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Sent: Friday 11 June 2021 17:24
To: circulareconomy
Cc: Alan Weldon; Office Manager
Subject: Submission to the Proposed Publication of the Circular Economy Strategy
Attachments: RDC AGCES 110621.pdf

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Please find attached our Submission to the Proposed Publication of the Circular Economy Strategy.

Please do not hesitate to contact me if you have any queries.

Kind regards

Sarah

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*Circular Economy Division,
Department of the Environment, Climate and Communications
Newtown Road
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Friday 11 June 2021

***Submission to the Proposed Publication of the Circular
Economy Strategy***

The Rediscovery Centre, as the National Centre for the Circular Economy, welcomes the publication of the draft Circular Economy Strategy and is delighted to support its development through input to this consultation.

Whilst evident that there is much work ahead in the circular transition, this strategy alongside the development on the Circular Economy Unit within the Department of the Environment, Climate and Communications and the appointment of the Minister of State for Communications signifies a monumental shift towards the development of a low carbon, sustainable society.

We welcome the acknowledgement that the circular economy is 'bigger than waste' and requires a more inclusive examination and transformation across all sectors, all stages of the supply chain and within Irish consumption practice generally.

Enclosed please find a response to the consultation. We hope that our comments will support the Department's work in the very important work of developing a Circular Economy policy.

Please do not hesitate to contact us further for clarification on any information provided in the submission.

Yours sincerely,

Dr Sarah Miller
Chief Executive
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Introduction

The Rediscovery Centre

The Rediscovery Centre (RDC) is the National Centre for the Circular Economy in Ireland. For over sixteen years the RDC has been at the forefront of sustainability in Ireland, connecting people, ideas and resources to promote the implementation of the circular economy at a local, regional and national level.

The RDC supports the circular economy through the re-introduction of valuable resources into the supply chain, leading the change from waste to resource through reuse, redesign, research and education. It helps facilitate artists, scientists, designers and craftspeople to promote sustainability and reuse.

The RDC also effects positive behavioural change through life-long learning programmes, which include public awareness exhibits, events, workshops, demonstrations and educational activities. These programmes serve to highlight the benefits of effective resource management, underpin EU policy, and demonstrate best practice in sustainability through interaction with the built, natural and cultural environment.

The RDC's staff and Board of Directors consists of highly qualified scientists, business managers, designers and creatives united in the common purpose of sustainability. The Centre also provides vocational training to people on placements ranging from three months to three years, helping to support the local community and provide work to the long-term unemployed.

The Centre itself serves as a public education tool to inspire, inform, and lead positive behavioural change with respect to resource management and efficiency. As a best-in-class example of sustainable living, the Centre is considered a '3D Textbook', offering examples of renewable and efficient energy systems, sustainable building materials, rainwater harvesting, grey water recycling, and composting toilets. The RDC also contains educational exhibits and gardens designed for biodiversity enhancement and environmental education. The development of the Rediscovery Centre is aligned with the seventeen Sustainable Development Goals (SDGs), created by the United Nations in 2015 as a blueprint for global sustainable development.

The RDC operates four social enterprises within the main visitor centre that promote the repair and reuse of materials whilst providing community access to training and employment:

- Rediscover Furniture, a furniture repair, restoration, and refurbishment programme
- Rediscover Paint, a paint reuse programme
- Rediscover Fashion, a textile reuse programme producing fashion and home accessories
- Rediscover Cycling, a bicycle reuse and repair programme

Following key circular economy principles such as repair and reuse, all programmes reuse materials, which result in significant environmental benefits. All products created in the Rediscovery Centre's social enterprises are sold to generate funds, which are then reinvested to support training and labour activation initiatives.

The centre's business model strives to achieve 50% overhead costs covered by the sales of product and services and 50% through strategic public and corporate partnerships.

The Rediscovery Centre and Circular Economy Policies

The RDC runs sustainable skills and lifestyle workshops for the public and often hosts events and conferences centred on important climate and environmental issues. Its research programmes investigate reuse and circular economy opportunities in Ireland and policy work aims to promote sustainable consumption, climate action and the SDGs.

