IGBC's submission to the Whole of Government Circular Economy Strategy - 2026-2028

Introduction

The Irish Green Building Council (IGBC) welcomes the Whole of Government Circular Economy Strategy -2026-2028.

The Irish Green Building Council (IGBC) is a registered charity with over 450 members drawn from all parts of the value chain, from occupiers, design professionals, contractors, suppliers, academics, and public authorities. The IGBC provides leadership for a sustainable built environment and is affiliated with a global network of 70 national councils within the World Green Building Council. This allows us to create workable solutions and tools to deliver transformative change towards a sustainable built environment.

Our submission focus on the built environment and is informed by the extensive experience acquired through projects on the circular economy in construction and the built environment in Ireland. The most recent finalised piece of work is the Design and Development of a National Circular Built Environment (CBE) Roadmap for Ireland launched in May 2025. Developing the recommendations outlined in the roadmap involved **extensive desk research and in-depth stakeholder engagement with the construction and property sector, with over 225 stakeholders consulted.** These stakeholders included representatives **from central government, local government, industry – from building designers to developers, contractors, and product manufacturers, as well as NGOs**. This ensured a comprehensive understanding of the current progress and improvement needed to further enhance the country's circular economy in construction and the built environment. The roadmap is focused on the six priority areas— 1. Value our existing building stock, 2. Plan for resource efficiency, 3. Design for circularity, 4. Close the materials loop, 5. Change the business models, and 6. Enable the circular transition. The full Roadmap and the full list of stakeholders involved can be found on our website here.

The IGBC is also involved in other projects that aims to implement the strategies outlined in the roadmap such as the Material Passport, a project for digitally documenting materials in buildings; the Transition to a Circular Economy project, which aims to deliver a circular economy design guidance and templates; a feasibility study for a circular economy hub but also other initiatives like the development and delivery of "Circularity in the built environment" training courses. Further information on our work on circularity in the built environment can be found at Circularity in the Built Environment - Irish Green Building Council.

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 overall vision is good and comprehensive, highlighting many of the co-benefits associated with this transition. However, the objectives do not appear to align with the vision or clearly explain how it will be achieved.

For instance, while we agree that local authorities have a key role to play as enablers for this transition, they will need sufficient resources to do so. Simply stating that they will be "actively supported" is too vague.

Furthermore, while we support the vision of Ireland becoming a recognised leader in sustainability by 2030, setting an objective of merely reaching the EU average of 11.8% by that date appears contradictory to that vision. More ambition is needed, including in the construction sector, as the construction of new buildings and infrastructure will lead to significant increases in carbon emissions, waste production, and nature depletion if we do not accelerate the transition to a more circular built environment in the next 5 years. See the findings of the carbon modelling report we commissioned from UCD

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?

No. This is not aligned with the overall ambition of becoming a leader in this field, and it will most likely be insufficient to reach our 2030 carbon targets. We recommend applying a back-casting approach, starting from a 2050 zero-waste vision and defining interim 2030 and 2040 milestones.

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.

While the strategy is sound, the document lacks a clear timeline, defined deadlines for each action, and an explicit allocation of responsibilities.

We suggest reviewing the proposed actions under the built environment section to embrace the "waste hierarchy" principles and prioritise reuse of buildings and materials (by valuing our existing building stock and planning for resource efficiency), designing for circularity and closing the material loop.

See the next questions for more information.

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

In relation to the whole strategy and for each sector, we recommend applying a back-casting approach, starting from a 2050 zero-waste vision and defining interim 2030 and 2040 milestones.

Built Environment:

The strategy should be based on the 'Waste Hierarchy' principles, whereby prevention and preparing for reuse are prioritised. Therefore, we believe that a target for the re-use of existing buildings,

including for the delivery of homes, must be included. The development of a target to encourage an intensification of use of existing buildings could also be considered. In relation to new build, all larger projects (> 5000sqm) should be designed with Design for Adaptability / Deconstruction approaches by 2030, and all projects by 2040.

