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From: [Redacted]
Sent: 11 June 2021 17:29
To: circulareconomy
Subject: Public Consultation on the Proposed Publication of the Circular Economy Strategy
Attachments: Circular Economy Strategy.pdf

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Please find attached response sheet.
Many thanks

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Rialtas na hÉireann
Government of Ireland

Ireland's First Whole-of-Government Circular Economy Strategy

Public Consultation on the Proposed Publication of the Strategy

April 2021



Prepared by the Department of
the Environment, Climate & Communications
gov.ie

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Purpose of this Paper

The Programme for Government, *Our Shared Future*, recognises that the next ten years are critical if Ireland is to address the climate and biodiversity crisis facing the world today. In addition to marking a step-change in the level of Ireland's Climate Action ambition, the Programme committed to a range of actions to support the transition to a circular economy. This included the establishment of a Circular Economy Unit in the Department of Environment, Climate and Communications (DECC) and the adoption of a Circular Economy Strategy.

Following on from the Programme for Government, in September 2020 the Minister launched Ireland's National Waste Policy 2020-2025, *A Waste Action Plan for a Circular Economy*. The new Waste Action Plan will inform and give direction to waste planning and management in Ireland over the coming years. The Plan commits to significantly increasing Ireland's performance in relation to waste management, resource efficiency and the circular economy. The Plan also sets out overall national policy on the circular economy, namely that Ireland is fully committed to transitioning to a circular economy and embracing the opportunities that this transition can bring. Finally, the Plan re-commits to the adoption of a Circular Economy Strategy, as a high-level whole-of-government document aimed at delivering policy coherence.

Accordingly, the Department has now prepared a draft of Ireland's First Whole-of-Government Circular Economy Strategy and is seeking input from interested parties, in line with Aarhus guidelines in respect of public engagement, through a public consultation.

This consultation will help inform the final content of the Strategy, as well as longer-term policy development in relation to the circular economy.

How to Respond

The Department is committed to engaging with stakeholders in a clear, open and transparent manner.

Submissions may be made based on the questions set out in this Paper and it is not necessary to answer all questions. Additional comments outside the questions posed are also welcome. For your convenience, a template is set out in Annex 1 which may be used to make a submission. Lengthy additional comments may be submitted separately in a Word document.

In addition to such responses and commentaries, DECC is also seeking case-studies of Irish circular economy initiatives for inclusion in the final version of the Strategy in order to illustrate the circular economy in practice. Section 3 of this paper sets out the requirements for such case studies.

Submissions may be made by email to: circulareconomy@decc.gov.ie

Alternatively, submissions may be made in writing to the following address:

Circular Economy Strategy Consultation

Circular Economy Division

Department of the Environment, Climate and Communications

Newtown Road

Wexford

Y35 AP90

Closing Date

The public consultation will close at 5.30pm on Friday 11 June 2021.

Freedom of Information

Please note that responses to this consultation are subject to the provisions of the Freedom of Information Act 2014 and Access to Information on the Environment Regulations 2007-2014. Confidential or commercially sensitive information should be clearly identified in your submission, however, parties should also note that any or all responses to the consultation are subject in their entirety to the provisions of the FOI Acts and may be published on the website of the Department of the Environment, Climate and Communications.

By responding to the consultation, respondents consent to their name being published online with the submission. The Department will redact personal addresses and personal email addresses prior to publication. Your attention is drawn to the Department's privacy statement:

The Department of the Environment, Climate and Communications requires respondents to provide certain personal data in order to provide services and carry out the functions of the Department. Your personal data may be exchanged with other Government Departments and Agencies in certain circumstances, where lawful. Full details can be found in our Data Privacy Notice which is available [here](#).

Next Steps

Following the consultation, DECC will consider all responses received and make a submission to the Minister for the Environment, Climate and Communications. The Minister will then submit the final version of the Strategy to Government for approval prior to its publication.

Section 1 – Context and purpose of the draft Strategy

Overview

When we talk about a circular economy we mean one that is not based on the ‘take-make-waste’ model which characterises the current global economy, which features pressure on natural resources and high-volumes of disposable items.

