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Good morning,

Please find attached a response to the above consultation on behalf of CEWEP Ireland.

Should any further information be required, please do not hesitate to get in touch.

Kind regards,

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CEWEP Ireland Submission

Whole of Government Circular Economy Strategy

CEWEP Ireland ('CEWEP') is pleased to take this opportunity to comment on Ireland's first Whole of Government Circular Economy Strategy. CEWEP supports the overarching objectives of this Strategy aimed at providing a national policy framework for Ireland's transition to a circular economy.

CEWEP Member's activities support circular economy objectives including the Circular Economy Package (CEP) by diverting non-recyclable resources from landfill and recovering valuable energy from the same.

CEWEP Ireland Overview

CEWEP Europe is the umbrella association of the owners / operators of waste-to-energy (WtE) facilities, representing approximately 500 facilities across Europe. CEWEP Ireland is the Irish branch of CEWEP Europe and has two members: Indaver, which operates the Meath facility and is proposing to develop similar facilities on the island of Ireland; and Covanta, which operates the Dublin facility. Over the next few years it is anticipated that members will have a total treatment capacity of over 1,100,000 tonnes per annum residual waste and export more than 90MW electricity and/or heat.

CEWEP facilities are part-renewable plants and treat waste that cannot be prevented, reused or recycled. This non-recyclable material is used as an energy source. Landfill is considered to be the least preferable option for waste management and should be limited to the necessary minimum in line with the European waste hierarchy priority order. Diverting waste from landfill reduces GHG emissions from waste treatment by avoiding methane emissions (methane is 25 times more potent than CO₂).

CEWEP Ireland members currently produce electricity, but plans are well underway to decarbonise the heat and transport sectors through the development of District Heating network(s) and the production of hydrogen.

Consultation Questions

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?

Yes, CEWEP broadly agrees with the objectives proposed in the Strategy. In particular, the need for a much greater level of awareness amongst households, business and individuals in relation to the circular economy and how it can provide environmental, climate and societal benefits is required.

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?

CEWEP agrees with the level of ambition set out in the Strategy.

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?

The setting of quantifiable medium and long-term targets should be considered as opposed to a top-down goal to perform 'above the EU average by 2030' as the same cannot be predicted with any degree of certainty nine years in advance.

With regard to any new sectoral targets to be adopted, the same would need to be contingent on broad measures to promote public awareness in relation to the meaning of circular economy concepts in the first instance whilst also requiring both Exchequer and non-Exchequer funding for investment.

Likewise, economic, regulatory and social barriers to Ireland's transition to a more circular economy must be identified and addressed if the overall ambition of the Strategy is to be realised.

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 developing the circular economy?

It is submitted that public awareness of circular economy concepts is particularly low in Ireland. Improvements in public awareness is key to embedding such principles in real terms. Continued and ongoing public awareness campaigns will be needed and the use of digital technology applications for use on smart phones may provide an effective means to engage the public in a more consistent manner.

Clear consumer product labelling to provide consumers with easy to understand instructions on end of use and recycling options etc. would also be beneficial in this regard.

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

Awareness raising and education amongst the public and the business community is vital as currently the understanding of the concept of circularity appears to be very poor.

A dedicated public information campaign should be utilised to underline that all citizens must play a role in the proper management of waste and that collective obligations exist in this regard all of which are key to the delivery of a more circular economy. Continued and ongoing investment in awareness campaigns will be required if Ireland is to meet our enhanced recycling rates and indeed improving the application of circular economy practices by citizens and businesses alike. This would also mean that citizens would become more informed and be in a position to question the recyclability or otherwise of products placed on the market.

In this regard, CEWEP members undertake awareness raising initiatives in the form of school and guided tours to interested parties (and to be resumed in line with public health guidance as appropriate) in order to underline the part played by recovery facilities as part of an integrated waste management system and the transition to a circular economy.

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?

Yes, in the main CEWEP is satisfied with the proposed stakeholder arrangements outlined in the draft Strategy.

