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**From:** Green Foundation Ireland <info@greenfoundationireland.ie>  
**Sent:** Friday 11 June 2021 15:32  
**To:** circulareconomy  
**Subject:** Submission from Green Foundation Ireland to DECC  
**Attachments:** DECC, SUBMISSION on Circular Economy Strategy, 11 Jun 2021.pdf

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Attached please find a submission from Green Foundation Ireland in connection with the public consultation on the ***Proposed Publication of the Circular Economy Strategy***.

As we understand that submissions in relation to this public consultation must be received by 5:30pm on 11 June 2021, we are ahead of your deadline.

With best wishes.

Ann



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*2010 9042 Registered Charity Number (RCN)*  
*CHY 21114 Charity Revenue Number*

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# Green Foundation Ireland

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11 June 2021

## SUBMISSION

**from:**

Green Foundation Ireland

**to:**

The Department of Environment, Climate and Communications

**Public Consultation on:**

The proposed publication of the Circular Economy Strategy

Registered in Dublin, Ireland: Number 508243 — Irish Charity Number: CHY 21114 — Registered Charity Number (RCN): 2010 9042

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# RESPONSE TO PRE-CONSULTATION ON ALL OF GOVERNMENT CIRCULAR ECONOMY STRATEGY

## 1.0 OVERVIEW

Green Foundation Ireland (GFI) aims to create an ecologically literate Ireland which would be a sustainable society that does not destroy the natural environment on which they depend and understand how nature sustains life. Meeting the biodiversity and climate change crisis is not only an environmental challenge, but also a cultural and political one that requires environmental education and active citizenship. GFI advocates for policy change that would create a sustainable society in Ireland, and we also engage with public consultations on the environment.

The principle behind a circular economy is that all goods and materials should be valued and recirculated within the economy for as long as possible. This is easy to agree with but more difficult to put into practice.

The internalisation of external costs means that production needs to include the cost of better design, and managing and extending the life of goods and materials. Making the transition to a circular economy is an important goal for a sustainable society. Yet the complexity of such an undertaking means that no single industry can achieve it alone and ecosystem-wide change is needed.

Some measures we believe are required to achieve this system change are outlined in response to the pre-consultation paper below.

## 2.0 CONSULTATION QUESTIONS

### 2.1 DO YOU AGREE WITH THE DRAFT STRATEGY'S PROPOSED KEY OBJECTIVES? IN YOUR VIEW, ARE THERE FURTHER OR ALTERNATIVE OBJECTIVES THAT SHOULD BE INCLUDED?

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

We agree that a national policy framework and public sector leadership are necessary for this transition.

This framework should help connect and align the plans and policies currently being developed to provide for the circular transition, including the Waste Action Plan for a Circular Economy, the National Waste Management Plan for a Circular Economy and the EPA Circular Economy Programme. There is currently a degree of duplication and conflicting goals between the plans, programme and strategy that need to be addressed.

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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

While targets are necessary to address the lack of progress in waste prevention, reuse and repair we do not agree that the circularity gap will address these important areas.

It is likely that, with the focus of the circular material use rate being on secondary materials rather than products, recycling will be the main beneficiary. However, challenging targets are already in place to support growth in recycling under the Waste Framework Directive, so this would represent unnecessary duplication. Rather, targets supporting prevention, reuse and repair are needed.

We are also concerned that targets are proposed in all of the proposed plans, programme and strategy and there is no obvious connection or alignment between them, or lines of accountability. We urge the Department to ensure any set targets are properly coordinated and interlinked.

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TO RAISE AWARENESS AMONGST HOUSEHOLDS, BUSINESS AND INDIVIDUALS ABOUT THE CIRCULAR ECONOMY AND HOW IT CAN IMPROVE THEIR LIVES

Green Foundation Ireland hosts seminars, workshops and conferences to demonstrate how practical action can create systems change in both education for sustainability, and work towards a green economy and society.

Otherwise put, we recognise that raising awareness is important but that people need to be able to take practical action on the back of it. This means providing the opportunity for people to prevent waste, reuse and repair and making this affordable and attractive.