It is estimated that half of total greenhouse gas (GHG) emissions and more than 90% of biodiversity loss and water stress come from the resource extraction and processing that support the current economic model. None of this is sustainable.

In contrast, in a circular economy we can keep resources in use for as long as possible, extract the maximum value from them whilst in use, then recover and regenerate products and materials at the end of life.

Delivering a circular economy will have positive environmental, economic and social impacts and a well-designed circular policy framework can identify co-benefits, so that environmental improvements also provide economic and social opportunities, and vice versa.

Across Europe, countries are adopting towards circular economy practices, and the European Union is pursuing its ‘European Green Deal’ strategy which has the circular economy at its heart. In March 2020, the EU launched its *Second Circular Economy Action Plan*.

At the national level, Ireland is preparing its first *Whole-of-Government Circular Economy Strategy* in order to ensure policy coherence across the public sector and to outline Government’s overall approach to the circular economy for stakeholders and the public.

The draft Strategy is not a list of actions and it does not contain detailed targets in the way that the Waste Action Plan does. It is a strategic document which is intended to explain what the circular economy is, why Ireland needs to achieve a circular economy and how national policy will develop to support that goal.

The draft Strategy has 5 key objectives, which are as follows:

- To provide a national policy framework for Ireland’s transition to a circular economy;

- To support and implement measures that significantly reduce Ireland's circularity gap, in both absolute terms and in comparison with other EU Member States, so that Ireland's rate is above the EU average by 2030;
- To raise awareness amongst households, business and individuals about the circular economy and how it can improve their lives;
- To support and promote increased investment in the circular economy in Ireland with a view to delivering sustainable, regionally balanced economic growth and employment; and
- To identify and address the economic, regulatory, and social barriers to Ireland's transition to a more circular economy.

Achieving all of these objectives will be a long-term project and, once adopted, the Strategy will be regularly reviewed and updated to ensure that the objectives are met. Subsequent versions of the Strategy are expected to include more detailed circular economy actions and targets as the national policy framework develops.

Section 2 – Consultation Questions

This section sets out the questions which DECC are proposing for answer under this consultation. Please review the draft Strategy in answering these questions. It is not necessary to answer all questions if you do not wish to do so and respondents are free to submit more wide-ranging responses in the space provided in Annex 1. In the case of lengthy additional comments, please submit these separately in a Word document.

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

- 10. How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?**
- 11. What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?**
- 12. Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?**
- 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?**
- 14. Any other comments?**

Section 3 – Call for Case Studies

As mentioned above, it is intended to include a limited number of concise case studies in the final version of the Strategy which can illustrate the circular economy in action, how it relates to the lives of households and individuals as well as economic development, and the associated environmental, social and economic benefits.

Therefore the Department is seeking submissions of case studies outlining Irish examples of:

- Repair Schemes/Hubs
- Re-Use Schemes
- Sharing schemes – particularly community based/organised examples
- Libraries of Things
- Circular Design
- Circular Business Models
- Circular Manufacturing
- Circular Innovation

Individual case studies should be no more than 600 words in length, and the Department cannot guarantee that all studies submitted will be included in the final version of the Strategy. Where a study is selected for inclusion in the Strategy, the Department will notify the case study author in advance of publication and reserves the right to make minor edits for brevity and clarity.

Annex 1 – Template for Responses

No.	Question	Response
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 but I think it could go further, see additional case study document
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?	Not ambitious enough
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?	Yes
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?	Low and I think it is essential to rectify this
5	What are the most effective awareness raising measures that could be taken under the Strategy?	A combined all media awareness campaign

6	<p>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?</p>	
7	<p>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?</p>	<p>Less waste = more profits Less destructive practices support delicate natural systems that nurture peoples mental and physical health</p>
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>My sector, amenity horticulture is very vulnerable to rising and falling demand and therefore profits. In order to change practices businessess need to be supported.</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>Consumers are not yet ready to pay a premium for plants that have been grown in Ireland using good environmental practices</p>

10	How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?	Essential
11	What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?	To prioritise these issues
12	Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?	
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?	
14	Any other comments?	