In 2020, the RDC formed part of the Advisory Group to the Waste Action Plan for a Circular Economy (WAPCE), assisting the Irish government to prepare a new waste policy to smooth the transition to a circular economy. Looking more broadly at the implementation of the circular economy in Europe, the RDC has also hosted a webinars on comparing Circular Economy Action Plans (CEAPs) that have been implemented within the European Union and identifying key learnings.

The Rediscovery Centre partners with several organisations, institutions and governmental departments in the delivery of its work and aims to be a collaborative force, bringing together people at all levels to encourage behaviour and policy change. Key strategic partners include the EPA, Dublin City Council and the Government of Ireland. Recent projects include a national SFI funded higher education programme, a government funded circular economy public awareness campaign and the soon to be launched national paint reuse network.

In 2018, The Rediscovery Centre launched its Circular Economy Academy. The Academy is an initiative designed to support individuals or social enterprises seeking to establish new circular economy projects or replicate one of the Rediscovery Centre's material reuse projects in their own community. The Academy currently supports ten members across the country ranging from established social enterprises to business start-ups. The work highlights the opportunities presented by the Circular Economy and demonstrates how community-based projects and ideas can scale when developed in a collaborative environment.

The Rediscovery Centre and the Circular Economy Strategy

The Rediscovery Centre is in the unique position of possessing an in-depth knowledge of the circular economy as well as having a communications team with the skills and experience to help develop and coordinate citizen awareness and engagement. The Rediscovery Centre is the perfect partner to promote and execute a wide-reaching educational campaign.

Through use of its social enterprise and community engagement programmes, the Rediscovery Centre can support the transition to skills-based labour. Training can be provided to promote reuse and repair of existing resources, helping to fill the labour gap that has been identified as a barrier to the implementation of the circular economy.

With over sixteen years of experience in working towards the circular economy, the Rediscovery Centre, as one of the founding member of the Community Resources Network Ireland, a member of the European Reuse Network and the country representative on the European Circular Economy Stakeholder Platform's Coordination Group, is also uniquely positioned to act in an advisory capacity.

Drawing on research conducted across a variety of sectors, the Rediscovery Centre can aid in the implementation of the circular economy by identifying opportunities and potential barriers.

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 Rediscovery Centre, has advocated for a Circular Economy strategy, set apart from a waste action plan and welcomes this draft strategy, as well as its proposed objectives.

The first objective commits to providing a *national policy framework for Ireland's transition to a circular economy*. We believe the success of the strategy will be dependent on the ability of the framework to implement the significant and transformational changes required within government, business and societal practice. The cross-governmental approach will be critical and whilst the development of the Circular Economy Unit and the appointment of the Minister for the Circular Economy is identified as very positive, much work will be needed to enable the change required.

The strategic focus in the pre-consultation, through a dedicated framework, on the circular economy and the shift away from waste management is welcome. An all of government approach is crucial given the requirement to intervene across the supply chain and across all sectors to achieve a more circular economy. While the objectives themselves are a significant step forward, what is missing from the proposal is a benchmark against which the success of each of these key objectives can be measured.

While we recognize that, for now, the strategy is less action oriented and more focussed on developing frameworks and understanding, without targets we will not be able to measure success nor progress at any significant pace.

While we welcome the ambition to reach above the EU average by 2030, if we are to reach that target we need to be measure circular development from the onset. A decision regarding the metrics that will be adopted to measure circularity is needed alongside a roadmap detailing actions to achieve them.

Furthermore, to contextualize and direct efforts, focusing the strategy on key areas of impact for Ireland would make sense. As such, we recommend that the government undertake a nation-wide circular gap report, or circular scans for specific Irish regions and cities, as has been done in cities like Bern, Basil, Prague, Glasgow, and Amsterdam. This would not only highlight the key areas of circular economic opportunity, but also allow us to focus efforts as we transition to a more circular society.

