

Chambers Ireland Submission to the Department of Communications, Climate Action & Environment on the development of a Waste Action Plan for a Circular Economy

February 2020

Chambers Ireland represents the largest network of businesses in the State. With 40 Chambers, located in cities and towns in all parts of the country, we are uniquely positioned to understand the needs and concerns of Irish businesses and to represent their views. Drafted in consultation with our Chamber Network and associated policy fora, which represent the Chambers and their member organisations, Chambers Ireland is pleased to have the opportunity to make a submission to the Department of Communications, Climate Action & Environment on the proposed introduction of a Waste Action Plan for a Circular Economy. This submission outlines Chambers Ireland's recommendations on the development of a national Waste Action Plan that would achieve the required waste reductions targets while also protecting businesses and consumers in the transition to a circular economy.

Introduction

Proper management of resources is crucial to securing a better, more sustainable Ireland for future generations. Inefficient consumption and missed opportunities for reuse, recycling and composting lead to high waste generation and greenhouse gas emissions (GHGs). The design and implementation of a national waste policy must ensure that we reduce our carbon emissions and lessen our environmental impact by helping to reduce GHGs and reducing the generation of all waste streams - including food, packaging, construction and demolition, and municipal waste.

Ireland's national waste policy, based on the plans and procedures outlined in *A Resource Opportunity – Waste Management in Ireland*,¹ is due to expire later this year and must be replaced by an ambitious Waste Action Plan that will inform future cycles of waste policy and resource management plans. This new plan should provide a detailed framework in which sectoral policies, targets and objectives can be realistically realised. Although the Climate Action Plan recognises the need to focus on how we characterise waste and prioritise its prevention at every opportunity through improved eco-design, increased reuse and repair where appropriate, and the use of fiscal measures such as taxation and levies, Chambers Ireland calls on the Government to ensure that any such changes to waste policy and increased fiscal measures be underlined by adequate supports for businesses so as not to harm their competitiveness.

Any proposal for a new Waste Action Plan under the Climate Action Plan must additionally coincide with the transition to the circular economy. Strategies to further push Europe's economy towards a more circular

¹ Department of the Environment, Community and Local Government (2012), *A Resource Opportunity: Waste Management Policy in Ireland*. Available at: <https://www.dccae.gov.ie/en-ie/environment/publications/Documents/46/A%20Resource%20Opportunity-%20Waste%20Management%20Policy%20in%20Ireland.compressed.pdf>

model play a significant role in the European Commission's 'European Green Deal', and Ireland must not become a laggard in meeting Europe's combined targets of net-zero emissions. For individuals, the circular economy offers a sustainable lifestyle with reduced environmental impact and lower household bills. For businesses, the circular economy reduces costs, improves the raw material supply chain and offers opportunities such as new business models and markets.

Recommendations

On the fourth anniversary of the UN Sustainable Development Goals (SDGs) in September 2019, all affiliated Chambers across Ireland announced that they had signed a pledge giving their commitment to supporting the SDGs. We have chosen to focus, initially, on Goals 8, 13, 11, 9 and 5, and we commit to ensuring that we make progress in achieving these goals which is reflected in all the work that we do. Therefore, we propose that the Department frames all its work in the area of waste action under the SDGs, specifically Goals 12 (Responsible Consumption and Production) and 13 (Climate Action).

The delivery of the Climate Action Plan, Project Ireland 2040 and the National Development Plan will require sustained investment in the sustainable management of our resources and waste structures. All future policy must be designed to support businesses who have already made changes to their supply chains so that they remain competitive. The correct allocation of funding for businesses across Ireland to implement effective and efficient recycling and composting infrastructure, and to incentivise innovation, will play a key role in the success of a future Waste Action Plan for a Circular Economy.

Chambers Ireland's recommendations for a new national Waste Action Plan are presented to reflect the design of the Department's consultation document.² In doing so, we have structured our recommendations under eleven distinct headings which both promote and incentivise measures to deal with commercial and household waste prevention and improve proper segregation and recycling of waste, in addition to the urgent infrastructure measures that need to be adopted nationally.

