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Sent: Thursday 10 June 2021 19:58
To: circulareconomy
Cc: Enda Kiernan
Subject: Final Submission CIWM Ireland Centre - DECC Consultation on the National Circular Economy Strategy
Attachments: Submission made by CIWM Ireland Centre - DECC Consultation on the National Circular Economy Strategy.xlsx

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On behalf of CIWM Ireland, can I thank you for the opportunity to provide our members collective view on the Department's Consultation on the National Circular Economy Strategy, as per the attached Excel document. We have requested input from across the Irish Centre Membership to collate this submission but please note the views contained below are not necessarily representative of individual Member's positions in relation to the Strategy.

CIWM Ireland note and acknowledge the conditions of the submissions as outlined in the consultation paper and I welcome the opportunity in due course, to discuss our submission with you.

Kind Regards,

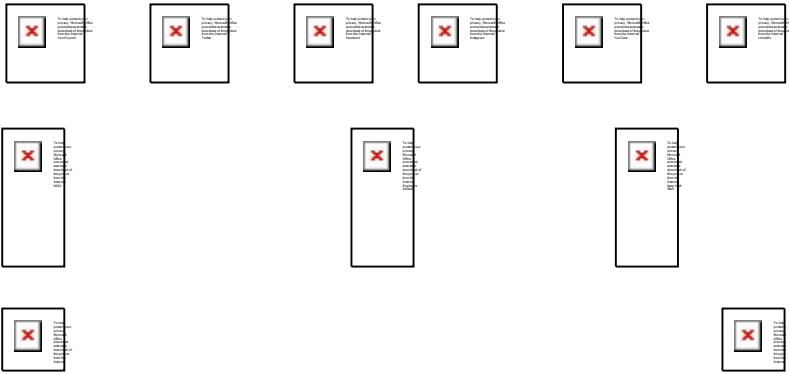
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**CIWM Rep of
Ireland Centre
Final Collated
Response**

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3. Do you agree with the draft Strategy's proposed key objectives?

The objectives are:

1. To provide a national policy framework for Ireland's transition to a circular economy and to promote publi...

Yes. But note that Circular Economy aligns with the CEAP/Climate Change and avoid unintended consequence(s).

4 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?

Yes, but again, we would advise caution and to be aware of potential unintended consequences, for example, with the Bio Economy area.

6 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?

Yes. Note - Ireland should at least align with EU counterparts on goals and ambitions. However, there are countries (less developed than Ireland) that are achieving greater progress as they require improved levels of upcycling and re-use in their products compared to Ireland at present. Refer to the Ellen Mac Arthur Foundation and numerous projects globally, it would be advisable to invest in personnel to constantly review this ever changing area for best practise examples which might apply to Irish secondary raw materials generated.

7. Would you rate Irish public awareness of the circular economy as : **How important do you think raising public awareness is to further developing the circular economy?**

Low, bordering on negligible.

Extremely important but not just with the general public, but also across business and organisational thinking too. There is a need to ensure that Circular Economy principles and requirements are clearly aligned with Climate Change (Goals) and community resilience messages to frame the "need"!

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

Public campaigns using all media sources with all products having correct information for consumers to make informed choice / decisions.

10 What are the most effective awareness raising measures that could be taken under the Strategy?2

improving consumers', households' and businesses' basic understanding of the circular economy;Addressing the lack confidence to invest in circular products or services;Developing a single national circular economy online platform;The adoption and widespread use of a national brand on publicly supported/funded circular economy projects and initiatives;Encouraging demonstration projects.

11. 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...

Yes. It is important that there is joined up thinking of all stakeholders as they travel down the CE road together with sharing of information and co-operation to reach the same end goals. It would be useful to include social and community groups on the WAG. TASC project leaders, Reps from NAG Social Community and environmental pillars as community buy in is essential to success. Also BITCI representation may be useful to align their members with the Circular Economy Strategy and allow information exchange between industry and community.

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 opportuni...

