

## Western Development Commission (WDC) Submission to Public Consultation on the Whole of Government Circular Economy Strategy 2026-2028

### 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 Western Development Commission (WDC) welcomes the draft Strategy's proposed objective to centre the circular economy in Ireland's economic, innovation, and social activities, and that the circular transition will be implemented at national, regional and local levels. The draft Strategy incorporates many key areas which are important for developing our circular economy, and which builds on previous strategies and policy direction. Underpinning the Strategy with a comprehensive and detailed approach is essential for delivering a transformative circular economy for Ireland. With this in mind, the WDC believes there are some areas which could be further developed and/or included in the Strategy.

For example, a circular economy framework should address various specific territorial characteristics, while also contributing to Ireland's climate action targets. An implementation roadmap is needed to underpin the Strategy and drive its delivery, in addition to targets and actions. Such a roadmap may be in development, but that is not currently clear from the draft Strategy document. The whole of government approach set out in the document is very welcome but could be strengthened in the Strategy. To support this approach, the roles and responsibilities of each Government Department should be outlined and woven into Strategy's targets, actions and roadmap. The Department for Enterprise, Trade and Employment (DETE) will undoubtedly play an important role in rollout of the Strategy, and we would view their responsibility for Local Enterprise Offices (LEOs) and Regional Enterprise Plans (REPs) as important areas of focus for SMEs and social enterprises operating in the circular economy space. The WDC views social enterprise as a key area for supporting the circular economy in Ireland, and particularly in the Western Region, and the Department responsible for social enterprise, the Department for Rural and Community Development and the Gaeltacht (DRCDG), should be interlinked with circular economy objectives from this perspective. Linked with this, the draft Strategy references the inclusion of the bioeconomy and circular economy in the DRCD's strategy, Our Rural Future (ORF). Ideally, the importance of the circular economy would be outlined in the updated ORF strategy, which is currently in development. Such an approach should be taken for all Government Departments, with circular economy objectives embedded in policy direction and strategies for each.

The WDC believes that a focused, regional approach is critical for achieving overarching national circular economy objectives. The draft Strategy refers to the regional scalability of circular economy activities, which the WDC views as essential if we are to enhance rates of circularity nationally. The Strategy also refers to rural and regional opportunities for development, which is very welcome. However, the objectives of the Strategy should place greater emphasis on understanding specific regional attributes, needs and requirements, with the aim of carrying out a needs assessment in each region.

The Strategy should include a focus on coordination between regional bodies, local authorities, academia and all other agencies, with the goal of harnessing opportunities for rural and regional development through the circular economy. It is our view that focused regional supports and leadership are needed to drive circularity in our economy, but it is not currently clear which bodies would be responsible for leading in this area. Greater focus could be placed on utilising existing regional hubs in the Western Region, such as Data2Sustain and the Northwest Bioeconomy Hub, with the aim of fostering connections between businesses and research institutions to drive a circular economy. The Strategy should also include support of SMEs in the key objectives, given the role of enterprise in advancing the circular economy and the proportion of SMEs in the Western Region, and nationally.

**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?**

The target for reaching 11.8% circular material usage is not necessarily overly ambitious, and it is positive that the draft Strategy aspires to reach the EU average by 2030. However, this ambition should be informed by the context in which it operates. Ireland has a circular material use rate of 2.3% and currently sits in the bottom three in Europe in terms of circularity<sup>1</sup>. While it is commendable that the draft Strategy references the intention of positioning Ireland as a 'European leader' in circular business models and green technologies, this may be overly ambitious at this stage of Ireland's journey in raising our circular material use rate. This is not to imply that Ireland should not strive to deliver in this area, but rather to highlight that there is a need for a comprehensive approach to enhancing our circular economy, which is anchored in best practice, which harnesses those areas where we excel, and which aims to develop those areas where we can and should improve. For example, the European Environment Agency's (EEA) 2025 assessment of circular material use rates states that Ireland has a high domestic extraction rate and that acceleration is needed. However, the same

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<sup>1</sup> [European Environment Agency \(EEA\), Circular Material Use Rate, Country Profiles – Ireland \(2025\)](#)

assessment notes that Ireland ‘has been a leader in the use of national by-product and end-of-waste decisions, with a particular focus on construction materials’<sup>2</sup>, which is positive.

