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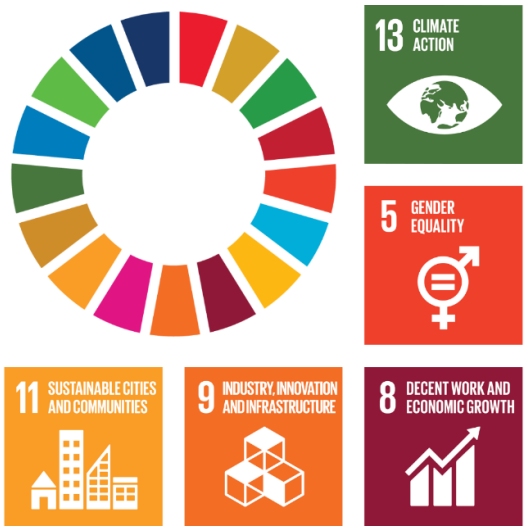

Whole of Government

Circular Economy Strategy

2026-2028

Submission by Chambers Ireland

November 2025

Contents

About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Key Points

- The Strategy should ensure circular economy policies reduce business costs, especially for SMEs, and avoid undue financial and regulatory burdens for companies.
- Support, funding, and clear guidance should be facilitated to help businesses adapt to circular economy requirements.
- The Strategy should implement phased timelines, financial supports, grants, and incentives for innovation and compliance.
- Business-led sustainability should be facilitated through flexible, adaptable policies tailored to sectoral needs.
- Investment is required in local recycling and repair infrastructure to achieve economies of scale and reduce waste exports.
- Cross-border and international collaboration should be strengthened to share infrastructure and best practices.
- Clear, harmonised end-of-waste and end-of-life criteria and standards should be implemented to encourage use of secondary and recycled materials.
- Goldplating of requirements must be avoided to ensure the administrative and financial burdens on businesses are not increased.
- Permitting and certification processes should be streamlined for innovative circular products and materials.
- Consideration should be given to the use of artificial intelligence by businesses to improve how resources are managed and reused in the Strategy.
- Awareness campaigns and green public procurement (GPP) should be examined as a means to stimulate market demand for recycled products.
- Quantifiable indicators and practical tools should be implemented in GPP to ensure contracts reward circular value and not just the lowest cost.
- Monitoring frameworks should be aligned with UN Sustainable Development Goals (SDGs) for accountability and for international benchmarking.
- Regular, unified circular economy progress reports should be published to ensure transparency and guide policy.

- The development of innovative start-ups should be encouraged by simplifying administration, improving access to finance for businesses and fostering public-private collaboration.
- Best international practices should be used when adopting reporting and life cycle costing in procurement.

General

Climate Action

Ireland has committed to a number of key Climate Action targets such as reducing greenhouse has (GHG) emissions by 51% by 2030, and achieving net-zero emissions by 2050. Failing to meet these targets will lead to financial penalties, environmental degradation, a loss of public trust in the State's commitment to climate action, and a loss of international credibility.

The Circular Economy can make a key contribution towards progressing in our Climate Action targets. Investment in the circular economy can help communities and businesses to innovate and reduce waste[1]. Key aspects of the circular economy are waste reduction, which can reduce emissions from landfills and incineration, and resource efficiency which can help to reduce reliance on new materials which are carbon-intensive to extract and process.

The role of Businesses in the Circular Economy

The transition to a circular economy is expected to generate 7-8 million jobs globally by 2030. There are number of opportunities for business to avail of during this transition. Cost savings can be achieved through reducing material use and disposal expenses, and lower energy consumption can reduce bills. There will be opportunities for businesses to create refurbished or upcycled products, and to monetise waste by turning it into inputs for other industries. Raw material markets can be volatile and reducing dependencies can strengthen resilience.