Furthermore, while the strategy is framed as a whole of government strategy, what is missing from both this strategy and the EPA's circular economy programme is alignment. Ideally, the objectives, targets, outputs and outcomes of each of these strategies are very closely aligned, if not completely integrated with one another. Furthermore, the strategy should also refer to circular economic policy references outlined and proposed by other governmental policy documents such as the Our Rural Future strategy, and leverage its success

As an interested and active practitioner in the Circular economy, we are grateful to see our name mentioned specifically within the document, and we look forward to playing our part in specific key objectives such as objective number 3.

Particular objectives could be further developed to encompass a wider scope. Objective number three for example could be expanded to not only aim for citizen awareness, but to expand to knowledge sharing strategies related to circular economic research, policy and innovation at home and abroad. Additionally, while references to households, individuals and businesses are mentioned in objective number 3, circular economic impact can also stem communities and community action. Not only can the circular economy strengthen communities and add value to them (for example tidy towns), but particular communities have the power to leverage circular economic success in Ireland,

such as the design community. As such, a reference to fostering and strengthening these communities within the targets would be beneficial.

Objective number four could also be expanded to consider de-incentivizing the linear economy. In order to create a level playing field across Irish society for the circular economy to develop, the linear economy needs to be held accountable for detrimental environmental and societal impacts.

Finally, while references to a Just Transition are highlighted within the document, it could also be mentioned as one of the key strategy objectives. References to Doughnut Economic frameworks could be considered to further push the circular economy ambition into one that is embedded into a just and balanced transition for all.

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?

While elements of the strategy do indeed seem to be quite ambitious, such as the goal to be above the European average by 2030, we would recommend being more specific in those ambitions, and to set those ambitions against measurable targets. As well as this, when benchmarking ourselves against the EU average, we should remind ourselves that the EU average is going to increase over time. We would like to suggest that indicative forecasted figures for the 2030 EU average are highlighted to give an idea of where we are headed. It must be noted that even though we are the second-worst performing country in the EU at the moment, we will have an even larger gap to catch up on over the next 10 years.

Furthermore, as outlined above, aligning the specific ambitions of the government with the ambitions of the EPA programme makes total sense. In fact, disjointed ambitions would make for an underperformance in terms of outcomes.

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?

While we recognize the importance of benchmarking our progress against our European peers, we should recognize the contextual differences between EU countries. Ireland's economy and industrial priorities are completely different to that of Denmark, Greece and Portugal. Furthermore, culturally, what might incentivise social and behaviour change in Malta will probably differ from Mayo. We must recognize the social, cultural, infrastructural and industrial advantages and disadvantages that Ireland faces, and design relevant ambitions and strategies around those strengths and weaknesses relative to our European peers. For example, the Netherlands has a cycling culture and recycling infrastructure that works well for them but would take time to replicate here in Ireland. Nevertheless, while all EU nations focus on bringing about circular cities, developing the added focus area of circular rural communities could help Ireland to stand out amongst our European peers, creating demonstration projects that could only happen within an Irish context. Aligning with initiatives like the Our Rural Future policy could help make this happen.

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?

Our understanding is that the current public awareness about the circular economy is quite low. However, in order to paint a more nuanced picture, we also recognize that there is a need to undertake a formal market research study to understand the current awareness of the circular economy across the nation, related to specific topics. From

our experience, understanding within the business community is higher, and within specific industry sectors it is high. However overarching, the circular economy is not part of the public debate or public discourse.

What is needed in Ireland is a shared vision and understanding around what the circular economy means within an Irish context. As such, we support the proposed creation of a national circular economy "brand" for Ireland that sits separately from organizations such as the EPA, Circuleire, the Rediscovery Centre and DECC.

Furthermore, we also support the development of a circular economy platform for the whole island, similar to platforms that exist across many other EU nations. This platform should not only share national and international circular economy news and developments, but should shape the conversation around the circular economy through undertaking and sharing research, and through the creation of campaigns that address specific issues within an Irish context. Going beyond the conceptualized idea of a digital platform, this circular economy platform / brand should also develop analogy and print media, broadcasting and PR.

However, we also recognise that communication on its own is not enough. Communications not only needs to go hand in hand with infrastructure and system development, but also should be designed around the capacity and development of those infrastructures and systems. Furthermore, the aims and goals of this brand / platform should be to work with different Irish organisations to encourage FDI, promote innovation, and foster circular culture across multidisciplinary sectors.

