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**From:** Lorcan Cooke <LCooke@cif.ie>  
**Sent:** Friday 11 June 2021 15:43  
**To:** circulareconomy  
**Cc:** James Benson  
**Subject:** Submission for " Pre-Consultation Whole of Government Circular Economy Strategy 2021-2022"  
**Attachments:** Pre-Consultation - Whole of Government Circular Economy Strategy 2021-2022 (11.06.2021).pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Dear Sir/Madam,

Please find attached the CIF submission for Public Consultation on "Pre-Consultation Whole of Government Circular Economy Strategy 2021-2022".

I would appreciate a response recognizing receipt of above.

Kind regards,  
Lorcan Cooke





# Pre-consultation: Whole of Government Circular Economy Strategy 2021 – 2022

SUBMISSION OF POSITION PAPER BY THE CONSTRUCTION & DEMOLITION WASTE POLICY  
COMMITTEE OF THE CONSTRUCTION INDUSTRY FEDERATION

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**SUBMITTED TO:**

DEPARTMENT OF THE ENVIRONMENT, CLIMATE & COMMUNICATIONS

**SUBMITTED BY:**

CONSTRUCTION & DEMOLITION WASTE POLICY COMMITTEE OF THE CONSTRUCTION INDUSTRY  
FEDERATION

**DATE:**

FRIDAY 11<sup>TH</sup> JUNE 2021



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## **1. CIF CONSTRUCTION & DEMOLITION WASTE POLICY COMMITTEE**

**THE POLICY COMMITTEE SEEKS TO WORK WITH INDUSTRY WITH THE FOLLOWING OBJECTIVES:**

- a) Support establishment of Construction Sector Waste Resource Group.
- b) Represent the industry so that appropriate, effective, and efficient facilities are available to industry for use of construction products, soil and stone and other construction and demolition waste.
- c) Liaise with other representative bodies and agencies in support of industry objectives.

## **2. Pre-consultation: Whole of Government Circular Economy Strategy 2021-2022**

The Construction Industry Federation (CIF) welcomes the above consultation and the opportunity to provide feedback from an industry perspective. As construction activity again gets back to normal after a period of lockdown the industry continues to face the ongoing challenges of construction and demolition waste, the management of soil and stone material and the limited capacity in available facilities.

The CIF wish to seek clarification on several items within the above consultation and previous guidance documents. Environmental protection should be the key goal of all parties working within construction and demolition waste and by-product material. Without action a negative impact will continue to restrict the sector and inhibit reaching a circular economy.

The CIF would request further engagement with the Department of the Environment, Climate and Communications and associated stakeholders on this consultation prior to any finalisation of guidance documents.

The CIF would also request clarification on the intended timelines for the next steps of this consultation and opportunity to meet to discuss?



### 3. CONSULTATION OBJECTIVES

<b>Objective 1:</b>	To provide a national policy framework for Ireland's transition to a circular economy and to promote public sector leadership in adopting circular policies and practices;
<b>Consultation Comment:</b>	The industry fully supports this objective and a flexible policy framework recognising the unique characteristics of various sectors is critically important. Construction and demolition waste plays a significant role in reaching a circular economy.

<b>Objective 2:</b>	To support and implement measures that significantly reduce Ireland's circularity gap, in both absolute terms and in comparison, with other EU Member States, so that Ireland's rate is above the EU average by 2030;
<b>Consultation Comment:</b>	Industry supports this objective and supports the identification of all sector barriers to reaching a circular economy and the promotion of measures to remove those blockages

<b>Objective 3:</b>	To raise awareness amongst households, business and individuals about the circular economy and how it can improve their lives;
<b>Consultation Comment:</b>	Previous action plans identify the need to promote awareness about the need for circular economy. Equally it is suggested that greater education of the current enforcement measures in place should be highlighted.

<b>Objective 4:</b>	To support and promote increased investment in the circular economy in Ireland, with a view to delivering sustainable, regionally balanced economic growth and employment; and
<b>Consultation Comment:</b>	The industry fully supports this objective and all efforts should be made to ensure the adequate resourcing and funding to state, semi state and regulatory bodies connected to C&D waste.

