

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 11 June 2021 00:23  
**To:** circulareconomy  
**Subject:** Circular Economy Strategy Consultation  
**Attachments:** Response to consultation on Ireland's strategy for a circular economy.pdf;  
ATT00001.txt

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Hello

I have attached a PDF with my contribution to the Circular Economy Strategy Consultation.

Kind regards,

[REDACTED]

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## Comments on the *Whole of Government Circular Economy Strategy 2021 - 2022* — Pre-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?**

The key "key objective" not listed.

The key key objective is to identify the economic sectors and activities where it is most urgent and most important to implement changes towards the Circular Economy.

The only place in the Strategy where prioritization is mentioned is Annex 5: The EU's Second Circular Economy Action Plan, Action point 3:

- "Focus on the sectors that use most resources and where the potential for circularity is high ..."

This is the "harvest the low hanging fruit" strategy.

It is a good start, but the focus should be on activities<sup>1</sup> that are most damaging to the environment and thus of most concern to this and future generations.

The strategy needs an explicit approach to identifying, prioritising, and managing projects that will reshape the economy in line with the principles, values, aim, and processes of the Circular Economy.

**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?**

The strategy is profoundly unambitious compared to the scale of the problem.

See the response to Question 1.

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<sup>1</sup> The Strategy, as expected, discusses Circular Economics with respect to sectors.

This is a good start, but averages conceal the best and the worst.

The focus should therefore be on the most damaging economic activities, whether they fit neatly into the classification of economic sectors.

**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?**

Ireland should measure its progress away from the linear economy using internationally agreed metrics.

It must also include locally meaningful metrics of both distances from targets, and progress in moving towards targets.

The strategy probably needs to take account of the EU taxonomy for sustainable activities. See:

[https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/eu-taxonomy-sustainable-activities\\_en](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/eu-taxonomy-sustainable-activities_en)

**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?**

I would rate Irish public awareness of the circular economy as rock bottom.

The changes needed for meaningful movement away from our linear economy can only happen if the public are aware of the scale and distribution of the problems, and the scale of the efforts needed to address them.

**5 WHAT ARE THE MOST EFFECTIVE AWARENESS RAISING MEASURES THAT COULD BE TAKEN UNDER THE STRATEGY?**

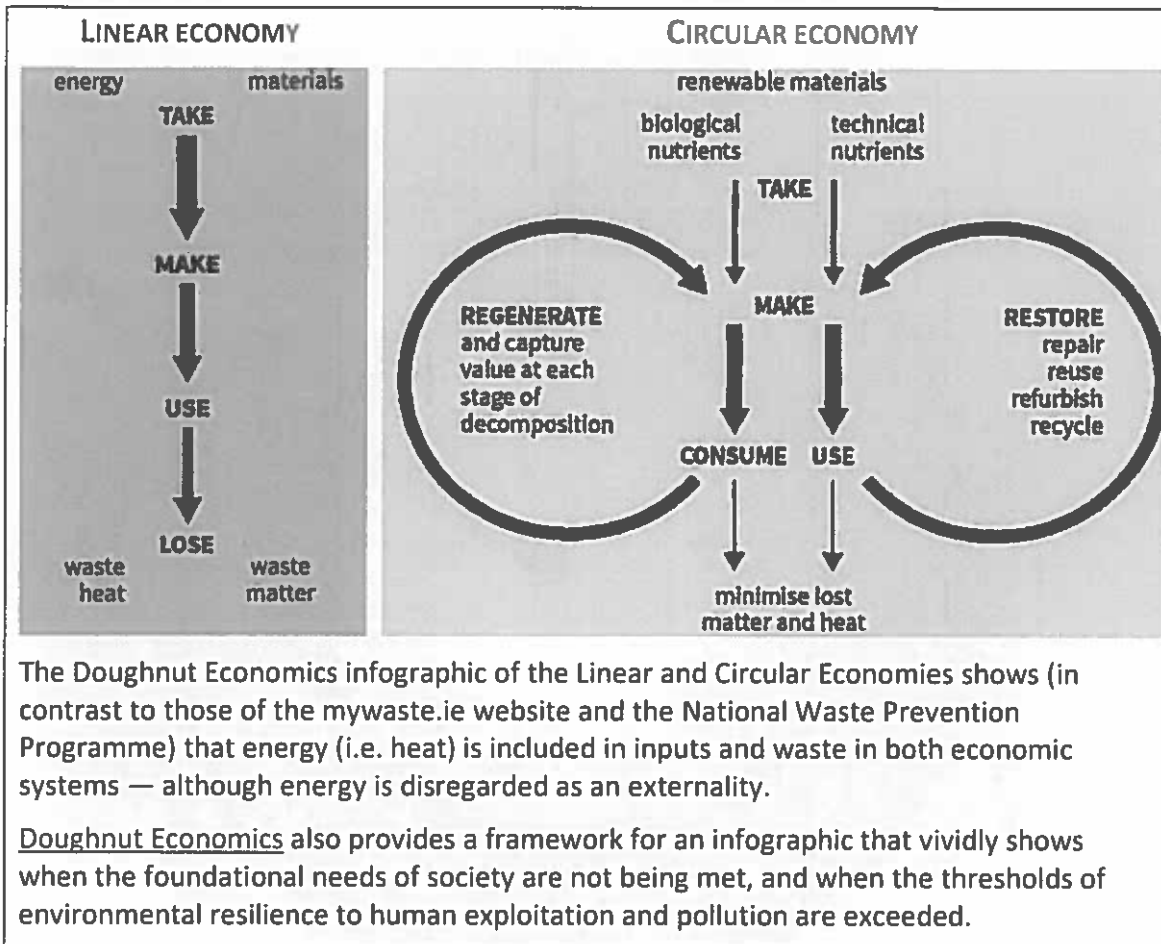
The Strategy is very heavy on branding and very light on problems, solutions, and how transitions in people's lives will be supported.

