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**From:** Joseph Cummins <Joseph.Cummins@enterprise.gov.ie>  
**Sent:** Friday 11 June 2021 15:06  
**To:** circulareconomy  
**Cc:** Aisling McCarthy  
**Subject:** DETE support for CES  
**Attachments:** 20210611 DETE submission on circular economy strategy.pdf

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Dear DECC colleagues,

Please find attached a short submission from DETE in response to your public consultation on the Circular Economy Strategy. Aisling McCarthy (cc'd) and myself, along with colleagues across a number of DETE divisions and our agencies, will continue to engage with you on this important cross-governmental policy area.

Kind regards  
Joe

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**Joseph Cummins**  
*Climate Action and Economic Infrastructure Unit*

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## Submission to Consultation on Ireland's First Whole-of Government Circular Economy Strategy

The Department of Enterprise, Trade & Employment (DETE) welcomes the development of Ireland's first Whole of Government Circular Economy Strategy and the opportunity to provide observations on it during this period of consultation. The Department will continue to work closely with the Department of Environment, Climate & Communications (DECC) on this cross-Government agenda, with a focus on the opportunities for businesses and enterprise policy in adopting circular business models and value chains. The input provided here is intended as a high-level overview of that detailed engagement.

DETE supports the five objectives of the proposed strategy, and in particular the aims 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
- identify and address the economic, regulatory, and social barriers to Ireland's transition to a more circular economy.

DETE also welcome that it will be an evolving document that will be updated based on progress achieved. The establishment of a Circular Economy Working Group to monitor implementation of relevant actions will be an important driver of its success. DETE and its agencies will contribute and support the work of this group as appropriate.

It is essential that the transition to a circular economy is underpinned by robust legislation and that levies and, where required, financial supports, are put in place to incentivise businesses and society in undertaking the behavioural changes that will be needed, and in this regard DETE welcomes the drafting of a Circular Economy Bill. It is also welcome that there will be a ring-fenced Environment and Circular Economy fund to support circular economy projects and initiatives.

There is relevant work ongoing in areas of mutual interest and cooperation between DETE and DECC:

- *Eco design and energy labelling.*  
DETE has policy responsibility for implementation of the *eco design Directive*. Under proposals being brought forward by the Commission under the 'Sustainable Products Initiative' it is expected that circularity, repairability, availability of replacement parts and product design for durability (tackling planned obsolescence) will be part of an expanded ambition for product regulations. Eco design regulation can significantly complement our national ambition on the circular economy and DETE will work with DECC and relevant agencies to promote this shared objective.
- The *Climate Toolkit 4 Business* under development on behalf of the two Departments will be an online calculator tool that will assist Irish businesses, particularly SMEs, to calculate their carbon footprint based on simple metrics they input in the areas of energy, waste, water, travel. The tool will provide a series of relevant actions that businesses can take & formulate a tailored Climate Action Plan. It will also direct them to advice and supports available by IDA,

EI, SEAI, Irish Water, EPA and others. Actions in the area of resource use and waste management will be aimed at helping relevant businesses achieve circularity in their products and supply chains.

- Under Climate Action Plan 2019, DETE has a target of increasing the use of *Solid Recovered Fuels* (or 'waste' fuel) in the cement sector. The cement sector, if it is to achieve the targets set, will use an increasingly large portion of Ireland's non-recyclable waste streams. This process is considered 'waste recovery'. It will be essential that our ambition to reduce non-recyclable waste and our ambition to decarbonize cement production are complementary – officials in DETE and DECC are engaged on ensuring that both objectives are consistent and deliverable.

DETE notes that there will be additional economic opportunities in the transition to a circular economy, particularly around repair and maintenance of a variety of products. A 2018 EU Commission report on the impacts of circular economy policies on the labour market estimated that a circular transition could deliver an additional 700,000 EU jobs across all skill levels by 2030. DETE officials and its agencies will continue to work with DECC colleagues and agencies to achieve this national ambition and ensure that Irish enterprises are well placed to capture the economic opportunities of circular business models and increased resource efficiency.

DETE again welcome this public consultation and look forward to working with stakeholders to implement relevant aspects of the strategy as it is finalised.

**Climate Action and Economic Infrastructure Unit**

**10 June 2021**