More generally and also relevant to the circular economy transition and the sustainable reuse of materials, CEWEP welcomes the opportunity to participate in the recently established Working Group to develop national end-of-waste applications for identified priority waste streams as committed to in the Waste Action Plan for a Circular Economy (see further in relation to question 6 below).

As the sustainable reuse of all materials including incinerator bottom ash (IBA) is at the core of the transition to a circular and low-carbon economy, participation in this Working Group will be of assistance in helping to advance and bring about the circular reuse of IBA in the State.

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?

There are many benefits associated with moving towards a more circular and climate resilient economy, including:

- A reduction in carbon emissions in line with the State's international, European and soon to be statutory national obligations as set out in the Climate Action and Low Carbon Development (Amendment) Bill 2021;
- Protection of the State's existing natural resources and associated improvements in environmental protection such as biodiversity, air quality, water quality etc.;

- Compliance with the EU mandated Circular Economy Package (CEP) targets on recycling and landfill diversion for 2025 and 2030 and avoidance of fines;
- Alignment with delivering increased self-sufficiency in the management of waste and the need to minimise waste export as per numerous national and EU public policy positions;
- Assist with decoupling economic growth from resource use while maintaining long term competitiveness;
- In line with growing individual and community awareness of the need for climate related behavioural change, awareness of circular economy principles will also facilitate engagement and activation of society to a greater degree; and
- As many new skills are needed for the transition to a circular economy (such as design, repair and refurbishment) the same gives rise to significant employment opportunities and which in turn are complementary to those needed to support the transition to a just and fair climate neutral economy and society.

Moreover, from a policy perspective, the transition to a circular economy is a fundamental step towards achieving climate targets including net zero by 2050 due to be enshrined in law imminently, those at European level and the United Nations Sustainable Development Goals (SDGs).

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.

Firstly, CEWEP submits that there is an urgent need for a streamlined approach to the development of critical and strategic waste infrastructure. The planning process pertaining to the development of strategic infrastructure including critical waste treatment infrastructure requires significant reform if future economic growth and development is not to be undermined by the failure to deliver strategically important infrastructure necessary for a growing population.

Such reform would also assist with the delivery of the National Planning Framework (NPF) policy objectives centered on sustainable and plan led development. This framework comprising the statutory National Planning Framework (NPF) and the associated National Development Plan (NDP) will guide at a high-level strategic planning, development and investment for the country over the next 20 years to ensure that as the population grows, this growth is sustainable in economic, social and environmental terms.

Reform is also needed in the context of licensing by the Environmental Protection Agency (EPA) given their role as the competent authority with respect to licensing in the State and which also is critical to the delivery of strategically important infrastructure projects. This is of vital importance given the Agency's remit as regards environmental protection and its statutory duty to balance the need for infrastructural, economic and social progress and development and by implication a climate resilience economy.

In this regard, ever increasing delays with regard to the granting of environmental licences including amendments effectively means that economic progress and development is being unduly hindered and is likely to have implications from an inward and foreign direct investment perspective as ever increasing delays will inevitably affect job creation. Such delays if not addressed will also impact the State's transition to a more circular economy in the near to medium term.

This need for reform has been underlined in the Waste Action Plan for a Circular Economy¹ wherein a commitment to examining the legislation and procedures regulating the development of waste infrastructure and whether processes and timelines can be streamlined is underlined.

Secondly, regulatory barriers relating to End-of-Waste (EoW) and By-product applications must be addressed as the same is currently preventing the circular reuse of a range of materials. The sustainable reuse of materials including incinerator bottom ash (IBA) would assist in Ireland's envisaged transition to a sustainable and circular economy. A National EoW framework for Incinerator Bottom Ash (IBA) and other waste streams is urgently required in order to encourage reuse as seen throughout the EU. In this regard, the Waste Action Plan for a Circular Economy² also underlines that the efficiency of the process must be enhanced if we are to fully realise the circularity potential of EoW status. The establishment of a national EoW Working Group should be helpful in this regard.

