



Circular Economy Strategy Consultation
Circular Economy Strategic Policy Unit
Department of Climate, Energy and the Environment.
Tom Johnson House,
Haddington Road.
D04 K7X4

Sent by email to: CircularEconomyConsultations@dcee.gov.ie

5th November 2025

Re: Public Consultation Whole of Government Circular Economy Strategy 2026-2028

Dear Sir/Madam,

In response to the above-referenced public consultation, the IWMA offers the following views.

About the Irish Waste Management Association (IWMA)

The IWMA is the Trade Association that represents waste management companies in Ireland. Our 74 member companies are listed here <https://iwma.ie/about-us/list-of-iwma-members/>. Our members employ approximately 8,500 people directly and manage roughly 11.4 million tonnes of waste annually at their c.200 waste management facilities.

The IWMA represents a broad spectrum of waste management activities. The waste types handled by our members include household, commercial, industrial, construction, demolition, liquid and hazardous wastes. The facilities that they have developed include transfer stations, recycling centres, sorting facilities, biological treatment plants, landfills and waste to energy plants.

Our main goals as an Association are to raise standards in the waste industry, to promote compliance with all legislation and to assist Ireland in meeting the targets set by the EU in a variety of Directives. All our submissions are available publicly on our website, www.iwma.ie.

We provide answers below to the consultation questions and also provide further feedback at the end of this submission.

Questions

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

The core objectives are described in the draft Strategy as follows:

- "Increase material circularity: 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.
- By 2030, the circular economy in Ireland has a central role in shaping economic thinking and action nationally.
- Ensuring that circularity is a product design principle.
- 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."

The IWMA largely agrees with these core objectives.

However, we recommend that DCEE challenges the current methodology for calculating CMUR as it is not fit for purpose in our view. The IWMA has raised this issue recently with Eurostat, in a meeting facilitated by FEAD on 8th September 2025.

Our presentation to Eurostat is included as Appendix 1 to this submission. Note that the IWMA views on the CMUR Calculation Methodology are largely informed by the EPA Research Report No. 458, 'A Critical Analysis of Ireland's Circular Use Rate', which is referenced in Appendix 1.

Our conclusions and recommendations are as follows. Please read Appendix 1 for the details behind these conclusions and recommendations.

IWMA Conclusions on CMUR Methodology:

- The recycling/recovery of soil & stone is not consistently applied across the EU and that has a very large impact on the CMUR measured in each Member State.
- CMUR methodology does not reward waste prevention and reuse. Producing more waste and recycling it is rewarded, whereas producing less waste is punished. Biodegradable garden & parks waste as well as soil & stone are examples where large volumes can be produced and 'recycled' rather than avoided and prevented.
- CMUR methodology unfairly punishes users of imported recycled materials. Importing non-recycled animal feed would fare better under the current methodology.

- CMUR methodology unfairly punishes Member States that export materials.
- Member States that produce very little material for export and have an economy based on services rather than manufacturing, will always score much higher than Ireland under the CMUR methodology.
- It is unlikely that any Member State will reach 25% CMUR if 'recycling' of soil & stone and recycling of biodegradable garden & parks waste are both excluded from the scope.

IWMA Recommendations to Eurostat on CMUR Methodology:

1. CMUR should not include uncontaminated excavated soil & stone, as moving clean soil & stone around a Member State to facilitate development and to provide various forms of land improvement is not described consistently across the EU in terms of waste management activities. This material can be classified as a by-product rather than a waste, which we believe is preferable.
2. CMUR should not include the recycling of biodegradable garden & parks waste as the collection and centralised composting of that material carries carbon burdens that are higher than home composting. Prevention of that waste, by treating at source, results in a better outcome in terms of carbon emissions. See [Rural Organic Waste Collection](#) on IWMA website.
3. Recycled Aggregate should be counted if it is sourced from construction & demolition waste.
4. Member States should be encouraged to use recycled content, even when that is imported. The CMUR score should add, rather than subtract, recycled material that is imported and used to displace virgin material. E.g. recycled animal feed imported into Ireland.
5. The CMUR should be based on what is used in a Member State, rather than what is produced in the country. Burdens should go with exports and come with imports, rather than stay with the country that produced the material for export.

2. 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?

We question whether it is actually possible for Ireland to reach 11.8% circular material use rate using the current Eurostat methodology, as discussed above. It should be noted that countries like the Netherlands and Austria report high levels of CMUR, but they generate three times as much waste per capita than Ireland and the CMUR methodology does not reward waste prevention.