The Rediscovery Centre is ready and has the expertise and capability to contribute in the creation, development and running of this circular economy brand / platform.

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

While awareness for individuals, businesses and households is important, we also would like to highlight that raising awareness with specific sections of society and "low hanging fruit" communities can lead to a stronger specific impact, acting as circular economic catalysts within Irish society.

Raising awareness specifically with young people can help to shape consumer trends related to circularity, while raising awareness amongst those closer to retirement could have a stronger impact in growing local community action such as Tidy Towns. Furthermore, raising awareness amongst the design community and entrepreneurs especially could help to bring circular design and business models to life. As such, awareness raising across the whole of Irish society is important, but awareness raising strategies that are effective need to be designed around the aims and objectives of the strategy, and be targeted at specific communities that can achieve those aims. From our own experience of communicating about the circular economy, creating target audience groups and tailoring messages and media around the needs of that group is fundamental. While a blanket approach might be appropriate to some degree, information provided to target audience groups should answer specific questions that they have. As such, market research and analysis, stakeholder engagement and focus group work should be undertaken by the circular economy brand / platform to design such campaigns around the needs of those target audiences.

As the aims and goals of the strategy are to go beyond circular economy as being a "waste issue", the communication strategies undertaken by the strategy should aim to help citizens recognize circular economy when they see it across society, through business models, product designs, consumer decisions, shared social habits, infrastructures and systems and across society at large. We welcome the highlighted example of demonstration projects mentioned in the strategy.

Along those same lines, while attempting to understand a rather abstract concept such as the circular economy, it makes sense to make use of a foundation of shared and familiar knowledge. Many people are familiar with particular circular economic activities such as DRS schemes and bike sharing, and may be living a very circular lifestyle (or did at some point in their life) without even realizing it. As such, specific actions mentioned in the campaign such as DRS, rewards systems and Keep Cups should be recognized as opportunities that can help broader populations to develop an understanding around the circular economy in a more holistic way. Communication strategies designed around such campaigns should be designed cleverly by the brand / platform with knowledge sharing in mind.

Furthermore, alongside strategies that build on the foundation of familiar knowledge, we should also encourage citizens to imagine what the circular economy can and will look like in the future. This kind of strategy is effective because it gives people a vision to work towards. Campaigns designed by the circular economy platform / brand should strive to create that vision of what the circular citizen will live like in 10 years' time.

Some crucial elements are key to embedding the circular economy within the Irish zeitgeist. It is important to recognize the role of arts, heritage and visionary leadership in making that happen. The arts help us to make sense of the changing world around us - as it did during the pandemic in particular - and can help inspire movement across society. Furthermore, many examples of Irish circularity from across the centuries can show how a circular economy has traditionally been a part of Irish culture. In recognizing it as a part of Irish heritage, circularity will become part of Irish identity.

Leaders across society can help to shape norms and drive national conversations. As an example, the public visionary leadership shown by the Mayors of both Amsterdam and Paris were pivotal in leading the charge towards "Doughnut Economic Amsterdam" and "15 minute Paris". Effective communication within an Irish context could need leadership from the President or a similar figure. If the role of this circular economic brand/platform is to create a shared vision and understanding around the circular economy - to really tap into the Irish zeitgeist, then they should have the aim of leveraging the arts, heritage and leadership in order to achieve that goal.

In feedback submitted in partnership with CRNI, the RDC also recognises the need for consistent, coordinated communications that connect various awareness raising efforts and channels, prioritising messaging and providing coherent, clear and simple communications that engage citizens and businesses. It is important to ensure that processes and infrastructure for the circular economy are made accessible at the same time as awareness is raised. Whatever method is used to promote the circular economy within Ireland, existing community networks should be leveraged for communication and marketing, such as Green Schools and teacher supports. In order to support the awareness campaign, a central repository of information on the circular economy in Ireland should be created and maintained for knowledge sharing purposes. If quality assurance policies such as CRNI's ReMark were to be introduced, to reassure the public about the standard and quality of reused products, this would help strike a balance between product regulation and awareness raising.

