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Sent: Friday 11 June 2021 16:16

To: circulareconomy

Subject: Dublin Chamber Submission Circular Economy Consultation

Attachments: Circular Economy Strategy Consultation_Dublin Chamber_June 2021_FINAL.pdf

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Good afternoon,

Please find attached the Dublin Chamber response to the public consultation on the proposed Circular Economy Strategy.

Kind regards, Sinéad

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Submission to the Department of the Environment, Climate, and Communications in response to its Public Consultation on the Proposed Whole of Government Strategy for a Circular Economy

June 2021

Introduction

Dublin Chamber is the largest membership organisation representing the business community of the Greater Dublin Area. Its membership spans the spectrum from SME to MNC and ranges across sectors. Dublin Chamber has a history of actively advocating for the inclusion of circular economy principles in national planning and been vocal in its support of incorporating Green Public Procurement (GPP) principles. Additionally, the Chamber has encouraged Government to align its goals and climate action planning with that of the EU in order to most effectively access Next Generation EU and EU Green Deal funding, whilst also recovering the post-Covid economy and resetting for a transition to a low carbon economy.

Dublin Chamber has made frequent submissions to Government and to the Department of the Environment, Climate and Communications specifically in relation to Circular Economy related developments, including submissions on the Waste Action Plan for a Circular Economy, on a proposed Deposit Return Scheme, and on the National Recovery and Resilience Plan, as well as through papers detailing the need for action on Green Public Procurement.

Dublin Chamber welcomes the delivery of the new cross-Government Circular Economy Unit as an addition to the Department of the Environment, Climate and Communications (DECC), reflecting the need for circular principles to be adopted across society. Further detail as to how the new unit will progress this objective, how it plans to stimulate public awareness and participation, and how it will strive to prevent green washing would be welcome.

In the following paper, Dublin Chamber will respond to a selection of the questions as outlined in the DECC's Consultation Paper on the Proposed Publication of the Strategy.¹

¹ Ireland's First Whole-of Government Circular Economy Strategy- Public Consultation on the Proposed Publication of the Strategy April 2021

Furthermore, and most importantly, we will argue that a focus on achieving sustainable cities must be central to any Circular Economy Strategy.

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?

The objectives as set in the Strategy are broadly positive and Dublin Chamber commends the objective for the strategy to be an all of Government approach, for its ambition of Ireland becoming a leader in the space in the European landscape, and its commitment to promoting the understanding of the Circular Economy in Irish society. However, there is a need for a level of accountability in the National Strategy for such objectives to be achieved.

Departmental accountability at national Government level is necessary for Circular Economy practices to be effectively implemented across the public and private sector. In order for circular principles to take precedence as a new way of conducting business as opposed to merely an additional requirement or box to tick, an objective for the public sector specifically is required so that the overall objectives of the Strategy can take hold across societal institutions. We would encourage greater ambition in the National Circular Economy Strategy in relation to how the integration of circular principles will be implemented in the public sector. A key aspect of this will be through the integration of green procurement and thinking in relation to life cycle costing and supply chain innovations across Government.

The strategy objectives need to account for integration of circularity at both State and local level. While the objective of fostering leadership in the public sector in relation to the circular economy is commendable, the objective needs to also include the requirement for its implementation at all levels of the public sector. There is a clear need for city and county councils to be trained and educated on circular principles and on how to integrate them into public sector functionality. Local government is key to the Circular Economy truly becoming a part of national strategy and progress at this level should be an objective of the Circular Economy National Strategy. Dublin Chamber recommends that Circular Economy education and training is made available to local authorities and that local authority staff across departments access it. Circular Economy knowledge and understanding cannot be under the guardianship of one person or department in a local authority; it must be a baseline part of operations.

Similarly, ambition in encouraging response to the opportunities of the Circular Economy need to be more explicit in the stated objectives. The National Strategy on Circular Economy

needs to encourage and enable innovative industry responses and include provision to incentivise this going forward. Private sector engagement must be a priority.

