
From: Thornhill, Stephen <S.Thornhill@ucc.ie>
Sent: Friday 11 June 2021 16:37
To: circulareconomy
Subject: Public Consultation on Ireland's Circular Economy Strategy
Attachments: Circular Economy Consultation - Dr S Thornhill 11-6-21.docx; CobhZeroWaste-WhatWeDo.pdf

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Circular Economy Strategy Consultation

11 June, 2021.

By Dr Stephen Thornhill

Chairperson of Cobh Zero Waste

The following views are my own but are submitted in my role as Chairperson of Cobh Zero Waste, with the approval of the Committee.

Cobh Zero Waste is a volunteer-based group, formed by representatives from Cobh Tidy Towns, Cobh Community Allotments, Cork Harbour Alliance for a Safe Environment, Greening Cobh Business and members of other groups and businesses, including the Chamber of Commerce. A Steering Group comprising Cork County Council, South East Cork Area Development, Cork Environmental Forum and waste management companies, helped to establish Cobh Zero Waste in the first year.

The group's activities are mainly around awareness raising of sustainability issues and how the community can help in moving toward a circular economy and reducing greenhouse gas emissions to help in the fight against global heating. We hold a monthly zero waste market stall, composting and recycling workshops, repair cafes, press articles, keep cup project, clothes swaps, public talks, re-use events, school challenges, anti single-use plastic and other campaigns and other events. Our volunteer-led group aims to make Cobh a zero waste town by 2030 and a zero carbon town by 2040. I have attached a pdf presentation of some of our activities for the case study call.

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, but much depends on bullet point 2 in terms of the strength of measures introduced and policies adopted. The strategy seems to depend on supports, raising awareness and reducing barriers to improve investment by private-sector led initiatives. Those countries that have performed best within the EU in terms of the circularity gap often have strong municipality-based systems for waste and other circular economy initiatives, enabling them to actually establish infrastructure to meet ambitious targets, rather than hoping that businesses will deliver.

Given the urgency of the situation, and the scale of the transformation needed, more municipal control over resource use and maintenance is likely to be required rather than leaving it to businesses in the current "failed" market where externalities have not been sufficiently addressed.

We would also like to see separate circularity gap targets for the biogenic circle and material circles. Indeed, if this is a whole government strategy, then each government department should set strategic targets of its own in order to identify any areas of overlap or incoherence between departments.

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 think it could be a lot more ambitious given the climate emergency we face.

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?

I would like to see the targets based on the need to reduce emissions sufficiently and conserve biodiversity sufficiently in line with the SDG and Convention on Biological Diversity targets, including remaining within the 1.5 degree centigrade limit on SDG 13, rather than simply trying to achieve targets above the EU average.

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?

In Ireland as a whole I would say low. Here in Cobh, where our Cobh Zero Waste volunteers have been raising awareness on conserving resources, the circular economy, the climate emergency and energy transition over the past three years at our monthly market stall, recycling and composting workshops, public talks, repair cafes, clothes swaps, schools challenge and other events, I would say we've gone from low to medium awareness.

It is vitally important to raise public awareness, but also to introduce measures which promote behaviour change, including sufficient incentives. At present most "green" products seem to be more expensive than standard (including fossil-fuel based) products, mainly because of market failure where externalities are not sufficiently factored into the price. So heat pumps should be less expensive than gas boilers if the real costs were built into prices, and similarly electric cars versus petrol and diesel. For the circular economy, it's important that leased goods such as washing machines and driers (preferably with heat pumps), are priced more attractively than purchased. That will probably require more government intervention to correct the market, in the form of higher carbon taxes, subsidies for green goods, or, if we want to be sure of a result, regulating out the use of non-green and high emission products.

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

Our experience in Cobh is that you have to get out into the community and keep communicating the importance of reducing waste and the circular economy for our future well-being. People do eventually get the link between their behaviour and climate change, for example. One particularly successful engagement here, as part of our CIRCLE (Conserving Ireland's Resources by Community-Led Effort) project (with the Community Foundation), has been the 200 households responding to our online waste survey and then many of these requesting further assistance and advice in reducing their waste further. We believe that an online App could be developed to help households achieve targets in line with national strategies and would be willing to work with researchers on this.

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?

No. We believe there are many community groups out there in Ireland who could play a big role in coordinating their own communities to become zero waste, zero carbon and achieve circular economy targets. For example, every town could have its own CIRCLE project (Cobh-CIRCLE, Roscommon-CIRCLE, etc). This could be enabled through the funding of a community sustainability hub in each town of over 10,000 people, employing one or two part or full-time positions with funding from government to cover volunteer-led actions. Each hub would have local community group Committee members, including the Chamber of Commerce, and could be supported

by a national central hub. These CIRCLE hubs could also help to coordinate community actions in helping Ireland meet its national targets on the circular economy, SDGs, climate change and other goals.

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?

Our local group has adopted Doughnut Economics as a framework for our work. This takes the view that the economy should meet societal and planetary goals, improving the well-being of people and planet. That means changing the indicators of success for economics, from GDP (which includes all greenhouse gas emission and polluting activities) to measures of well-being for the planet (eg greenhouse gas emission reductions) and people (eg health, jobs and income from non-emission related activities and business).