In addition, there should be a focus on sharing of expertise and best practice around circular economy activities, and Ireland could draw insights from and collaborate with our European counterparts which have relatively advanced research and development around circular economy activities. From the WDC’s perspective, there is significant value in adopting a regional perspective regarding circular economy activities, and looking to best practice, such as that of EnergyVille in the Flanders region of Belgium, to draw on examples of excellence to drive the circular economy and support balanced regional development. The Strategy should also reflect what is practical to achieve by 2030, and with flexibility built into mid-term reviews and performance indicators, whilst looking to future targets to meet and reach beyond the EU average, too.

**3. The draft Strategy includes 71 proposed actions across key sectors as well as crosscutting 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.**

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

Considering our remit to support development in the Western Region, the WDC is best-placed to answer from a regional development lens, and to draw on our experience in delivering projects which make use of sector-specific circular economy activities. Therefore, we will address questions 3 and 4 together.

From general perspective, we believe there could and should be more specification within the targets and action points set out in the draft Strategy, linking with the development of a roadmap to ensure delivery of the aims and objectives of the Strategy. More specific regional targets could be developed in response to the results of regional needs assessments and context mapping, which should feed into a broader implementation roadmap. Such focused targets and actions would support the deepening of sectoral support initiatives and opportunities for scale where activities are already ongoing in each region. For example, in the Western Region the WDC works with regional and EU partners on circular economy projects involved in marine plastics (CIRCNETS) and textiles (THREADS), and there could be opportunities to scale and/or replicate initiatives in this space, where they have been successful.

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<sup>2</sup> [European Environment Agency \(EEA\), Circular Material Use Rate, Country Profiles – Ireland \(2025\)](#)

Linked with replicability and scalability, the relevant targets to the marine plastics sector include the intention to develop two large scale demonstration pilots. From our experience with project delivery in this area, there is merit in developing solutions to circularity issues which provide a local or regional benefit, as well as delivering on circular material use objectives. Therefore, it could be beneficial to include the importance of investment in local solutions of an appropriate scale within the target around the development of demonstration pilots.

From our experience in delivering circular economy projects which are focused on the textiles, the targets and actions outlined in the appear appropriate for the timescale of the Strategy. Much of the activity around shifting towards circularity in the textiles sector has been relatively recent, and so the inclusion of targets around the collection of baseline data are welcome.

As noted, the WDC views social enterprise as a key area for delivering on any circular economy strategy, both regionally and nationally. While there is reference in the draft Strategy to the challenges and opportunities for social enterprises in supporting the circular economy, this could be developed further. Specific actions and targets and actions related to social enterprise as a key sector should be included in the Strategy, as well as broader economic opportunities.

#### **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 draft Strategy identifies that innovative and inclusive Governance and a robust monitoring framework is required to realise the potential of Ireland's circular economy. The draft Strategy refers to the importance of clarity around roles and responsibilities, which is welcome. However, further detail is needed on what those roles and responsibilities will look like in practice and should be clearly set out to ensure delivery on circular economy objectives during the lifetime of the Strategy, and beyond. Given the low levels of circularity in Ireland's economy, there is little room for ambiguity around Governance structures if we are to make progress in this area. For example, while the inclusion of stakeholder forums and the High-Level Oversight Group are positive, it is currently unclear where specific structures and role responsibilities will lie. In addition, it is crucial that there is sectoral and regional representation as part of the High-Level group and within stakeholder fora. Such representation could take the form of specific sub-groups or regional groups, and/or the identification of strategic 'pillars' for delivery for each sector, and roles and responsibilities assigned within each.

In relation to regional scalability, consideration should be given to including regional bodies, such as the WDC and Regional Assemblies, within the Circular Economy

Advisory Group to ensure the representation of rural and regional perspectives in coordinating policy delivery. Governance structures must ensure the representation of all stakeholders involved in delivering circular economy activities in regional and rural communities, and ensure that the Strategy provides policy coherence, supports communication to build capacity, and secures buy-in across all areas of the circular economy.