Considering the strong objective of becoming an EU leader in the space by 2030, greater reflection of the set objectives of the EU Circular Economy Strategy would be well placed. For example, the EU Circular Economy Strategy objectives around supporting regions and cities in becoming circular should be more strongly articulated. Additionally, Dublin Chamber recommends the inclusion of an objective to remain up to date and progressive in line with emergent Actions from the EU Circular Economy Strategy as this will help with accountability and with maintaining competitiveness in a changing EU marketplace.

Objectives around the delivery of infrastructure that will work in support of delivering circular economy objectives should be included. The proposed strategy fails to recognise the role of key resources of energy, waste management, water, and transport infrastructure in progressing and maintaining a circular economy.

Lastly, an objective that highlights the UN SDGs should be incorporated, and include consideration of goals relating to biodiversity, climate action, sustainable cities and communities, and of course Circular Economy.

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?

Considering the stated national goals around emissions reduction and achieving a low carbon economy by 2050, the ambition of the Strategy is just about appropriate, if not in need of greater ambition in relation to the potential impact in the business community. The potential to decarbonise through Circular Economy innovations and responses to consumer and market demand should be highlighted and be part of the overall ambitions of the plan. While the transition to renewables and implementation of resource efficiency and demand management measures will contribute to national emissions reduction, this can only account for 55% of emissions generally, the other 45% of emissions come from the production of food and other products. This means that implementing CE principles to alter the approach to how products are made and used will be important for decarbonisation efforts.²

The consultation states that the National Circular Economy Strategy is not intended as a document with a list of actions, however further clarity and stated ambitions on the

² Ellen McArthur Foundation- Completing the Picture How The Circular Economy Tackles Climate Change https://www.ellenmacarthurfoundation.org/assets/downloads/Completing The Picture How The Circular Economy-Tackles Climate Change V3 26 September.pdf

mechanisms and channels for achieving circularity for cities, regions, private sector, and public sector are important to ensure real progressions are made. Currently the draft strategy is too vague to ensure measurement and management of the integration of Circular Economy principles and the elimination of waste from the design process for products and projects.

Dublin Chamber recommends a strategy roadmap to aid in measurement and management. This roadmap should include key markers and milestones, and should reflect the EU Circular Economy Strategy targets and timelines. The EU has well defined action plans with different sectoral circular economy roadmaps with defined objectives, the Strategy should note these objectives.³

Additionally, the Strategy should consider comparable Circular Economy strategies that have been implemented in countries of a similar size and consider the objectives set in such examples as achievable. Scotland, for example, has been implementing its Circular Economy strategy since 2016 to good effect and has been recognised for its efforts by the World Economic Forum.⁴

Dublin Chamber also argues that there needs to be far greater ambition outlined in relation to the delivery of key infrastructure projects around essential resources, including water, energy, waste, and transport. Each of these infrastructure areas are central to achieving circularity and yet do not feature prominently in the proposed strategy.

Finally, the Strategy should outline the direct links to other existing Government strategies that reference the importance of circularity for economic growth.

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?

Dublin Chamber is in favour of measuring Ireland's progress in achieving a more circular economy through benchmarking against its European peers as this is the market in which many Irish business will be competing and the countries it may be competing against for more global opportunities.

³ EU Actions Against Food Waste https://ec.europa.eu/food/food/waste/eu-actions-against-food-waste_en

⁴ Ellen McArthur Foundation Scotland Case Study https://www.ellenmacarthurfoundation.org/case-studies/scotland-making-things-last-a-circular-economy-strategy

It similarly makes sense to benchmark Ireland's success against European peers as they will be operating within a similar regulatory framework as set by the EU and working to the same EU Green Deal goals.

EU member states also provide a number of best practice examples which Ireland can look to as it progresses in implementing circular economy principles at Government level, in waste management, and in encouraging and leading the business community in actively taking advantage of circular practices in their business models and propositions.