Our recommendations encompass tackling food waste, the eradication of single-use plastics and packaging, the promotion of citizen engagement campaigns, confronting construction and demolition waste improved waste management infrastructure, the roll-out of extended producer responsibility schemes, supports for research and innovation, green public procurement, a circular economy advisory and implementation group, developing a quality waste management assurance scheme, and support for the bioeconomy. Above all else, any proposed national Waste Action plan must incentivise a just transition to a circular economy and not harm the competitiveness of businesses in Ireland.

² Department of Communications, Climate Action and Environment (2019), Public Consultation Waste Action Plan for a Circular Economy. Available at: https://www.dccae.gov.ie/en-ie/environment/consultations/Documents/26/consultations/Waste_Action_Plan_for_a_Circular_Economy.pdf

1. Tackling Food Waste

As we get serious about reducing our waste and carbon emissions, we must look to all sectors of the economy to determine the best ways that we can capture the carbon that we are producing so as to harness this energy source in order to replace other fuels that are unsustainable and environmentally damaging. The UN Food and Agriculture Organisation estimates that 1.3 billion tonnes of food are wasted annually.³ This means that, after America and China, food waste is the third largest contributor to global GHGs with 3.3 billion tonnes of CO₂ a year. This is approximately 10% of global carbon emissions.⁴ It's not just the food itself that goes to waste, it's all the resources that went into making it, from water to land and labour. In Ireland it is estimated that we generate *at least* 1 million tonnes of food waste each year.⁵ While some food waste is anaerobically digested to make biogas, composted or rendered for animal food, much of it still ends up in landfills or incinerated.

Chambers Ireland is therefore calling for the introduction of adequate municipal and commercial waste segregation infrastructure to ensure that food waste is properly managed. This will ensure that recycling streams are less likely to become contaminated, in addition to improving composting environments and the opportunity to yield biogas.⁶ Additionally, we recommend the introduction of a national Waste Action Strategy that supports the decarbonisation of food waste, through anaerobic digestion facilities that produce biogas (which is a renewable alternative to natural gas) which can be used to generate heat and electricity. Anaerobic digestion facilities can also be used in agriculture as they produce digestate, similar to compost, which can also be used as a soil amendment as a replacement for fertilisers to grow crops.⁷

If we look at France, they are best in class when it comes to dealing with their food waste and Ireland can learn a lot from them. In many Irish supermarkets and grocery shops, food that is past its sell-by date is thrown away even though it is still suitable for consumption for a couple of more days, depending on the product. Since 2016, France has introduced a law that bans grocery stores from throwing away unsold food that has passed its sell-by date that could be donated to charities and NGOs.⁸ Not only are businesses reducing their carbon footprints by avoiding sending food waste to landfills, they can benefit from tax breaks on up to 60% of the inventory value of the donated food.⁹ Chambers Ireland is advocating for a similar law to be introduced here that would save thousands of tonnes of nearly out-of-date food being sent to landfills

³ Food and Agriculture Organisation of the United Nations (2019), Save Food: Global Initiative on Food Loss and Waste Reduction. Available at: <http://www.fao.org/save-food/resources/keyfindings/en/>

⁴ Food and Agriculture Organisation of the United Nations (2019), Save Food: Global Initiative on Food Loss and Waste Reduction. Available at: <http://www.fao.org/save-food/resources/keyfindings/en/>

⁵ EPA (2019), The Environmental Impact of Food Waste. Available at: <https://stopfoodwaste.ie/resource/the-environmental-impact-of-food-waste>

⁶ Biogas is the mixture of gases produced by the breakdown of organic matter in the absence of oxygen, primarily consisting of methane and carbon dioxide. It is a renewable alternative to natural gas that can be produced from a range of raw materials such as municipal waste, plant material, sewage, green waste or food waste.