Consequently, it is imperative that the Agency is provided with an enhanced level of resources in order that all applications concerning licensable activities including EoW applications can be dealt with expeditiously thus promoting confidence in the system. This will be key to the sustainable reuse of materials and is at the core of the transition to a circular and low-carbon economy as envisaged in the draft Whole of Government Circular Economy Strategy.

Thirdly and related to existent regulatory barriers, there is scope for further circularity in relation to our energy system. For example, the energy recovery process has the potential to provide waste heat as a heat source through district heating (DH) or industrial heat networks. This source of heat is currently not recognised in any Irish energy policy as a viable source of heat, even though it is indigenous, abundantly available and zero carbon.

The development of district heating networks would enable steam to be provided to a network of users and clearly underlines the important role that the energy recovery process could play in meeting EU targets going forward and in particular Ireland's challenging renewable heat target. Moreover, the same would also assist with Ireland's decarbonisation agenda and emission reduction targets aimed at bringing about net zero by 2050 and due to be enshrined in law in the Climate Action and Low Carbon Development (Amendment) Act 2021. Such infrastructure would also assist in reducing our external energy dependency. As such, there are clear synergies with the envisaged transition to a circular economy.

¹ Waste Action Plan for a Circular Economy, Ireland's National Waste Policy 2020-2025, Section 13, Supporting Indigenous Treatment Capacity at page 47: [Waste Action Plan for a Circular Economy](#)

² A Waste Action Plan for a Circular Economy, Ireland's National Waste Policy, Section 15 End of Waste: [gov.ie - Waste Action Plan for a Circular Economy \(www.gov.ie\)](#)

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.

CEWEP submits that the role of the producer and activity at source must be focused on in this regard. Currently, large volumes of non-recyclable materials are placed on the market including non-recyclable packaging waste.

There is also a deficit in terms of clear labelling on packaging products. Consumers currently are not properly informed as labelling is not consistent and in relation to particular items it is difficult to decipher if the same is recyclable and should be placed in the MDR bin. Also, consumer confusion over which materials can be recycled is leading to higher levels of contamination.

As such, all packaging should identify clearly which bin should be used thereby avoiding confusion for the consumer and ensuring that proper source segregation of all materials takes place.

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

CEWEP considers this to be of fundamental importance in assisting with and effecting behavioural change. The UN Sustainable Development Goals (SDG's) recognise the transformative potential of green public procurement. In this regard, SDG12 commits to 'ensure sustainable production and consumption processes' and SDG Target 12.7 will 'promote public procurement practices that are sustainable in accordance with national policies and priorities.'

In terms of national public policy positions, the 2019 Climate Action Plan and the Waste Action Plan for a Circular Economy³ set out a suite of policy proposals aimed at accelerating green procurement practices. The Programme for Government also references a number of important commitments in relation to GPP.

The implementation of such policy measures would assist with underpinning the credibility of national policy objectives and enhance Ireland's standing as a green economy whilst simultaneously delivering environmental policy objectives on carbon reduction, air and water quality, and waste reduction.

In addition, proposed policy measures contained in the Waste Action Plan for a Circular Economy regarding Construction & Demolition (C&D) Waste and End of Waste (EoW) designations should be extended to all waste streams including incinerator bottom ash (IBA) in order to facilitate its reuse in line with circular economy principles.

³ Waste Action Plan for a Circular Economy, Ireland's National Waste Plan 2021-2025, Section 18, Green Public Procurement Waste at page 60: [Waste Action Plan for a Circular Economy](#)

Similarly and in order to meet Ireland's indicative EU political target of 50% of GPP included in the National Action Plan on Green Public Procurement 'Green Tenders' consideration should be given to mandated inclusion of green criteria in all public purchasing contracts.

In terms of public procurement, mandated inclusion of green criteria in all public construction contracts should be introduced with a minimum % of reusable material that must be used in all such contracts as a means of further promoting material reuse and circular economy practices.

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

As referred to in relation to question 10 above, the mandated inclusion of green criteria in all public procurement contracts should be considered. Likewise, the introduction of mandatory recycled content for particular materials should also be considered to promote the development of the circular economy.