In making the transition to a circular economy, it is important to facilitate business-led sustainability and work collaboratively with business to avoid negative impacts. It is important to learn from experience and develop policies which are flexible and fitted to the particular set of circumstances. For example, the Plastic Bag Levy in 2002 was a simple policy which had an immediate and visible impact. It was broadly accepted and had a minimal negative impact on small

[1] https://chambers.ie/press-releases/chambers-ireland-welcomes-e27-million-investment-in-circular-economy/

business. When the disposable cup levy was introduced[2], it was addressed to a more complex issue, all cups were not of the same material, some were made of biodegradable materials that should be considered differently. In addition, consumer behaviour around hot drinks is different than around grocery bags. This means that taking the policy from one issue and applying it directly to the other is not necessarily effective or appropriate. These principles of flexibility and adaptation should be considered generally when we think about how to develop circular economy policies.

Renewable Energy

There are a number of important opportunities in renewable energy for increasing circularity. There is a developing market for the refurbishment and re-engineering of broken wind turbine parts. As an example, there are approximately 11,000 tonnes of wind turbine blades in Ireland that are expected to be decommissioned by the end of 2025. These blades are primarily made from glass fibre reinforced polymers (GFRP), which are non-biodegradable and difficult to recycle using conventional methods. As our wind energy sector increases in scale and more older turbines reach the end of their operational life, this issue will become more acute. As GFRP materials are designed to resist decomposition, landfill disposal is problematic (landfill bans are being considered across Europe, including Ireland). There is an opportunity to grow the circular economy in this area and innovative projects are exploring wats to repurpose blades into bridges, furniture, and e-mobility hubs· In addition, a number of companies are piloting blade recycling and reuse strategies to reduce waste and support sustainability. There may also be opportunities to consider industry partnerships which can aim to foster a circular economy supply chain.

Construction

The construction sector is the largest single producer of waste in the State. In 2023, 9 million tonnes of construction and demolition waste was generated. This includes soil, stones, concrete, metals, woods and plastics, much of which can be reused or recycled. Construction relies heavily

[2] https://chambers.ie/wp-content/uploads/2023/03/Chambers-Ireland-submission-regarding-the-consultation-to-introduce-an-environmental-levy-on-single-use-disposable-cups.pdf

on new materials such as concrete and steel, which are carbon-intensive to produce and circular initiatives could be used to decrease the carbon footprint of this sector.

Companies are willing to engage in the circular economy but policy has to incentivise them to turn this into reality. There are a number of innovative projects which are working on this issue and trying to take opportunities to reduce the amount of waste created by the sector by implementing circular economy strategies. Construction companies in Ireland have developed a low-carbon working group and developed strategic partnerships to help embed circularity in their practices as part of a collaborative sustainability roadmap[3]. In addition, some companies in Ireland have also developed initiatives to re-use discarded pallets which have saved over 1,000 tonnes in carbon[4].

Use of Artificial Intelligence in the Circular Economy

Advancing the circular economy in Ireland will increasingly depend on the intelligent use of data and technology to improve how resources are managed and reused. There are numerous examples of how companies can use AI responsibly which can aid their workflow and their transition to more sustainable practices.

For example, a waste management company could deploy advanced data analysis and automated sorting systems to increase the efficiency and accuracy of recycling processes which can ensure that more materials are recovered and reintroduced into the production cycle. Similarly, manufacturers can use predictive tools to identify patterns in material usage, enabling them to reduce waste, optimise inputs, and design products with reuse or remanufacturing in mind.

[3] https://www.businessnews.ie/sustainable-infrastructure-2025/green-infrastructure-and-low-carbon-materials-redefine-construction-standards/

[4] https://ukandireland.bam.com/media-centre/news/2025/4/bam-becomes-first-principal-contractor-in-ireland-to-adopt-the-pallet-loop

In addition, AI can enable new models such as product-as-a-service, where goods are leased rather than sold. The use case is to manage usage data, predict maintenance needs, optimise product returns and refurbishments. The Strategy should account for all such uses.