The draft Circular Economy Strategy supports waste prevention as well as reuse and repair, which we agree is appropriate, but the CMUR methodology does not support such measures. It rewards large scale production and recycling of heavy materials, such as soils and aggregates.

3. The draft Strategy includes 71 proposed actions across key sectors as well as cross-cutting actions required to accelerate the transition to a more circular economy. Are there further actions that should be considered for inclusion? If so, please specify.

The proposed actions are extensive and appropriate. However, we suggest that there needs to be adequate resources and funding available to ensure that they are carried out in a timely manner. The EU Commission is planning to extend the 'own resources tax' to other materials apart from plastic packaging, so it is prudent for the Irish Government and the relevant Producers to invest more now to increase recycling and reduce residual waste, which in turn will reduce Ireland's current and future tax burdens.

Given the volume of infrastructure planned over the course of the next five years we suggest adding specific actions relating to construction of infrastructure projects as the current actions are focused primarily on building stock.

We suggest that a further useful action would be to examine the data behind the best performing Circular Economy countries, such as the Netherlands and Austria, in order to find ways to increase Ireland's Circularity. This exercise may expose reporting differences between Ireland and other countries and/or it may find some good lessons for Ireland to learn from their practices.

4. Are the associated 38 proposed targets sufficient to realise the objectives of the Strategy or are further targets required? If so, please specify.

The IWMA is generally supportive of the Targets, but even if all the targets were met, we suspect that Ireland would not reach 11.8% circularity, using the existing CMUR calculation methodology, so that issue should be addressed as a priority.

In relation to the reduction of food waste and food losses in line with United Nations Sustainable Development Goal (SDG) 12.3, we have previously made submissions to the EPA on how that is measured. There is avoidable food waste such as uneaten food or expired food and unavoidable food waste such as peelings, skins, shells, cores, etc. The latter is not wasted food and when it is collected separately, it is a useful feedstock for anaerobic digestion and/or composting. It is often used to produce biogas as a renewable energy source and that is preferable to using virgin crops for that purpose.

From an environmental and carbon perspective, the target should be based on wasted food and should exclude unavoidable waste that is derived from food preparation and consumption, particularly when that fraction is collected separately and used as a feedstock for composting and AD plants. The EPA has explained to us that it is following the established methodology when calculating progress to this target, but if the methodology is flawed, the Irish State should question it and seek to have it revised to properly reflect the principle of reducing the wastage of food.

It is very doubtful that the target will be reached using the current methodology and it is impacting on investments in composting and AD plants, where feedstock assessments assume that the food waste feedstock for those plants will be halved by 2030.

5. 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?

The proposed Governance structures look good, but it also needs a full time executive to work on the implementation of the 71 proposed actions and it needs a large budget to make things happen.

6. 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?

The IWMA members have limited involvement in the areas of reuse and repair, so we are not well placed to offer feedback or expertise in response to this question. However, we will certainly assist wherever possible to support these activities, when approached to do so.

7. 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 to “derisk” investment in more circular business models?

In terms of businesses that recycle waste, they need planning consents, permits and/or licences as well as End of Waste decisions. Improvements in the timing of those consent processes would de-risk many investments. In particular, having an option to avoid the Strategic Infrastructure Development process would be helpful as it is not fit for purpose for the waste sector and has led to long delays in waste management infrastructure projects. In order to attract investment for the re-processing of wastes, companies should be able to acquire all necessary consents, in parallel, within a 6-month period. This has been achieved in neighbouring countries in recent years, so we believe that it is possible.

The other main barrier for recycling and circular economy developments is the market for secondary raw materials. Some recycled materials, such as metals and glass, are attractive to the markets, as they maintain a high or steady value, due to the fact that the quality is equivalent to that of virgin raw materials. Other recycled materials such as paper, plastics and aggregates may not always achieve the same characteristics as virgin equivalents and so may be seen as inferior products, which in turn can attract lower prices than the virgin materials that they replace, while still meeting end product specifications or requirements. This is particularly evident in plastics recycling, where the cost of producing secondary raw material is high for many polymers.

The IWMA suggests that the Circular Economy Strategy should put more emphasis on the role of the producers in supporting the recycling of their products. We note that the CE Strategy actions refer to eco-design and design for circularity in a number of places, albeit without associated targets. Our members inform us that many products on the market, including white goods, laptops and phones are not suitable for repair and reuse, due to design issues. There are also many examples of non-recyclable packaging products on the market in Ireland, although we recognise that the PPWR will phase those out over time.

We suggest that the producers should also be mandated to support the recycling of their products where the market demand is insufficient and this should support the development and operation of the necessary re-processing facilities. We need the development of such re-processing facilities in Ireland to protect us against international market problems, such as the current well-documented issues with the plastics recycling market.

