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**From:** Simon Stringer (LEAF.ie) <Simon@leaf.ie>  
**Sent:** Friday 11 June 2021 13:16  
**To:** circulareconomy  
**Subject:** Response to the consultation document 11/6/21  
**Attachments:** Leaf CE Consultation Response 110521.pdf

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Good afternoon,

Please find attached a very brief response to your consultation document.

We could of course expand on all of the points, and will be happy to do so, but I think that the overall message is clear.

Should you have any queries, please do not hesitate to contact me.

Best regards

Simon

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# Leaf Environmental Ltd response on Public Consultation on the Proposed Publication of the Circular Economy Strategy

Submission via e-mail to: [circulareconomy@DCCAIE.gov.ie](mailto:circulareconomy@DCCAIE.gov.ie)

Date: 11th June 2021.

Managing Director: Simon Stringer

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## Introduction

Leaf Environmental wishes to make the attached submission in relation to the Department of Environment, Climate and Communication (DECC) - Public Consultation on the Proposed Publication of the Circular Economy Strategy.

## Name

Leaf Environmental Ltd. Contact details are on the cover page to this submission.

## Who are we?

Leaf Environmental has been operating since 2001. It is a leading consultancy specialising in Producer Responsibility legislation. It provides project management, audits, advice and support on all PR legislation with a special emphasis on packaging, WEEE & batteries across the British Isles, and increasingly across Europe.

The Leaf Group operates packaging compliance schemes in Great Britain as well as having been a recent member of the Advisory Committee on Packaging that provides advice, guidance and technical support to Defra on policy and legislation around the Packaging Regulations and the recovery & recycling infrastructure in the UK. This puts Leaf Environmental in a unique position of identifying potential conflicts between ROI and UK waste policies and the effects they will have on clients that operate in both jurisdictions.

Leaf Environmental is mindful of the complexity and interconnectedness of the circular economy (CE), biodiversity and extended producer responsibility (EPR). We are aware of the legislative framework that producers must work within and many of the changes that are expected. It is our duty to our clients to help inform them of these changes, but also to provide feedback to policy makers and regulators about the impacts of the potential changes.

## Consultation Questions

Leaf Environmental could answer all of the questions posed, but offer a few select and focused responses instead. If any of them need greater explanation, expansion or detail, please do not hesitate to contact us.

- 2 We would absolutely agree with the level of ambition as set out. We must, there is no choice but to sustainably live on the resources that our one shared planet can provide us. To do that, we must do whatever it takes. This will include making and enforcing unpopular decisions, for example, completely ban the burning of cut turf and move to re-wetting bogs, as they are incredible carbon sinks; ideally now, but no later than 2 year, for example.
- 3 Ireland should set its own minimum target and provide updates every 18-24 months on how far it has come, how far we are from achieving our goal and a roadmap of how we intend to get there.

- 4 We would rate Irish public awareness as poor. This is partly because recycling has been “sold” as the silver bullet, rather than prevention and with the corollary of consumption. It is easier to get people to put their off casts into a green bin than ask them to “make more with less” as prevention is frequently perceived. To change this attitude, it will take clear, consistent and continual messaging.
- 5 We believe that communications are vital to the success for transition to the circular economy. Communications need to be aimed at all levels of society therefore it needs to be part of the school’s curriculum at both primary and secondary level. Third level institutes must take the opportunity to run courses at providing the necessary skills and techniques required. Social Media and radio campaigns and advertising should be heavily invested in as this is how most citizens now engage with the outside world. Case studies of how it is done in other Member States and the benefits of those actions both economically and socially should be communicated alongside the ‘national message’.
- 7 We believe that urban and rural planning could be one of the biggest winners in circular economy via retrofitting and revitalising town centres and existing building. This should create jobs (up and down the supply chain), revitalise dying town centres nationally, improve badly needed housing stock at a lower cost than new builds while also stimulating local economies.
- 8 We are concerned that it has been proposed that the packaging waste regulations will no longer have an option for producers. This is known as “self-compliance”, and for our clients to be forced into Repak is unacceptable. In the WEEE and batteries regimes there is competition or an alternative to a single approved compliance scheme. We would counsel that the packaging regime either has another approved compliance scheme or that self-compliance is retained.  
**Digital Deposit Refund Schemes** could be a viable option for Ireland within 1-2 years, if Ireland waited for the technology to be ready, it could have major benefits in terms of cost efficiency, customer buy-in and increased recycling rates rather than the reverse vending machines approach. There is a case study taking place in Dublin during July 2021 and the results of this will be very interesting and should be considered before any DRS system is introduced.
- 9 We believe that the “right to repair” Directive, the sustainable products initiative, and the liability of repaired or re-used products needs to be urgently examined and implemented as appropriate. This is simply to retain as much resource as possible in the system prior to it being recycled and needs to be expedited to achieve this situation. We understand that the public attitude is slowly changing to support this outlook, in part through the restrictions brought about by the pandemic, and the government communications should support this.  
  
Access to credit via green banking or circular economy initiatives will be very important so that investment in non-traditional businesses can happen at the scale required and desired.
- 11 We believe that the government can show leadership by specifying products to the standard required. To achieve a greener outcome, in the specifications or tender, the better the carbon, or water or social benefit, footprint the better the product or service would score. Perhaps a “bonus” points system, or points deducted for not having a set percentage of recycled content, for example could be used.



12 We believe that engaging the citizen is key to changing to a more circular economy. All citizens will then carry that forward to other environments such as the factory floor, boardrooms, schools, and universities driving change across all sectors of society. To do this, the change must be as easy as possible through infrastructure being available for citizens to do the right thing, communications being clear, concise, and uniform so that they understand what the correct thing to do is and that businesses are ready so that the products and services that are required are ready for sale. This will not be easy, and all stakeholders are required to buy-in.

**End of submission.**