⁷ EPA (2019), The Environmental Impact of Food Waste. Available at: <https://stopfoodwaste.ie/resource/the-environmental-impact-of-food-waste>

⁸ Angelique Chrisafis (2016), French law forbids food waste by supermarkets, *The Guardian*. Available at: <https://www.theguardian.com/world/2016/feb/04/french-law-forbids-food-waste-by-supermarkets>

⁹ The French Federation of Food Banks agrees that the law is working. It is a major middleman in the grocery store-to-charity food chain. Every morning, more than 2,700 supermarkets send nearly out-of-date food to nearly 80 warehouses around the country, rescuing 46,000 tons a year that would otherwise be thrown away.

Pulitzer Center (2019), Is France's Ground-breaking Food-Waste Law Working? Available at: <https://pulitzercenter.org/reporting/frances-groundbreaking-food-waste-law-working>

while also helping to feed many people in our society. A tax incentive or VAT reduction should also be introduced in line with this so as not to harm business competitiveness, in addition to a monitoring mechanism which the French law provides for through which consumers can report if a business fails to comply with the donation regulations.

2. Eradication of Single-Use Plastics and Packaging Waste

China's ban in 2018 on the importation of plastic waste from EU countries means that exporting our plastic waste is no longer possible. This poses a significant challenge for Ireland which ranks as the largest producer of plastic waste in the EU.¹⁰ Engaging in ways to reduce plastic waste production in Ireland, especially single-use plastics, is subsequently a key environmental challenge for individuals, industry and Government if both damage to the environment is to be reduced, and if a national waste action plan for a transition to a circular economy is to be successfully achieved.

The plastics industry is very important to the Irish economy and increasing its sustainability can bring new opportunities for innovation, competitiveness and job creation. While it is unlikely that we can transition to an entirely plastic free Ireland, we can reconsider and redesign the way in which we use plastics in a more sustainable manner by engaging in a more circular model. This requires a profound change in how we think about growth and economic development and will affect everything from product design to finance, and from technology and innovation to public policy and the structure of society.

Nonetheless, a drastic decrease in the number of single-use plastic food containers and packaging must be a key objective in any proposed national Waste Action Plan. Chambers Ireland recommends that an outright ban on unrecyclable single-use plastics food packaging must be implemented in the medium-term (within 3 to 5 years) with a date agreed upon through close consultation with businesses. Unrecyclable single-use food packaging should be subject to a higher levy in the transition period to actively discourage consumption, taking into consideration all socio-economic circumstances. Furthermore, the Government must ensure that any levy is not negatively impacting the competitiveness of businesses by punishing those who have already revised their supply chains to reduce plastic waste and carbon emissions.

The recommended DCCA environmental levy proposals require greater market research concerning reusable products already on the market and those being developed for future use, in addition to the appropriate waste disposal infrastructure. For example, materials such as bees wax paper¹¹ can be washed and re-used for up-to one year and is 100% compostable, but only if it is treated in correct composting systems. These could potentially become more attractive options for food packaging in retail outlets for bakery items, fruit, vegetables, meat, etc. Bamboo is another good example of a fast-growing renewable food

¹⁰ Kevin O'Sullivan (2018), Plastic: how much do we generate and how can we reduce it? Irish Times. Available at: <https://www.irishtimes.com/news/environment/plastic-how-much-do-we-generate-and-how-can-we-reduce-it-1.3469909>

¹¹ <https://irelandbeeswaxwraps.ie/care-instructions/>

packaging material. Both living biomass and long-lived bamboo products have the potential to sequester 2.6 tonnes of carbon per acre annually.¹²

Nonetheless, for the environmental benefits of switching to compostable and biodegradable materials to be realised it would rely on correct segregation into composting waste streams and investment in those facilities. A new Waste Action Plan for a circular economy must ensure that revenues are ringfenced from single-use food packaging levies, should they be introduced, so as to ensure that such new biodegradable and compostable materials are sent to facilities within Ireland that can offer the correct environments for their disposal and reintroduction into the circular economy chain.

