



**Chambers
Ireland**
Advancing business together



Chambers Ireland response to the general scheme of the Circular Economy Bill 2021

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce 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. In doing so, we signed a pledge in September 2019 to support the Sustainable Development Goals and use them as a framework to identify policy priorities and communicate our recommendations.

In upholding the Sustainable Development Goals both the Chamber Network and Chambers Ireland are keen supporters of the circular economy and have made several submissions on this topic.¹ We understand the importance of the transition to more circular practices and the opportunities that it presents. For individuals, it offers a more sustainable lifestyle with reduced environmental impact and lower household bills. For businesses, it provides the chance to reduce costs, improve raw material supply chains and increased opportunities to diversify into new business models and markets, attracting a variety of new customers. It also allows for a resilient economy; with greater reuse, a circular economy does not need the same volume of inputs, and this reduces the impact of supply shocks. For society, the circular economy presents huge employment and innovation opportunities that will be essential in the post-Covid-19 recovery. Managed well, the transition to the circular economy will have major benefits for the labour market, including the creation of job opportunities and reducing inequalities through a redistribution of value.

¹ [Chambers Ireland submission to the Department of Environment, Climate & Communications on Ireland's First Whole of Government Circular Economy Strategy](#)
[Chambers Ireland Submission to the Department of Communications, Climate Action & Environment on the development of a Waste Action Plan for a Circular Economy](#)
[Chambers Ireland submission to the Department of Environment, Climate and Communications on potential models of a Deposit Return Scheme for Ireland](#)
[Chambers Ireland submission to the Department of Communications, Climate Action and Environment on the Proposed Introduction of New Environmental Levies](#)

General comments

Expand the powers of the National Waste Collection Permit Office

The Waste Action Plan for a Circular Economy provides an excellent basis for the development of the Circular Economy Bill 2021 and the actions contained therein should guide the development of certain aspects of the Bill. For example, the Action Plan states that the Department of Environment, Climate and Communications seeks to expand the role of the National Waste Collection Permit Office (NWCPO) to become a collection market oversight body with roles encompassing data analytics, oversight of charging structures, penalties and service provision, and the management of consumer rights with a complain escalation mechanism.

The Action Plan goes on to state that current legislation hampers the powers of the NWCPO including to investigate specific consumer complaints. We recommend that additional provisions be provided under Section 14 of the current Circular Economy Bill 2021 to strengthen the capacity of the NWCPO, in addition to local authorities which is provided for, to address the aims of the Waste Action Plan for a Circular Economy (specifically those outlined under the ‘Measures to Achieve Optimum Results’ of the ‘Empowering households and businesses through better consumer protection’ of the action plan).

Deposit and Return Scheme for plastic bottles and aluminium cans

The Waste Action Plan for a Circular Economy also outlines that the introduction of a deposit and return scheme for plastic bottles and aluminium cans will be commenced through the underpinning of legislation in Q3 2021. This has yet to be achieved, even though the consultation process took place almost one year ago which Chambers Ireland made a submission to.² The Circular Economy Bill 2021 does not currently contain any provisions to establish a deposit and return scheme of this kind, as committed to in the Waste Action Plan.

We know that Ireland is falling short of the required levels of recycling³ and could face substantial fines if we continue to neglect this. The EU Single Use Plastics Directive sets a collection target of 90% for plastic bottles by 2029 with an interim target of 77% by 2025.⁴ A study carried out by Eunomia shows that Ireland is currently achieving an estimated 55% separate collection for polyethylene terephthalate bottles (PET) and aluminium beverage cans, leaving us behind the 2025 target and well

² [Chambers Ireland submission to the Department of Environment, Climate and Communications on potential models of a Deposit Return Scheme for Ireland](#)

³ EPA (2019), [New figures show that further measures will be needed to ensure that packaging recycling levels don't stagnate](#)

⁴ [Directive on the reduction of the impact of certain plastic products on the environment](#)

short of our 2029 target.⁵ The Single Use Plastic Directive also requires that PET beverage bottles contain at least 25% recycled plastic by 2025 and that all plastic beverage bottles contain 30% by 2030.

A well operated deposit and return scheme is capable of producing high quality food grade recycled which can be used by beverage manufacturers to meet these recycling content targets. Chambers Ireland, therefore, strongly recommends the inclusion of provisions to establish a statutory footing for establishing a deposit and return scheme for plastic bottles and aluminium cans in the Circular Economy Bill 2021.

Focused discussion

Head 5 – Circular Economy Programme

- The establishment of a Circular Economy Programme is an excellent initiative, and we are pleased to see under Section 5(2) that the Agency will demonstrate the contribution of instruments and measures towards the objectives of the Circular Economy Strategy as doing so will keep the goals of the legislation in sight.
- Nonetheless, we believe that Section 5(3) needs to be amended so that there is a statutory footing for an evaluation of the Circular Economy Programme every 2 years. A reduction from what is suggested in the Circular Economy Bill would allow for greater improvements to the programme as new innovations and technologies in the field of the circular economy come on stream.

Head 6 - Environmental Levies and Prohibitions on Certain Products

- The categories of single-use products specified under Section 6(1) are not broad enough. The legislation should provide a more exhaustive list of categories that goes beyond the food and drink industry. If we are to tackle waste in a meaningful way, a wider variety of single-use plastics used to package a variety of products should be included. For example, single-use plastic items across the domestic consumer goods sector and from the pharmaceutical/beauty industry may also need to be considered. The minister should, with the consent of government, be permitted to expand the schedule to include other single use categories through secondary legislation.
- The name of the ‘Environmental Levy’ under Section 6(2)(a) should be changed to the ‘Circular Economy Levy’ to reflect the change in the name of the Environment Fund to the Circular Economy Fund. This will avoid confusion and coordinate amendments.

⁵ Eunomia (2019), [Improving the Capture Rate of Single Use Beverage Containers in Ireland](#)

- Section 6(3) concerning the cost of the levy should be enough that it deters consumption and waste inducing behaviours. Chambers Ireland believes that the capped €1 levy per item should not be included in the primary legislation, as that may not be sufficient to alter behaviours in the future. Flexibility should instead be given to the Minister to alter the amount of the levy in accordance with the product classification, and that this should be put into effect through secondary legislation as highlighted in the first discussion point under this Head.

Key points

- Amendment of Section 5(3) to enable a review of the Circular Economy Programme at least once in every 2-year period
- Expand the categories of single-use products listed under Section 6(1) by introducing a schedule that can be amended through secondary legislation
- The 'Environmental Levy' under Section 6(2)(a) be changed to the 'Circular Economy Levy' to reflect the change in the name of the Environment Fund to the Circular Economy Fund
- Section 6(3) be amended so that the Minister can specify the levy value appropriate to the product category
- Provide additional provisions under Section 14 of the Bill to strengthen the capacity of the National Waste Collection Permit Office, as detailed in the Waste Action Plan for a Circular Economy.