So we would see the economic benefits as reducing emissions, more jobs in the circular economy (from Anaerobic Digester plants, to material sorting and recycling centres, repair cafes, etc), better health and decreased vulnerability to shocks, as our local communities and Ireland as a whole, would be less dependent on imported materials and exports.

The other economic benefits would be lower running costs for communities, such as in heating and transport (leased green electric products and vehicles should be cheaper to run); healthier environments from less fossil fuel burning for heat and transport, leading to lower healthcare costs and a better overall standard of living and well-being.

The social benefits would also be enormous, in helping to bring communities together to work toward commonly agreed goals and helping Ireland achieve its national targets. This would engender stronger and more resilient communities, helping to overcome the challenges that climate change is likely to bring over the coming decades (eg more hurricane force winds, storms flooding and sea-level rise).

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.

The main regulatory barriers are probably the lack of regulation regarding non-sustainable practices. If we allow incinerators to be built, for example, that will disincentivise the recycling of materials and make it more difficult for Ireland to make progress on the circularity gap, as materials (both biogenic and man-made) will be destroyed rather than sorted, separated and re-used.

There could be regulatory barriers that block progress toward a circular economy, such as in the form of planning permission for essential circular economy infrastructure, that may need to be fast tracked.

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.

The main non-regulatory barrier is likely to be a continued focus and reliance on businesses to deliver the outcomes for Ireland to meet its circular economy, SDG and climate change targets. Governments have failed over recent decades to tackle the social and environmental damage that has been primarily caused by businesses, who have been successful in lobbying against measures that could affect their profits.

So we now need to transform certain sectors, involving a more interventionist approach for government and a greater involvement of civil society, working with businesses to deliver better outcomes for people and planet.

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

Essential, and leading by example.

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

Establish government-funded community “sustainability hubs” (eg similar to the Dingle model) in every large town (and city area) in Ireland (eg greater than 10,000 people), working with local civil society groups and businesses to create local circular economies. The hub would be manned by at least two professional staff in a central location linked to local community groups and businesses, with sufficient funding to enable a range of circular economy supporting activities.

This will only work if government regulation and other measures are introduced to ensure that existing market failures are corrected in favour of sustainable products and services (eg phasing out the use of disposable nappies and other non-circular goods in favour of recyclable and reusable, banning the use of all single use plastic, phasing out mixed textile clothing in favour of single materials which can be better recycled, etc).

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

The agri-food system can make a massive contribution in the circular economy. Ireland is well behind on the establishment of Anaerobic Digesters (AD plants), for example, due to insufficient incentives, and more importantly, not having a municipal-based waste system. In other EU countries where waste services are run by local authorities, AD plants have been established (rather than relying on the private sector) to deal with separately collected food, farm (eg slurry) and other biowaste, in order to produce biogas for local energy needs and compost and organic fertiliser to replace fossil-fuel based synthetic fertiliser.

Currently some 30% of residual waste sent for incineration and landfill is organic (food and paper) and incineration companies discount the emissions from burning this when reporting their total emissions (its argued that all biowaste is from living matter that once absorbed CO₂, so the burning of this is deemed neutral). However, that does not account for all the valuable nutrients lost, such as phosphate which is finite in supply and has to be imported. These nutrients could have been recycled in AD plants and as a compost to replace imported synthetic fertilisers involving fossil fuels in their production. So by recycling much more of our biogenic resources huge emission reductions can be achieved compared to incineration and landfill.

In the material circular economy, we can also achieve much greater contributions by establishing separation, sorting and recycling plants on the island for different materials. Again, local government, municipal-run services tend to have an advantage in terms of implementation and tailoring the service to the needs of communities, including local businesses. Private sector plants have been slow to establish due to market failure (ie real costs and benefits are not factored into the market due to lack of government intervention). We need better infrastructure for sorting and recycling materials, such as glass bottling, textile sorting, electrical goods, construction goods and batteries (eg from electric vehicles).

And for any non-recyclable waste left (eg hazardous waste), the polluter should pay for disposal by chemical or mechanical methods to ensure there is no air pollution or emissions into the atmosphere.

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?

Broadly yes. But more should be done to integrate civil society and communities into these policy actions, particularly in assisting local group involvement to ensure that community needs are met, rather than actions enforced on them

14. Any other comments?

Whilst this strategy is warmly supported, it seems incredible that our community is again in the midst of trying to prevent a multi-national business from establishing an incinerator in the world's second largest natural harbour where recent tourism and education investments are now the main focus.

Incinerators are a relic of the linear economy, as they burn valuable resources, creating huge emissions and air pollution, with very little energy gain. They discourage the sorting and recycling of materials for reuse, because they require materials to constantly burn, creating toxic ash that then has to be landfilled. And because they destroy valuable resources, more resources have to be extracted or produced to replace them, creating even more emissions, as your draft strategy emphasises.

The European Commission has advised member states to phase them out as the circular economy and recycling initiatives are reducing the availability of unsorted materials available to burn. Indeed, Sweden is now importing huge quantities of unsorted resources to keep its incinerators going. In the UK many local authorities are now delivering large quantities of recycled materials to incinerator companies in order to fulfil their supply contracts. Denmark has the highest level of waste production per capita and this is reflected in the huge incineration capacity in the country providing little incentive to sort materials for recycling.