Questions

Q1: Do you agree with the draft Strategy's proposed key objectives? In your view, are there further or alternative objectives that should be included?

Our circularity rate is the lowest in the European Union and it is vital that we make substantial efforts to improve in this area. The key objective that by 2030 the circular economy will have a central role in shaping economic thinking and action nationally is also an important objective.

We agree with the core objectives of this strategy, however there should also be an additional objective focussing on reducing the cost of business while also encouraging circularity. It is critical that Ireland's circular material use rate (CMUR) is increased but equally acknowledge that this should not come at an undue cost to businesses.

We anticipate that in the future the circular economy will become even more important as consumers find it difficult to rely on complex global supply chains. The negative tone of international trade diplomacy and the re-assertion of an anti-trade agenda on the global scene is a problem that we will have many different manifestations in many different policy areas, but an increased cognisance of the importance of the circular economy could help build resilience in the Irish economy.

Circularity should therefore be considered as a principle in product design. It is a consumer protection issue to ensure that products are not being designed with the idea that if they are especially fragile and break easily, but difficult and expensive to repair, that a company can reap greater profit from producing an inferior product.

We support the following key objectives listed in the consultation document:

- *Material markets are largely circular and there is a sustainable market for recycled materials.*
- *Decouple economic growth from resource use: Achieve growth whilst reducing the total material footprint.*
- *Drive innovation, competitiveness and job creation: Position Ireland as a European leader in circular business models and green technologies.*

- *Enhance social equity: Ensure the benefits of the circular transition are widely shared by communities and workers.*
- *Empower citizens to make the transition to a more circular lifestyle through effective programmes of awareness.*
- *Actively support Local Authorities in developing the circular economy across communities in Ireland.*
- *Digitalisation is established as an enabler of the circular economy.*

However, the important issue is deliverability and actions aimed at achieving these objectives.

Cost of Business and the Circular Economy

In the key objectives section there is no recognition that the cost for business, especially SMEs, should be considered. The cost of business has increased steadily over the past number of years and this has had a negative knock-on effect on the competitiveness of many businesses in Ireland. At the geopolitical level, competitiveness has been impacted over the past year by growing uncertainty in global trade which is driven by tariffs and protectionist decisions[5].

There is also concern over rising energy costs among many businesses and the significant increases they are experiencing place strain on their cash flow and cause increased operational expenses. Some of the actions which will be taken by businesses to help achieve the objectives of the circular economy are expensive, so steps need to be taken to ensure that the costs of taking these actions are as low as possible and there is not a large economic disincentive to acting in an environmentally sustainable manner.

The circular economy should be implemented in a way that supports, rather than undermines business competitiveness. In addition to investment, the circular economy transition will require adaptation by businesses; especially SMEs. There is a need for government support, funding and clear guidance to help businesses manage these costs and avoid disproportionate burdens. If

[5] https://chambers.ie/wp-content/uploads/2025/09/250821-Chambers-Ireland-Submission-to-JCDETE.pdf p.5

circular economy policies are implemented without these supports, then the costs associated with compliance (e.g. for new reporting, product design, or procurement requirements) could impact business competitiveness, particularly for smaller firms. To mitigate this there is a need for phased implementation and realistic timelines, financial supports, grants, and incentives for innovation and compliance, investment in infrastructure (e.g., recycling, repair, digital), skills development and training to help businesses adapt.

Q2: The draft Strategy aims to raise Ireland's circular material use rate (CMUR) by at least 2 percentage points every year with an aim of reaching the EU average of 11.8% by 2030. Do you agree with this level of ambition? If not, is further ambition needed or is the draft Strategy overly ambitious?

The ambition to reach this target must be matched by practical delivery and support. This goal is high, given Ireland's current low baseline and the need to catch up with peer European countries. While achieving a target level of 11.8% would be impressive given the current position we are in, it should be remembered that even if we reach this level, we would be a long way behind high performing countries[6].