Additional interim targets, e.g., 2030 and 2040, are needed to achieve a zero-waste vision by 2050. We would encourage the Department to consider using the targets developed as part of the Building a circular Ireland roadmap. In particular, T3 could be expanded on, with a GPP target set for 15% recycled material use within buildings by 2030, and 100% materials from deconstruction reused/recycled by 2040. In fact, priority should be placed on the reuse of materials—or on preparing materials for reuse—before considering recycling, which typically requires more energy and water. Targets for recycling should therefore be accompanied with targets for reuse.

It's hard to comment on T1 (35% reduction in emissions by 2030 from construction materials), without looking at the whole picture – or understanding if this is consumption or production based. The carbon modelling report we commissioned from UCD shows that tackling embodied carbon of construction will require a three-prong approach, firstly prioritising projects within the National Development Plan (NDP) based on environmental and social needs to 2030, secondly maximizing existing buildings stock, by bringing Ireland's very high levels of vacant, derelict, and suboptimal use of space back into more intensive use across the country and finally a radical strategy of reducing the carbon intensity of the remaining construction by a minimum of 50%. These findings highlight the need for targets for re-use as part of strategy.

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?

Getting the circular economy infrastructure right is critical to a successful implementation of the strategy. A70 and A71 are both positive development as collaboration and breaking the siloes is key, but further information on the composition of these groups, the scope of their work, how often they will meet, etc. is needed to provide meaningful feedback.

To support A71, we recommend giving responsibility of overseeing and coordinating all the actions to one Department (e.g., the Department of An Taoiseach) to ensure a holistic and efficient approach to carbon emission reductions and the implementation of the strategy. In relation to the work of the group, they should also be responsible for ensuring all policies, regulations and financial incentives are fully aligned to support our transition to a fully circular economy by 2050.

The focus on the enhancement of the operation of the Civic Amenity Site Network Project (A59) is positive as physical infrastructure (e.g., for storage) are needed, and local authorities should lead. The new decarbonising zones set up in each local authorities could also be used to pilot new models and ideas. However, to avoid a piecemeal approach, all national and local initiatives must be connected. These connections must be clearly explained in the strategy.

Finally, to reach its full potential, the strategy must be implemented in a transparent, fair and inclusive way. As continuous improvements will be needed to address weaknesses and to keep up with best practices, product development or new technologies, more information is needed on the strategy will be updated and adapted if required.

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?

Built Environment

While the section on the built environment is good, a stronger focus on the "waste hierarchy" principles is needed.

More specifically, actions and targets related to adaptive reuse and intensification of use are needed. Preserving and optimising the use of the existing building stock can make a substantial contribution to climate change mitigation while addressing other environmental challenges, such as resource overconsumption and its associated impacts on nature. To support this shift, planning policies and processes, as well as building regulations and Technical Guidance Documents (TGDs), should be reviewed and strengthened. Furthermore, pre-demolition audits and selective demolition standards should be mandated to ensure the high-quality recovery of secondary materials, thereby breaking the current cycle of low-quality recycling and weak market demand.

While the inclusion of A2 is positive, it would be helpful to better understand how it will relate to circularity. The best way to achieve this would be to ensure that it integrates embodied carbon and circularity as key considerations, and that retrofit and renovation methods and materials become more align with circularity principles.

In addition, as leaner designs are key in addressing carbon emissions and waste, maximum embodied carbon limits at the building level should be introduced ahead of the requirements of the Energy Performance of Buildings Directive (EPBD). The Directive requires all member states to introduce these targets by 2030 at the latest, but this is too late given the quantum of construction in Ireland. Work has already been done by SEAI on the development of the methodology, and baseline data has already been created for different building typologies. Limit values could be introduced from 2028, alongside requirements to measure these emissions – as per the requirements of the EPBD.