The true cost of incineration emissions are never fully captured because incineration companies do not have to report the emissions from the burning of biogenic waste (30% or more) even though the recycling of such material would actually reduce emissions significantly. They also reduce their emission reports for any energy generated (even though its very inefficient to produce energy from burning waste) by subtracting the equivalent emissions that would have been generated from burning coal! This together with the fact that when materials are burned other materials have to be extracted or produced to replace them, leading to even greater emissions, means that incinerators need to be phased out as soon as possible to meet climate change and circular economy targets. Building any new incinerators at this point in time would be flying in the face of all climate change, SDG, circular economy and waste directive commitments.

Our Community has spent a fortune in court cases but even more in peoples time and effort for more than two decades fighting off a multi-national company from imposing an unsustainable and unsafe economic activity on our doorstep that nobody wants here. We urge the government to step in and help us.

Best regards

Stephen Thornhill

Dr Stephen Thornhill

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Cobh Zero Waste





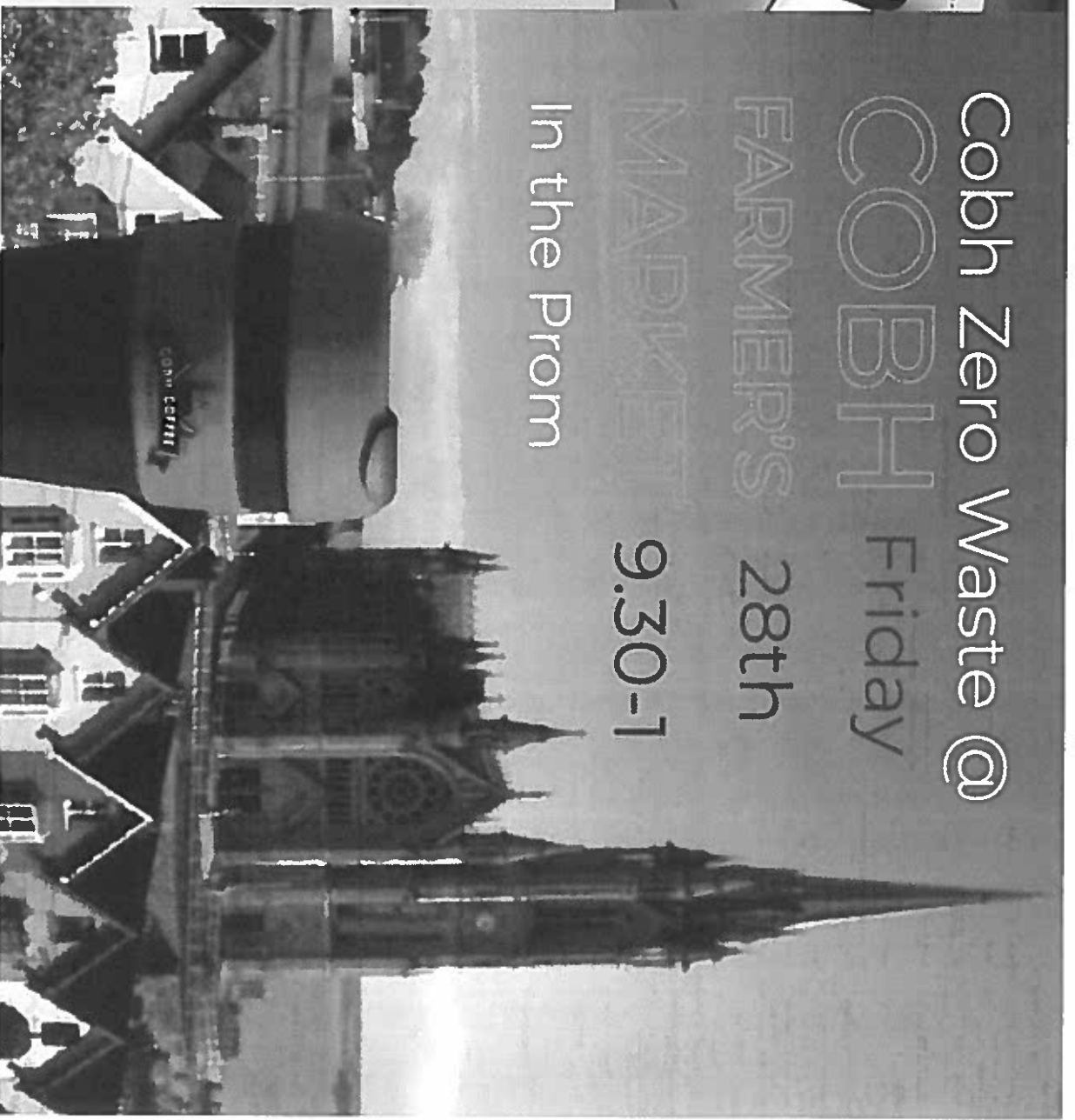
Cobh Zero Waste







Cobh Zero Waste @
COOBH Friday
FARMER'S 28th
MARKET 9.30-1
In the Prom





CORK, 2017
27 SEPTEMBER

ROCHESTOWN PARK HOTEL

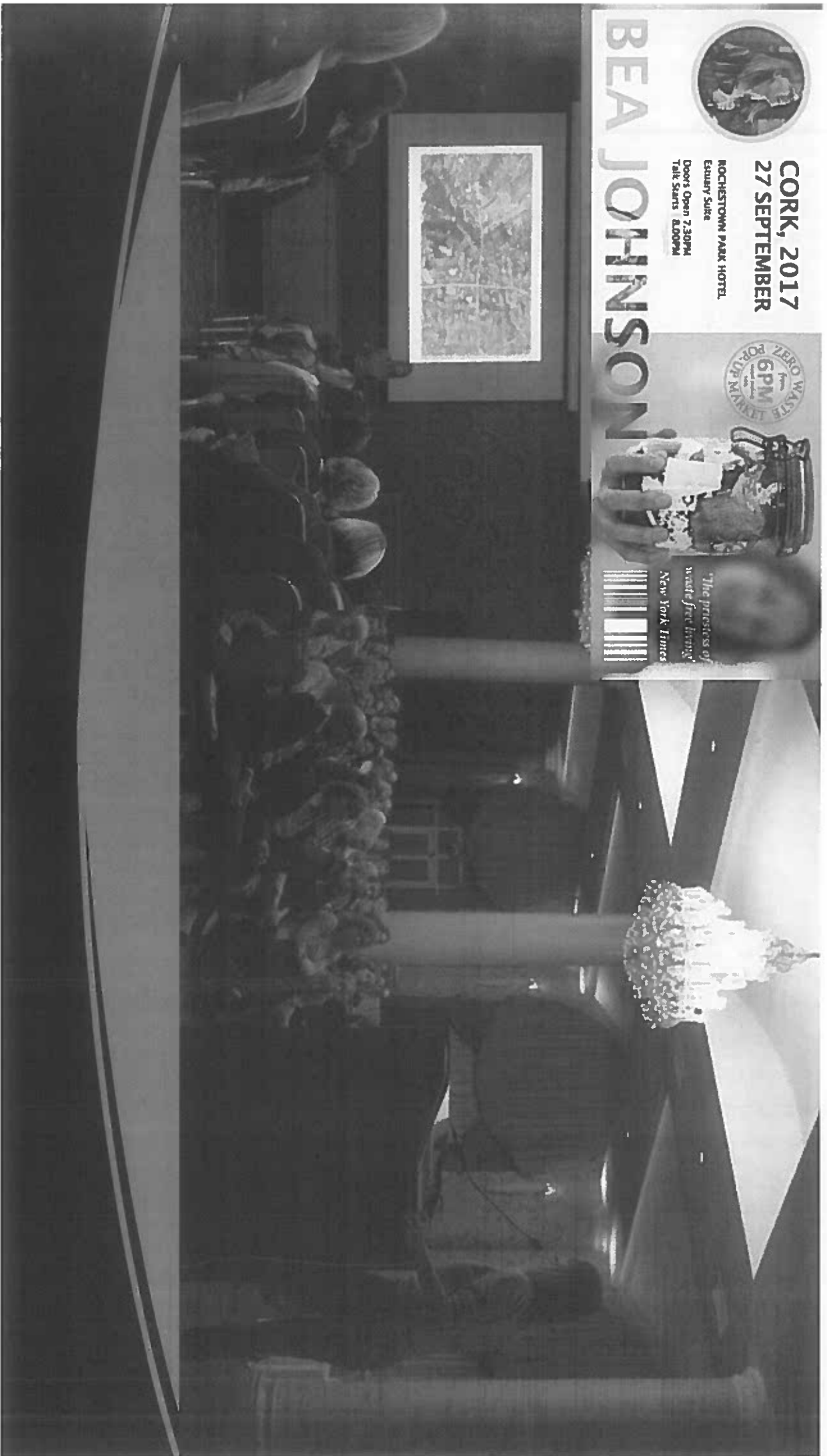
Esquey Suite

Doors Open 7:30PM
Talk Starts 8:00PM

BEA JOHNSON



"The prettiest of waste free living"
New York Times





Paul Connet Public Talk at
Cobh Heritage Centre 2017



ARE WE TALKING RUBBISH?!

Family Friendly - Free Event

Join us for an informal evening on waste reduction in our community



"See what is available locally to support innovative reuse and create less waste"

EXHIBITION & WORKSHOPS

reuse month
 repair • recycle • reuse

A Cobh Zero Waste event

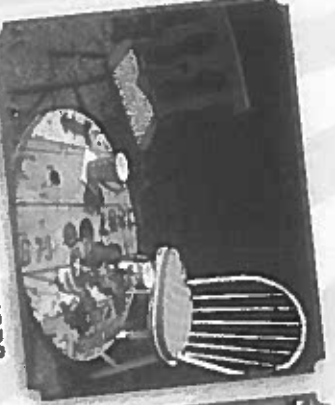
The Great Island Community Centre
 Wednesday 17th October
 7.30pm - 9pm

UPCYCLING

FOR THE HOME

& Pre-Loved CLOTHING

FREE EVENT!