[6] For comparison the Netherlands CMUR is above 30%. In Belgium it is 19.7%. In France it is 17.6%. In Italy it is 20.8%. The figure for these countries shows that much greater performance is possible if we take effective measures that incentivize and enable business participation in the circular economy. https://unece.org/sites/default/files/2024-06/S8_2_Circular%20Material%20Use%20Rate%20%28CMUR%29%20Explanation%20of%20the%20indicator%2C%20how%20to%20calculate%20and%20how%20to%20interpret%20it.pdf

Q5: Are you satisfied that the Governance structures proposed in the draft Strategy are sufficient to address the complex challenge of developing the circular economy across government?

Consistent with our emphasis on delivery, cross-government engagement will be important to ensure that the objectives of the Strategy are met.

We urge Government to ensure that the relevant governance bodies are empowered to hold all departments accountable, respond to stakeholder feedback, and adapt to emerging challenges. There should be a culture of continuous improvement and shared responsibility across all departments and transparency will be essential to ensure that governance arrangements are not only robust in design but also effective in practice.

Effective circular economy policy requires breaking down traditional policy silos. For example, progress on circular construction depends on alignment between housing, planning, environment, and finance; advancing the bioeconomy requires coordination between agriculture, enterprise, and research; and scaling up reuse and repair involves collaboration between businesses, education, and local government. It is for this reason that we urge that the governance structures are empowered to facilitate genuine cross-departmental problem-solving and joint action.

Having effective governance structures that are effective is acutely important given the State's circularity rate – i.e the proportion of materials reused or recycled rather than newly sourced - is only 2.7%, compared to the global average of 7.2% and the EU average of 11.8%[7]. We consume 22 tonnes of raw materials per capita annually, which is 5 tonnes more than the EU average and nearly triple the estimated sustainable level of 8 tonnes per capita. Ireland's consumption-based

[7] https://www.oecd.org/en/publications/the-circular-economy-in-ireland_7d25e0bb-en/full-report.html

carbon footprint is 12 tonnes per person, more than double[8] the global average.[9] The recycling rate in Ireland is also lower than the EU average[10].

The governance bodies should use leading international examples in ascertaining the success of the circular economy strategy. For example, the Netherlands performs very strongly in the circular economy and like other advanced economies it consumes a large amount of raw materials per capita and has a high consumption-based carbon footprint. Its performance in these areas is much better than Ireland's, which suggests that there is scope for us to make significant improvements even if it is to be expected that wealthy countries will producwe a relatively large amount of waste per capita. In particular, the Netherlands' strong performance in recycling is an area where Ireland can seek to emulate their example and consider what policies they are pursuing.

Both Ireland and the Netherlands have a target year of 2050 for full circularity, however, the Netherlands has an interim target year of 2030 for a 50% raw material reduction[11], Ireland does not have a quantified interim goal but rather sectoral targets. Perhaps the biggest contrast in the

[8] https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250219-1

[9] Notably, 58% of this footprint is linked to imported products which highlights the environmental cost of Ireland's consumption patterns. The recycling rate of the State is 32.5%, compared to an EU average of 40.8%. Ireland has a total collection rate for waste and electrical and electronic equipment of 43.6%. This compares with 40.6% for the EU as a whole but is below the target rate of 65%. In comparison the Netherlands which is a high performer in the circular economy has a circularity rate of 24.5%. A person in the Netherlands consumes 13.7 tonnes of raw material per capita. The Netherlands despite its high levels of circularity has a consumption-based carbon footprint is 8 tonnes per capita, which is higher the EU average of 6.9 tonnes per capita, but it is much lower than our level of 12 tonnes per capita. The Netherlands has a recycling rate of 56.8%, much higher than Ireland's rate of 32.5%. The Netherlands has a Total collection rate for waste and electricals of 35%, which is less than Ireland's level. This shows that we are doing worse than the EU average in the main measurements of the circular economy, and that we are a long way behind the strongest performers in most categories.

