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Please see attached Gyproc response for the Public Consultation on the Proposed Publication of the Circular Economy Strategy

Regards,
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Public Consultation on Ireland's First Whole-of-Government Circular Economy Strategy

Response by Gyproc Saint Gobain

Introduction

Gyproc Saint Gobain (referred to hereafter as Gyproc) welcomes the opportunity from the Department of the Environment, Climate & Communications (DECC) to submit a response as part of the public consultation for Ireland's First Whole-of-Government Circular Economy Strategy. Gyproc has considered responses to the consultation questions posed by DECC, with details of our response to each question below.

Gyproc Background

Gyproc is one of the leading manufacturers of plaster and plasterboard in Ireland. We source gypsum from a mine in Monaghan, and manufacture building plaster and plasterboard in Kingscourt, Co. Cavan. Gyproc employs 180 people in the Kingscourt manufacturing plant and we are targeting a significant investment in the plant and mine over the next five years. Mined gypsum is turned to powder for the manufacturing of plasterboard, and once the product is manufactured it goes to site.

Gyproc is committed to increasing plasterboard recycling and we have established a company target of 20,000 tonnes within Ireland over the next four to six years. Plasterboard can be infinitely recycled, with 100% of the returned material suitable for recycling and we currently recycle over 97% of the waste produced from our own manufacturing plant. We launched the Gyproc plasterboard recycling service, a responsible waste management solution, in 2015 and we are currently the only plasterboard manufacturer in Ireland with dedicated plasterboard recycling facilities. This is a priority for us in Ireland as we have always believed effective waste management makes good environmental and business sense. We currently work with six regional waste management partners to return plasterboard cut-offs from all 32 counties on the island. Our partners deliver 25 tonnes Gyproc branded skips to site, collect them, remove any contamination and return the clean material to Kingscourt where its processed into new plasterboard.

All waste management companies we work with have the appropriate waste licenses, we also carry out our own audits of these companies to ensure compliance. Natural wastage in plasterboard is up to 20% and it is possible that all of this material can be recycled and made into new plasterboard, with any material produced at manufacturing that is not fit for purpose also recycled.

As an industry, including other plasterboard providers, we place 350,000 tonnes of plasterboard material per annum on the market and we are seeking to recycle as much of this as possible. We believe that steps should be taken to preserve the natural gypsum resources. Although in good supply presently, there is only a limited supply available worldwide. Therefore, it is important that recycled gypsum powder can be used to replace the natural gypsum rock in the raw material for plasterboard production, this could see a saving as much 30%.

Gyproc's current plasterboard recycling scheme is focussed on the recycling of plasterboard waste generated on new builds, however we also want to address end of life and demolition plasterboard waste in the future. While our primary goal is to increase the levels of plasterboard material being recycled, we are also ambitious to improve the circularity of all of the primary materials we supply.

For further information of Gyproc in Ireland please see link here: <https://www.gyproc.ie/>

Consultation Question Responses

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?

Gyproc believes the Strategy's proposed key objectives represent a strong foundation on which to build a sustainable circular economy for Ireland. However, we feel that objectives and targets need to be set regarding the recycling of gypsum plasterboard material within Ireland's construction sector.

As an industry, we annually supply 350,000 tonnes of plaster and plasterboard materials to the construction sector, with 20% of this becoming off-cuts that will not be used. Considering that plasterboard is 100% recyclable and that when gypsum waste is co-disposed with organic waste it breaks down into hydrogen sulphide (H₂S) gas, which is colourless, toxic and flammable and can lead to odour nuisance, it makes sense to fully recycle this material.

The disposal of gypsum-based materials in landfills for non-hazardous waste, unless in cells where there is no biodegradable waste, is prohibited under the European Council Decision 2003/33/EC. Currently, no such specific landfill exists here that can fulfil this requirement, which again reinforces the critical need to recycle gypsum waste here, and why our plasterboard recycling service is of such importance for environmental reasons.

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?

Gyproc believes that DECC's draft Strategy is an ambitious document, that when implemented will allow Ireland to rapidly move towards a circular economy. As outlined in response to Question 1, we believe there is a need to expand on the ambition of the Strategy to include the recycling of plasterboard within the Irish construction sector.