For example, the producers that place plastic packaging on the Irish Market should be obliged to financially support the development of re-processing infrastructure for the post-consumer plastic packaging that is sorted by our members at their Materials Recovery Facilities (MRFs). That re-processing infrastructure can be financed by the private sector, independent of the producers, but it needs guaranteed prices for the outputs to ensure ongoing viability. If the market can support those prices, then there would be no obligation for the plastic packaging producers, but when the market price falls short of the required level, there should be an obligation on the plastic packaging producers to make up that shortfall with subsidies. This should apply to existing, as well as new facilities, as we must avoid unfair competition. Such a system of supporting outputs from re-processing plants would be consistent with the obligations upon the producers to financially support the recycling of their products.

8. Are there other existing hubs and networks that could be utilised to deliver transformative solutions for increased circularity?

The IWMA welcomes the incentive for cross-sectoral engagement, we also welcome the inclusion of Circuléire in the development of R&D. Cross sectoral incentives such as product eco-design and supply chain actors are critical for inclusion in the development of circularity.

In particular, the IWMA would welcome the development of a hub or dedicated network to identify and breakdown barriers to the use of construction and demolition wastes as aggregates in bound and unbound applications. Such a hub would require inputs and participation of academics, the building materials production sector, the NSAI, the waste sector and the construction industry federation.

9. What clusters and networks do you think will be needed in the future to maximise resource use?

No comment.

10. What role can sectoral compacts or voluntary agreements play in enhancing circularity across the key sectors- which should be prioritised and what are the optimum structures, supports and obligations that should be features of such compacts.

Some sectors are obliged to meet recycling targets under EU legislation and other sectors are not. The CE Strategy provides an opportunity to set national targets that support the Circular Economy. Given the heavy nature of C&D wastes, we suggest that there should be a requirement upon the construction sector to use recycled content in their projects, as that would have a significant impact on Ireland's Circularity rate. Currently, there is little attention paid to source segregation of materials during demolition projects and on building sites. This an area where major gains could be made, for example by keeping plasterboard separate from soils and aggregates. That would facilitate the recycling of both.

11. 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 EPA National End of Waste (EoW) decision on recycled aggregates is hampered by OEE enforcement decisions that are inconsistent with it, so we are currently failing to produce that secondary raw material, which is critically important in terms of Ireland's Circularity rate. The EPA enforcement section (OEE) insist that aggregate segregated from mixed C&D waste should be classified as LoW 19 12 12. However, the National EoW decision on Recycled Aggregate, prepared by the EPA, excludes the use of LoW 19 12 12 as an input material.

A large portion of recycled aggregate in Ireland is derived from processing of mixed C&D waste, yet that material cannot achieve EoW status unless the OEE and the EPA can agree on the suitable LoW code. We suggest that LoW 19 12 09 should be used as it applies to 'minerals (for example sand, stones)' and that is recognised in the EoW decision as an acceptable input material. The non-recyclable residues derived from the processing of C&D waste should be classified as LoW 19 12 12, in order to distinguish them from the recyclable fractions.

The National EoW decision also restricts uses that are permitted under the EU harmonised aggregate standards, e.g. for drainage stone, concrete and road construction materials (without placement restrictions). We recommend that these restrictions are reviewed and where appropriate amended to facilitate recycled aggregate uses in risk appropriate uses.

There are also barriers that relate to standards for materials used in construction, but we understand that there are ongoing efforts by the NSAI and industry to prepare suitable standards.

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

We suggest that the executives working on the Strategy should ensure that all data is correct and accurate and that is likely to require the assistance of industry and/or consultants. In trying to increase Ireland's recycling rates, the IWMA has found large errors in the data reported by the EPA to Eurostat. The fault does not lie with the EPA, but it relates to the classification of waste, by waste management companies

and brokers. The IWMA is trying to fix those issues through training and consultation with waste companies and brokers, as well as engaging with the EPA.

A large quantity of C&D waste collected in skips has been incorrectly classified as Bulky MSW (LoW 20 03 07) and most of it is residual in nature. We have also found that a large quantity of recycled paper waste has been classified as non-MSW (LoW 03 03 08), but our deep dive into that material is finding that most of it is derived from MRFs and is actually MSW. In addition, we suspect that recycled paper classified as LoW 19 12 01 might not be counted as MSW, but our deep dive is finding that most of it is MSW. These few corrections alone, can add as much as 8% to Ireland's MSW Recycling Rate. The fact is that Ireland could now be very close to 50% MSW Recycling, yet we are reporting just 42% to Eurostat.