[10] https://www.statista.com/topics/9617/recycling-in-europe/#editorsPicks

[11] https://www.government.nl/topics/circular-economy/circular-dutch-economy-by-2050

approach of Netherlands, and that of Ireland is that they are transitioning towards mandatory measures[12] while our approach is based on incentives, regulation and partnerships.

Effective reporting

Reporting will be critical in analysing the effectiveness of circular initiatives in Ireland, however this should not manifest in extra costs for businesses who are already subject to increasing significant administrative burdens and financial pressures. Government has to lead in this aspect.

To ensure progress, the Strategy should be proactive in implementing circular initiatives and international examples that do so effectively should be examined if we are to emulate the successes of other countries[13]. For example, the Integral Circular Economy Report (ICER) has been crucial in measuring the effectiveness of the circular economy in the Netherlands and ensuring that targets are met.

In this context it is important to note that the current Strategy includes sectoral actions and targets and the Strategy assesses the Circularity Gap Report which is a diagnostic tool, although it is not a government-led monitoring report like ICER. The EPA also provides a detailed analysis of our circular economy policies[14]. The Strategy in chapter 3 also outlines how annual circularity reports are to be published by the DCEE. However, this is a more fragmented system of reporting than the integrated monitoring report produced by the ICER in the Netherlands[15]. Of acute

[12] https://circulareconomy.europa.eu/platform/sites/default/files/17037circulaireeconomie_en.pdf p.26

[13] https://www.oireachtas.ie/en/press-centre/press-releases/20241015-joint-committee-on-environment-and-climate-action-publishes-report-on-the-circular-economy-makes-47-recommendations-members-believe-can-help-to-increase-ireland-s-rate-of-circularity/

[14] https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/EPA-SOER-2024-Chapter-15-CircularEconomyWaste.pdf

[15] https://www.pbl.nl/system/files/document/2025-07/pbl-2025-integral-circular-economy-report-5912.pdf

relevance in this context is that data collecting on the circular economy has also been criticised[16] and it is important that progress is therefore made in this regard.

Scientific collaboration is also very much EPA-led in our case, while in the ICER there is a more multi-agency approach. Regular unified reporting such as in the case of the ICER also increases public transparency than a more fragmented system of reporting.

Q6: Are the actions proposed in the draft Strategy sufficient to address the issues cited such as barriers to reuse and repair in Ireland? Are there further measures that could be considered to realise the potential of this sector?

Our previous submissions provide a series of recommendations regarding the right-to-repair[17]. In our submission in recent years, we proposed a ban on unrecyclable single-use plastic food packaging which goes beyond the draft strategy's general packaging targets and would directly reduce waste at source. In addition, we proposed a broader EPR Scheme with a shared cost model. The strategy mandates EPR but emphasises cost-sharing among industry, government, and consumers, which would improve fairness and increase compliance.

We welcome the consideration given in the Strategy to the introduction of repair voucher schemes. These would be an effective incentive to encourage repairing products rather than dissuade them from buying new products.

[16] https://www.eea.europa.eu/en/topics/in-depth/circular-economy/country-profiles-on-circular-economy/circular-economy-country-profiles-2024/ireland_2024-ce-country-profile_final.pdf/@@download/file

[17] https://chambers.ie/wp-content/uploads/2023/09/Submission-to-the-Department-of-Enterprise-Trade-and-Employment-regarding-the-Proposal-for-a-Directive-on-Common-Rules-Promoting-the-Repair-of-Goods_FINAL.pdf

Q7: The draft Strategy aims to support innovation through enhanced financial supports and the establishment of a Centre of Excellence for the Circular Economy. Are there further measures which could be taken in order "derisk" investment in more circular business models?