We feel that there is a real opportunity to significantly expand on the volume of plasterboard waste that is recycled in Ireland, reducing the amount of gypsum that needs to be mined and the environmental impact of gypsum that is not disposed of correctly.

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?

When it comes to plasterboard recycling, Ireland should be measuring itself against other European Country's such as France and the United Kingdom, where recycling schemes have been successfully introduced and are seeing higher levels of gypsum recycling.

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?

We feel that public awareness, and indeed industry awareness, around plasterboard recycling is incredibly low. Currently we estimate that we are recycling 12% of waste plasterboard at the construction projects we supply. Considering that 100% of this material is recyclable, this figure shows that members of the construction industry are not aware of the need to recycle plasterboard materials. Our experience tells us that large construction firms are increasingly recycling

plasterboard, but that smaller firms and sole traders are not as aware of the need to recycle plasterboard.

The Circular Economy Strategy Ireland offers a great opportunity to increase awareness amongst the public and the construction sector, which will help to significantly increase the volume of plasterboard we are recycling in Ireland. This will then have the knock-on effect of reducing the amount of gypsum mined in Ireland, which will help to preserve this limited natural resource, and reduce the level of unnecessary environmental damage caused by the improper disposal of plasterboard material.

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

Gyproc is wholly committed to trying to increase plasterboard recycling in Ireland, and we have established a company target of 20,000 tonnes within Ireland over the next four to six years. We are the only plasterboard manufacturer in Ireland with dedicated plasterboard recycling facilities, and this continues to be an increasingly important priority for us in Ireland.

We feel that producers of plaster and plasterboard materials, should be required to implement recycling schemes with their customers to encourage plasterboard recycling across the Irish construction sector. Ireland could also set a minimum percentage of new plasterboard products to be made up of recycled materials, which will further encourage recycling.

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?

Gyproc believes that the proposed stakeholder engagement in the draft Strategy needs to be reviewed to include manufacturers of plasterboard materials, waste management companies, members of the construction industry and the over 400 stockists of plasterboard in Ireland.

These are the stakeholder groups that can drive an increase in the awareness and level of plasterboard recycling in Ireland across the general public and the construction industry. These groups are currently not being engaged on how they can contribute to the Circular Economy and should be one of the target groups included within the final Strategy.

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?

Gypsum is one of the most common natural minerals and a type of rock, which is available in mines in several countries. Gyproc source gypsum from a mine in Co Monaghan, and manufacture building plaster and plasterboard in Kingscourt, Co. Cavan.

We believe that steps should be taken to preserve our natural gypsum resources. Although in good supply presently, there is only a limited supply available worldwide and therefore, it is important that we increase the volume of plasterboard materials being recycled. The latest technological advancements mean that recycled gypsum powder now can replace up to 30% of the natural gypsum rock in the raw material for plasterboard production. If producers are encouraged to hit this figure for recycled gypsum, we will significantly reduce the amount of gypsum we need to mine in order to manufacture plasterboard products.

Plasterboard can be infinitely recycled, with 100% of the returned material able to be made into new plasterboard. This means there is limitless potential for the industry to recycle, reducing the amount of new gypsum to be mined and helping to improve our environment.

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.

A lack of regulation around plasterboard recycling is key a factor in limiting the levels of recycling in Ireland. The development of this Strategy is an opportunity to address this lack of industry regulation, by placing specific targets on the levels of plasterboard recycling for the industry to reach.

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.

Low levels of industry and public awareness is the main barrier to increasing the volume of plasterboard recycled in Ireland. Most consumers, either building or renovating, are not aware that plasterboard can be recycled or of the environmental impact of sending it to landfill with other construction waste. This low level of awareness is also an issue amongst smaller builders, with only the largest construction firms currently implementing recycling procedures for waste plasterboard material.

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

Gyproc believes that Green Public Procurement will play a vital role in supporting the development of the circular economy. Government and the State need to be leading by example when it comes to plasterboard and construction waste recycling, with set requirements being specified in tenders for state funded construction projects. If the State is failing to require the recycling of plasterboard materials in its projects, then private firms will not have a clear example to follow and will further slowdown the growth in plasterboard recycling.