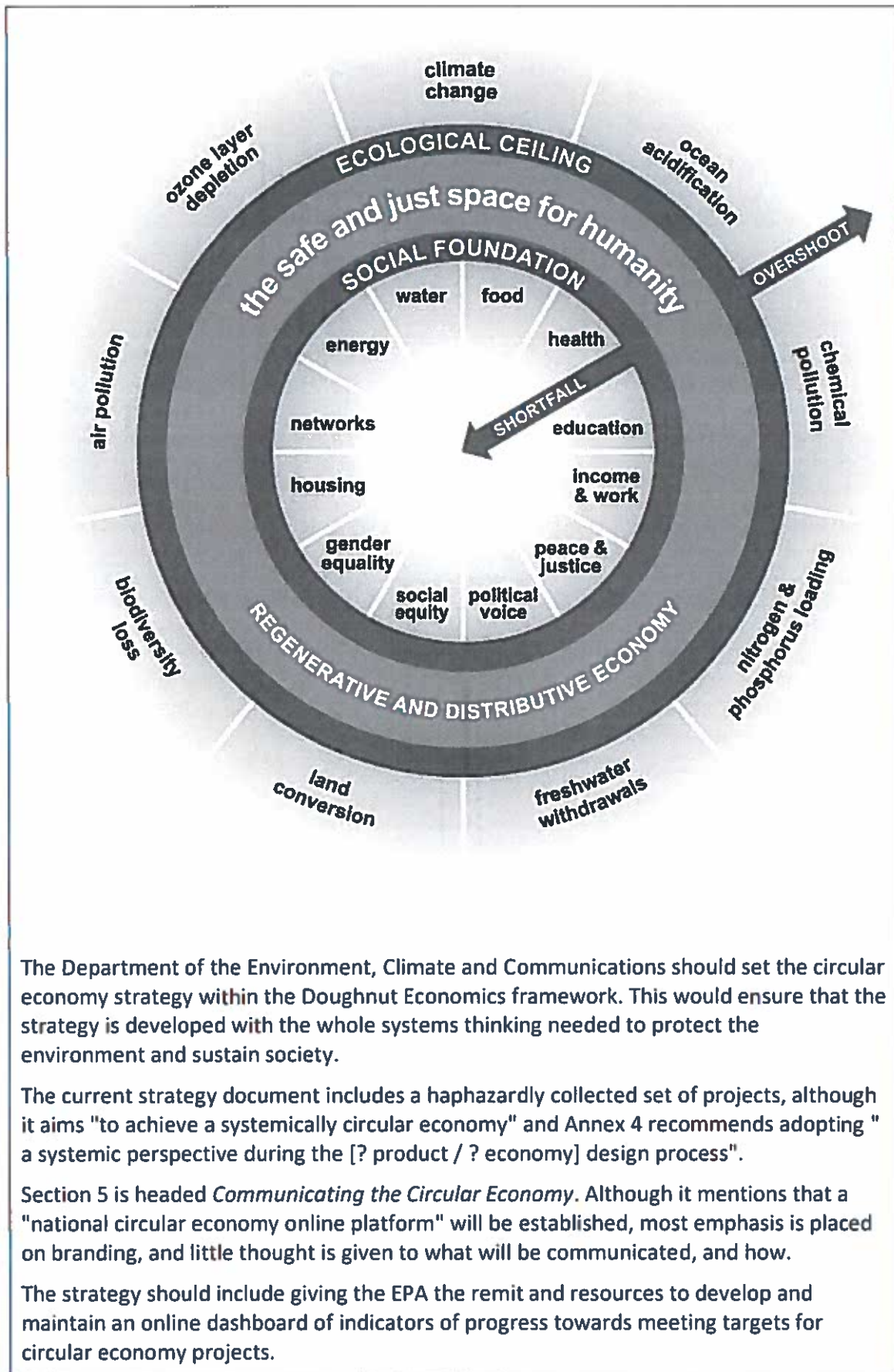
Branding is easy to advocate, but useless without some evidence-based content in the messaging.