Any measures to support awareness raising therefore need to be accompanied by measures that help build the sector and make it easy for people to make the right choices.

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TO SUPPORT AND PROMOTE INCREASED INVESTMENT IN THE CIRCULAR ECONOMY IN IRELAND, WITH A VIEW TO DELIVERING SUSTAINABLE, REGIONALLY BALANCED ECONOMIC GROWTH AND EMPLOYMENT

As highlighted above, measures are needed that will make it easier and cheaper for people to prevent waste, reuse and repair. This will require policy measures like targets as well as sustainable investment and supports to enable businesses to deliver the necessary services and goods and enable Ireland to meet these targets.

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TO IDENTIFY AND ADDRESS THE ECONOMIC, REGULATORY AND SOCIAL BARRIERS TO IRELAND'S TRANSITION TO A MORE CIRCULAR ECONOMY

There are many barriers to the circular transition, from bad product design to inappropriate subsidies and the cost of repair and refurbishment. We have addressed some of these barriers through our webinars which are available on our website at <https://www.greenfoundationireland.ie/circular-economy/> and are summarised below.

**2.2 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?**

We are concerned about the pace of change in light of the short timeframe we have to address the climate emergency.

We would therefore like to see in this first All of Government Circular Economy Strategy more concrete commitments and goals that will drive growth and uptake of prevention, reuse, repair and recycling. These commitments and goals should be tracked and reported on a 6 months to 1 year cycle to ensure progress is being made.

**2.3 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?**

As highlighted above, the circular material use rate may not be the most appropriate measure to reflect a truly circular economy in Ireland.

While it can be helpful to measure progress against peers from a communications perspective, we have seen from recycling and other targets that comparisons are often complicated by different reporting methods or completely different approaches to developing a sector. Therefore there should not be too much weight applied to such measures.

**2.4 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?**

The pandemic has seen a shift in behaviour and awareness of our reliance on everyday goods. Even before this, we have seen consumer pressure influencing major brands like fashion retailers H&M, Selfridges and M&S to develop more sustainable offerings.

However, the pace of real progress is slow and more needs to be done to make it easier for the public to both change their behaviour and take action.

**2.5 WHAT ARE THE MOST EFFECTIVE AWARENESS RAISING MEASURES THAT COULD BE TAKEN UNDER THE STRATEGY?**

As highlighted above, we believe that providing information in communities and demonstrating practical actions that can be taken will create systems change.

We would also like to see greater coordination between the many organisations looking to raise awareness in this area. GFI is part of the Irish Environmental Network (IEN) which connects NGOs across a range of areas including waste prevention, but there are many other Government or NGO bodies in this space. A co-ordinated approach would help maximise how effective these efforts are given the limited resources available.

2.6 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?

Yes – as noted above, a co-ordinated approach is essential to ensure proper policy / plan / strategy and sectoral alignment.

2.7 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?

**Environmental**

A 2020 report by Circularity Gap Reporting Initiative highlights that switching to a circular economy could reduce global greenhouse gas emissions by 39%. These savings relate to avoided emissions associated with upstream material extraction, manufacturing and transport and end of life management.

**Economic**

By keeping goods within the economy for longer, prevention, reuse and repair can support new business opportunities, job creation and economic growth in communities through localising supply chains.

**Social**

The European Commission estimates a circular transition could deliver an additional 700,000 EU jobs across all skill levels by 2030. Social enterprises have long been associated with reuse and refurbishment in Ireland, tapping the value of unwanted materials to build social capital in communities through training and capacity building and also providing goods and services to low income families, students and other individuals.

2.8 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.

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**TARGETS**

As highlighted in Section 2.1 above, targets are needed that support and drive prevention, reuse and repair. Targets are needed to help set the ambition and focus on these activities at the top of the waste hierarchy.

The Circular Economy Report for the Joint Committee on Environment and Climate Action recommends a target to double the size of the Reuse Sector 2026, which would be welcome. This should be introduced as soon as possible and should be provided for in the Circular Economy Bill, as it will take some time to build the sector and to reflect the urgency of the climate situation we face. It should be accompanied by clear lines of accountability and penalties for failure to meet the target.