3. Citizen Engagement – Increasing Public Awareness Campaigns

Central Government and Local Authorities, in cooperation with waste management operators, have an important role to play in improving public awareness of the correct way to dispose of waste and ensure high-quality separate collections. The necessity for such public awareness campaigns and high-quality separate collections was highlighted in the EPA's 2018 'Waste Characterisation Campaign Report'.¹³ For households it highlighted that the correct use of the three bins could reduce the volume of the general waste bin by one-third and that 20% of the material in the mixed dry recycling bin should not be in that bin.¹⁴ The results from the commercial sector were even starker where 70% of the material in the general waste bin could be diverted to the mixed dry recycling or organic bins.¹⁵ Chambers Ireland recommends that increased public awareness campaigns be included in the new Waste Action Plan to ensure that there is consistency of correct waste disposal messaging nationwide to ensure success.

4. Confronting Construction & Demolition Waste

To unlock the circular consumption opportunities in the construction industry, actions must be implemented to unblock existing barriers, in tandem with the development of a market for recycled/ recovered materials. Currently there is minimal reuse of materials in Ireland owing to regulatory uncertainties and the lack of clear guidelines. Construction and demolition waste must be reframed as a raw material. This requires a supportive regulatory framework and the application of a market stimulus package to get engagement with the circular model of consumption and recovery.

In consultation with members in the construction industry, there may be an opportunity for a secondary material market to create demand for reused/ recovered materials and recommends the development of

¹² Ellen MacArthur Foundation (2019) Completing the Picture: How the Circular Economy Tackles Climate Change. Available at: https://www.ellenmacarthurfoundation.org/assets/downloads/Completing_The_Picture_How_The_Circular_Economy-Tackles_Climate_Change_V3_26_September.pdf

¹³ Environmental Protection Agency (2018), *What is in our bins?* Available at: https://www.epa.ie/pubs/reports/waste/wastecharacterisation/Waste_Characterisation%20Top%20Sheet_logo_v2.pdf

¹⁴ Environmental Protection Agency (2018), *Household Waste Characterisation Campaign*. Available at: https://www.epa.ie/pubs/reports/waste/wastecharacterisation/Household_Surveys_Final_Report1.pdf.

¹⁵ Environmental Protection Agency (2018), *Non-Household Waste Characterisation Campaign*. Available at: https://www.epa.ie/pubs/reports/waste/wastecharacterisation/Final_Report_NHWC.pdf

supportive incentives to get widespread participation amongst the construction sector with the recovered materials. To ensure a thriving circular economy in C&D, mechanisms and accreditations are recommended

Funding for research, development and innovation (RDI) in the development of new materials and applications is an opportunity for the construction sector, especially with regard to the development of non-hazardous materials to replace hazardous materials in the construction sector, in the long term ensuring the potential circularity/ recycling/ reuse of materials. Finally, the development of a materials passport system to capture maintenance, reuse and recycling potential will increase the pre-demolition identification of reusable and recyclable construction products. This would be hugely beneficial to aiding audits of buildings to register the type and volume of materials in the existing building(s).

Though there has been a recent increase in threshold limits for waste facility permits for soil and stone, the capacity of facilities to accept soil and stone is severely constrained. With the level of construction increasing, the opportunities to reclassify soil and stone waste as a by-product and the application of End of Waste decisions on crushed concrete must be prioritised. The reclassification of soil and stone where appropriate as a by-product is positive however currently there is insufficient clarity within the construction sector on the EPA guidelines that accompany this. Currently there is a lengthy advisory period of 10 weeks to determine if a reclassification is appropriate.

To develop an agile circular economy in C&D, Government must increase the resources of the EPA to review these requests within shorter timeframes.

5. Improved Waste Management Infrastructure

Ireland is reliant on exporting municipal, construction and demolition, packaging and other waste in order to manage the waste we produce. This leaves the State somewhat exposed if there are external shocks to the export market, while also meaning that we are exporting materials, energy and jobs that could be harnessed here. In addition, there is pressure on our infrastructure to cope with the amount of waste we are generating, again leaving us exposed to potential environmental damage and/or a potential slow-down in the development of our economy due to a lack of outlets for managing waste.