EXHIBITION & WORKSHOPS



"See what is available locally to support innovative reuse and create less waste"

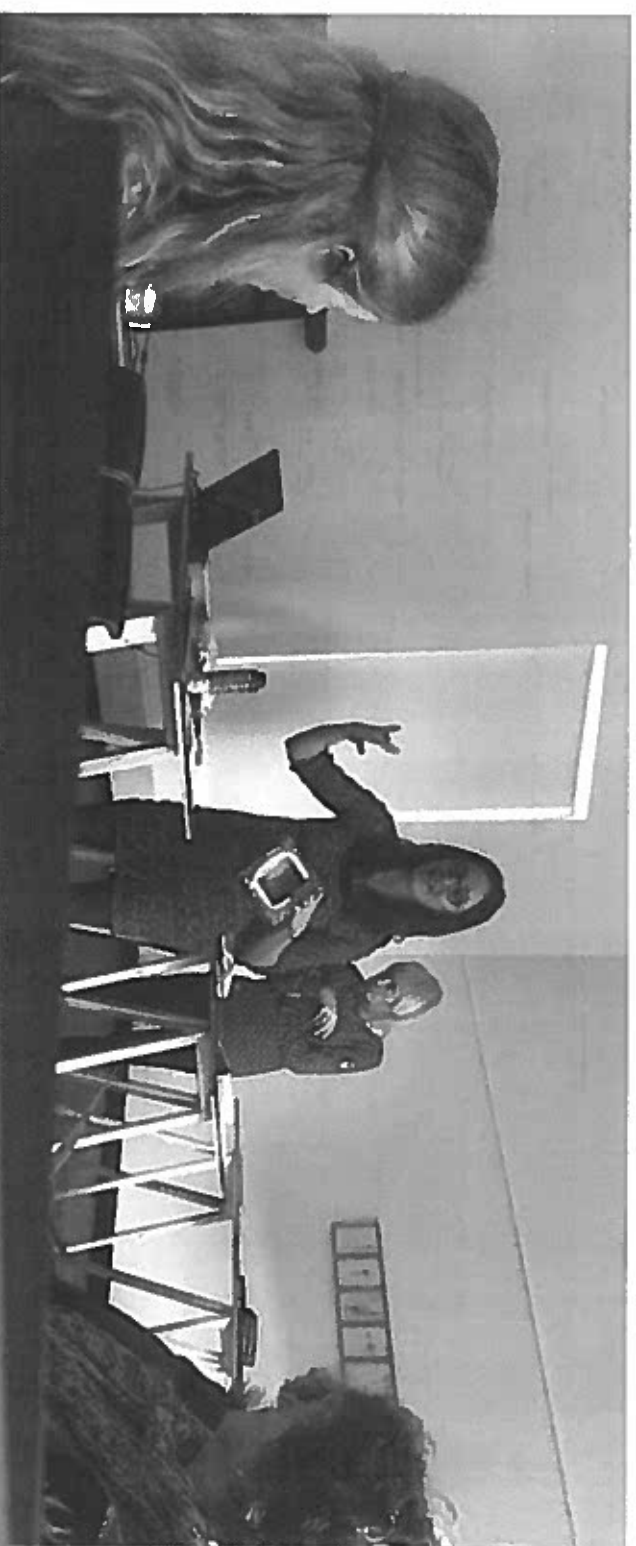


COBH COMMUNITY CENTRE,
 SATURDAY 28TH OCTOBER

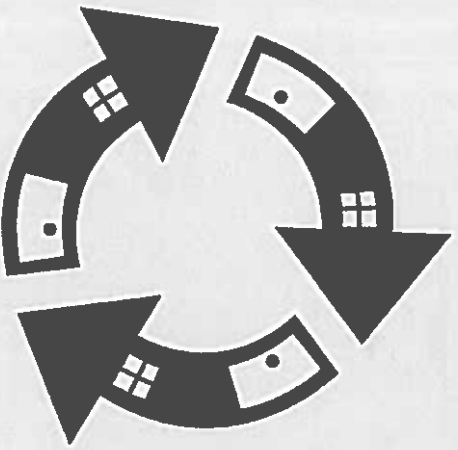
Cobh Community Centre







**Recycling
Workshop with
VOICE
Cobh Library
2018**

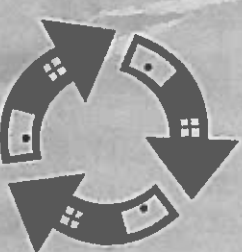


Cobh Zero Waste



the importation of our waste gives us the chance to develop new ways it, write **Mary O'Leary, Stephen Thornhill, and Brendan Richardson**

Waste leads to opportunity



Cobh Zero Waste

In stark contrast to the Zero Waste approach, incinerators provide no incentive to conserve resources or reduce waste. Instead, waste management companies are typically contracted to deliver sufficient quantities of materials as mixed waste, whether recyclable or not, to incinerator corporations, in order to avoid penalties for under-delivery. Incineration also destroys resources requiring more to be extracted or produced, thereby creating additional greenhouse gas emissions. That is why the EU Commission clarified its position on incineration at