New build must be designed for optimum use by facilitating alternative uses at different times and over the lifespan while retaining the value. This requires allowing enough leeway within the building design. Designing homes for adaptability would also allow us to respond more quickly to demographic changes. Consequently, actions to support designing for adaptability and deconstruction (e.g., as part of the planning process) should be considered.

A3 and A5 are welcome, but these need to go further. More specifically, a full review of the implementation of Art. 27 & 28 of the Waste Framework Directive in Ireland should be carried out to better support reuse, ensuring the EPA have sufficient resources to process these applications quickly and smoothly. Likewise, further support for recertification is needed.

A7 is welcome as material storage facilities are critical. However, further information on how this will be funded is needed. These physical storage facilities must be complemented by a comprehensive catalogue/database of products for re-use, so that products are identified at the right time. This should probably be done at national level –e.g., operated by the EPA.

The strong focus on GPP, both in terms of actions and targets is welcome. GPP is a strategic instrument that can be used to influence the market and create demand for circular goods and

services. It can support circular business models and supply chains, including take-back schemes, and provide the industry with real incentives for investing and upskilling in circularity, and other stakeholders with the confidence they need to support the transition. While the 2028 target is welcome, additional interim targets should be developed to 2050 to support our climate targets. E.g., a target of 100% materials from deconstruction reused/recycled by 2040. In fact, priority should be placed on the reuse of materials—or on preparing materials for reuse—before considering recycling, which typically requires more energy and water. Targets for recycling should be accompanied by targets for reuse. In addition, public procurement policies and contracts should be adapted to incentivise sustainable innovation and promote advanced models like Products as a Service (PaaS). See Q13 for further feedback on GPP actions and targets.

As it is essential to foster innovative circular business models, it is suggested to add actions on Extended Producer Responsibility (EPR) and Product as a Service (PaaS). A structured dialogue should be initiated immediately with producers and industry stakeholders to define the approach for construction-related EPR schemes in Ireland, including materials covered and timeline, and set clear targets. They would also need to determine whether these schemes should be voluntary or mandatory by 2030

The bio-economy

Although further information on the level of funding and how actions will be implemented is needed, the inclusion of actions A11, A13 and A14 are positive.

Ireland with a large agricultural sector has a strategic interest to identify, encourage, and develop local low carbon biobased solutions from agriculture and forestry for the construction industry. Anecdotal evidence gathered from other green building councils across Europe show that the introduction of limit values (required by 2030 under the EPBD) around the full life cycle global warming potential of buildings has led to an increase in demand for these materials. While the work of the “timber in construction” working group is welcome, it is suggested to develop a similar approach to support the development of other biobased materials, such as industrial hemp, straw and other agricultural fibres.

Cross cutting measures

- Financial incentives:
  The immediate implementation of action A51 is critical. In a climate crisis, all government’s spending and incentives (from GPP, to grants and tax incentives) must be fully aligned with our 20250 targets. Further information on this working group, i.e., membership, scope of work, timeline is needed, and the work of the group should be collaborative and transparent.

  Under this section, the amount of funding available to local authorities to better support re-use in construction materials (e.g., for storage facilities) should be clear. Funding for scaling up demonstrator projects of innovative low-carbon, reused and biobased materials and technologies is also needed, as well as further funding to support SMEs in this transition.

  Government investment in the transition to circularity must go beyond funding desktop research to direct intervention to help create the supply chains. This will require the Government to invest directly in the supply of new models of circularity, increasing certification/recertification, funding production and storage infrastructure, and finally build

capacity by offering capital funding for built demonstrator projects.

For example, the Netherlands, the leading circular economy in Europe, supports its bio-based construction strategy with a €200 million activation fund to help simultaneously tackle supply, production and demand.

On the private sector side, companies will need investment, and financial institutions need to understand the value of investing in the circular economy. Research from the Bocconi University, Ellen MacArthur Foundation, Intesa Sanpaolo (2021) showed the opportunities for financial institutions investing in companies, including those producing construction materials with a high circularity score.