Setting common standards and ensuring there is a predictable regulatory framework is important for accelerating the development of circular markets. This can reduce uncertainty for investment by making the market environment more stable and predictable[18]. The EU's regulatory push (e.g., mandatory recycled content in batteries, ecodesign requirements) is designed to create stable demand for circular products and services, which is essential for derisking investment by ensuring future markets for circular solutions.

Efforts should be made to explore partnerships to increase the State's recycling and reprocessing capacity. The financial model for certain sectors such as fibre and paper-based recycling in Ireland has been proven to be viable[19]. However, further steps should be taken in certain sectors such as plastic and glass waste to ensure the economies-of-scale needed to achieve circularity in these areas. To achieve these economies of scale, we could invest more in local recycling infrastructure, we exports significant volumes of waste especially plastics due to limited processing capacity[20].

Cross-border and international collaboration can also generate economies of scale which will make circular investments more viable and less risky by sharing infrastructure and best practices.

[18] https://www.bruegel.org/policy-brief/european-circular-single-market-economic-security-and-competitiveness

[19] https://www.iiea.com/publications/closing-the-loop-advancing-the-circular-economy-for-packaging

[20] https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/EPA-SOER-2024-Chapter-15-CircularEconomyWaste.pdf

Q11: What do you see as the major regulatory or non- regulatory barriers inhibiting the use of secondary or recycled materials and how should these be addressed?

The circular economy impacts all areas of industry, however these would need to be assessed on a sectoral basis. Given the emphasis on climate action and sustainability by our network, examples can be taken from the renewable energy sector.

For example, wind turbines is an area where we see a number of regulatory and non-regulatory barriers inhibiting the use of secondary or recycled materials[21]. Lack of clear end-of-waste criteria and standards is a notable regulatory barrier. Currently, there is a lack of clear, harmonised protocols and standards for when a waste material (like a used blade) can be classified as a "product" again and safely reused in new applications (e.g., civil engineering). This regulatory uncertainty discourages investment in repurposing infrastructure and makes it difficult for businesses to confidently use secondary materials.

Another barrier can be a complex or fragmented permitting process. Projects aiming to repurpose wind turbine blades or use new recyclable materials (like thermoplastic resins) may face lengthy or unclear permitting and certification processes, especially when introducing novel materials or products. This slows down innovation and increases costs for startups and established firms alike.

There are also green public procurement barriers. There are projects which aim to create demand for repurposed blades through green procurement. In these circumstances public sector procurement rules may not always prioritise or recognise secondary materials which limits market opportunities for recycled products.

There are also several non-regulatory barriers. Market demand and awareness is an example. Even with technical solutions available, there may be limited demand for products made

[21] https://esb.ie/media-centre-news/blog/article/esb/2024/04/22/embracing-circularity-through-implementing-end-of-life-plans , https://esb.ie/media-centre-news/press-releases/article/2024/01/30/esb-group-to-collaborate-with-bladebridge-to-repurpose-wind-turbine-blades-for-new-e-mobility-hub

from recycled wind turbine blades, due to lack of awareness or confidence in their performance. Without strong market signals, businesses are less likely to invest in secondary material solutions. In addition, the logistics of collecting, transporting, and processing large, heavy renewable energy infrastructure for recycling or reuse are complex and costly. Without dedicated infrastructure, these costs can be prohibitive.

Q12: Is the proposed monitoring framework sufficiently robust to track progress on our circular economy goals, to ensure accountability, and to guide policy?

We are pleased that the Strategy commits to publishing a public "Circularity Dashboard" in its reporting and will summarise progress on actions and targets. The report that will be published on an annual basis on the progress made will be helpful in ascertaining the implementation of the strategy and progress made in relation to actions and target attainment. In addition, the High-Level Oversight Group is necessary is necessary to ensure progress on the objectives in the Strategy.

We would like to emphasise that the UN Sustainable Development Goals (SDGs) are essential for ensuring that the strategy is implemented in a way that is accountable and effective.