Local Authorities are statutorily responsible for the preparation of regional waste management plans which set out the policies for the prevention and management of waste in a safe and sustainable manner in each region.¹⁶ The preparation of a Waste Action Plan for a Circular Economy will be key to the formation of replacement plans, while the plans themselves will be central to the implementation of infrastructure that will be able to cope with Ireland's waste for generations.

¹⁶ There are currently 3 regional waste management planning regions - Connacht Ulster, Eastern Midlands and Southern with 3 respective plans covering the period 2015-2021.

Insufficient volumes of materials for recycling and composting can lead to poor quality of separation, collection and sorting. It is imperative that the facilities we use for recycling and composting improve to both encourage sustainable waste segregation practices and to ensure that we avoid introducing contaminants in the recycling streams and retain high safety standards for recycled materials. The waste sector must be sufficiently funded to enable the development of more indigenous waste facilities to recycle and compost waste within Ireland and capture resource potential here.

Therefore, Chambers Ireland recommends that a 'pay-as-you-throw' (PAYT) scheme be introduced, in line with the European Environment Agency's proposals, to dramatically increase recycling in Ireland as part of a future Waste Action Plan. In PAYT schemes the fees are based on the weight or volume of the waste generated, acting as an economic incentive for households and businesses to recycle their waste, making the producer of the waste financially responsible for the collection and treatment of the waste produced.¹⁷

The types of PAYT pricing structures can vary from:

- Full unit pricing: residents/businesses pay for all the waste collected in advance by purchasing a custom bag, bin or selected size container.
- Partial unit pricing: local authorities decide on a maximum number of bags or the collection of waste containers which are covered by taxes. Should the user exceed the permitted amount of waste, additional bags or containers are available for purchase. A flat fee ('first-tier') is applied to create revenue stability, and then the 'second-tier' fee is based on the additional amount of waste thrown away.
- Variable rate pricing: Residents/businesses can choose to rent bins or containers of varying sizes with the price corresponding to the amount of waste generated. The advantage of this model is that householders and business owners ration their waste generation to fit the size of container they rent and they are motivated to rent smaller container.

Both the Flanders region in Belgium and the Schweinfurt county in Germany have implemented successful PAYT schemes.¹⁸

In parallel to the introduction of a PAYT scheme, Chambers Ireland also wishes to highlight the urgent need for increased investment in waste recovery and recycling infrastructure to support a thriving circular economy. There is an opportunity for an online platform for raw material/ by-product selling, market stimulus structure to support this, education and awareness, skilling in product design (to design-out/ minimise waste), and much enhanced investment in research, development and innovation. Business must be encouraged and

¹⁷ Interreg Europe (2017), Pay-as-you-throw schemes increase recycling rates. Available at:

<https://www.interregeurope.eu/policylearning/news/550/pay-as-you-throw-schemes-increase-recycling-rates/>

¹⁸ Interreg Europe (2017), Pay-as-you-throw schemes increase recycling rates. Available at:

<https://www.interregeurope.eu/policylearning/news/550/pay-as-you-throw-schemes-increase-recycling-rates/>

supported to change organisation-wide behaviours, and we highlight that the pay-by-weight charge should not be overly onerous and should take account of the business sector, operational constraints and business size. We highlight that business is under increasing pressure to evolve their businesses to adapt to a low carbon economy and therefore new measures must be balanced.

6. Extended Producer Responsibility Scheme

Financial resources collected through revenues from environmental levies can do much to boost the efforts already being taken by the Local Authorities and Central Government.¹⁹ The Landfill levy has been used previously as a source of local government finance rather than as an economic instrument that achieves an agreed political objective. This needs to change. We have previously recommended that the proposed increase of €5 per tonne for each levy to be implemented without delay so that high-quality separation collections can be implemented across Ireland. In doing so, this increase has the potential to complement Extended Producer Responsibility (EPR) Schemes. EPR is an environmental policy approach in which a producer's responsibility for a product is extended to the post-consumer stage of a product's life cycle.²⁰ These schemes help to share the cost of managing the end-of-life of a product among industry, government and consumers. Generally, the cost of waste is borne by the consumer, government and councils as clean-up and landfill costs.