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?

The stakeholder engagement proposed by the Circular Economy strategy is unfortunately less than satisfactory. Currently we believe that it is too waste focused. If the goal of the strategy is to move beyond the circular economy as a waste issue, then

there is a need to include stakeholders from a wide spectrum of Irish society, including innovators, designers, researchers, communicators, marketers, financiers and regulators. All stages from influential sectors in the circular supply chain should be represented. Furthermore, these stakeholders must not only advise on iterations of the implementation of the strategy, but should act as a sounding board for the strategic campaigns of the circular economy brand / platform.

The success of the entire strategy will rely on how effectively all stakeholders can engage with each other and the ability for clear and concise communication to be channelled in an ongoing fashion. This applies not only at national level but must be considered in the perspective of the larger global movement. Additionally, opportunity for assessment, reflection and most importantly adjustment to reflect the initial learnings will be paramount in the success of the transition to a circular economy at global level.

It is important to note the role played by the social economy in assisting with the transition to a circular economy and the values and objectives of the social economy will have a large influence on how society as a whole embraces these changes. With that in mind, representation from activists within the social economy must be included in all stages of consultancy.

Ultimately as an all of government strategy - all relevant departments must be involved and engaged in the process

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?

The circular economy will have benefits for many different stakeholders within society. The role of business models is pivotal in creating either benefits or drawbacks. Renting, leasing and a bolstered second hand market will mean that citizens will have access to a wide range of items as opposed to only a few, for a reduced price. However, sharing economy business models such as Uber or Airbnb, when unregulated, can lead to employee rights being undermined, and exacerbate existing social issues. As such, enabling some circular business models while regulating others should be one of the aims of the strategy.

Furthermore, coupling the work of social enterprises with the circular economy can create a grassroots and local vision of the circular economy across Ireland, and will be crucial in shaping the post-pandemic economic rebound across society.

As was mentioned in previous answers, coupling the aims of the strategy with the Our Rural Future policy will mean that circular economic benefits are seen across the whole island, as opposed to being seen in cities alone.

In feedback submitted with CRNI, a key benefit of the circular economy is that reducing the consumption of new goods will have a positive effect on the environment, namely by cutting greenhouse gas emissions. As well as this, the circular economy will localise supply chains by keeping goods within the economy and prolonging their lifecycle. By minimizing the circle of supply, local and regional economies are boosted as consumers are encouraged to shop locally or avail of local reuse and repair services.

One benefit agreed upon by the RDC, CRNI and AICEP is the creation and development of jobs and investment in the social agenda. The circular economy requires a just transition in order to prevent job losses and ensure that relevantly-skilled persons have opportunities in the appropriate sectors, while preventing disenfranchisement among more vulnerable sections of society. The creation of a circular economy will help to promote indigenous businesses and attract new

businesses from outside the state. The transition to the circular economy can also help to build social capital within communities through the creation of jobs and investment in the social agenda.

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.

In the current economic climate, Ireland lacks a sustainable product policy to limit greenwashing and support claims by companies and businesses related to sustainability. The European Commission has approved a Taxonomy Regulation to manage green and sustainable financial policies, which is due to come into effect this year, however legislation around product policies is still in the nascent stage.

There is a requirement for further regulation to assure that spare parts are made available for each product for a minimum amount of time. Currently that is 7 to 10 years for many products but this should be extended and an emphasis should be put on the importance of creating components that can be used universally, unless it can be shown that these components require unique design. There is a requirement for a focus to be put on retaining end of life products and for returning these to the value chain.

Ambitious targets are required and the incorporation of additional support for eco-design is required. Alongside this a requirement for clear labelling on every product and in a way that allows this information to be accessed easily is important. Transparency around options for the public in terms of the product as it reaches the end of its life cycle should be clear and understandable to all members of society. Countries such as France have made good progress with this labelling and could be looked to as an example of how we should apply this in Ireland.