Supportive measures—such as favourable tax depreciation and free take-back schemes—should also be considered to ensure that second-life, remanufactured, or refurbished products can compete effectively, achieving a final cost equal to or lower than that of new products. As part of the discussion on VAT, it is recommended to investigate reduced VAT rate, not only for low-embodied carbon products (circular and/or biobased), but also for renovation.

- Skills:

  To date, awareness of circularity in Ireland is generally focused on the lower levels of the waste hierarchy. Engagement by IGBC with the construction and built environment industry, through the piloting of the CMEX material exchange platform in 2023 and the development of the Building a zero carbon Ireland - Industry Progress report, showed a lack of awareness, and priority given to circularity in the industry.

Awareness raising and upskilling are needed in the following areas to enable Ireland to move up the waste hierarchy:

• Planning and systems level—Policymakers, Planners, Regulators, and Infrastructure Providers: System-levels awareness of the impact on resource use and circularity of the national spatial strategy, national infrastructure, housing policy, spatial standards, and local development plans is needed. As further research and guidance emerge, more specific training on how to optimise resource use at a strategic planning policy-making level will be required.

• Business development - Producers, Entrepreneurs, Developers: The implications and solutions for innovative business model development, including PaaS and new tenure models and typologies, will need to be understood and adopted.

• Procurement - Procurers (Public and Private): Procurement practices that enable the transition, including knowledge of shared indicators, and new innovative ways of collaborating with the supply chain outside of traditional contracting practice.

• Digital skills—Producers, Designers, Property Owners: Use digital tools such as material passports, digital product passports and BIM to share data on products and materials used within buildings to facilitate reuse.

• Design - Designers: Application of circularity to design, including the use of indicators for design and construction, for adaptability, disassembly, leaner and resource-efficient design, and the use of innovative bio-based materials.

• Auditing – Consultants, Developers, Planners: Skills for those submitting and evaluating pre-development audits, including credible comparative analysis for carbon and resource use, as well as options for retention of structures and reuse.

• Deconstruction - Contractors, Designers: Auditing skills for recovery of materials, including carrying out pre-renovation and pre-demolition audits (European Union, 2024b). The piloting of the CMEX platform showed a lack of awareness of the importance of providing quality information on products offered for reuse. On-site skills for deconstruction and segregation to avoid contamination. This should include emerging technologies, including robotics and technology for the recovery of higher-value materials.

• Construction - Contractors: Skills in construction designed for deconstruction

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?

Under this section, the amount of funding available to local authorities to better support re-use in construction materials (e.g., for storage facilities) should be clear. Funding for scaling up demonstrator projects of innovative low-carbon, reused and biobased materials and technologies. is also needed, as well as further funding to support SMEs in this transition –e.g., to recertify products.

Government investment in the transition to circularity must go beyond funding desktop research to direct intervention to help create the supply chains. This will require the Government to invest directly in the supply of new models of circularity, increasing certification/recertification, funding production and storage infrastructure, and build capacity by offering capital funding for built demonstrator projects. For example, the Netherlands, the leading circular economy in Europe, supports its bio-based construction strategy with a €200 million activation fund to help simultaneously tackle supply, production and demand.

On the private sector side, companies will need investment, and financial institutions need to understand the value of investing in the circular economy. Research from the Bocconi University, Ellen MacArthur Foundation, Intesa Sanpaolo (2021) showed the opportunities for financial institutions investing in companies, including those producing construction materials with a high circularity score.

Supportive measures—such as favourable tax depreciation and free take-back schemes—should also be considered to ensure that second-life, remanufactured, or refurbished products can compete effectively, achieving a final cost equal to or lower than that of new products. As part of the discussion on VAT, it is recommended to investigate reduced VAT rate, not only for low-embodied carbon products (circular and/or biobased), but also for re-used and renovation.

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

There are a number of existing networks that can be leveraged but will require additional resources to be more effective. The EPA chair a Reuse and Repair network of organisations, in which IGBC participates, however this meets on a limited basis. Additional resourcing could enable and encourage greater and more meaningful collaboration between these organisations.