**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 “derisk” investment in more circular business models?**

There should be a policy focus on and investment in centres of excellence across the circular economy, and particularly from a regional perspective. From our own engagement with circular economy activities in the west and north west, the WDC believes that a centre of excellence should be established in the Western Region. A leading example in Ireland, CIRCULÉIRE has established itself as a centre excellence for circular innovation, through its growth as a network across relevant sectors and industries and as a hub for sharing best practice, developing product and material (re)design, understanding practical challenges and opportunities for Irish industry to inform coherent policy development in this area. Research and innovation are crucial to supporting circular business models in Ireland, and care should be taken to ensure that businesses and industries based in rural communities and regions are included as part of this.

Potential public/ private partnership models could be considered as a measure to ‘derisk’ investment in more circular business models. From the WDC’s experience in delivery of circular economy projects with a range of partners over the past eight years, public/private models could assist with gaining industry buy in and make models more sustainable in the long run. Similarly, this experience in the development and delivery of projects has identified that successful models often involve the incorporation of public model resourcing or supporting into private enterprise value streams. Consideration could also be given to agglomerated/multi stream models, which accommodate and support specialist materials and specialist or smaller-scale sectors, to increase circularity across the economy.

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

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

We will address questions 8 and 9 together. The WDC believes that there are a range of existing hubs, clusters and networks which could be utilised to support the development of circularity solutions. Those which are relevant to the Western Region and other regions in the State, include the Connected Hubs Network, social enterprise networks in each county, and public Participation Networks (PPN) Networks in each county. Each of these networks are directly linked to people, businesses and social enterprise in the towns, villages and counties in which they operate, and present significant opportunities to develop circular economy activities in local and regional economies and communities.

The draft Strategy references the potential to ‘scale up and expand’ the geographical presence of the Rediscovery Centre through Circular Economy Demonstration and Outreach Hubs (CEDOH), which is welcome. The WDC believes that CEDOHs should be located in each region and should be cross-sectoral, to support the regional scalability of circular economy activities.

Other national hubs which could be utilised further could include the EPA’s National Resue & Repair network, Repairmystuff.ie, and the Community Resources Network Ireland (CRNI). Raising public and sectoral awareness of these hubs could support the development of skills, sharing of knowledge, provision of resources for business, industries and social enterprise groups, and encourage behaviour change and the implementation of circularity in local and regional economies and communities.

## **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?**

Our perspective on regulatory and non-regulatory barriers is largely informed by our ongoing collaboration on circular economy projects in the marine plastics and textiles sectors in the Western Region, and from engagement with a range of stakeholders working in the circular economy space.

Regarding regulatory barriers, there are some challenges in communicating existing and forthcoming legislative requirements of businesses and industries, at both national and European levels. SMEs may also more difficulty in complying with some regulatory requirements than larger companies, such as the implementation of measures like the EU Digital Product Passport (DPP). Guidance or support with addressing regulatory requirements could be made available for small-sized and medium-sized businesses and social enterprises, which may not have the available resources to explore requirements and timeframes for implementation as they are enacted at national and EU levels. In addition, there are some areas of the circular economy where efforts have progressed from a ‘linear economy’ but have not quite achieved full circularity. For example, through our work with circular economy projects focused on marine plastics,

we have noted that plastics collection processes are well established through bodies such as Haul it Back, but that additional plastics processing capabilities are required in Ireland to provide greater circularity regarding these materials.

Slow and administratively cumbersome licensing and safety processes are also a regulatory barrier for some activities, and particularly for those in the reuse, repair and recovery sectors. This is a focus which was raised as part of the OECD fact-finding report on circularity in the Western Region, whose mission was hosted by the WDC. For example, the report highlights that the aquaculture sector ‘faces a slow and burdensome licensing process, alongside strict food safety regulations, which limit the availability of raw materials for valorisation from by-products’ (p23)<sup>3</sup>. The OECD report recommends that reducing entry barriers and de-risking such activities is important for accelerating circular economy initiatives.

A national and sectoral barrier to use of secondary and recycled goods is in relation to Public Sector procurement, and regulations often do not allow for second-hand purchases or passing of secondary and recycled products. For example, the HSE are prohibited from passing on equipment post patient use and favour getting new goods instead. While there may be health and safety considerations, there may also be areas in each sector where recycled products can be passed.