We are also concerned that the plastic packaging generation figure for Ireland is an anomaly compared with all other EU Member States. The average across the EU is 35kg per capita, yet Ireland reports 66kg per capita. We find that figure hard to believe, but we have not had an opportunity to do a deep dive on that data. We understand that REPAK is working with the EPA on this issue and they inform us that the figure appears to be an over-estimate. If so, Ireland will pay less to the EU in the Plastics Own Resources Tax, which is currently costing the country roughly €200 million per annum. Further own resource taxes are being planned by the EU, so the Irish Government really needs to invest in expertise to ensure that the data reported to Eurostat is correct.

We therefore suggest that all data relating to the Circular Economy should be examined closely and fully audited by experts that are very familiar with the relevant industry, whether that is construction, agriculture, bioeconomy, retail, waste electrical, MSW, etc.

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

Green Public Procurement is absolutely critical in supporting the market for Recycled Aggregates and perhaps for other recycled materials including compost.

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

The two most important actions from our perspective are to speed up regulatory decisions and to create markets for secondary raw materials. To create or enhance markets, we recommend the use of green public procurement, mandatory recycled content and extended producer responsibility to subsidise secondary raw materials that cannot achieve an adequate market value to support viable re-processing businesses. There has to be guarantees from producers to make re-processing in Ireland viable in many cases.

15. Are there any further significant areas within the circular economy that require research?

As stated earlier, there needs to be research into the data that is gathered and reported as well as challenges to the CMUR methodology. EPA Research Paper No. 458, referenced in Appendix 1 was a really important piece of work in that context.

There are many other areas where research would be helpful. Here are some suggestions that are relevant to our sector:

- Preparation of national standards for secondary raw materials
- Research on the viability of national re-processing infrastructure for secondary raw materials such as plastics and paper

- Consumer research to find ways to encourage the public to better segregate wastes
- Research on the construction and demolition sector to encourage better segregation of C&D wastes on building sites and demolition projects, i.e. selective demolition
- Research on how other countries achieve high levels of circularity and the applicability of their experiences to our efforts in Ireland
- Research on producer responsibility to see if there are opportunities to mandate greater involvement of producers in the recycling of their products
- Research on eco-design of products to make them easier for repair, reuse and recycling
- Research on Digital systems, including the potential introduction of Digital DRS for a range of products, including both recycling and reuse of targeted products.

16. 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?

We suggest that these startups should be supported financially by producers under Extended Producer Responsibility (EPR) obligations.

17. Have you any other comments or feedback on the content of the draft Strategy

The draft Strategy is an excellent document and we fully support the actions and targets that are proposed in it. The IWMA will continue to work to increase recycling rates and we fully support waste prevention initiatives. The contamination detection system (CDS), using cameras in refuse collection vehicles, that is currently being rolled out by our members, has the potential to engage the public in much more meaningful source segregation of waste which should lead to higher recycling rates.

Proper use of the brown bin for biowaste is recognised by our members as a major factor in increasing recycling rates and reducing residual waste. We want to work with the relevant authorities and the public to maximise the shift of biowaste from general waste bins to brown bins.

Yours sincerely



Conor Walsh
IWMA Secretary

For and on behalf of the Irish Waste Management Association

cwalsh@slrconsulting.com
www.iwma.ie

Appendix 1 – IWMA presentation to Eurostat on CMUR Calculation Methodology


SLRCONSULTING.COM

Circular Materials Use Rate (CMUR) Calculation

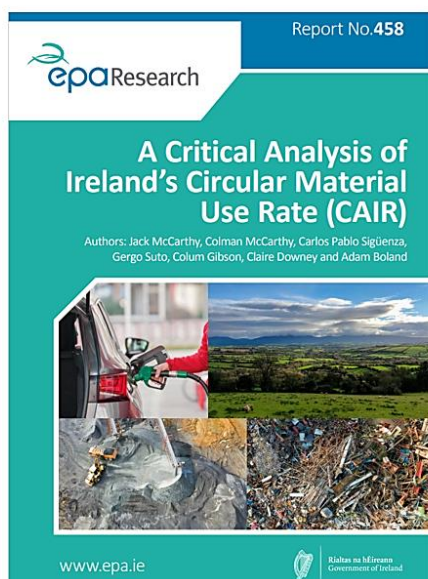
For FEAD Meeting with Eurostat

Conor Walsh
IWMA Secretary

8th September 2025



EPA Report Raises Major Issues



Project Partners

Jack McCarthy
Rediscovery Centre
Boiler House
Ballymun
Dublin 9
D09 HK58
Tel.: (01) 893 3801
Email: research@rediscoverycentre.ie