In order for the circular economy to develop in Ireland, from a regulatory point of view, companies will need to be policed and held accountable for claims and practises related to sustainability and greenwashing. This may include prohibitions around false claims related to sustainable products or tightening restrictions on product descriptions (ie 'biodegradable' vs 'compostable').

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

In feedback submitted in partnership with CRNI, the RDC has identified the need for fiscal incentives around labour costs through the extension or modification of existing subsidy schemes such as EWSS and CSP funding. CSP should receive additional funding with the sole purpose of supporting the transition to the circular economy, intended for green, circular and climate friendly community services. This support scheme could also be used to help Ireland meet the WAPCE commitment ahead of the introduction of EU targets. Large-scale projects that promote and drive reuse, repair and refurbishment should be prioritised in this investment, and supported through grants, loans and funds. Where funding cannot be given, incentives such as a reduced VAT rate, repair bonuses, reduced commercial rates or tax benefits for business and consumers should be explored. Existing legislation that is antithetical to the circular economy (for example, legislation that addresses waste as the point of discard rather than at the point of the original product purchase) should be reviewed, revised or nulled and replaced with legislation that complements the circular economy. Any legislation tabled should be proactive to prevent waste at the point of production rather than reactive to address waste when it has already been made.

A shared observation between CRNI and the RDC is the need for a shared-island process to promote and strengthen the circular economy across the whole island of Ireland, through collaboration with Northern Ireland and the wider United Kingdom. Due to import and export barriers as a result of Brexit, there is an opportunity to champion the circular economy model and place more emphasis on repair and reuse rather than buying new where it is now suddenly more difficult, time-consuming or costly to do so.

The low cost of firsthand, new items is a major non-regulatory barrier to the circular economy, which distorts the market against reuse or repair. Until the environmental and social impact costs of a product are included in the consumer price, the main barrier for the consumer will continue to be cost. The Strategy mentions that a consumer barrier to engagement with the circular economy is perceived concerns regarding, for example, a lack of quality in re-used or repaired goods, or doubts as to the environmental credentials of nominally 'green' products. This does not take into account the perception that low-cost products from certain retailers are not known for their high quality, however the consumer is willing to purchase these items and throw them away when they break or tear, exactly because the cost is so low.

There is also a non-regulatory barrier around product insurance; policy changes are required in order to make the share and repair of products more accessible and easier to carry out. Similarly, if a circular economy is implemented, manufacturer warranties will have to be altered or the responsibility of repair shared with other businesses.

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

Green Public Procurement is currently encouraged on a voluntary basis. A mandate must be considered and put in place which will speed up the adoption of green procurement measures. Green Procurement is paramount to the large scale transition to a circular economy and the shift will require both a top down approach along with a bottom up approach from all areas of management and employees in each organization in order to see a change.

There is a requirement for this adoption to be seen as a positive shift in each company and in order for that to be possible all levels will need to be involved in championing it's adoption.

In fact, mandatory inclusion alone will not be enough and specific targets should be set with a clear vision and timeline for adoption. Additionally, a tracking system will require implementation with consideration for all bands of public procurement, not just for high value purchases and price bands. There will likely be areas identified where cost is not the priority issue but perhaps time to access is the deciding factor and this will be important to find a way to incentivise as part of the transition. Access to supply may be a contributing factor. Ireland as an island has to import a number of items by sea. Similar island nations should be examined and good practice established.

To begin the transition, Ireland must look at the strategies applied to incorporate Green Public procurement in other countries that have succeeded in adopting these Green Procurement measures and adapt elements of this strategy to assist with the rollout in Ireland. As an example, The UK has seen gradual improvements since mandatory measures were introduced and has set specific targets that will come into effect within 2021 aiming to achieve net zero emissions by 2050. Finland is ahead of us and the population is really similar to Ireland in terms of numbers but there are some key differences - Ireland is an island, we have to import more so that comes with it's own considerations. We must consult with the thought leaders who created these previously successful strategies and draw from their experience.