SCHOOL STRIKE FOR CLIMATE

#climatestrike

March 15th @12pm

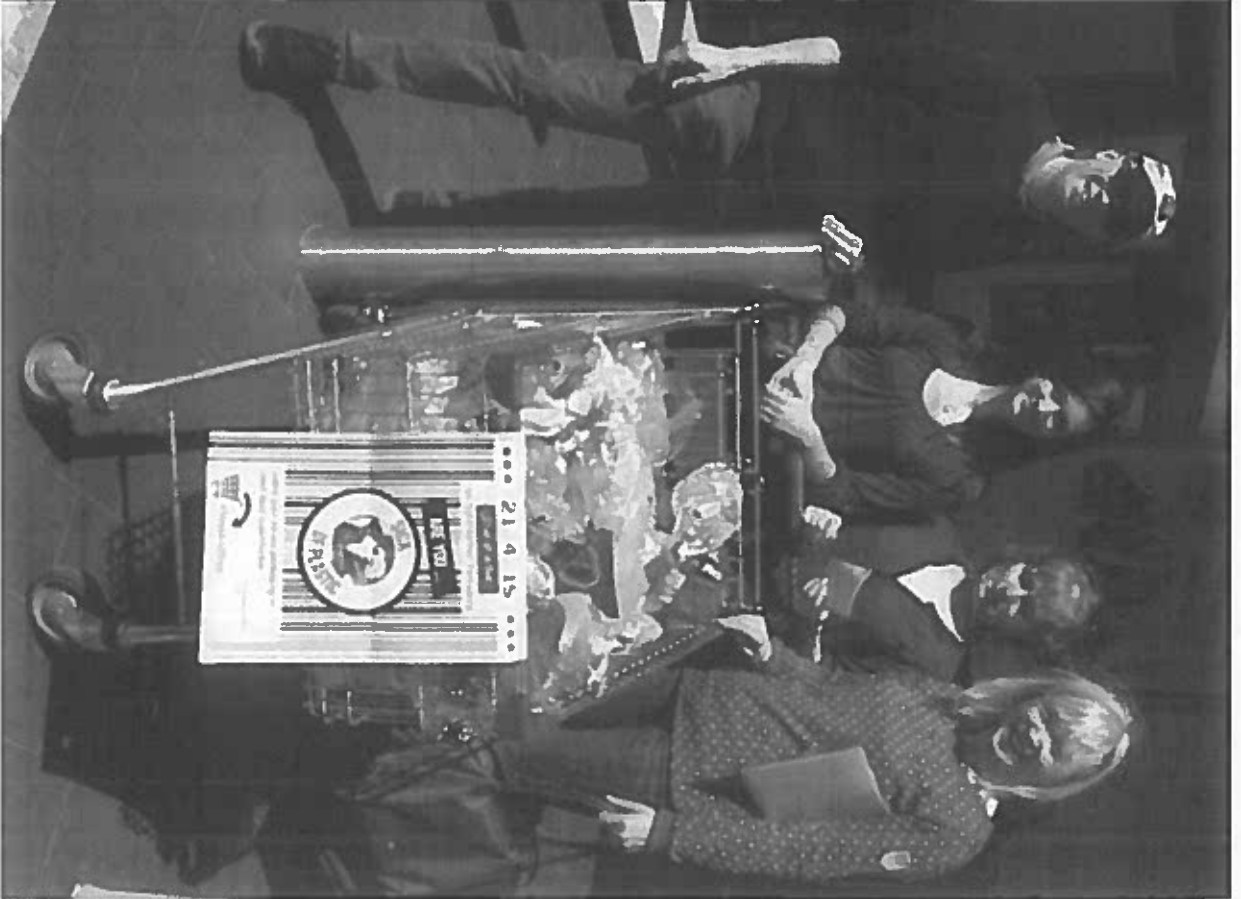
Meeting outside
Cobh Community
College &
marching to
St. Mary's School

Bring your
friends,
family,
dogs &
signs.