The SDGs provide a globally recognised framework for sustainable development. They contain targets on responsible consumption and production (SDG 12), climate action (SDG 13), clean water and sanitation (SDG 6), industry innovation (SDG 9) and the protection of life on land and below water (SDGs 14 and 15). The circular economy directly contributes to these specific goals by tackling pollution, rebuilding biodiversity and reducing resource extraction and waste.

Embedding SDG indicators and principles into the monitoring framework would ensure that progress on circularity is benchmarked against international standards. This enables transparent reporting and facilitates comparison with other countries.

Q13: How important do you consider Green Public Procurement is in supporting the development of new circular goods and services?

We consider green public procurement to be a very important aspect in the development of a circular economy. GPP should include quantifiable indicators rather than just broad principles. Unfortunately GPP is currently not used in an extensive way and in 2023 only 17% of public contracts which were awarded made reference to Green criteria[22].

Clear criteria and practical tools are essential to ensure consistent implementation across departments and agencies, particularly for SMEs navigating complex procurement processes. GPP should be embedded at both policy and operational levels, with procurement strategies aligned to sustainability goals. We support the publication of multiannual procurement plans that integrate circularity targets and track progress.

Overly prescriptive GPP criteria may stifle innovation or exclude emerging circular solutions. Accordingly flexible frameworks should be implemented that allow for experimentation and adaptation, supported by training and capacity-building for both buyers and suppliers.

Market engagement including supplier consultations and peer-to-peer learning are both critical. It is vital to ensure that GPP reflects real-world capabilities and fosters knowledge exchange across sectors.

In addition it is critical that contracts do not automatically go to the lowest bidder but rather to those offering the greatest circular and overall value. Accordingly non-monetary benefits should be considered alongside traditional cost metrics such as environmental impact, resource efficiency, and social value.

[22] https://enterprise.gov.ie/en/publications/publication-files/buying-greener-green-public-procurement-strategy-presentation-4-september-2024.pdf

It is also necessary that GPP aims are actualised and are not considered to be simply guidance. Ireland has at times transposed EU legislation on the circular economy but been less successful in effect than it has been in other countries[23].

As an example, green public procurement is advanced and works effectively in the Netherlands. the Dutch system makes extensive use of Life Cycle Costing (LCC[24]). In the Netherlands LCC is embedded in procurement law via EU Directive 2014/24/EU which mandates that LCC can be used as an award criterion when evaluating tenders. Procurement documents must clearly outline the LCC calculation method and the data required from bidders. Ireland has also transposed the directive, however this has not translated into widespread use.

Q14: What would be the most effective action Government could take to incentivise further investment in the circular economy?

Making it easy to participate is the most effective action to encourage investment in the circular economy. Simplicity and clarity is essential for businesses and consumers and this means:

1) streamlined access to funding;
2) clear guidance on compliance; and
3) ensuring that the administrative burden on business is as low as possible.

Other high level actions include using cluster-based collaboration and bringing together start-ups, researchers, and industry players to share knowledge and infrastructure. It is also important to ensure policy alignment with circular economy goals, enabling the development of co-products

[23] See further a presentation which outlines the low uptake of LCC practices in Ireland and possible reasons for this https://www.ceecorg.eu/wp-content/uploads/2020/12/CEEC-SCSI-webinar-22-October-2020-Presentation-Life-Cycle-Costs-DKEHILY.pdf

[24] LCC is a procurement method that evaluates the total cost of ownership of a product over its entire lifespan and not just the purchase price. This means that end-of-life costs, operating costs, and if quantifiable environmental impacts like greenhouse gas emissions are evaluated. LCC is widely applied in sectors like construction, transport, ICT, and energy.

and reducing environmental impact. There are international examples which show how regulatory pressure, public-private collaboration, and innovation funding can drive circular transformation in traditional industries[25]

The creation of an independent advisory body tasked with accelerating a competitive circular economy should be examined as this aligns with international best practice. Sweden has set up a body on these lines which has proved successful[26] and acts as a coordinating force between government, industry, academia, and civil society to ensure that circular principles are embedded across sectors and regions. The Delegation regularly submits formal recommendations to the Swedish Government, including proposals for cost-effective instruments and regulatory reforms. It additionally convenes Circular Expert Groups in fields like design, bioeconomy, and circular production. These groups develop concrete actions such as economic incentives or regulatory adjustments to accelerate the shift from linear to circular models.