Furthermore, considering that Ireland is lagging in terms of its green procurement in comparison to EU competition, it is essential that the country remains vigilant as to the progress of our peers as it relates to progressing national goals as well as monitoring for impact on competitiveness. EU sustainable finance policy actively encourages investment into projects that are deemed as 'sustainable' through regulatory actions and standardisation of what can be labelled as 'sustainable'. The EU is attempting to activate private investment in this space and also intends to fund through EU capital. Thus, innovation in line with EU standards on sustainability and circular practices will improve competitiveness for blended funding opportunities for projects in the years ahead.

While measuring against EU benchmarks is essential, the proposed Circular Economy Strategy should also include some less high-level modes of measurement that are directly relevant to the Irish context and climate action pathway.

Also, the proposed Strategy highlights the importance of international cooperation. The OECD has recognised that Circular Economy policies and initiatives largely take place domestically, and yet they have important interlinkages with international trade. Further alignment with the EU on Circular Economy may be a positive contributor to enabling international trade to the benefit of Irish enterprise and promoting the growth of internationalising businesses. It may be useful to outline actions within the Strategy that further develop cooperation in Circular Economy principles and actions within the EU. There should also be consideration of Circular Economy commonalities with the UK to further enable trade in a post-Brexit environment.

⁵ OECD <u>https://www.oecd-ilibrary.org/docserver/ae4a2176-</u> en.pdf?expires=1623248350&id=id&accname=guest&checksum=AF3A397C8DEF9976675DB3E1E10B23AC

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?

Evidence from the business community broadly suggests that there is recognition of the term 'Circular Economy' but a lack in depth of knowledge or engagement with its implications and opportunities in the wider economy.

Dublin Chamber launched a first of its kind initiative in February 2020 to enable the business community to take steps to ready themselves for a low carbon economy. The Dublin Chamber Sustainability Academy, sponsored by AIB, includes a training course in the Circular Economy.

In the process of developing the Sustainability Academy offering, we engaged in significant market research to gauge the entry level of knowledge among the business community in relation to sustainability, including the Circular Economy. In focus groups held in early 2020, led by Amárach Research, it was clear that businesses struggled to agree on what sustainability meant, and that this extended to the term Circular Economy.

In follow up surveying of business leaders from across the Greater Dublin Area in February 2021, data showed that nearly a quarter of businesses do not feel well informed about sustainability as it relates to business.

In its submission in response to the Waste Action Plan for a Circular Economy public consultation held in February 2020, Dublin Chamber argued that a considerable communications campaign around waste action in a circular economy is required. ⁶ This remains the case for businesses, a significant stakeholder in communities. NESC outlined in its 2017 study *Moving Towards the Circular Economy in Ireland* that knowledge and understanding of the Circular Economy is low in Ireland, there has been little action to address this at a large scale in the years since then. Existing efforts are small scale informative training and education offerings, a wider and more largescale campaign to tackle all stakeholders is necessary to bolster the baseline understanding of the circular economy.

The education and higher education sector should have their role in promoting the understanding of the Circular Economy recognised as they specifically can play a strong role in promoting Circular Economy awareness and supporting knowledge transfer to business and public organisations through workforce development. This is ongoing as the sector is

⁶ Dublin Chamber Submission on a Waste Action Plan for a Circular Economy
https://www.dublinchamber.ie/DublinChamberofCommerce/media/banners/Dublin-Chamber Submission-on-the-Waste-Action-Plan-for-a-Circular-Economy-21-Feb-2020.pdf

integrating circular principles and sustainability considerations across different programmes, not just in sustainability focused programmes.

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?

Greater involvement in the Waste Action Group from the business community and from urban representation would be a welcome addition to the Waste Action Group.

Businesses have done and will continue to play a vital role in carrying the message around waste action and responsible use to consumers. For example, those in the hospitality industry that positively influence customers to move towards reusable takeaway cups. Harnessing the innovation of the private sector on the Waste Action Group would be a positive addition. Dublin Chamber suggests that the National Strategy for a Circular Economy notes the role of the business community more widely in the transition.