Colman McCarthy
Clean Technology Centre
Munster Technological University
53 Melbourne Mews
Cork
Tel.: (021) 434 4864
Email: colman.mccarthy@ctc-cork.ie

Carlos Pablo Sigüenza
Circle Economy
Mauritskade 64
1092 AD
Amsterdam
Netherlands
Tel.: (031) 6 3637 4704
Email: Carlos_Pablo@cirele-economy.com

Gergo Suto
Circle Economy
Mauritskade 64
1092 AD
Amsterdam
Netherlands
Tel.: (031) 6 3637 4704
Email: gergo@circle-economy.com

Colum Gibson
Clean Technology Centre
Munster Technological University
53 Melbourne Mews
Cork
Tel.: (021) 434 4864
Email: colum.gibson@ctc-cork.ie

Claire Downey
Rediscovery Centre
Boiler House
Ballymun
Dublin 9
D09 HK58
Tel.: (01) 893 3801
Email: claire@rediscoverycentre.ie

Adam Boland
Rediscovery Centre
Boiler House
Ballymun
Dublin 9
D09 HK58
Tel.: (01) 893 3801
Email: policy@rediscoverycentre.ie

Issue No.1 – Waste Prevention and Re-Use

Ireland produces 2.5 tonnes of waste per capita versus 7.5 tonnes per capita in the Netherlands and Austria. Those countries claim to recycle more waste per capita than we generate. So, Ireland is doing much better in terms of waste prevention and the waste hierarchy, but much worse in terms of the CMUR. The CMUR does not reward waste prevention or reuse. It supports the generation and recycling of large volumes of materials such as soil & stone and biodegradable garden and parks waste.

Issue No.2 – Backfilling, Recycling & Recovery

The beneficial use of soil and stones in Ireland to backfill quarries does not count as recycling, the EPA classifies this as ‘Recovery’. However, it appears that similar uses of those materials in the Netherlands, is counted as ‘recycling’ by the Dutch Authorities. This may be the same in Austria.

In the CMUR calculations, Ireland does not benefit from the ‘recovery’ of soil and stones, but The Netherlands benefits from the ‘recycling’ of similar materials that are used for a similar ‘waste recovery’ purpose.

Issue No.3 – Burdens are not Exported with the Materials

Ireland is a small nation that exports large quantities of products including metals, cement and beef. The raw materials and energy used in the production of those products remains as a burden for Ireland and is not transferred to the country that actually consumes those products.

Issue No.4 – Imports of Recycled Materials

Ireland imports a large quantity of animal feed that is classed as a recycled material. These imports are subtracted from our recycling tonnages, which lowers our CMUR score. If we imported non-recycled animal feed, our CMUR score would be higher, so the methodology does not support the use of recycled content.

Conclusions

- The recycling/recovery of soil & stone is not consistently applied across the EU and that has a very large impact on the CMUR measured in each Member State.
- CMUR methodology does not reward waste prevention and reuse. Producing more waste and recycling it is rewarded, whereas producing less waste is punished. Biodegradable garden & parks waste as well as soil & stone are examples where large volumes can be produced and ‘recycled’ rather than avoided and prevented.
- CMUR methodology unfairly punishes users of imported recycled materials. Importing non-recycled animal feed would fare better under the current methodology.
- CMUR methodology unfairly punishes Member States that export materials.
- Member States that produce very little material for export and have an economy based on services rather than manufacturing, will always score much higher than Ireland under the CMUR methodology.
- It is unlikely that any Member State will reach 25% CMUR if ‘recycling’ of soil & stone and recycling of biodegradable garden & parks waste are both excluded from the scope.

Recommendations

1. CMUR should not include uncontaminated excavated soil & stone, as moving clean soil & stone around a Member State to facilitate development and to provide various forms of land improvement is not described consistently across the EU in terms of waste management activities. This material can be classified as a by-product rather than a waste, which we believe is preferable.
2. CMUR should not include the recycling of biodegradable garden & parks waste as the collection and centralised composting of that material carries carbon burdens that are higher than home composting. Prevention of that waste, by treating at source, results in a better outcome in terms of carbon emissions. See [Rural Organic Waste Collection](#) on IWMA website.
3. Recycled Aggregate should be counted if it is sourced from construction & demolition waste.
4. Member States should be encouraged to use recycled content, even when that is imported. The CMUR score should add, rather than subtract, recycled material that is imported and used to displace virgin material. E.g. recycled animal feed imported into Ireland.
5. The CMUR should be based on what is used in a Member State, rather than what is produced in the country. Burdens should go with exports and come with imports, rather than stay with the country that produced the material for export.