[25] For example, an Icelandic project called '100% Fish' incentivised further investment in the circular economy. The project aims to utilise every part of a harvested fish, not just the fillets, but also the skin, bones, heads, guts, and blood to create high-value products. This approach transforms what was traditionally considered waste into valuable resources for sectors such as Pharmaceuticals (e.g., fish-skin grafts for burn victims), Cosmetics (e.g., collagen and enzymes), Fashion (e.g., fish leather), Nutritional supplements (e.g., cod liver oil), and Medical devices (e.g., tissue regeneration products). The project has helped Iceland achieve up to 80% utilisation of white fish, with some cod generating over €4,000 in value compared to just €10 for fillets alone.

[26] Established in 2018 by the Swedish Government, the Swedish Delegation for Circular Economy serves as an independent advisory body tasked with accelerating Sweden's transition to a competitive circular economy.

Q16: Numerous business startups are developing solutions that promote recycling, reuse, and sustainable practices across various industries. How do we encourage the continued development of innovative startups?

Eurochambres have outlined an Access to Finance Key Recommendations[27] which are an important guideline for how to foster a competitive start-up ecosystem. We have worked with Eurochambres on the development of these points and we fully support their implementation.

- Address Market Fragmentation- Enhance integration of the Digital Single Market and facilitate cross-border e-commerce to enable seamless scaling.
- Improve Access to Finance - Establish a savings and investments union, encourage institutional investment in venture capital, and strengthen EU-level financial instruments.
- Simplify Administration - Reduce compliance and reporting burdens so start-ups can focus on innovation and growth.
- Develop Innovation Hubs - Support entrepreneurial ecosystems through chambers of commerce.
- Foster Shared Networks - Encourage start-ups to share suppliers, infrastructure, and knowledge to reduce costs and increase efficiency.
- Promote Public-Private Collaboration - Lower barriers to public procurement, support corporate partnerships, and bridge research with entrepreneurship.
- Cultivate Entrepreneurial Culture - Promote risk-taking, innovation, and learning from failure across the EU.
- Attract and Retain Talent - Make the EU attractive for skilled international workers and ease relocation processes.
- Integrate Entrepreneurship into Education - Embed practical skills, creativity, and problem-solving into all levels of education.

[27] https://www.eurochambres.eu/wp-content/uploads/2025/05/250502-From-Seed-to-Scale-10-Recommendations-to-Fuel-Start-Up-and-Scale-Up-Growth-in-Europe.pdf

- Support Deep Tech Start-Ups - Launch a dedicated EU Deep Tech strategy to address long development cycles and capital needs.

Q17: Have you any other comments or feedback on the content of the draft Strategy?

Consistent with our point elsewhere in the submission, to fully realise the strategies potential we should ensure it is explicitly aligned with the United Nations Sustainable Development Goals (SDGs)[28].

The SDGs offer a globally recognised blueprint for sustainable development, encompassing environmental protection, economic resilience, and social inclusion. By embedding these goals into the circular economy strategy, Ireland can:

- Ensure policy coherence across departments and sectors
- Strengthen accountability and transparency in implementation
- Mobilise cross-sectoral partnerships and innovation
- Enhance Ireland's international credibility and leadership on sustainability

We would like to see more references to the SDGs and a re-assertion of commitment to them in the draft Strategy.

[28] See above p.19