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To: circulareconomy
Subject: Veolia contribution to Public Consultation: Proposed Publication of Ireland's First Whole-of-Government Circular Economy Strategy
Attachments: Veolia's response to the Circular Economy Strategy - Public Consultation June 2021.pdf
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Hello,

Please find attached Veolia's response to the Public Consultation on the Proposed Publication of Ireland's First Whole-of-Government Circular Economy Strategy.

We remain at your disposal should you wish to discuss any aspect of our contribution.

Kind regards,

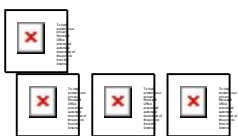
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Veolia's contribution to the Public Consultation on the Proposed Publication of Ireland's First Whole of Government Circular Economy Strategy.

June 2021

Introduction to Veolia

Veolia is Ireland's leading environmental services company employing 700 people and member of IBEC, IWMA (Irish Waste Management Association), Engineers Ireland and leader member of Business in the Community Ireland, having been awarded the Business Working Responsibly Mark accreditation in 2016. We provide a comprehensive range of energy, waste and water solutions and are dedicated to carbon reduction, protecting the environment and building the circular economy.

Veolia in Ireland works with our customers (private and public sector organisations) to carefully manage scarce resources as part of our Group's commitment to be the benchmark company for ecological transformation. Through our expertise in operations, engineering and technology, we reduce the environmental impact of our customers' activities while helping industrial companies, businesses and the public sector to operate in a more efficient manner.

Approximately 3m people benefit from our drinking water, wastewater and sludge management infrastructure. We are annually saving over 200,000 tonnes in CO2 emissions for our customers through implementing energy efficiency projects and we are proud of our 80% material recovery rate across 80,000 tpa of hazardous waste. Our circular economy-focused activities are featured as a flagship case study in the latest Business in the Community Ireland Low Carbon Pledge report, released on 10 June 2021.

Veolia in Ireland welcomes the opportunity to respond to the development of Ireland's first whole of Government Circular Economy Strategy. Last year, Veolia Ireland made a written submission to the draft Waste Action Plan for a Circular Economy. In it we highlighted a number of key areas to incorporate into such a plan, namely:

- The way materials are handled needs to be pushed up the waste hierarchy
- Locate infrastructure where it is needed, particularly in the area of treatment and reprocessing, looking beyond municipal to all types of waste generated in Ireland
- Incentivising increased recycled and recovered content in products
- Harmonisation and clarity in labelling of products; as well as in the terminology used to improve recycling
- Doing things differently requires investment, as well as changes in mindset, lifestyle and supply chain / production and design structures

These priorities are increasingly relevant and we are confident that this emerging strategy will enable an accelerated and accelerating transition to a circular economy in its holistic sense, as we understand to be the ambition of this strategy.

For this reason, we firmly believe that the building of a full circular economy goes beyond the considerations of waste or what we do with the outputs of our production and consumption. In order to go full circle, we must start at concept and design stage, and incorporate all the key stages of utilities and inputs along the production and consumption processes, before we reach recycling, recovery and reuse.

As such, circularity cannot be achieved in isolation by any business, organisation or community. We rely on government strategy and its delivery to enable the viable formation of those interconnections. We believe this will require investment in a balance of incentives and regulations which enable all organisation types, as well as wider Irish society, to understand and access greater circularity in their daily operations. Resourcing for the functions critical to its implementation will be key to this success.

At Veolia, we believe that we all need to put more value on resources. We would like to draw attention to "[The Circular Revolution in Ireland](#)" a report which we produced in 2016, where we highlighted that adopting a circular economy would create €1.65 billion of GDP in Ireland. This was calculated across six strategies: Landfill tax savings, value of Commodities, Energy values, focused Chemical initiatives, Products to Services and Contribution of Waste.

We also draw attention to our [Imagine 2050: the future of waste, water and energy in Ireland](#) report published in 2018, highlighting the role that the circular economy could play in preparing industry for what the future might hold.

In summary, Veolia welcomes the opportunity provided by this consultation to respond across a selection of the themes highlighted as part of the consultation. We broadly welcome collaborative efforts to help Irish society move towards a circular economy model which is transparent, clear for all stakeholders and enables everyone, whether individual, business or public sector, to play their part. This will ensure the Irish economy, as well as its supply and value chains to affect our environment and the impact we collectively can have in a positive way. We have provided some responses to the specific questions asked below and would welcome any opportunity to further discuss any aspect of this response.

Questions posed in the Consultation

"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 are very supportive of the five key objectives outlined in the strategy. Any transition to a circular economy, particularly if that transition needs to be accelerated, must address:

- A framework for policies and practices driving that transition
- Clearly defined measures which can be implemented and supported in order to achieve a target benchmark rate of circularity
- Awareness levels amongst all key stakeholder groups, including business, in terms of each of the benefits, the penalties, how it is being implemented, and how that implementation can be accessed

- Clearly defined ways in which investment in the circular economy will be enabled, supported, promoted and delivered - to set a clear prioritisation of the strategy and its implementation mechanisms
- Identification and mitigation of all the barriers that exist to implementing such circular economy strategy and measurable objectives

We would reinforce the objective descriptions contained within the strategy document with the additional words provided here above, in order to provide increased tangibility for all around the Circular Economy, which can be currently perceived by many as a vague concept rather than grounded practice.