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

The measures taken by the government during the COVID-19 pandemic are exemplary of the level of support and funding that must be invested into the nation in order to support the successful development of the circular economy. Concerns around the dangers of the COVID-19 pandemic can be easily mapped to concerns around the climate crisis facing the world today, and require a commensurate response. Support from the government should also be applied at a national level, rather than at a regional level, in order to maximise efficiency and equilibrium.

National and international standards for waste management and usage thresholds should be established and adhered to across the island, and minimum requirements should also be implemented in order to ensure compliance with circular economy principles. Where companies and businesses require only small changes to transition to a circular business model, support and funding should be made available to encourage the transition.

The implementation of the circular economy will require significant upskilling and training in order to support the societal adaptation to the new economy model. To ensure a just transition to the new model and avoid unemployment spikes the government must provide financial incentives for labour activation. This can take the form of business grants or employment and training funds, much like the government is doing with the Just Transition Fund (JTF) or the Employment Wage Subsidy Scheme (EWSS), or working with EU funding in a cross-departmental capacity to ensure job creation.

In feedback submitted in partnership with CRNI, the RDC has identified further Governmental action that can be taken to support and incentivize the development of the circular economy. These range from the implementation of a target framework, creating minimum requirements for production that place a greater emphasis on reuse at the point of creation, to building local supplier bases that specialise in products that align with circular economy principles. Tax incentives could be applied to businesses who are aligned with circular economy practises, or advantageous commercial rates negotiated for same. A shared-island approach to the circular economy could also be researched to maximise waste prevention.

Through similar feedback sessions with AICEP, other opportunities for the government to support circular economy implementation were identified. These include the creation of a supporting infrastructure that helps to carry the nation from stage to stage in the execution of the circular economy, while increasing the availability and development of knowledge across the island. Collaboration must be encouraged between governments, businesses and educational institutions. The government should also develop proactive legislation to manage and support the development of the circular economy. Ireland can become a leader in this regard through a balance of encouraging and discouraging legislative and tax reforms, covering sectors such as plastics, recycling, labelling and standardisation. The government should also invest in research and development to look forward and find new technologies that will support the circular economy in future.

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

As mentioned previously, we believe cross governmental action and policy on all challenges and opportunities should be mentioned more throughout the strategy. Food waste is likely the next space that may receive particular attention and lobby to be

addressed, after plastic waste. This links into the three-bin system and would benefit from a reward based incentive.

Repair and reuse sectors have the potential to create many employment opportunities in a large range of distributed industries with particular opportunities for a wide base of skills to be developed. In general the reuse and repair sector is labour intensive as it requires a large number of repair processes that are less possible to streamline and each item requires individual consultation and consideration.

There is a requirement for a responsibility to be on the producer in terms of applying a circular model to their product. Perhaps a sustainability ombudsman should be incorporated into the chain. Is the current governance for the circular economy at an acceptable level? If not how will we improve this? Additionally, while we wish to implement change at business level it will be very important to empower the individual as every step that they take will create a communal shift which in turn will influence how business perceives public perception of the circular economy and lead to additional positive change.

A third of the food produced globally is wasted and it is the greatest opportunity we have to reverse global warming. Examples such as Food Cloud point to the potential for anaerobic digestion and the creation through this process of biofuel.

Social Enterprises are often pioneers and drivers of research and development and their organisational structures and composition most often allow opportunity for an agile team who can embrace change and manage it across the organisation in a quicker time frame compared to for instance a large corporation. With this in mind they act as very good test beds and sounding boards for innovative solutions. The circular economy relies on innovative and creative practitioners within these spaces to bring about the innovations required help positively influence behavioural change.

Any sectors that can introduce a refund scheme for any element of the experience that can be reused should be explored to their full potential. While we have seen the beginnings of this with glass and plastics there is the potential for more components of products to be universally adaptable and in turn allow for greater potential for reuse.

It is important to look at all roadmaps in a larger global perspective and where feasible map to and take influence from and lead with ideas that bring Ireland, Europe and the global population in a similar direction.

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?

The Rediscovery Centre appreciates the scope of the Strategy, however there are policy areas that either have not been addressed or could be addressed in greater detail.