<b>Objective 5:</b>	To identify and address the economic, regulatory and social barriers to Ireland's transition to a more circular economy.
<b>Consultation Comment:</b>	The industry again fully supports this key objective and would take the opportunity to outline further some of the barriers currently restricting the aim of circular economy from the construction and demolition sector



## 4. INTERNATIONAL & DOMESTIC CONTEXT TO CIRCULAR ECONOMY

### 4.1 International Context

Approximately 374 million tonnes of construction and demolition waste was generated in 2016 making it the largest waste stream in the EU by weight. Construction and demolition waste is defined as a priority area in the EU according to the Circular Economy Action Plan (EC 2015), while the revised Waste Framework Directive (WFD 2008/98/EC, amended 2018/851) sets a mandatory target for its recovery of 70 per cent by 2020.

In a circular economy, raw materials are not taken out of their cycles, but remain in the economy for as long as possible through their efficient and smart use. Their value is preserved by optimising reuse or high-grade recycling. In the built environment, this means buildings and construction elements being designed to be easily adaptable with limited being demolished.

Building materials or building elements should be quickly and efficiently recovered, resulting in high-quality materials remaining in a closed loop. It is important to widen the scope of any action plan which can influence waste management to cover all stages of the lifecycle of buildings and other structures. A circular economy action made in the early stages of a building's lifecycle will affect the management of the building's waste significantly.

To create an effective circular economy requires identification of potential circular economy actions during the whole lifecycle of construction products from design to end of life.

Phase	Action
<b>Material production phase:</b>	New high-grade products with high recycled content;
<b>Design phase:</b>	Design for disassembly;
<b>Construction phase:</b>	Materials passports;
<b>Use phase:</b>	Lifetime extension of existing structures;
<b>End-of-life phase:</b>	Selective demolition.

Linear Versus Circular Economy	
<b>Linear Economy</b>	A circular economy represents a fundamental alternative to the linear 'take-make-consume-dispose' economic model. The linear model assumes that natural resources are available, plentiful, easy to source and cheap to dispose of. However, the linear model is not sustainable, as evidenced by the limited capacity available to the Irish Construction Sector.
<b>Circular Economy</b>	The circular economy is restorative in nature, and it aims to maintain the utility of products, components and materials for as long as possible while also retaining their value. It minimises the need for new inputs of virgin materials and energy, while reducing environmental pressures linked to resource extraction, emissions and waste management.



## 4.2 Irish Context

As construction activity grows, the Irish Construction Industry is facing costly issues in the treatment of construction and demolition waste, the management of soil and stone material and the limited capacity in available facilities.

Construction and demolition waste accounts for the largest waste stream in the EU, with an increasing production volumes and high recovery rates. Although this may suggest that the construction sector is highly circular, assessment of waste management practices in Ireland indicate that construction and demolition waste recovery is largely based on backfilling operations and low-grade recovery, such as using recycled aggregates in road sub-bases in a limited number of situations.

European Trends Comparable within Ireland
EU countries are on track to fulfil the 70 % recovery target of 2020, with most countries already exceeding the target in 2016.
The high recovery rates of construction and demolition waste in Europe are mostly achieved by using recovered waste for practices such as backfilling and low-grade recovery applications, reducing the potential to move towards truly circular waste management.
Increased waste prevention and increased recycling can be achieved by tackling the lack of trust in the quality of secondary materials, lack of information on the composition of materials used in existing buildings
Circular economy-inspired actions, facilitated by measures such as standardising secondary raw materials and sharing information among stakeholders, have a high potential to contribute to increased waste prevention and to higher and better-quality recycling.



### 4.3 Key Identified Micro Challenges in Ireland

#### Waste Facility Capacity Increases

The CIF welcomes the recent increase in threshold limits for waste facility permits for soil and stone. These came into operation on 11th September 2019. The maximum quantity of 'Class 5 material' that can be recovered under a waste facility permit issued by a local authority will increase from 100,000 to 200,000 tonnes maximum over a facility's lifetime. Each local authority will continue to be responsible for all decisions on waste facility permits within their functional area. Each local authority may specify a maximum lifetime intake of up to 200,000 tonnes or less if deemed appropriate.

However, this will not be adequate to meet the requirements of contractors and developers, and several facilities are reaching capacity in autumn of any year. The Environmental Protection Agency (EPA) licenses larger facilities located to areas of activity close to city and urban areas. However, these often reach capacity well within their annual timeframes, forcing companies to transport waste substantial distances.

#### Article 27: Soil and Stone

Classification of soil and stone, where appropriate as a by-product, brings significant economic benefits as the material can be appropriately handled outside of waste legislation. The environmental benefits are also considerable, as the process facilitates the circular economy.