The Waste Management Act, 1996 established a legislative basis for Producer Responsibility Initiatives (PRIs). Essentially, PRIs allow product producers to develop schemes that fulfil the basic objectives of waste management legislation. This means that the products they produce are disposed of in a responsible manner, which complies with current government policy. The principal PRIs in Ireland concern Waste Electrical and Electronic Equipment (WEEE), Batteries, End-of-Life Vehicles (ELVs), tyres and farm plastics.

The critical role in the collective approach to PRI is discharged through a Compliance Scheme, whereby the Producer Responsibility Organisation (PRO) offers a service that enables producers to comply with their environmental obligations. Under the PRI approach, the PRO operates under an approval granted by the Minister. These producer responsibility agreements are underpinned by legal obligations so that individual businesses which do not elect to participate in a compliance scheme must then self-comply, as they cannot opt out of their obligations, or the costs associated with those obligations. These need to be expanded upon through EPR initiatives.²¹

Proposed Extended Producer Responsibility Scheme in Ireland

¹⁹ The last account statements available for the Environment Fund in 2017 reported that the environmental levy on landfill of waste generated €37,106,281. Department of Communications, Climate Action and Environment, Environment Fund Accounts 2017, <https://www.dccae.gov.ie/documents/ENVIRONMENT%20FUND%20ACCOUNTS%202017%20FINAL.pdf>.

²⁰ OECD (2001) Extended Producer Responsibility: A Guidance Manual for Governments, Paris, 164. <http://www.oecd.org/env/toolsevaluation/extendedproducerresponsibility.htm>

²¹ Both Japan and Germany have introduced very successful EPR schemes. See Yamini Gupt and Samraj Sahay (2015), *Review of extended producer responsibility: A case study approach*.

Producers accept responsibility when designing products to minimise life-cycle environmental impacts, and when accepting legal, physical or socio-economic responsibility for environmental impacts that cannot be eliminated by design. The application of EPR also ensures that waste management costs arising during the life of a product are internalised in the price charged to consumers. Such costs can be minimised where materials and products are managed in an environmentally effective manner throughout their life cycle. Increasing recycling and the reuse of plastic packaging is crucial to Ireland's plastic waste management. EPR has the potential to play a key role, by evolving from a cost recovery approach to one that also incentivises a transition to a circular economy and supports the bioeconomy.

Despite EPR being, in theory, an individual obligation, in practice producers often exert this responsibility collectively. In collective schemes, a PRO is set up to implement the EPR principle on behalf of all the adhering companies (the obligated industry). A collective EPR should be extended under PROs which were established by the Waste Management Act 1996.

Suggested Models:

1. Product take-back mandate and recycling rate target:

This would make it mandatory for the manufacturers and/or retailers to take back end-of-life (EOL) products and sets specific recycling targets. These requirements are often met by forming a PRO, collective effort by the industry to fulfil the EPR obligations of the member companies.

2. Voluntary product take-back mandate and recycling rate targets:

This would require a purely voluntary approach for the take-back with no penalties for not meeting the targets.

3. Mandatory take-back and targets with a tradable recycling scheme:

In addition to mandating take-back and setting recycling targets, this would allow trading of credits among producers to meet the required targets.

The Economic Instruments include the following:

- 'Advanced Recycling Fee (ARF)', which imposes tax on the sale of the product to cover the cost of recycling EOL products. Fees are assessed per unit of the product and are charged at the point of sale either separately or assessed upstream on producers and incorporated into the retail price.
- 'Recycling fee combined with recycling subsidy', which uses the revenue generated from either the ARF or post-consumption recycling fee to subsidise the recycling process. Revenue generated can

be used in several ways. It is either used to subsidise the upstream producer's activity of getting the waste recycled or cost of managing the waste including the infrastructure cost.

- 'Deposit Refund System (DRS)' combines tax on the product consumption (the deposit) with rebate or refund when the EOL product is returned for recycling or environmentally friendly disposal. The deposit sum of the commercial cost of the product and the environmental cost associated with recycling. The mechanism encourages reduction and reuse of material inputs and ensures flow of materials for recycling and recovery.

