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To: circulareconomy
Subject: Public Consultation on the Proposed Publication of the Circular Economy Strategy
Attachments: DECC Public Circularity Consultation Submission 100621.pdf

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Good evening,

Please find attached submission for the above consultation.

Regards,

Kenneth Joyce

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Whole of Government Circular Economy Strategy 2021 – 2022 Pre-consultation

Coillte Submission – 10th June 2021

Introduction.

Circularity is a key element of the new EU Green deal and a vital component to our future economy.

The forest and forest products industry is one of the pioneering sectors in circularity. Irish forests grow a natural and sustainable product in wood. Wood is processed into end products through a cascading model, where all the wood fibre is fully used within the processing process. Initially sawmills process wood into sawnwood, producing products for construction, furniture, fencing, timber pallets and so. Residues (woodchip, saw dust and bark) from this primary processing are then used for other uses:

- As a fuel to heat kilns to dry sawnwood and other timber products
- As wood fibre to manufacture wood based panels like MDF and OSB
- Animal bedding
- Industrial fuel for other industries

In this way all the materials are used in a circular manner throughout the processing industries to ensure all materials are optimally used.

Timber products are then used in the broader economy to displace higher embodied carbon products.

At the end of life timber products can be re-used or recycled for use or used as fuel.

Under the circular economy and Green Deal there is now an increased focus in developing these timber products for a longer life by designing the products for multiple re-use.

Natural and sustainable sectors like forestry are key to the success of the bio and circular economy into the future.

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.

Forestry like other land based businesses uses a certain level of inputs to manage production, such as aggregates for road construction to access forest blocks, fuel for transportation, and fertilisers and pesticides to manage crop health. Using bio-based solutions will be key to reduce these inputs into the future, as outlined in the EU Farm to Fork Strategy on land use management. Bio-solutions will require regulatory support that allow end of life waste streams to recycle and develop product solutions to address these types of challenges. An example of this is the use of end of life construction aggregate for use in forest road construction to displace virgin aggregates or the use of organic waste streams to develop bio-fertilisers and soil conditioners.

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.

Market supports are required in some cases to support bio-based and circular products to compete with traditional high embodied carbon products. Examples of this can be seen in the development of any bio-based solution and it's a ability to compete with incumbent dominant products. During the start-up phase of new bio or circular products support and incentives will be required to allow these products develop and compete.

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

Green Public Procurement will be key to support green/circular solutions entering and competing in the market. As outlined in Q.9 above, market incumbents of traditional high embodied carbon products have the economies of scale to compete and prevent green, bio, circular products gaining a foothold in the market. Given the novel nature of some of these bio/circular products and our history of using more traditional high embodied carbon products, public projects can demonstrate the use of low embodied carbon product solutions to help drive the change required.

In respect of timber products there are some key points for Green Public Procurement:

- In all publicly funded projects, a wood first policy should be considered. Central government and local authorities should promote the use of a wood first policy throughout the construction sector.
- Implement a green procurement strategy for public buildings outlining a certain specific or % use of more sustainable products and design to include whole life embodied energy calculations/targets.