

Bioeconomy Action Plan Consultation

Sectoral Policy and Land Use

Department of the Environment, Climate and Communications

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RE: Consultation on Bioeconomy Action Plan

Uisce Eireann welcomes the opportunity to make a submission on the departments **Consultation on the Bioeconomy Action Plan**. Our response to the questions posed in the consultation are set out below.

1. Are you satisfied the outlined Pillars represent the structure of the Irish Bioeconomy?

Yes, Uisce Eireann are satisfied the outlined Pillars represent the structure of the Bioeconomy.

2. Are there specific key performance indicators and/or targets the Bioeconomy should be setting out to achieve to measure its implementation?

Potential KPIs;

- a) Measuring/monitoring the beneficial impacts on carbon emissions.
- b) Utilising a by-product (bioresource) to a circular economy outlet (e.g. tds/y).

3. What other key issues should the Governance Pillar deal with?

National Legislation and Policies may require a review to align with the EU Circular Economy Action Plan etc. Other European member states have progressed well regarding Policy alignment with Bioeconomy initiatives.

4. What key issues should the Research, Development & Innovation Pillar deal with?

Further support for Bioeconomy research projects would be beneficial. More consideration around what is regarded as Innovative verses Business As Usual would be beneficial. More opportunities to share RD&I advancements in this area.

5. *How could the RD&I Bioeconomy approach be best structured to support the enhancement, application and scaling-up of biological knowledge and Bioeconomy solutions?*

Consideration for restrictions during the Planning application stages, e.g. promote nature-based solutions, also supporting scale up projects that impact on renewable generation and reduce carbon emissions.

6. *What key issues should the Nature, Climate & Circular Pillar deal with?*

Incorporate more incentives for advancing Nature, Climate and Circular Economy initiatives. A lot of good initiatives in other member states should be reviewed with potential for implementation in Ireland.

7. *What key issues concerning consumption patterns need to be examined to close the gap between sustainable supply of biological resources and demand?*

National Legislation review.

8. *What key issues should the Agriculture, Food & the Marine Pillar deal with?*

Regarding sewage sludge management, key legislation focused on the control and management of sludge pre-dates the current EU climate neutrality and circular economy policy agendas. As a result, there is a lack of a unified strategy to ensure that sludge governance also encourages circularity, recovery or reuse. Reuse of bioresources, such as biosolids & biochar should be promoted and is a key initiative for this Pillar.

Potential for co-digestion (Anaerobic Digestion) of Food Waste and Sewage sludge should be considered in more detail. Legislative constraints are prohibiting progression in this space - which has a lot of benefits to the Bioeconomy and circularity approach.

9. *What key issues should the Communities Pillar deal with?*

Stakeholder engagement across all key stakeholder groups should be promoted.

10. *Are local and regional policies ensuring the consideration of Bioeconomy opportunities are in scope, and are coordinated approaches on such services in place at regional assembly and local authority level?*

More could be done in this space. More communication around success stories and demonstrating the benefits of a Bioeconomy at a local level. Understanding the risks around Bioeconomy initiatives and implementing mitigation strategies to deal with these risks.

11. *What key issues should the Industry & Enterprise Pillar deal with?*

Industry and Enterprise have progressed re: Bioeconomy well in particular areas, are we capturing all these success stories, lesson learned etc?

12. What lead market initiatives could support entrepreneurship, development, innovation and the commercialisation of bio-based products, processes, information, and services?

Incentives in place to promote development of markets.

13. Due to the requirement for capital and operational investment what innovations aimed at financing infrastructures and technical and economic evaluation of innovation are necessary to scale up the Bioeconomy?

More consideration around what is regarded as Innovative verses Business As Usual would be beneficial, e.g. further research around sewage sludge derived biochar.

14. What key issues should the Knowledge & Skills Pillar deal with?

Alignment with research, implementing more knowledge sharing events. Educational piece, particularly to the public regarding what Bioeconomy means to Ireland. Knowledge sharing around understanding the risks associated with reuse and what potential mitigation measures should/are in place.

15. Can the regional skills and regional enterprise approaches better support Bioeconomy development?

Educate at a local level the benefits of Bioeconomy initiatives.

16. An important part of developing the bioeconomy is to determine the most appropriate practices, treatments, technologies, logistics and business models to valorise ecosystem services, primary and secondary biomass resources. What role do advisory systems play in addressing this challenge?

Advisory systems play a key part in addressing challenges outlined above.

17. Are there any further Pillars/Issues which this Action Plan should address?

Generation of renewables from bioresources should be included more in the Action Plan.

18. Indicate what the top five priorities for action in the Bioeconomy over the next three years should be?

1. Support National Legislative/Policy reviews required to enable Bioeconomy initiatives to align with European action plans such as Circular Economy Action Plan and EU Green Deal.
2. Promote and support a pipeline of RD&I Bioeconomy projects e.g. (pyrolysis- biochar).
3. Educational piece required at regional/local level supporting Bioeconomy initiatives.
4. Review opportunity to incentivise Bioeconomy initiatives.
5. Understand what risks are associated with different Bioeconomy approaches and develop/communicate mitigation measures.

Yours sincerely,