A non-regulatory barrier to the use of secondary and recycled products relates to financial burdens and incentives. The cost of recycling, repairing, and/or repurposing materials versus buying new sometimes does not make financial sense, which can present a barrier to businesses and consumers in moving to more circular behaviours. Carrying out needs assessments and context mapping, as mentioned earlier in the submission, would inform whether additional measures could be introduced at national level to encourage use of secondary and recycled materials (such as examining the introduction of a drop in VAT on recycled/repurposed goods). It would be beneficial to have greater understanding on the monetary savings and environmental benefits through the use of recycled and repurposed goods, which could also assist with encouraging behaviour change.

Driving political and sectoral will to realise greater circularity in our economy may be a non-regulatory challenge in the medium- to long-term. While it is very positive that the Strategy will take a whole-of-government approach, we believe that specific and tangible measures and accountability will be required to ensure that progress continues to be built upon during the lifetime of this Strategy and beyond.

There are practical barriers around ‘closing the loop’ in relation to information and process sharing amongst key actors. Better supply chain processes are needed to

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<sup>3</sup> [Organisation for Economic Co-operation and Development \(OECD\), The Circular Economy in the Western Region Ireland \(2025\)](#)

connect those designing and producing goods, those purchasing goods and those dealing with waste and discarded products and materials. While information sharing plays a role in this, opportunities to connect and access to channels of communication are also required, and this may be an area that requires development. It is recognised that many of these processes would be required on a global scale, given Ireland's open economy, which would be very challenging. However, there could be potential to develop greater engagement across national supply chains.

Comprehensive and detailed data collection is required to effectively assess progress, gaps, and opportunities over time. At present, the WDC believes that there are relatively significant gaps in data and knowledge of what activities are currently in place or underway, as well as a lack of understanding of how regions or counties are performing regarding embedding of circular economy practices in local economies. The OECD fact-finding mission carried out in the West was crucial for establishing the state of the circular economy in the region, carrying out an initial mapping of stakeholders and activities, and identifying gaps, opportunities and needs. We believe it would be beneficial for such a study to be replicated in other regions, to obtain a complete picture of how Ireland is performing nationally, and where there are specific barriers inhibiting the use of secondary or recycled materials from place to place.

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

The WDC believes that a robust monitoring framework is essential for tracking progress on circular economy goals, regionally and nationally. The draft Strategy notes that the proposed framework will monitor key indicators, ensure accountability and guide policy, which is positive. Data collection and evidence-based decision-making must underpin the Strategy and its targets, actions and roadmap. The framework should include monitoring of detailed county-level (and regional-level) data, as well as collection of information across disaggregated data points (e.g. sectoral, geographic, rural/urban, and enterprise type (including SMEs and social enterprises)). Collection of detailed data is important for providing a clear picture of Ireland's baseline circularity and progress towards targets.

While the Strategy refers to mapping of funding opportunities and skills as one on the proposed actions, the WDC believes that this should be more extensive. This is elaborated on in greater detail in response to Question 15. Linked with this, it is important that any monitoring framework identifies leadership for each sector (such as the role CIRCULÉIRE holds for manufacturing) to ensure accountability for delivery of targets and actions around the circular economy. It is crucial that key bodies, such as the EPA, are involved in collating data collection, mapping and monitoring at national



and regional levels. Doing so would support the development of specific sectoral and regional targets in the short-, medium- and long-term.

Dissemination of international and regional best practice regarding circular economy activities, such as that in the Basque Region or Flanders Region, and supporting peer engagement and collaboration would also support with identifying key progress indicators, methods of ensuring accountability, and guide policy development.

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

While WDC is not an expert on Green Public Procurement, we regularly work with organisations and enterprises which deal with goods and services and engage with national and EU procurement processes. Our engagement with stakeholders in the Western Region as part of the OECD fact-finding mission on circularity in the West has also informed our understanding of the current context around circularity of goods, services, and procurement processes.