The major economic and social co-benefits we foresee are new job opportunities and material resources longer in use before final disposal. Improving our environmental outcomes is key to avoid natural impacts such as rising sea levels, loss of bio diversity, food production capability, etc. Reducing the carbon footprint of all the materials we export as recycling for remanufacturing elsewhere & then purchasing new products containing the same materials. Reduced waste, reduced use of scarce resources, less pressure on our environment, improved environmental quality.

13 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...

1. Definitions of waste 2. EoW Criteria (but this must be very carefully considered) 3. Lack of regulatory impetus to make circular choices cheaper than linear, quality assurance for second life products, higher targets for recycle use ie C&D, again with caveat that Quality Assurance and safety standards are paramount. The lack of specifications on the use of re-processed materials. complexity of existing compliance and EPR registrations in Ireland particularly for SMEs, to go beyond compliance and encourage CE innovation, which we need to streamline and make compliance easier. This includes better reporting and data systems and a requirement for more timely publication of national waste and resource data. Publication of CE Bill should give EPA a clear direction (and additional competent resources) as currently, EoW & Article 27 By_Products decisions are too slow and are a major barrier to the development of the Circular Economy timelines and pathways towards CE developments - industry needs time to plan ahead. The scale and pace of regulatory developments in the last 24 months relating to CE is significant - CEWLP, Ecodesign, new EPR requirements, focus on digitalisation and new circular electronics with sustainable products initiatives still to come.

14 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 t...

Knowledge gap and change behaviour required to move from linear to circular economy. A lack of effort by the manufacturing, packaging and construction sectors to design out waste and to incorporate recycled content. Pull measures are needed for recycling. Economies of scale, plus the demand for Circular Economy products & services. We need a culture and behavioural change, to create an insistence by consumers for such products. e.g. Electric vehicles were for the select few in the past but now consumers are demanding an EV option. if we embrace CE as a way of life then it can become the norm.

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

Very important - Essential to springboard the Circular Economy are green procurement targets, essential to achieving these targets is investment / upskilling professionals in green procurement- Wales and Scotland both have teams at Local Authority level looking at all procurement in terms of CE -aligning with the norm there would make deep inroads.

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

Materials tax on Virgin producers to drive non-circular products out of the economy. Promotion by way of incentives, grants, etc., and hosting seminars, conferences, etc. reduce VAT rate on CE services, streamline existing compliance and regulatory requirements, better national reporting systems. Require mandatory recycled content in products sold in Ireland including materials used for construction. Require mandatory and certified labelling of products to describe their end destination (recycling/reuse/disposal). Speed up licensing and EoW decisions. reduce VAT rate on CE services, streamline existing compliance and regulatory requirements, better national reporting systems.

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

Areas as already highlighted as priorities under EU CEAP

18 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?

These areas of future development are :

Cons...

19 The Department's consultation also calls for case studies to inform strategy development. Please indicate below if your company is undertaking or knows of any relevant case studies :

Yes, we are of the opinion that the Food Processing and Electronics Sectors should be included in the "future Development" in addition to addressing Food Waste generally as part of Climate Action plans. In addition, the Retail Sector needs to be examined - 80% of products sold are imported - we cannot be circular if teh goods / materials being sold, are not!

Yes - Skillset for a Circular Economy - CirculEIRE innovation project by WEEE Ireland, FIT, WGA also Light as a service models from Urbanvolt and Signify, indigenous recycling solutions by KMK Metals and Irish Lamps Recycling. Repairmystuff.ie. Lauralynn WEEE Ireland Battery Box programme shows how social incentives can encourage better environmental behaviour and increase takeback. There are many projects in the Agri- Food sector already informing strategy. It would be useful to stimulate pilot projects in the Agri sector at local / community/ SME level, inroads on BioEconomy might be achieved here.

20. Do you have any other comments?

Effective mechanisms to achieving the targets are critical. Policy is not good enough on its own

Please press the submit button below when complete. Thank you.