economy checklists developed for the Construction Sector in Ireland here: <http://southernwasteregion.ie/content/circular-economy-checklists-construction>
- Businesses respond well to peer-to-peer communication, so businesses listen to other businesses. Champion businesses and peer-to-peer communication should be a pillar of building awareness of Circular Economy among businesses.

		<ul style="list-style-type: none"> On a positive note, Ireland has some really good expertise in Circular Economy including public, private and civic society sector actors - we should harness this capacity to increase general awareness of the Circular Economy
6	<p>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?</p>	<p>The stakeholder strategy is based on establishing a Circular Economy Advisory Group, which will consist of the existing Waste Action Group plus additional relevant stakeholders.</p> <p>While the Waste Action Group has served an important role to date, we would suggest that creating an augmented version of this as a Circular Economy Advisory Group may not be sufficient. We would recommend an intensive stakeholder discovery and analysis process to identify a full set of stakeholders prior to creating the Circular Economy Advisory Group.</p> <p>As a Circular Economy is a holistic and systematic framework, the stakeholder group involved will be much more extensive than a typical waste management stakeholder group.</p> <p>In addition to the existing members of the current Waste Action Group, in our opinion, organisations that could be considered as additional stakeholders</p> <ul style="list-style-type: none"> Dept. of Enterprise, Trade and Employment Enterprise Ireland/LEO representative Congress of Trade Unions* Circuléire Irish Bioeconomy Foundation Small Firms Association Irish Small and Medium Enterprises Various Industry representative bodies Academic researcher / research institution (eg. university or NESCI) <p>Further, as the Circular Economy Advisory Group will undoubtedly be a large group and as transitioning to a Circular Economy is a complex process both within sectors and for the country as a whole, it would be prudent to include some deep stakeholder consultation work (such as workshops, focus groups, surveys etc.) in addition to Circular Economy Advisory Group meetings, particularly in relation to the seven key product value chains as set out in the WAPCE and the sectors set out in the Draft Strategy.</p> <p>*The inclusion of trade unions would be really useful for a number of reasons: the high importance of labour and skills in the circular economy; the inevitable shedding of some industries and types of jobs and the emergence of new types of jobs and business models; the requirement for a just transition.</p>
7	<p>What do you see as the major economic</p>	<p>Circular Economy offers environmental improvements but also offers a range of economic and socio-economic benefits for Ireland</p>

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?

Economic benefits of CE

- According to Circul@ire, a 5% material improvement by scaling circular economy strategies will create a €2 billion opportunity for Ireland
- The Circular Economy Action Plan (CEAP) points out that implementing a Circular Economy is likely to create 700,000 jobs in the EU by 2030 while resulting in a 0.5% increase in GDP
- A Circular Economy is likely to result in an increase in 'green' investments with a positive environmental and societal impact
- Security of supplies, particularly of finite and dwindling mineral and metal resources and of vulnerable natural resources.
- Circular Economy builds resilience to supply-chain shocks. The truncating of supply chains experienced during Covid-19 pandemic has thrown into sharp relief the importance of local supply chains and secure supply chains. Transitioning to a Circular Economy will help to build resilience against vulnerability in supply chains. Potential causes of such vulnerability include extreme weather events, climate change-related disasters, cyber security lapses and of course, future pandemics. A Circular Economy helps to create supply chains that are resistant to shock.
- A Circular Economy will foster innovation and innovative solutions as companies pivot to integrate circularity into their operations and as new circular businesses and business models emerge.
- A Circular Economy opens up new areas of research and cross-disciplinary collaboration.
- As with any significant economic or industrial systems change, a Circular Economy is likely to result in some types of jobs and professions being shed even as others are created. Projections from a range of sources on employment and circular economy suggest that the net result will be a significant increase in jobs created.

Business benefits of CE

- In addition to improved environmental performance, resource efficiencies help reduce business costs for water, energy, water and materials
- New business opportunities will emerge for businesses within their own operations or across supply chains
- Striving for circularity and marketing this with honesty and integrity will attract and present new business opportunities and open up new market segments, especially as Circular Economy and sustainability awareness continues to grow amongst the general public.
- Businesses we have worked with found that Circular Economy principles were helping to increase their competitiveness and to shape customer demand
- Circular Economy models such as sharing platforms, repair, leasing models and refill models help to build customer loyalty
- Integrating circularity into our businesses will help employers attract and retain talent, particularly among the Millennial and Generation Z cohorts. Reports in 2020 and 2019 by Deloitte on Millennials and Generation Z cohorts in Ireland show that climate change is a particular concern for these groups and that businesses behaviour in respect to ethical issues (from climate change to diversity) is a significant factor in their choices in relation to careers, employers and spending. (<https://www2.deloitte.com/ie/en/pages/consulting/articles/millennial-survey.html>)

Social benefits of CE

- A Circular Economy contributes to achieving many of the Sustainable Development goals, including 3, 6, 7, 8, 9, 11, 12, 13, 14, 15