The strategy should therefore include a programme to identify and communicate to the public the economic activities (at sector and sub-sector level) where the circular economy design principles most need to be applied. The prioritisation process should separately assess environmental impact, urgency to meet societal concerns, and obstacles to change (which would include the measures necessary to ensure a just transition).

The strategy should also include an approach to monitoring projects, and communicating progress to the public.

Doughnut Economics (horrible name, but essential set of concepts) provides 7 ways of thinking when designing an economy to meet the needs of people and sustain the environment. One of these ways is the circular economy.





The dashboard should be structured on the lines of the Doughnut Economics framework. RTÉ should be tasked with communicating information about the circular economy.

**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?**

IDEN, The Irish Doughnut Economics Network, should be invited to join or contribute to the Circular Economy Advisory Group.

**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?**

Visible benefits are useful for selling projects. In this case the major benefits may from risk reduction. The communications team will have to identify indicators of benefit and risk reduction that can be shown on the Circular Economy website and dashboard.

**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.**

This is beyond my expertise, but it is obvious that the petrochemical industry has multiple protections against improving their effect on the environment, and these include regulations and subsidies.

**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.**

As for the previous question: This is beyond my expertise, but it is obvious that the petrochemical industry has multiple protections against improving their effect on the environment, and these include regulations and subsidies.

**10 HOW IMPORTANT DO YOU CONSIDER GREEN PUBLIC PROCUREMENT IS IN SUPPORTING THE DEVELOPMENT OF NEW CIRCULAR GOODS AND SERVICES?**

Green Public Procurement is essential, and it is essential that there is maximal transparency and effective audit for procurements.

**11 WHAT WOULD BE THE MOST EFFECTIVE ACTION GOVERNMENT COULD TAKE TO PROMOTE/SUPPORT AND INCENTIVISE THE FURTHER DEVELOPMENT OF THE CIRCULAR ECONOMY?**

Excellent question.

I would start with identifying and prioritising the economic activities with the greatest ecological footprint.

**12 WHICH SECTORS DO YOU THINK CAN MAKE THE BIGGEST CONTRIBUTION TO MAKING IRELAND'S ECONOMY MORE CIRCULAR?**

Petrochemical.

**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?**

The strategy is a hodge-podge collection of projects.

It desperately needs a whole systems approach.

The Doughnut Economics framework can help develop such an approach.

**14 ANY OTHER COMMENTS?**

The term "The circular economy" leads one to expect that it is a thing, and that such a thing exists. But, the concept is vacuous, until details are provided.

It would be better if the strategy stated explicitly that the term "circular economy" is a set of principles, aims, and values to be used when designing (changes to) an economy.