COBH ZERO WASTE





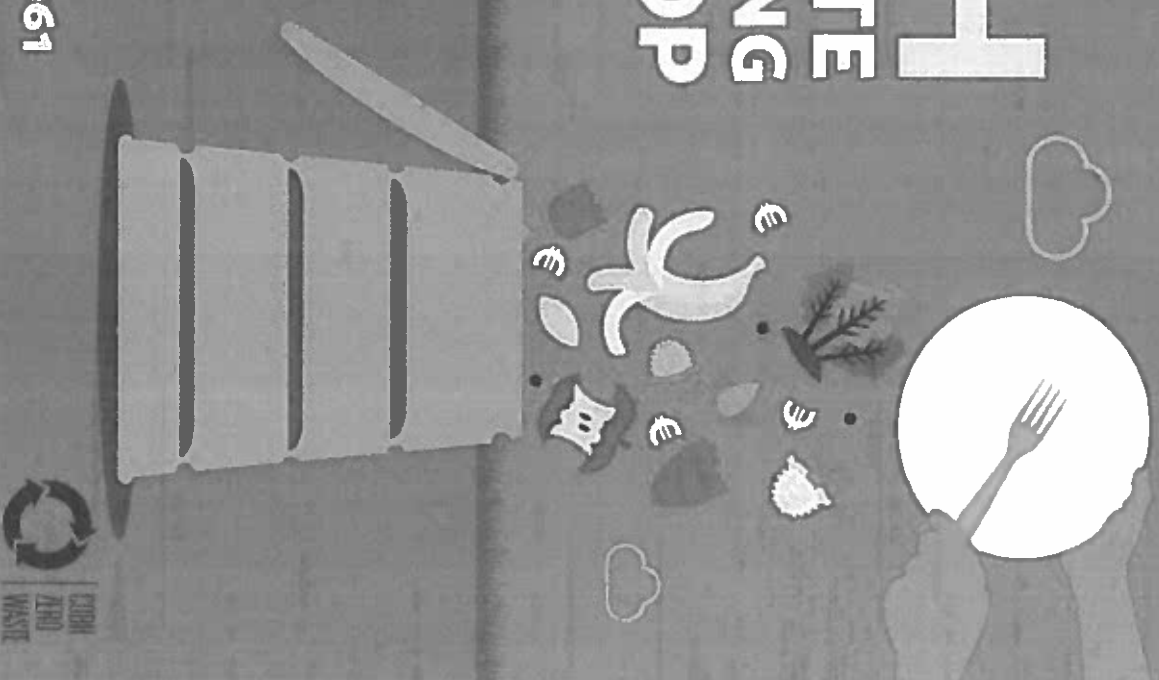


STOP FoodWaste.ie 

COBHH FOOD WASTE & COMPOSTING WORKSHOP

Wed April 3rd
@7:30 pm

Cobh - Great Island
Community Centre
For info contact:
Moggy on 086 0560961





Composting Workshop

Cobh Community Centre



COBH ZERO WASTE

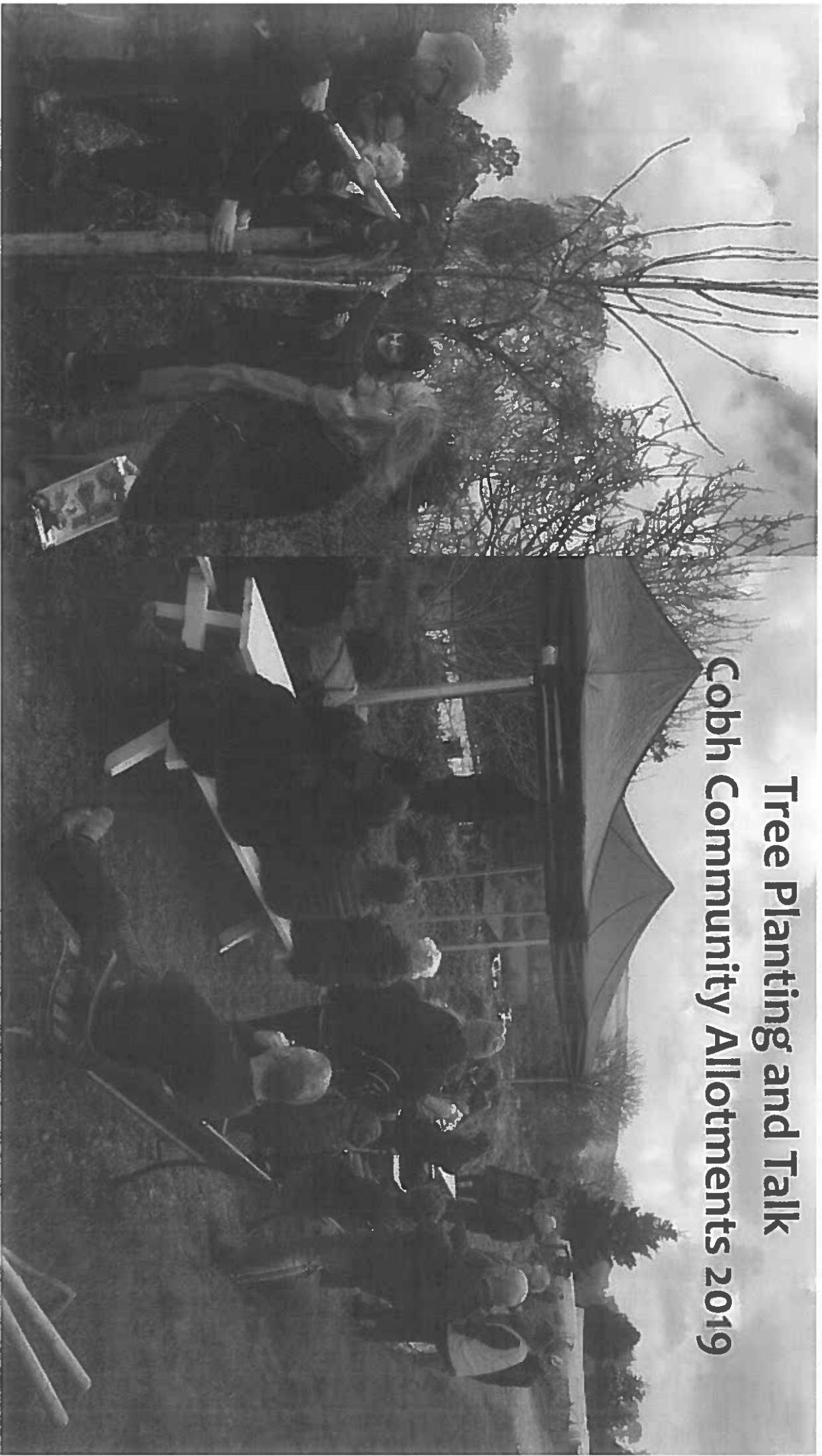


Cobh Community Allotments - April 6, 2019, noon

Guest speaker Gerard Banks on Restoring the DNA of Native Irish Woodlands

Family friendly. free event

**Tree Planting and Talk
Cobh Community Allotments 2019**





Clothes Swap on International Buy Nothing Day

When: Friday, 23. November
@7pm

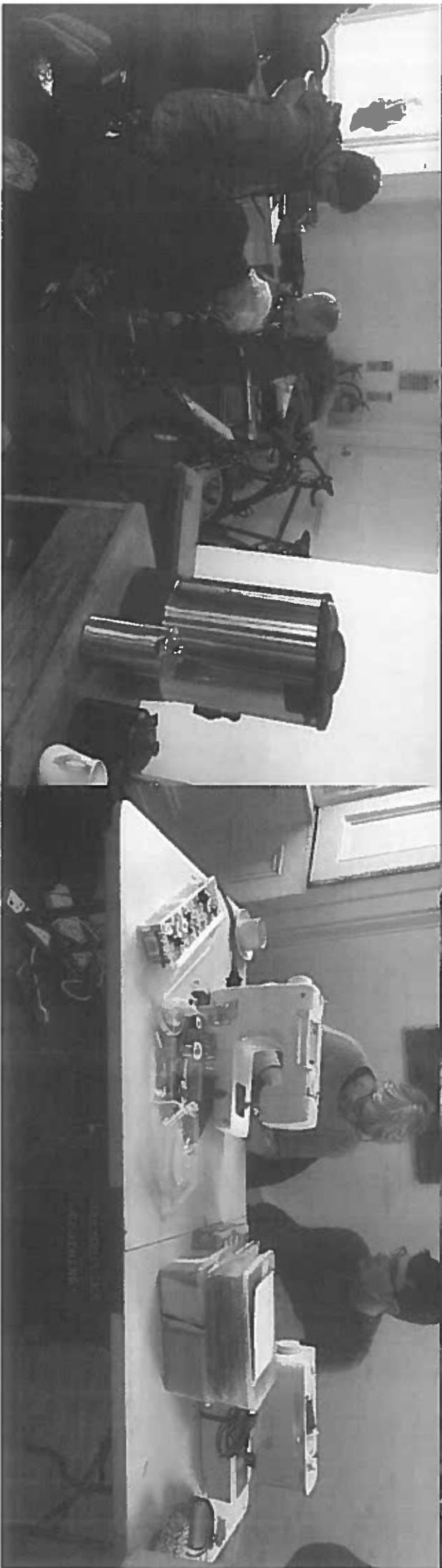
Where: Coliemore
The Artists House
4 Rahilly Street, Cobh

What: Bring up to 10 pieces
of clean clothes/accessories
that are in good condition

How: No money involved,
just bring your items and
swap them

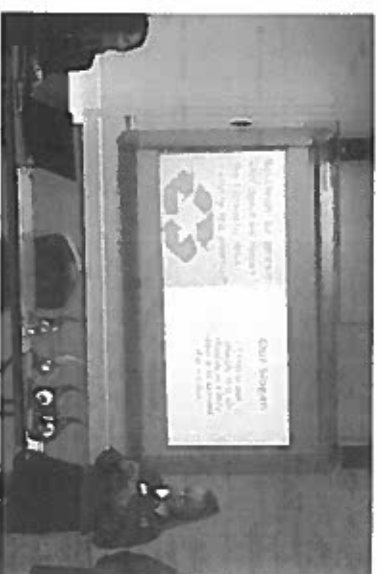
Organized by







**Education
Workshops
and Schools
Challenge**



PIC-COLLAGE



Emerald

Floating Wind
in the
Celtic Sea



Play (k) Energy Presentation: Cobh Zero Waste

Presentation by Aurore Lopez & Oisainn McKeown

0:03 / 55:04



Comharchumann Fuintimh Oileáin Árann Teoranta

Atlantic Islands Renewable Energy Limited

Presentation to Cobh Zero Waste

August 11 2020

Dara O'Leary/Phu

Carrigrohane

0:02 / 27:42

What is "sustainable?"



Sustainable food systems are those where the inputs and outputs can be continued at the current rate indefinitely.

Almost none of our current food systems are really sustainable:

- soil erosion and depletion
- deforestation

Shirley Plunkett and Constance



amarenco

A Global Renewable Company

Cobh - Ballynacrushta Solar Farm

www.amarencogroup.com



0:03 / 58:42



Planning Meeting

Cobh Chamber of Commerce





Cobh Zero Waste

Cobh Zero Waste Website

Resources ▾

Blog



Cobh Zero Waste's mission is to help the people of Cobh to reduce their impact on the environment. We aim empower real change on our little island by providing information, education, and conversation about how we can all make a difference.

Cobh Zero Waste is a collaboration of local groups, including CHASE (Cork Harbour Alliance for a Safe Environment), Cobh Tidy Towns and Cobh Community Allotments, Cork Environmental Forum and waste management companies operating in the town, with the aim of making Cobh one of Irelands first Zero Waste towns.

And we need your help. Please join us at our events and help our incredible community to make lasting change.

[About us](#)



Cobh Zero Waste