		<ul style="list-style-type: none"> • Circular Economy business models such as reuse and repair provides quality goods to consumers at low cost, therefore saving consumers cash and empowering them – eg. the new Right to Repair laws are very empowering for consumers • Circular Economy business models create social enterprise opportunities, thus creating employment opportunities for groups who are often excluded from the traditional jobs market • A cleaner environment and healthy biosphere offers human health benefits and wellbeing
8	<p>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.</p>	<p>Article 27: The ongoing lack of clarity about which materials need to be notified as by-products under Article 27 and the ensuing confusion this causes for businesses is a major regulatory barrier to the Circular Economy. For example, it would seem that excavated material from construction projects need to be notified, while other materials going for direct reuse may not. In addition, micro enterprises and sole traders who wish to utilise relatively small volumes of materials, particularly inert materials such as timber from construction sites or coffee grinds from local cafes, find that obtaining information on legislative and regulatory requirements can be very difficult. They need to know are they reusing is it a by-product or are they discarding this as a waste. It would be extremely useful if a simplified and streamlined process could be developed for a range of commonly reused/upcycled non-toxic and inert materials.</p> <p>Article 28: In general, the slow pace of Article 28 end-of-waste declarations is a significant barrier to the development of a Circular Economy.</p> <p>Product Liability: Product liability in relation to reused and repaired goods is also a barrier to the circular economy and is, of course, listed in the Draft Strategy as a policy area for future development.</p>
9	<p>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.</p>	<p>The main barriers to the further development of the Circular Economy include</p> <ul style="list-style-type: none"> • Low level of awareness and understanding of Circular Economy • Circularity needs to be considered and included in planning processes eg. Local authority City and County Development Plans and national and local Spatial Plans need to facilitate the integration of Circularity into all planning processes • Difficulties in demonstrating how CE help business to increase profitability, competitiveness etc. - this is where case studies and peer-to-peer communication between businesses will help • Access to finance and investment to scale-up innovative Circular Economy business models and ideas • For the most part, most current product design and existing production, processes, industrial infrastructure and equipment support linear business models - changing this will require disruptive interventions • Some companies and regions are moving ahead as early adopters while many are still not aware of or are not planning for a transition to a Circular Economy, the resulting uneven progress towards transition makes it difficult for businesses trying to begin their CE process. Such businesses find it particularly difficult to engage other businesses along their value chain. • Research work recently undertaken by the NCAD and RDC and funded by the Eastern-Midlands Regional Waste Management Planning Office concluded that some Irish businesses may be hesitant to utilise advanced circular designs, perceiving these as risky. However, they are likely to employ incremental changes.

		<ul style="list-style-type: none"> • Circular Economy requires a change of mindset for businesses where the triple bottom line replaces the profit-only bottom-line and where collaboration and cooperation between businesses will increase while competitiveness lessens. This will take time and momentum to become the norm. • Progress on Circular Economy will require a shift in mindset for the general public also, one which requires a re-evaluation of consumption habits. This may be a difficult behavioural change challenge.
10	How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?	<p>Green Public Procurement is vitally important in the transition to a Circular Economy and to creating demands and markets for circular goods and services. In creating markets for these circular items, GPP will act as an important stimulus in the development of new circular goods and services.</p> <p>The public sector is a major buyer of goods and services. In Ireland it accounts for 10% - 12% of Ireland's GDP and at European level it is even high at 16%. The EU market is of course also open to Irish-based business. Shifting a sizable proportion of this spending to goods and services that meet the criteria set out within the GPP process represents a lot of money being directed towards eco-innovation and 'green' goods. This will help to create a critical mass of spending that has the potential to act as leverage in the transition to a circular economy.</p> <p>From our experience of exploring the potential enablers and barriers to GPP within the local authorities, we have ascertained that training must be multi-level and that direction must come from upper management to ensure organisational buy-in. Training that focuses on procurement sections and procurement staff alone is not sufficient as by the time prepared tenders come to the procurement officers it is too late to insert green criteria. All budget holders and buyers in each department and section of the organisation need to be confident in understanding and applying criteria when preparing and evaluating tenders. Therefore training is necessary across the organisation. Public servants are ready and willing but need practical guidance in what can added to tenders generally. In new development or retrofits we need to be clear about what can be included at design stage in tender briefs to ensure materials stay in circulation longer. That we design for future use and reuse with flexibility in facades designed for disassembly etc.</p> <p>We also need GPP rules to give green criteria an equal footing to the current weighting on economic cost.</p> <p>In addition to training those in the public service, it is imperative that suppliers, particularly local supply chains and social enterprises working in reuse and recycling understand Green Public Procurement and have the knowledge and skills to bid in procurement processes where green criteria are being used. If suppliers are lacking in know-how around GPP, then the market will not be able to respond in a convincing fashion to GPP criteria in procurement processes. Informing business communities about GPP and facilitating local supply chains to upskill in relation to bidding for contracts containing GPP criteria could be carried out by organisations such as Enterprise Ireland, Local Enterprise Offices, SkillsNet and so on.</p>
11	What would be the most effective action Government could take to promote/support and	<p>We would recommend the following actions:</p> <ul style="list-style-type: none"> • Conduct a national Circular Economy awareness campaign • Capture steps some companies and organisations have already taken steps on their CE journey