Similarly, it is important that the urban perspective is captured, the five cities as recognised in the National Development Plan should be represented on the Waste Action Group. For example, the chambers of commerce of the five chambers of Cork, Dublin, Galway, Limerick, and Waterford come together under the banner of City Regions Ireland to collectively act as the voice for cities and would make a welcome addition to the Waste Action Group. ⁷

Finally, considering the role that the public sector needs to play in leading on Green Public Procurement and in reducing waste, it is important that the public sector is widely represented and not solely represented through DECC.

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?

As the EU continues towards its Green Deal goals, from an economic perspective it is essential that Ireland continues to move with the EU market in order to remain competitive.

⁷ City Regions Ireland https://www_cityregionsireland.ie/

Circularity will contribute significantly to reducing waste and emissions, thus helping with national climate action goals and reducing the likelihood of penalty fines.

There is considerable potential economically and socially in the transition to a circular economy as it can be used as a mechanism to engage those who have been displaced by their industry as a result of Covid-19. Skills and training in evolving industries, including retail and hospitality, should be targeted. Solas has a clear remit in this space and so should be considered in the Circular Economy Strategy.

Job creation resulting from supporting academia and the start-up community to engage in circular opportunities has significant potential.

Technological Universities are particularly active in the skilling and training of workers in the retail and hospitality sectors. These sectors can play a role in the development of the Circular Economy and ensure that jobs in these sectors are more sustainable.

Furthermore, there is considerable potential for positive impact on bio-diversity with increased circularity in design and packaging.⁸

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 key to enabling and supporting innovative, circular responses by industry is to ensure that Government policy is swift in its response to new technologies and progressions, thus creating a supportive environment to foster innovation.

In order to ensure that regulatory barriers to further developments in support of the Circular Economy, a level of agility at both local and national Government must be developed. The response time at a regulatory level to making sure a promising innovation can be supported to a point where it can be safely and effectively implemented in Irish business and society needs to be fast and agile in approach.

⁸ NESC Moving Towards the Circular Economy http://files.nesc.ie/nesc_reports/en/144_Moving_Towards_the_Circular_Economy.pdf

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 most considerable non-regulatory barriers to the further development of the circular economy in Ireland relate to general understanding of what the circular economy is and what it entails. This is relevant to the whole of society; however for the business community the lack of understanding has perhaps a greater impact on transitioning the economy towards circularity.

Dublin Chamber research undertaken through surveying and focus group sessions over the past two years shows that businesses are still grappling with the meaning of sustainability, and, with what aspects and actions in support of sustainable practices are relevant to their business. This is mostly the case for SMEs and micros businesses particularly, considering the understanding of 'sustainability' is murky still for many. The term 'Circular Economy' provides an even greater challenge, and following this, Environmental, Social, and Governance (ESG) factors again cause confusion.

For large corporates, the guidance around what aspects of ESG are relevant to a firm through deciphering what is financially material is accessible through EU and other international regulatory systems. While this can prove to be complicated and time consuming for firms, it does offer clear and established guidance and terms of reference that is not suitable or applicable for most Irish SMEs.

Dublin Chamber recommends that a widespread communications and information campaign to bring businesses and society as a whole on a journey to comprehending the concept of the circular economy be developed, and that terms of reference on circularity are made accessible for Irish SMEs.

Dublin Chamber also recommends that an easy to follow sustainability or circular economy mark is considered as something to be made available for businesses to achieve and display so that consumers and clients can easily ascertain how circular a product, service, or business is. This should be a mark that is achieved by comparison to Government set terms of reference. This mark should indicate high level compliance with broad circular principles and for larger businesses also correspond to having achieved a level of accreditation in an existing reporting scheme for carbon disclosure or ESG, for example. While sustainability and accreditation is considerably complicated, Ireland does have form in this space as can be seen in the Origin Green programme. Businesses need to be able to display a simple mark to show their credentials in order to guide customers appropriately. The ability of firms to actively mislead consumers as to their green credentials needs to be actively

discouraged. Customers and the public also need to be widely communicated to through a campaign to raise awareness of the benefits of circularity and waste action.