Advantages of Extended Producer Responsibility Schemes:

1. Creation of a sustainable production and consumption policy:

EPR is a key element in implementing a sustainable production and consumption policy, promoting resource efficiency, high-quality recycling, substitution, use of secondary raw materials and the production of sustainable goods. As a result, it will improve the environmental performance of products throughout their life cycle, while meeting industrial and consumer needs.

2. Incentivise eco-design:

With the introduction of EPR producers will be encouraged to incorporate changes in the design of products in order to be more environmentally sound. This will make products easier to dismantle, reuse and recycle. In this way, the total environmental impact of a products will decrease, and waste prevention will be stimulated.

3. Full internalisation of environmental costs:

The full internalisation of environmental costs allows for the financing of a sustainable and economically efficient management of waste. The environmental costs, at the least, include costs for pollution prevention and the collection, recycling and treatment of waste. These environmental costs should be incorporated into the price of products. Consequently, the consumer, and not the taxpayer, bears all costs related to the waste they have produced, which is more socially fair.

7. Research and Innovation Supports

Thinking differently through design – whether it be engineering, scientific, product, systems or more conventional design – is going to be instrumental in helping generate new circular economy solutions and business models as we work towards a more sustainable economic growth approach which helps to combat waste challenges that are currently faced here in Ireland.

Innovative companies like CuanTec in Scotland is a good example of a business that is making huge strides in this area by engaging in scientific design to provide an innovative circular economy solution to plastic pollution and food waste.²² They take waste from the fisheries industry and up-cycle it into anti-microbial, compostable food packaging which extends the shelf-life of fresh seafood. Their invention of a new material which can be used to create biodegradable plastic is the kind of progress which could entirely revolutionise the packaging industry by helping to use food waste from langoustines to create a solution to the single-use plastics crisis.

Chambers Ireland is calling on the Department to support businesses that are engaging in such innovative practices by providing greater funding programmes to them to expand their research and operations. Circular economy start-up funding schemes should also be specifically introduced for start-ups that commit to circularity business practices from their inception. These schemes should be rolled out by relevant Government bodies and agencies, such as Local Enterprise Offices and Enterprise Ireland.

8. Green Public Procurement

In order to achieve net-zero emissions by 2050 and transform the economy from linear to circular, a co-ordinated, All-of-Government response (both national and local) to Green Public Procurement (GPP) will be required. Indeed, within the Climate Action Plan, all public bodies will have a climate mandate and a key element of delivering this mandate will be to increase engagement with green procurement to deliver change. It is envisaged that moving from a tendering process, which currently prioritises lowest price, to a process that gives greater weighting to life cycle and resource efficiency, will have a positive impact in reducing carbon emissions.

We need to ensure that the business community is ready to respond to newly enforced Green Public Procurement criteria. An increased focus on sustainability in procurement practices will have a knock on impact from large corporates down to SMEs.

Ahead of any introduction of mandatory GPP, Chambers Ireland is asking for a phased introduction of GPP criteria in public tenders, so that business can train in how to respond to it, and so that businesses have time to catch up to European neighbours that have been implementing GPP practices successfully. A co-ordinated public awareness and educational campaign, aimed specifically at SMEs, must also be a priority for the Department.

9. Circular Economy Advisory and Implementation Group

Business needs clarity on waste regulation and a facilitative framework that allows them to plan accordingly for new production methods and materials need to be adopted. We welcome the recent appointment of a

²² <https://www.cuantec.com/>

Just Transition Commissioner to oversee the transformative changes required so society can move to a low carbon, low waste economic model. Either the current, Just Transition Commissioner, or a new Just Transition Commissioner, should also examine the challenges for the business community and the challenges for doing business in more rural parts of the economy. Such a Commissioner would be responsible for overseeing the circular economy must be set-up to support business in changing their consumption and material use production cycles, while driving engagement across the business community, educational institutions and at broader community level.