	<p>incentivise the further development of the circular economy?</p>	<ul style="list-style-type: none"> • Provide low-cost training for micro-enterprises and SMEs on Circular Economy • Provide information or a national platform on Circular Economy featuring case studies • Encourage networking on Circular Economy between large corporation and smaller companies, particularly along value chains and supply chains • Intense industry inclusion in promoting and developing Circular Economy • Consider tax incentives to promote Circular Economy goods, services and business models (e.g. repair) along the lines of the Accelerated Tax Allowance (ATA) which is used to promote investment in energy efficient products • Develop a financing model to help innovative Circular businesses scale • Develop KPIs
12	<p>Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?</p>	<p>The seven product value chains set out in the WAPCE policy document are all important sectors to focus on in developing a Circular Economy. These are: Electronics and ICT, Batteries and Vehicles, Packaging, Plastics, Textiles, Construction and Buildings, Food/Water/Nutrients</p> <p>In addition, the four sectors destined for Sectoral Circular Economy Roadmap, as set out in Annex 3 of the Draft Strategy - Construction, Transport, Agrifood and Consumer Goods are also important foci.</p> <p>Food, water and nutrients are a part of the wider bioeconomy sector. The bioeconomy sector is being increasingly recognised, both in Ireland and internationally, as one which offers a diversity of potential opportunities for innovation and wealth creation and also one that offers opportunities and innovations that will help push the transition towards a circular economy (https://www.enterprise.gov.ie/en/Publications/Publication-files/Realising-opportunities-for-enterprise-bioeconomy-and-circular-economy-Ireland.pdf). In addition to Nutraceuticals and Functional Foods (Food, Water, Nutrients), the bioeconomy includes Biotechnology, Biorefining and Bioconversion market (agricultural and forest biorefining, energy, chemicals, botanicals and fuels) and Low Carbon Construction. As this sector has such potential and is still at an early stage of its development, there is an argument this sector in its entirety, i.e. beyond food, water and nutrients, is an important one on which to concentrate when considering intervention and policy in relation to Circular Economy.</p> <p>We would consider that the Construction sector has the potential contribute greatly to making Ireland's economy more circular. Promoting circularity within the construction sector should be prioritised as an early action in Ireland's Circular Economy transition. From planning and design, right through construction, demolition, repurposing and refurbishing, circularity can be applied throughout the lifecycle of a new construction project. Developers could be encouraged, and eventually required, to prepare a Resource Management Plan, including a Circular Economy Statement covering the various phases of the developments lifecycle. Concepts such as the application of modular construction, the avoidance of demolition, design for disassembly, ease of repair and the reuse and recycling of materials should all be incorporated into mainstream construction projects to encourage circularity.</p>

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, we agree broadly with the policy areas listed. It is a comprehensive list
14	Any other comments?	<p>In Europe and elsewhere, Circular Cities and Circular Regions are proving to be pivotal in accelerating the transition to CE (see Circular Glasgow, Circular Yorkshire, Circular Prague, ReLondon).</p> <p>We believe that developing one or (preferably) more Circular Cities and Regions, such as for example Circular Dublin, Circular Cork, Circular Limerick, Circular Midlands, would be an impactful initiative in driving Circular Economy, developing case studies and learnings and raising awareness. Such an initiative would provide an excellent testing bed for the demonstration projects mentioned in the Draft Strategy document. (see as an example https://www.circularglasgow.com/)</p> <p>Developing a Circular City or Circular Region in Ireland would also signal Ireland's commitment to the Circular Economy at home and internationally and could be utilised as a selling point for Irish produced products. It would help to raise the bar nationwide for CE principals and implementation.</p> <p>Programmes such as the OECD Programme on the Circular Economy in Cities and Regions and (https://www.oecd.org/regional/cities/circular-economy-cities.htm), with which the DECC and the RWMPOs have been engaging, and Circle Economy's Circle Cities Programme (https://www.circle-economy.com/programmes/cities) provide tools and support to initiate and develop Circular cities and regions. A broad stakeholder engagement process along with our connections and study of other EU Circular Regions would help to formulate and refine the development of a suitable model/procedure for use in Ireland. For examples of circular Cities and Regions, see Circular Glasgow (https://www.circularglasgow.com/), ReLondon (https://reondon.gov.uk/), Circular Prague (https://www.circle-economy.com/resources/circular-prague), Circular Amsterdam (https://amsterdamismartcity.com/channel/circular-city)</p> <p>A strategic first step, may be for one or more cities in Ireland to sign the Circular Cities Declaration. Currently over 50 European cities have signed this. Signing the Circular Cities Declaration does not require any pre-action, rather it states intention and provides a platform to showcase circular projects and to learn from other jurisdictions</p> <p>https://circularcitiesdeclaration.eu/ https://circularcitiesdeclaration.eu/fileadmin/user_upload/Images/Pages/Images/Circular_City_Declaration/CircularCitiesDeclaration.pdf</p>