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## DESIGN

The basis for all progress in circularity is in better design. We encourage the Department to engage with and support EC efforts to improve the design of consumer goods through the sustainable product policy and ecodesign measures.

In particular, mandatory ecodesign measures need to be extended and apply to many more electrical and electronic devices which currently are discarded in significant volumes due to bad design and the cost of repair. We also look forward to ecodesign measures applying to non-energy products.

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## LABELLING

One excellent and recent example of labelling is the new labelling requirements for product repairability in France. Applicable to electrical and electronic equipment, this lets the consumer know whether their product is repairable, difficult to repair or not repairable.

A similar scheme should be considered for Ireland and we would encourage the Department to support European Commission efforts to develop consumer labelling requirements.

2.9 WHAT DO YOU SEE AS THE MAJOR NONREGULATORY BARRIERS TO THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY IN IRELAND? IN ANSWERING THIS QUESTION PLEASE FEEL FREE TO ADDRESS ECONOMYWIDE ISSUES OR THOSE AFFECTING YOUR SECTOR IN PARTICULAR.

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## REUSE AT CIVIC AMENITY SITES

Civic Amenity Sites are valuable public facing centres for the management of resources and should be supported to provide more reuse opportunities. Targets or requirements should be introduced via Local Authority contracts to boost reuse and raise awareness about circular economy.

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## COST AND VIABILITY

One important barrier is that in many cases it can cost more to consumers to prevent, reuse or repair than buy something new.

Several measures can be taken to address this cost issue without impacting affordability of basic household goods. For example:

- A 0% VAT rate should apply to repair and repaired goods, or a voucher scheme for repair introduced to cut costs to consumers.
- Investment is needed in infrastructure and reuse/repair operations to ensure their viability and enable new models to be explored.
- Tax rebates should be introduced on donated goods similar to the UK's gift aid system.
- Levies should be applied to single use products to ensure refill and reuse are prioritised.

We also need to see infrastructure that facilitates prevention, reuse and repair prioritised in the same way it has been prioritised for recycling, recovery and disposal until now.

There are many large funds coming down the tracks from the European Just Transition Fund to the Sustainable Europe Investment Plan and the ESF+ Fund for investment in education and training. These funds need to be channelled into supporting training and backing jobs in the circular economy.

**2.10 HOW IMPORTANT DO YOU CONSIDER GREEN PUBLIC PROCUREMENT IS IN SUPPORTING THE DEVELOPMENT OF NEW CIRCULAR GOODS AND SERVICES?**

Green and Social Public Procurement can play a very important role in helping develop the market and in demonstrating leadership.

Although the Circular 20/2019 encouraged Local Authorities to adopt Environmental and Social Considerations in Public Procurement there has been little progress to date in this area. We would like to see more mandatory requirements for criteria or target setting. For example, in Italy all public authorities are required to apply waste prevention criteria into calls for tenders and contracts.

**2.11 WHAT WOULD BE THE MOST EFFECTIVE ACTION GOVERNMENT COULD TAKE TO PROMOTE/SUPPORT AND INCENTIVISE THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY?**

As highlighted above, a multi-pronged approach is needed to address this complex area, including supporting better design from the outset, setting targets and backing these targets with financial instruments including green procurement and raising awareness. These should all be designed to make sure it is as easy as possible for people and businesses to prevent waste, reuse and repair.

**2.12 WHICH SECTORS DO YOU THINK CAN MAKE THE BIGGEST CONTRIBUTION TO MAKING IRELAND'S ECONOMY MORE CIRCULAR?**

We believe that the community sector and communities are often overlooked, and have a great deal to contribute in this area. The role of community action, like events run by GFI, can be very significant in raising awareness and reducing waste in key areas. The Local Authorities are in a unique position to support local awareness building and practical actions that have real impact at community scale.

**2.13 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?**

We agree with the priority areas including construction and demolition, textiles and reuse and repair. As noted above, we believe that actions should be listed in the current strategy rather than for future development.

**Green Foundation Ireland**

**11 June 2021**