However, in the immediate, the transition away from current waste disposal strategies and systems must be urgently addressed, and to do this we must reinforce the need for immediate transformation with a government function that can specifically support, accelerate and enhance actions and measures to implement all necessary changes. As such, Chambers Ireland calls for the establishment of a Circular Economy Advisory and Implementation Group to design a Waste Action Plan through targeted consultation with stakeholders across Government, industry and communities that will enable a long-term waste policy that protects all.

10. Quality Waste Management Assurance Scheme

Chambers Ireland recommends that a Quality Waste Management Assurance Award scheme be developed to enable businesses to demonstrate that they are managing their municipal waste sustainably. Given that sustainability and sustainable practices are now something that can be marketed and sold by businesses, this type of scheme will be of huge benefit to enterprises across Ireland as it has the potential to verify that organisations are complying with best waste management practice in terms of waste prevention, recycling, composting, etc. in the transition to a circular economy and promotion of a bioeconomy.

11. Supports for the Bioeconomy

Through feedback from our member chambers, opportunities in the bioeconomy have been identified through success stories such as Carbery, Barryroe CoOperative Farmers, Biorefinery Glas²³ project. This project uses a small-scale biorefinery to optimise the use of grass by separating it into a spectrum of co-products for ruminants, non-ruminants and for the food chain, improving resource efficiency. In this project alone, farmers will demonstrate new business models, using an automated and low cost biorefinery. This project has the potential to be replicated across Ireland, addressing fodder and emissions challenges whilst adding value. This is a growing area with vast potential to increase resource efficiency and dramatically decrease waste. Chambers Ireland believes there is a significant opportunity in supporting this sector.

²³ <https://www.agriculture.gov.ie/media/migration/research/bioeconomy/BIGProgressReport050919.pdf>

Conclusion

Businesses are acutely aware that environmental measures and EU Directives are quickly coming down the line as the world gets serious about climate change, habitat protection and the urgency to alter waste and consumption habits and behaviours. This is further evidenced by the European Green Deal, which focuses on setting a single roadmap for a climate neutral continent by 2050.²⁴ Given Commission President von der Leyen's palpable commitment to this zero-carbon ambition, all national policy must be forward-thinking in its design and ready to adopt the range of future EU legislation.

Ireland must take the lead on this now. If we are to accelerate our transition to the circular economy on a national scale, Chambers Ireland strongly contends that the correct funding, infrastructure, and supportive frameworks to enable businesses to make a coherent transition will be more successful in encouraging businesses to make the switch to alternative waste reduction systems and supply chains. If Ireland is to meet its waste and carbon reduction targets by 2030 and 2050 respectively, it is critical that the introduction of a new Waste Action Plan must not harm the competitiveness of businesses who are already taking the lead in this sphere. The transition towards a circular economy, with the correct funding and infrastructure to enable businesses to make a coherent transition, must be a priority for Government as part of the Climate Action Plan and all future national development plans.

The adoption of an Extended Producer Responsibility scheme under the Waste Management Act 1996 so that the costs of managing the end of life of a product are shared between Government, industry and consumer should be a priority for Government in achieving an ambitious Waste Action Plan for Ireland that places the transition to the circular economy at its core, in line with the Climate Action Plan. Similarly, a 'pay-as-you-throw' scheme should be seriously considered to act as an economic incentive for households and businesses to recycle their waste. Adequate waste management infrastructure, public awareness campaigns and a quality waste management assurance scheme, all guided by a Circular Economy Advisory and Implementation Group and a Just Transition Commissioner for Business will be fundamental in addressing current national waste challenges and planning for future development in this sphere.

We remind policy-makers and legislators that ahead of the introduction of changes to how we manage waste, that there is an opportunity to engage with private sector business representation as a partner, and we believe there are practical benefits in this approach. Constructive engagement with the business community is instrumental in facilitating representative discussions on future pathways and actions. Through a collective discussion, policy is informed via ground-up engagement. Resilience and capacity building are key, and business needs to be supported with a strong regulatory and policy framework. We emphasise the value of public consultations and welcome future opportunities to engage on this and associated topics.

²⁴ European Commission (2020), *A European Green Deal*. Available at: https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en