Green Public Procurement (GPP) is important, but it is our view that it is not currently well understood across many industries and within various parts of the civil service. Provision of education/information resources and training for civil servants could support with embedding an understanding of green procurement processes and supporting their implementation. A GPP Action plan was created for 2024-2027, with the intention of ensuring ‘that public bodies play a critical part in...helping our transition to a circular economy’<sup>4</sup>, and this should be built upon. For example, target KPIs could be introduced to reflect Green Public Procurement in action. It is positive that green procurement is encouraged, and concrete targets, enhanced data collection and greater transparency could be put in place to accelerate processes and support circular economy activities.

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

In the WDC’s view, a regional approach to circular material usage is crucial. Resourcing across a range of regional and local levels should play an important part of this approach, as well as provision of opportunities in relation to identified regional needs.

For example, Local Authorities are incentivised to develop more circular waste management processes under the National Waste Management Plan For A Circular

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<sup>4</sup> [Department of Climate, Energy and the Environment, Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027 \(2024\)](#)

Economy 2024-2030<sup>5</sup>, which is positive. However, this approach is focused on following regulations around waste and potentially misses the potential to link with local and regional circular and social enterprise opportunities. Consideration should be given to how to best implement and connect different national circular economy plans at regional and local levels.

The provision of CEDOHs in the Western Region would incentivise social enterprises to develop solutions to address problems in their local communities. In addition, the provision of funding and resources for a 'one stop shop' in each region could support the acceleration of the circular economy across every aspect of society, in addition to but also beyond industry-specific activities. Such one-stop shops could be driven by a key national body with reach across every region, such as the EPA.

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

As noted, the WDC believes that a mapping of circular activities and stakeholders across each region would support the development of a comprehensive and detailed national overview of progress, barriers, and opportunities. Research in this area would serve to guide effective policy development and support accountability in delivering greater circularity in the Irish economy. Such a mapping could be led or facilitated by regional bodies; building on existing networks and engaging with relevant stakeholders based on their interests, influence, and potential contributions to the circular economy transition in the Western Region. For example, the WDC is currently examining the potential of piece of work to map the specific needs of regional SMEs and MEs to access circular economy competencies and opportunities in the Western Region, and the legislative and regulatory environment in which they operate.

Similarly, mapping each sector and existing networks and defining strategic pillars and related roadmap for each would provide a comprehensive overview of what circular economy activities are already in place and support identifying need regarding resources, guidance, and skills development. Carrying out a mapping of relevant sectors and networks would also avoid duplication of efforts and provide the opportunity to share learning and experiences between and within sectors and networks.

We have underlined the importance of in-depth and consistent data collection at regional levels earlier in the submission and reiterate those points regarding areas related to the circular economy which require further research. Utilising and expanding

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<sup>5</sup> [National Waste Management Plan for a Circular Economy 2024-2030, Regional Waste Management Planning Offices \(2024\)](#)

on existing research which provides regional context, such as the OECD report on the circular economy in the West of Ireland, would support the development of future research in this area. Similarly, carrying out more sector-specific research would assist with gaining an in-depth understanding of the different factors influencing progress or gaps in relation to the national circular economy.

**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?**

While there are a range of solutions being developed to support recycling, reuse and sustainable practices across industries, this could be enhanced or encouraged further through the provision of training, support for capacity building, and showcasing of successful innovations as case studies. In addition, while financial support is available for existing social enterprises that have a scalable model, there is limited availability of financial supports for start-ups and SMES. Such financial supports and incentives could be put in place to promote circular practices across all areas of the economy.

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

The WDC welcomes the opportunity to submit its views to the Public Consultation on the Whole of Government Circular Economy Strategy 2026-2028. Given the nature of our work, the WDC is best placed to provide insights which link with supporting balanced regional development, which we believe is a critical lens for the development of a whole of government national strategy on the circular economy. Throughout our submission to this consultation, we have stressed that a regional approach is important for reaching targets and goals around circularity, and believe that a facilitator and enabler role could be assigned to regional bodies to drive this regional approach.

The WDC recognises the importance of building Ireland's circular economy, as well as its role in supporting regional development across all regions. Through our own work on circular activities and projects in the Western Region, we are committed to supporting circularity for businesses, economies and communities across Ireland. If there are any queries about the responses included in this submission, please do not hesitate to get in touch: [franceshague@wdc.ie](mailto:franceshague@wdc.ie)

Frances Hague  
Policy Analyst, Western Development Commission  
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