In feedback drafted in conjunction with CRNI, key policy areas that would benefit from further development in the draft Strategy are:

- Construction and Demolition
- Textiles
- Repair and Reuse

Each of these areas offer a huge untapped opportunity in terms of waste prevention and the rollout of sustainable practises. Regulations are needed to minimise the production of hazardous waste, which then frees materials up for reuse.

The Rediscovery Centre itself is referred to as an example of sustainable construction, where circular economy principles were used as a benchmark at every stage of construction. CRNI's Circular Textiles projects identifies the opportunities at play in the reuse and reprocessing of textiles in Ireland, which are underdeveloped within the Circular Economy Strategy. Reuse and repair sit at the top of the waste hierarchy and so funding and training should be made available as part of the Circular Economy Strategy in order to foster reuse and repair and aid the transition toward a circular economy.

Ireland itself lacks a large-scale composting facility; Ireland generates at least one million tonnes of food waste annually so this could be an opportunity to divert existing waste and regain some use from food that is thrown away.

The maintenance and improvement of existing structures has also been under-represented in the draft Strategy. The Strategy applauds urban-specific transport leasing schemes such as GoCar and Dublinbikes, but 37% of the Irish population lives in non-urban areas and in these areas public transport is underfunded or non-existent. The lack of services here increases consumption as rural Irish citizens need to use personal transport to fill the gap.

The COVID-19 pandemic and resulting lockdown has also highlighted the dangers of becoming over-reliant on certain circular practises. In a post-pandemic world some practises (such as Keep Cups or charity shops) have been made less effective but there is an opportunity to derive key learnings from the pandemic itself. This includes, but is not limited to, the drop in consumption across retail and travel verticals, and there is an opportunity to explore how this new outlook can be incorporated into the Circular Economy.

The Strategy should also take care to apply a proportionate amount of responsibility to the actions required; companies and producers are responsible for the largest quantities of waste produced globally, but the Strategy appears to place a larger focus on individual waste production. Waste is best averted at the point of design rather than through any consumer action during the consumption process.

14 Any other comments?

The Rediscovery Centre is delighted that the Irish Government has drafted the Circular Economy Strategy, and we recognise that implementation of the Circular Economy in Ireland is reliant on the successful execution of the Strategy. The Circular Economy Strategy is a series of shared objectives that lead toward a shared future, and as the National Centre for the Circular Economy in Ireland, the RDC is in a unique position to support the Circular Economy Strategy through a variety of methods.

Public awareness is key to the success of the Circular Economy Strategy. Our in-house education team is adept at educating people of all ages and all learning levels about the importance of moving to a circular economy, through onsite workshops and online webinars. These events can be tailored to the recipient and delivered on a one-off or continuous basis.

With over sixteen years of experience, the RDC has a wealth of assets that have been created specifically to engage the public on the advantages and opportunities of the circular economy, which would be helpful to share to increase public awareness around the circular economy for the purposes of the government's Circular Economy Strategy. This could include infographics or marketing materials around 'The Life of the Circular Citizen', identifying opportunities for the implementation of the circular economy within the life of the average citizen and the varying levels of implementation available.

From a more practical business perspective, our Circular Economy Academy helps individuals, teams and businesses set up circular business models and sustainable practises through mentorship, guidance and funding. The Circular Economy Academy is in the perfect position to offer advisory support and networking opportunities to SMBs, drawing on the Rediscovery Centre's experience in the field of sustainability and the circular economy.

At a resource level, the Rediscovery Centre itself could be used as a base for sustainable initiatives as well as community engagement events. Our Reservoir event space is the ideal setting for awareness campaigns, conferences and events, and the centre itself serves as a best-in-class example of sustainable construction and the utilisation of circular practises in day-to-day life. Based in Ballymun, north Dublin, the Centre is well-connected by public transport and is an accessible space for those with mobility requirements.

As well as the onsite social enterprises that provide upskilling services for the practical promotion of circular economy principles (i.e., reuse and repair), the Rediscovery Centre can assist in activities that promote the circular economy, for example 'pop-up' events such as swap shops, library of things or sewing hubs.

We are ready and eager to play our part in Ireland's transition to a circular economy.