Another non-regulatory barrier is the ability for scaling up of processes so that the Circular Economy can be implemented on a sound and sustainable footing. This could be achieved in partnership with Digital Innovation Hubs or Technology Centres. Support schemes to develop demonstrator and pilot projects could be useful to scale up Circular projects so that they can become commercially and socially viable.

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

Dublin Chamber has long advocated for an acceleration in commitment to Green Public Procurement in the Irish context as a means through which to accelerate and enable a private sector response to utilising circular economy principles across supply chains. The Chamber has promoted the adoption of GPP in numerous submissions in recent years and has engaged directly with the DECC to voice support from the business community in this regard. The Environmental Protection Agency is due to release new GPP guidelines in the coming months and these will have a positive impact on progressing GPP integration. The Office of Government Procurement must commit to integrating Circular Economy and GPP principles in its own strategy.

Budget 2021 commitments to Green Public Procurement being used for public transport were a significantly positive step in integrating GPP. To further this progress an objective around GPP for major state infrastructure and construction projects should be a part of national Circular Economy strategy as it will have a significant and positive impact on greening supply chains on a grander scale, a key component of transitioning to a circular economy. The Programme for Government commits to the utilisation of GPP in an evidencebased approach.9

GPP is essential in development of new circular goods and services because it will foster competition from Irish business to be able to respond to tenders with the required green criteria. It will also encourage innovation because it will invite and favour tender responses that offer goods and services that are more circular and innovative but not necessarily those that are the least costly; while of course public spending will remain a priority circularity and life cycle cost must also be prioritised.

Programme for Government - Our Shared Future (2020) p36

In order to fully implement GPP to encourage innovation, it is essential that GPP criteria is not limiting as circular principles can be applied broadly, for example tenders must allow for innovative supply responses such as responding to a tender by suggesting providing a resource as a service.

Many EU counterparts have integrated GPP principles and are significantly further down the road in progressing circular principles in procurement policy indicating that Ireland has considerable work to do in this space. New GPP guidelines are due for release from the EPA in 2021, and these new guidelines will be key to furthering the agenda. The publication of these guidelines must be suitably communicated to the business community and across Government at both national and local level. Dublin Chamber research carried out with Amárach Research through surveying of over 200 Dublin-based firms in February 2021 indicates that businesses are aware of the relevance of GPP, with 6 in 10 stating that GPP is either Fairly or Very Relevant to business.

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

Incentivising, encouraging, and enabling the efforts of the private sector to engage with the circular economy is essential. The first step will include aiding the business community to engage with what the circular economy means for day-to-day business and the future of the economy.

Communications campaigns featuring successes in the space and focusing on the value for money and environmental advantages will be essential to the incorporation of the circular economy for all stakeholders. The consultation paper on the Strategy states that one of the objectives of the Strategy is to 'demystify' the term. However there is little detail as to how this will be achieved.

Furthering the understanding of what the circular economy is to general population and linking this to consumer trends for industry stakeholders is important to encourage transition towards this new way of approaching business and product design. Similarly, the transition to the circular economy should be linked to existing practices in the economy, for example the uptick in online reselling platforms, the popularity of re-furbished tech and equipment, and the return to a mending and upcycling culture, which are all accessible terms in which to communicate circular principles to businesses and the general public alike. Using case studies of well-known Irish businesses that have been engaging in circular practices, whether by design or as part of a business model whereby the term 'circular economy' was

unbeknownst to them would be positive as an inclusion in the Strategy in order to 'demystify'. Similarly, communicating how existing circular practices that many businesses are engaging in will encourage the assumption of achievability for circular practices

It has been widely recognised that achieving a low carbon, circular economy cannot be achieved without the support of private investment and the financial and banking sector are being actively encouraged into this space through the EU Action Plan on Sustainable Finance. The positive impact on the risk profile of a business or a project when that business or project is able to demonstrate its sustainability should be made widely known to the business community in any Government communications of the benefits of the circular economy.

