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From: [Redacted]
Sent: 10 June 2021 20:58
To: circulareconomy
Subject: Public Consultation on the Proposed Publication of the Strategy.
Attachments: Public Consultation_Questions.docx

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Dear Sir/Madam,

My name is [Redacted] I am an Environmental Engineer in Waste Management from Cork. I have been working as a waste manager with Veolia and as a waste expert.

I have read the Whole of Government Circular Economy Strategy 2021 - 2022, and intend here to provide my answers to the 14 bulleted questions.

Please find the questionnaire included.

I will look forward to the document being published.

Kind Regards,

[Redacted]

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Whole of Government Circular Economy Strategy 2021 - 2022

Questions

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?

One additional objective is a clearer *practical* objective included for instance.

Objective 6: require major industry players to undergo waste mapping finding all elements relating to the creation of wastes. The rationale for it is that each of us is highly aware that waste is an issue and it is very evident as well to industry. No need to shirk the truth. This objective aims to further the process to finding Circular Economy solutions. Each site has wastes of numerous types. State clearly an objective for producers of wastes (plastics, metal parts, grinders etc.) and organisations in key industries responsible for the bulk of wastes to at least methodically to study the actual waste that it is finding currently, and investigate if there's a CE alternative solution which will function in replacement of the waste generating activity. This could be - for instance - an industrial symbiosis where one organisation's waste product could provide an input for a separate organisation thereby displacing new material use. This was a very good initiative which fell by the wayside in the past. Examples: a replacement of plastic disposable pallet wrap to a renewable process, to re-treading of grinder wheels for moulded metal implants in a medical devices plant. This list may be very long in certain industries however, the sooner the process of namely identifying what "can" and what "can't" be made to have a second life, the sooner linear waste producing processes can be interrupted and cleaner Circular processes brought about. Organisations have to take responsibility if it is they that are at fault.

Comment on the third Objective:

3. To raise awareness amongst households, businesses, communities and individuals about the Circular Economy and how it can improve their lives.

It is hard sell in my view to consumers if CE improves lives as consumerism has had a hold for many a year and it will be hard at first to wean humanity off the endless stream of newer, better, faster products which seemingly had no end. That is until it was discovered just how bad a shape the earth was in. Most people are busy and it is not their concern apart from "us", who are working in this arena. CE improves the world upon which, human life, depends. And a better understanding is broadly needed that continuous consuming *is not a good thing*. This is a long way off from the mindset in most of the country right now. Upon entering into a material requirement, the first question should be – "can I get a reused version of x, y or z" or at the very least "can I get the model that is the most ecoefficient" with maximum life use for minimum environmental harm? However this is far from most individuals' current pattern. Given the availability of a reasonably priced new item with gigantic inherent carbon, over a less appealing one second hand, and the vast majority of us will go for the newer options. Better to be very clear at the outset that sacrifice and "small is better" is the way the world is actually moving.

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?

Objective 2: Specifically, by 2030 Ireland's ambition is to significantly improve its circular material use rate (in both absolute terms and in comparison with other EU Member States)

so that our national rate is above the EU average by the end of this decade. Achieving this improvement in the circularity gap is the second key objective of this Strategy.

Comment 1: There's the reason why Ireland's rate of CE is only 1.6%. This is most of the problem, that there is not an enforceable yardstick clearly explained, agree upon, and set, e.g. the medical devices section MUST reuse more than x % of its consumables such as packaging or consumables (excluding where it not possible e.g. single use). I worked in waste coordination for pharma and medical devices, and I worked directly with Environmental Managers on sites coordinating and managing total waste management and I saw first-hand that the last concern of many a busy manager is to interrupt the supply chain and to make demands to actively desist from a high waste producing processes, or make demands on responsible parties in the supply chain, to whom it is business as usual also. It simply doesn't happen without the enforcement required. While it is very clear in the IED licence that efforts must be made to promote CE as stipulated in the requirements for maintaining the licences. Why isn't the EPA enforcing CE as strongly as it must? I believe that we're at a level of maturity now that simply recycling MDR is the low end of achieving good practice and really what we're looking for now is change of existing linear economy processes and the introduction of CE. More should be done to force actions on this level and not simply let it roll over to the following year as has been the case for many a year to date. Therefore, I'd advise to include more stringent objectives for applying CE i.e. Each industry must be incorporating CE by year X.

Comment 2: Objective 2 is too vague, as "above the EU average" may be too small a target, it really depends. Best have a goal. Make a clearer goal such as 10% etc. Or have a higher goal such as half the EU top performer. Be optimistic. Industry has the money to invest to clean up their operations. The world needs this. They require the guidance to do so.

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?

Comment: Largely there are common products and services being offered across all of the EU countries. Using the successes or exemplars in other countries to make the benchmark for achievements in other places seems like a good idea. I agree that Ireland should therefore measure its progress based on successful Circular Economy around the world.

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?