In addition, the introduction of further extended producer responsibility schemes (EPR's) should also be assessed. A clothing and textile EPR Scheme is currently being considered in the UK and is due to be introduced by 2022⁴. The aim of the scheme is to ensure the industry contributes to the costs of recycling, supported by measures to encourage better design and labelling in the first instance.

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

It is suggested that the manufacturing, packaging and the construction sectors through the reuse of a range of recycled materials can contribute to and assist with making the economy more circular.

In addition, the energy recovery process also plays a key role in this transition in a number of ways, most notably:

- The energy recovery process forms a key component of an integrated waste management system and falls within the recovery tier of the waste hierarchy as underpinned in the amended Directive on Waste. Landfill is regarded as the lowest, least desirable and most environmentally detrimental tier of this hierarchy. If applied correctly, the hierarchy discourages the use of landfill except where no alternative recovery option is available;
- The energy recovery process fulfils a crucial sanitary function for society and the environment by treating contaminated and unavoidable residual waste that cannot be recycled in an environmentally sound manner, thus avoiding the need for landfill and detrimental impacts on land, air and groundwater quality;

⁴Department of Farming, Rural Affairs and the Environment, Waste Prevention Programme Consultation: DEFRA: Waste Prevention Programme Consultation

- The essential and crucial nature of the environmental task provided by energy recovery facilities (R1 facilities as per the amended Waste Framework Directive) was highlighted in clear terms throughout the Covid-19 pandemic when CEWEP facilities continued to provide this essential treatment function without interruption whilst operating in line with a stringent regulatory framework pursuant to the Industrial Emissions Directive (IED) and associated national Regulations;
- The energy recovery process assists with the saving of tonnes of CO_{2eq} each year through the diversion of non-recyclable residual waste from landfill and the avoidance of methane emissions, a greenhouse gas up to 84 times more potent than CO₂ over a 20-year period⁵;
- The process also eliminates the need to export waste to other countries, enabling Ireland to become self-sufficient in managing waste and to achieve compliance with EU mandated waste targets and avoidance of transport related emissions;
- With regard to residual waste safely treated by the energy recovery process, this covers the fraction of waste which is of poor quality (degraded materials after being recycled several times), waste that is rejected from recycling facilities, and polluted waste that would contaminate the recycling cycle;
- The process also acts as a carbon sink as it provides a substitute to fossil fuel, as waste is used to generate energy which is then converted into electricity for local communities which leads to further GHG savings;
- Similarly, the process prevents the carbon-intensive extraction of virgin raw materials as a result of mineral and metal recovery which can thereafter be re-injected into the economy and reused in line with circular economy principles;
- Also, in terms of material recovery from bottom ash – this may now be included by Member States when calculating their preparing for re-use and recycling targets as per the amended Directive on Waste and is giving effect to a circular approach to the management of residues and furthermore, this metal recycling from bottom ash saves further CO₂ emissions; and
- Finally, with a larger penetration of intermittent renewables in electricity production going forward there is a need for balancing and storage options. Energy recovery facilities can also fulfill this purpose together with creating new synergies with innovative technologies such as district heating networks and hydrogen production for low carbon transport applications.

⁵ CEWEP EU, Energy and Climate Fact Sheet & Circular Economy Calculation Tool (2019): potential for further CO₂ avoidance: [CEWEP - Circular Economy Calculation Tool & Energy-factsheet-final.pdf](#) ([cewep.eu](#))

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?

CEWEP broadly agrees with the policy areas listed. Whilst food waste is listed as a priority area in the forthcoming National Circular Economy Programme (which will replace the previous National Waste Prevention Programme (NWWP)) and in order to enhance policy coherence and alignment among national, regional and local activities, the same should be considered for future inclusion.

In this regard, further dedicated policy measures are required as Ireland generates approximately 1 million tonnes of food waste per year (not including wasted food from agriculture). The 2019 Climate Action Plan has endorsed both the UN and EU ambitions around reducing waste by 50% by 2030.