Further to demystifying the term 'Circular Economy', Government can support the innovation and responsiveness of enterprise through calls to action around identifying circular economy leaders, playing on the business need for brand recognition in the space of circularity.

Finally, financial grant support should also be provided to businesses engaging in re-design of product or process in pursuit of greater circularity. A core objective must be to encourage Circular Economy innovation, the launch of the Circular Economy Innovation Grant Scheme in April 2021 and encourages that Circular Economy innovation funding streams are made available across other enterprise grant schemes. Dublin Chamber recommends that there is an introduction of an R&D tax credit boost for green and circular R&D projects.

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

To begin with, Ireland's sectoral focus should take the lead from the sectors suggested by the EU Circular Economy Action Plan, such as electronics and ICT, batteries and vehicles, packaging, plastics, textiles, construction and buildings, food, water and nutrients.¹⁰

The potential of digital transformation and the introduction of digital technologies to enable the circular economy can make a positive contribution. Both the digital and sustainability agendas should be planned in tandem. This is in-keeping with EU recovery and resilience funding. For example, the use of digital and off-site construction technologies has the potential to reduce material waste.¹¹

construction-waste-management/

¹⁰ EU Circular Economy Action Plan https://ec.europa.eu/environment/strategy/circular-economy-action-plan en
¹¹ GeoSpatialWorld net https://www.geospatialworld.net/article/the-applications-of-digital-technology-to-

The management of food waste through retail and consumption could also potentially be one of the biggest contributors to the growth of the Circular Economy.

The Circular Economy strategy plan should highlight the importance and potential of innovation in the packaging sector. The appropriate innovation in this space will have a significant contribution to circularity as well to elimination of "one-use" materials. There are a number of firms within Ireland such as Smurfit Kappa that have significant expertise in this space and have shown the progression that can be made.

13. Other Comments

SDGs and Sustainable Cities

The National Strategy should make greater reference to the UN SDGs and take greater lengths to ensure that the Strategy explicitly incorporates them. NESC similarly recognises the promotion of the Circular Economy as key to furthering SDGs.¹²

The role of cities as test beds and accelerators for integrating circularity also needs to be incorporated. This is recognised by the World Economic Forum which identifies the potential inherent in cities as central actors in generating a circular eco-system.¹³ Furthermore, in 2017 a World Circular Economy Forum held in Helsinki recognised that cities and businesses in particular are core to driving towards a circular economy.¹⁴

The role of cities in achieving a circular economy needs to be incorporated in the National Strategy. The National Planning Framework Project Ireland 2040 and the National Development Plan clearly identify that Ireland's five cities of Cork, Dublin, Galway, Limerick, and Waterford are the economic engines of the country, it stands to reason that they should also be recognised in the National Strategy for the Circular Economy as engines for the circular economy.

In order to achieve this, an integrated approach and plan at city level must be considered.

Dublin Chamber notes the following the launch of a plan for rural Ireland, *Our Rural Future - Rural Development Policy 2021-2025*, a similar plan must be delivered for urban Ireland and

¹² NESC Moving Towards the Circular Economy http://files.nesc.ie/nesc_reports/en/144_Moving_Towards the Circular Economy.pdf

World Economic Forum-PWC White Paper Circular Economy in Cities
 http://www3.weforum.org/docs/White paper Circular Economy in Cities report 2018.pdfnb
 NESC Moving Towards the Circular Economy
 http://files.nesc.ie/nesc_reports/en/144_Moving_Towards_the_Circular_Economy.pdf

this must include the development of Ireland's cities as ideal centres for furthering the circular economy.

Dublin Chamber has long advocated for the introduction of a Directly Elected Mayor to further sustainable and circular goals for a resilient and sustainable Dublin. By mandating a Directly Elected Mayor with delivering a sustainable city, including circular practices, the appropriate goals, and initiatives can be executed across all four local authorities in the capital to progress it as a centre for driving the circular economy nationally.