Comment: The Irish public have not heard of the Circular Economy. They know less about the actual drivers, the "why", reasons, why it is now becoming apparent that most products and systems that are consumed are inherently unsustainable, as the materials, chemicals, plastics etc. which these are made from are unsustainable (not "eco-friendly" or ecoefficient) and there needs to be something done, and that is The Circular Economy. As mentioned earlier, the average person on the street cares little or thinks twice when buying a new product, even though the emissions in terms of CO2 which go into the life cycle of the product, are putting future generations as well as a multitude of species in jeopardy. Therefore, this present strategy is correct by its approach e.g. p. 13 – "Improving consumers', households' and businesses' basic understanding of the circular economy's potential should therefore represent a major goal of national policy". Concern with Circular Economy is low on average. Not only, the addiction to consumerism is higher than ever, as is shown by the numbers of new products for sale and minimal options to buy refurbished. However, it is very important to grow the options to live with a lower

carbon budget by promotion of consuming reused goods, and to raise awareness of the developing circular economy, but the difficulty as I see it is the conflict between the existing linear economy which pervades. Potentially if there were main street locations offering second hand goods, or if there were places where you might search for and take a once loved item as opposed to the side street charity shops then possibly this would let more young people realise that a movement is on the way that everyone should be involved with.

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

Comment: Educate on the impacts of consumerism and the connection with the ultimate breakdown of the earth's climate system. Each individual is assigned a "Carbon Calculation Score" which is indexed with purchases done via a card. Lower purchases mean a "green score" which means points are earned which can go towards purchases such as those in circular economy related industries. Prime time TV slots to curb consumerism? What a thought!

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?

Comment: Definitely the main waste producers must be included, that would mean the leading industries. It is clear for instance if you log on and visit the green and amber lists of wastes generated in Ireland (TFS website) and send abroad for treatment that there are opportunities for recycling in Ireland and for valorisation of waste streams such as polymers, plastics, paper pulp, solvents, WEEE, etc.

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?

Comment: It's possible that in the future it will probably be better if the point of consumption of a product as well as refurbishment and servicing was close together. More goods and services may well be provided locally, and this will benefit the economy and jobs.

There are major benefits to implementing local industry in servicing products. The skills required are numerous and so offer a multitude of job types across many product categories, examples consumer goods, furniture, electronics, IT equipment, industrial equipment, hazardous waste types currently sent abroad such as solvents, waste paper, metals, packaging.

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.

Comment: Incentivising the world's top companies to invest in alternative supply chain is not a simple matter and they are likely not to make fast advance without the encouragement from regulations. While IED licences particularly require CE nowadays, still no impact is seen. However what regulators can do is to have a very candid approach. When the Producer Responsibility initiatives were born, companies were still not separating and recycling e.g. packaging, WEEE, tyres, farm plastics however the local authorities work was to make sure that businesses were making efforts, by inspection and enforcement. Potentially a CE Enforcement Regional Local Authority to work on assisting organisations.

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.

Comment:

- A disinterested audience, they will only act when business needs require it – Make it a business need? Lack of a clear roadmap of what businesses must do to stay compliant re: CE initiatives. Agreed upon terms for all stakeholders to meet.
- Cheap provision of new goods puts refurbishment out of the bargain as it is not cost competitive.
- In industry, on the other hand most companies do not actively seek to improve circular economy, particularly if there is a cost involved in doing so. Provide supports?

Examples:

1. In the pharmaceutical industry: seeking to reuse packaging i.e. barrels etc. Is deemed cheaper and less hassle to use new.
2. Medical Devices: Seeking alternatives to disposing of materials, i.e. consumables, packaging, excess materials.

As long as there is a no stick approach frankly environmental managers contend to doing their best to uphold the actively enforced regulations as opposed to the ones which the EPA choose to overlook. As long as there is not an incentive to devote time and resources to interrupting or disrupting the linear economy based supply chain, such as managerial support and push towards actively providing the resources needed (man hours, finance) theirs is not very much momentum driving transitioning to circular. Again, it takes a certain kind of perseverance to get them to listen.

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

Comment: By offering contracts to those showing the most green initiatives this is really putting it out there that in order to be competitive, you must turn inwards and redesign your firm to have CE in mind.

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

Comment: Aim for most public bodies, as well as state run bodies to exemplify a real push towards the CE. It is not an easy ask to simply give carte blanche demands to the rest of the country without putting it to practice and seeing what is possible in this area. Promote these actions taken, highlight the CE initiatives and wins over waste over time. Not everything will be possible. There will be some waste. But everyone I think agrees that we have a long ways to go to really curb wastefulness. As mentioned, get the stakeholders to the table and make sure that a clear set of goals is agreed upon as to what they will do to be responsible.

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

Comment:

Electronics can be a poster child if the conditions are right. The WEEE directive called for producer responsibility for WEEE, and part of this was focused upon CE merits such as not importing EE with certain harmful chemicals. With more work in this area, more EE devices such as white goods, TVs, phones, and so on, could be targeted to remove those from the market that are part of the linear economy and least ecoefficient. Instead promotion of

products that have a lifespan and are repairable. Build up the knowledge base to repair these in Ireland, lock stock and barrel.

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?

Comment:

Yes, broadly agree with everything.

