
From: Clare Walsh <cwash@rgdata.ie>
Sent: Thursday 10 June 2021 11:39
To: circulareconomy
Subject: Circular Economy Strategy Consultation response RGDATA
Attachments: Circular Economy Strategy Consultation response RGDATA.pdf

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Good morning

Please see attached submission from RGDATA.

Regards

Clare

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Circular Economy Strategy Consultation

10 June 2021

A Chara,

RGDATA is the representative body for the independent retail grocery sector in Ireland, with members at the heart of their local communities. Our members' shops are key hubs within towns and villages and in addition to providing key services locally, are also key generators of economic activity locally. They are also the original "Green Grocers" putting sustainable retailing at the heart of their businesses, being close to their customers and seeking where possible to adapt and lead genuinely sustainable trading practices.

RGDATA is pleased to make a submission to the Government's Whole of Government Circular Economy Strategy. Given that only some of the questions in the template in Annex 1 of the Consultation Document are directly relevant, we will confine our replies to a limited number of areas of direct relevance.

From an RGDATA perspective there are a number of key elements that need to be considered in the context of a Whole of Government Circular Economy Strategy;

- i. Consumer awareness – it is really important that the highest possible level of consumer awareness is created around the implementation of the circular economy and Government has a central role to building and sustaining this awareness. Public information campaigns that are cleverly devised, appropriately targeted and delivered through omni-channels need to be a core part of building awareness around the different changes in consumer behaviour which need to be secured as part of the implementation of a new Strategy. There are particular opportunities to reach influential cohorts that will take a leadership role in delivering and influencing on the achievement of a circular economy, specifically involving younger people through school and third level education initiatives.
- ii. Whole of Government - The State plays a key role in so many sectors of society and the economy, as evidenced most recently by the Government response to the COVID-19 and has a reach and influence that really can dictate whether a specific initiative or programme is a success.

It is really important that the State through its different manifestations (Central Government, Local Government, agencies, regulators as well as State and Semi State bodies) adopt a consistent and effective approach to the achievement of a Circular Economy. Any inconsistent or disjointed approach to the achievement of the Circular Economy by Government and the State will fundamentally undermine its overall delivery across the broader economy and society. There needs to be buy in at Secretary General/CEO level across all State bodies with the relevant person who is the Accounting Officer, being accountable for the respective agencies approach to achieving the Circular Economy.

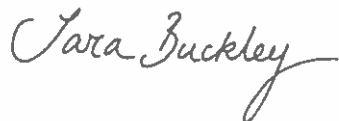
- iii. Ensure infrastructure exists to deliver the Circular Economy – if consumers and businesses are required to meet new obligations or implement behavioural changes to give effect to a Circular Economy, it is imperative that the necessary infrastructure is in place to allow this to be achieved.

For instance, if new obligations are to be put on consumers or retailers concerning the segregation and recycling of specific waste streams, then the appropriate structures and facilities should be mandated to ensure that this can take place – at home, in their businesses and in the public realm. Some innovative, flexible and responsive State structure needs to be enabled to identify and address any specific infrastructure obstacles that emerge.

- iv. Enforcement – one of the most challenging aspects of any new regulatory regime or programme arises where compliant businesses and consumers can witness an unwillingness or reluctance by third parties to meet their obligations, responsibilities or commitments to a new regulatory structure. RGDATA members are compliant, innovative and responsible, making the necessary investment and commitment to ensure that their obligations are met. They often find it deeply frustrating when other retailers, businesses or consumers do not comply with the relevant requirements and face no legal compulsion or sanction for failing to do so. It is vitally important that effective and meaningful enforcement is delivered if the new Strategy is to succeed.
- v. Proper business liaison to ensure effectiveness – when introducing measures to give effect to the new Strategy it is important that there is timely and effective engagement with businesses in terms of securing effectiveness. Advance engagement on the detail of a specific scheme proposed by Government can ensure that issues relating to avoidable cost impacts, unnecessary regulatory burdens and effectiveness are anticipated and addressed in advance. However, this engagement needs to be timely.
- vi. Business and consumer impacts - it is vitally important that the consumer and business impact of proposed measures are taken fully into account when proposing new measures to give effect to the Circular Economy. Specifically, it is vital to ensure that sustainable substitutable options for packaging, or the recycling of new waste streams are in place in good time for new rules to take effect. There is no point in advocating a new restrictive practice if there are no practical substitutable alternatives available to either businesses or consumers.

We trust that these comments will be of some assistance to the Department as you finalise the draft Strategy and would be happy to elaborate on any aspect if required.

Yours sincerely,

A handwritten signature in black ink that reads "Tara Buckley". The signature is written in a cursive, flowing style.

Tara Buckley
Director General
RGDATA