"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 applaud the consideration which has clearly been applied in drafting this first "whole of government" strategy. We do believe that the time for action is now. Our planet cannot wait any longer. How we interact with our planet's resources has an impact on the viability of many species, as well as on our climate. In this regard, although a significant step has been taken in compiling this first strategy, we do believe that it should go further. In addition to recognising the multiple efforts being made at community and local levels, government and national policy and practice needs to be front and centre of the strategic ambition and its implementation.

"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?"

To determine the measurable ambition, we would suggest identifying the benchmark performance that either already exists across each element of the circular economy value chain; or that which should exist if Ireland were operating a full circular economy and a leader amongst its peers. We would potentially consider peers as countries with a similar makeup of industry sectors, company types and resources.

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

Veolia's focus in Ireland is in the B2B marketplace and to that end we would suggest focusing on developing a broad-based industry incentive/enforcement framework which can be then easily integrated into company strategies. We would recommend that the business community, with various sectors and business sizes, should be clearly identified within the stakeholders of this strategy.

"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?"

We think that those proposed provide a very solid foundation. However, we do think that the identification of stakeholders could go further to encompass all key representative bodies from each element of the full circular economy Value Chain within Design and Production (business and sector representative bodies).

These include all utilities (e.g. SEAI for energy, Irish Water for water and so on), Logistics, Consumption, as well as Waste Recycling, Recovery and Reuse. This strategy provides an ideal opportunity to coordinate all the key stakeholders under one overarching approach, pulling their respective expertises in the same direction to accelerate this necessary transition to a circular economy.

"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?"

For us the benefits are clear; a holistic, circular economy approach is more sustainable for our resources, provides a more inclusive opportunity for all stakeholders within our society to participate, particularly when circular tends to be easier to implement when the associated elements and infrastructure are geographically proximate; thereby bringing local economy benefits; as well as ultimate increased sustainability for our environment and our planet.

"8 & 9. What do you see as the major regulatory and 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."

We believe that a technology-agnostic approach is merited where each input or utility is incentivised or evaluated on the basis of its contribution to the overall circular or carbon (in reality we cannot consider these fully independently of each other) and ultimate sustainability of a site.

For example, in some cases, CHP or gas might be preferable to the incumbent fuel (e.g. fuel-oil or coal) on a manufacturing site and contribute to an overall lower carbon footprint of a particular site, being an acceptable step on a journey to circular and low or zero carbon, which may incorporate sustainable technologies such as anaerobic digestion.

Biogas or hydrogen injection into networks, any network upgrades, private wire regulation - all should form part of the conversation and balance of solutions considered on the journey.

Additionally some of the regulators which administer the various licenses and permits are suffering from a lack of resources. If transitioning to a circular economy is indeed a strategic priority for our government, clear investment into bodies like the EPA is certainly merited.

They will then have the mandate and capacity to evaluate and approve new processes and technologies as they are developed.

Continuing this line of thinking, alternative approaches to the various technologies should be considered within the regulatory framework. For example, the area of co-digestion might benefit from an approach that looks at treating municipal brown bin waste and waste water sludges together.

If this strategy is to be the success it deserves, it merits spearheading from an overarching body who can see the whole circle and provide that balance of incentive and regulation rights across the circular value chain for all sectors and stakeholders.

"11. What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?"

As mentioned above, Veolia believes that a transition to a circular economy needs to be incentivised and regulated at the same time. This is to ensure that we continue to provide leading-edge manufacturing in Ireland with the support and mechanism it requires to achieve its own circularity and sustainability targets and enable the industries that are here to stay here, doing so sustainably.

This will involve evaluating projects not just on their financial cost as has traditionally been the case for many organisations, but also on the impacts for the environment and resources.

"12. Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?"

Each sector should make the biggest contribution it can to contribute to an improved circular economy in Ireland.

"13. 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?"

Yes, Veolia broadly agrees with the policy areas listed for future development in the draft strategy. In line with our previous responses, we would like to see these accelerated and coordinated, with a reinforcement and increased visibility of the tangible components that sit behind them, as we believe a robust, whole-of-circle approach will be critical to success.

We believe the time is right for such developments and we see many of our customers across all sectors placing sustainability, low-to-zero carbon and circularity at the core of their strategic objectives for the next ten years and beyond. The COVID-19 pandemic has brought a heightened awareness of what is important for our society, as well as an appreciation of the extent of what can be achieved when we all work together in coordination under strong leadership from our governments.

14. Any other comments?

While we applaud the Government in taking this critical first step to draft a strategy and open the conversation with stakeholders through this consultation, we believe there is an opportunity for increased clarity of ambition, direction and delivery roadmap for all key players to get behind.

Through our global experience in delivering circular projects in a wide variety of sectors and territories we have seen where things work, and much can be achieved with a coordinated will and provision of key funding to provide initial viability to the required innovative approaches necessary for a new circular mindset at country level.

For example the current circular economy innovation grant scheme could go further and wider. We are aware of projects in Melbourne where a focus on water reuse was government funded, as well as mandating that any new developments in certain areas must incorporate water recycling measures; this enabled the choice of the best and most sustainable technology to be used, rather than a cheaper alternative which would have been more viable on a solely-financial evaluation.

Additionally, continuing on the theme of Water, we are aware that in Sweden, Stockholm has set a goal to develop a water treatment supply with no chemical addition by a certain date, and requiring more sustainable, circular alternatives to be used and thereby incentivising the private sector to come up with novel and innovative approaches. Pioneering initiatives like this require appropriate funding structures and fall within a clear path of ambition from governments enabling their implementation.

We look forward to supporting the Irish government as it moves forward with its vision for a circular economy.