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**From:** Cian O'Hora <cian.ohora@imsirl.ie>  
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Dear Sir/Madam,

Please find our consultation response attached.

Should you require any further information please do not hesitate to contact us.

Kind regards,

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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?	Yes we agree with the proposed key objectives. Ireland are coming from a low base in terms of Circular Economy and Sustainability compared with other EU states and developed countries. We have a significant amount of work to do to catch up with peers. We also have the opportunity to learn from international experience and become a leader in sustainability.
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 need to establish where we are currently and then look to best practice. At a minimum we need to achieve and exceed all mandatory targets.
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?	Public awareness is moving from low to medium in the past year. It is important to raise public awareness as to what the CE is and how important it is to aid in sustainable development and combat climate change
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?	An education and awareness programme with schools, educators and public sector would increase awareness significantly. There is good awareness emerging in some business sectors due to emphasis on ESG, green financing etc.
5	What are the most effective awareness raising measures that could be taken under the Strategy?	Yes
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?	There benefits of a more circular economy are manifold including: - helping combat climate change - preferring natural resources -reducing emissions -saving money, reducing fines -positive for mental health - employment opportunities
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?	

8	<p>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.</p>	<p>We have a good regulatory framework in general however its implementation and enforcement does not appear to be functioning and indented. The area of environmental licencing, permitting and planning need significant review as timeframe and costs are a big barrier to businesses looking at providing circular businesses and innovation. In the area of EoW there are significant differences across regulating authorities. For example local authorities have issued county specific EoW within waste facility permits where the EPA have stated they are the competent body for such decisions. Clarity on regulation and enforcement is required to enable fair competition and to develop the national market for high quality compliant recycled materials.</p>
9	<p>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.</p>	<p>Producer responsibility plays a role in the generation of construction waste. There is no requirement for the producers of large volumes of construction waste to make their material available for recycling e.g. through pre-demolition audits, selective demolition, project waste tracking, project recycling targets etc. These measures could be implemented through planning conditions. There is a significant over reliance on backfilling of wastes, particularly construction wastes such as concrete, rubble, bitumen etc. Backfilling of these materials occurs at local waste permitted sites across the country and results in valuable materials being taken out of circulation. The materials embodied carbons are lost and if they are placed in environmental sensitive areas pollution can occur. These materials can be readily recycled however backfill is typically cheaper than recycling when the low value of recycled materials is factored in.</p>
10	<p>How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?</p>	<p>Green Public Procurement is one of the most important mechanisms for stimulating the CE. Public works have a massive opportunity to ensure CE principals are embedded in a projects design, operation and afterlife. Sustainable design is often considered during a project but is dropped in favour of cheapest price. The overall life cycle impacts and value should be assessed for projects.</p>

11	<p>What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?</p>	<p>The Government should introduce mandatory recycled content for certain materials used for construction and/or in the manufacturing sector. This could be accompanied by standards set for secondary raw materials. The Government could also consider an aggregate tax to assist with the development of recycled aggregate as a more circular alternative or supplement to extracted virgin products. A ban on backfilling of recyclable materials should also be considered.</p>
12	<p>Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?</p>	<p>Construction sector can give the biggest contribution in a relatively short space of time provided that projects are not assessed solely on a cost basis. Environmental impacts and whole life carbon need to be assessed.</p>
13	<p>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?</p>	<p>Yes</p>
14	<p>Any other comments?</p>	