There is still not enough certainty and speed in the acceptance criteria for Article 27 Notifications on soil and stone. The EPA issued 'Guidance on Soil and Stone By-Products in the context of Article 27 of the European Communities (Waste Directive) Regulations 2011' in June 2019.

The new guidance contains an advisory period for determination by the EPA. The EPA will take a risk-based approach to make determinations and will endeavour to make determinations in all cases by either agreeing with the economic operators' decision or determining that the notified material is a waste. The stated advisory period is 10 weeks from the time of placing on the register with the potential for a six-week additional consultation period if further clarifications are required.

The CIF would again express a concern that this 10-week time is excessive. If clarity is to be provided to all notifiers after the initial time periods and additional consultations have lapsed, it would mark the first step forward in streamlining an overly complex process for members.

#### Article 28: Declassification of Waste: Crushed Concrete

The CIF is aware that individual applications has been approved by the EPA for the 'End of Waste Status to Crushed Concrete for Road Planning'.

More progressively a common application to provide a roadmap for a potential national application for crushed concrete for industry is critical.





## 5. BARRIERS TO IRELANDS CIRCULAR ECONOMY

Many challenges linked with previous or current building practices, hamper the transition to a circular economy in the built environment. To make an economy truly circular, it is necessary to take additional measures by focusing on the whole lifecycle of construction products in a way that preserves resources and closes the loop.

The introduction of reuse solutions, the reduction of material consumption and use of lower-carbon alternatives, especially in design and construction phases, will provide significant environmental benefits – waste prevention and less waste generated.

<b>Common barriers as to why industry has not reached a circular economy.</b>
Manufacturing processes using waste as input material will only work when production costs are lower than the cost of using virgin materials and market uptake can be assured. In the future, a shortage in primary resources may change these market conditions in regions with limited mineral resources. Policy measures may have a strong influence on these market conditions through for example taxes of virgin materials, green procurement, taxes on landfilling, end of waste etc.
In addition to the economic factors, the quality of building products and materials is crucial for the uptake of circular economy solutions. Lack of available documented information regarding the origins of waste and data on the composition of construction products can create doubts about their quality. The use of traceability systems for recyclables and reusable products is integral to a future successful end of waste outlet i.e. reuse of crushed concrete to a national standard for an approved aggregate.
The importance of building information modelling (BIM) as a tool for material inventories and traceability as it carries information on construction products during their whole lifecycle up to the demolition stage. Passports for building materials can also be created to include information for maintenance, reuse and recycling. Traceability systems, BIM and materials passports can all support pre-demolition audits for identifying reusable and recyclable construction products. Policies can promote these system and technologies through above examples.
The delay in measurable circular economy gains in the construction industry may discourage stakeholders from acting on new material or product management solutions. A successful implementation of circular economy concepts requires support from all stakeholders in the production and supply chain.
Standardisation will play an important role in the assessment of performance of secondary materials / aggregates in products replacing virgin ones and in the design of construction products. Standardisation is often the base for certificates which our national standard body will seek. Some standards include overspecification to secure performance, but this can lead to the increased use of raw materials. When standards are revised, attention could be paid to the evaluation of whether experience in construction performance and the introduction of tools to track material quality, including non-destructive testing methods, could support changes in material requirements.

## 6. RECOMMENDATIONS

Recommendations		
Barrier	Challenge	Recommendation
Price competition with virgin alternatives	Stakeholders preference to more economical and credible proven solution. The processing costs required for secondary material use is prohibitive over virgin material use.	A competitive secondary material market would create demand for both quantity and quality of waste material, thus directly increasing circularity
Confidence in quality and structural properties of secondary materials	Stakeholders tend to choose virgin materials that are quality assured through warranties and standards and as approved by the relevant standards bodies.	Engaging in the development of standards for secondary raw materials would increase the trust in their properties and quality
Hazardous substances content	Polluted materials are not suitable for recycling, and removal of the hazardous content is costly	Develop technology for efficient removal of hazardous substances and reduce use of hazardous materials in new construction
Lack of data on existing construction / buildings	The composition of material streams from demolition activities is not easily achieved	Pre-demolition audits and, in the future, material passports help register the type and volume of materials in the existing building stock



## 7. CONCLUSION

The CIF would request further engagement with the Department of the Environment, Climate and Communications and associated stakeholders on this consultation prior to any finalisation of guidance documents.