Fingal Co Co are investigating creation of a Circular Hub and are engaging over 20 stakeholders. https://smartdublin.ie/smart-districts/smart-balbriggan/

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

Many actions are already taking place in this field, but information should be better to shared so that we can learn from each other. For instance, an annual event where public and private organisations meet to discuss learnings (good or bad) from circularity projects would be helpful. This information could also be published on a dedicated website.

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?

As market barriers and the lack of digital and physical infrastructure are covered in other parts of the submission, we will focus on regulatory barriers that relate to construction here.

The planning and regulatory system can create real or perceived barriers to the faster uptake of circularity. Examples have been highlighted in the preceding sections, such as the application of articles 27 and 28 of the Waste Framework Directive, but other challenges around planning requirements* setting infrastructure requirements, and TGD Part D of the building regulations should also be mentioned.

As the circular economy develops, there will likely be additional issues that have not yet been identified. Hence, it is important that the regulatory system can deal with and anticipate issues that could act as barriers or slow down the adoption of innovation. There are several ways to do this. For instance, under the Dutch Green Deal (van Langen & Passaro, 2021) the government undertook to engage with an industry review of perceived barriers in the regulations. Regulatory sandboxes are another example that offers a general framework that innovators can apply to test their innovative products, services, and methodologies for a certain period (European Commission, 2023). The system of certification for new products and recertification of secondary materials and reused products or components will need to be fully streamlined to stop this from becoming a barrier. This can be facilitated by the requirement in the CPR for notified bodies to share documentation with other notified bodies.

*On this point, we would recommend integrating the circularity principle far more into planning. E.g., through requirement for larger projects to demonstrate adaptability - that deconstruction is considered in the design, and pre-demolition audits as a condition for demolition. On this point, we would recommend having a look at the London Plan 2021 Policy SI 7(B) which requires applications that are referred to the Mayor to promote Circular Economy (CE) outcomes, and to aim to be net-zero-waste.

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

Developing and implementing a robust framework that allows tracking progress and identifying issues as they arise is key. It's positive that indicators relating to both production and consumption are included as this has been missing in Ireland.

Transparency in relation to action and reporting will be critical, and the Department will need to ensure the annual report is widely disseminated and accessible.

More importantly, what is missing in the current draft of the strategy are clear allocations of tasks and responsibility, as well as timelines.

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

Public procurement is a strategic instrument for the Government to influence the market, and should be leveraged to create demand for circular goods and services. This, in turn, can support circular business models and supply chains, including take-back schemes and 'servitisation' business models (Circle Economy, 2024).

Public procurement can also provide the industry with real incentives for investing and upskilling in circularity and provide other stakeholders with the confidence they need to support the transition. Additionally, circular procurement would help to link supply and demand by encouraging the market to invest in innovative and circular solutions (CityLoops, 2023), fostering collaboration across the value chain.

More specifically, circularity should be integrated into all the stages of construction projects, from the design, planning, and tendering to the construction and maintenance phases.

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

In the initial period up to 2030, the Government needs to play a role in activating private sector investment by providing certainty to the industry on the commitment to the circular economy. The private sector cannot activate the supply chain on its own. For example, targets, however low for circularity in green public procurement, can only be met if there is a supply chain to meet them. Private sector investment is dependent on there being confidence that there will be demand for their goods and services to develop these supply chains. The private sector also needs to show proof of concept and demonstrate their innovation, get support in getting to market, and demonstrate these innovations on real development/construction projects.

Construction is capital-intensive, and trying new construction methods and materials can demand additional design team time and added risk. Stakeholders, including developers and producers, have stated repeatedly that it is necessary to de-risk innovation, and they would be more willing to try new approaches if some of the additional costs could be covered. Government investment in the transition to circularity should go beyond funding desktop research to direct intervention to help create the supply chains. This will require the Government to invest directly in the supply of new models of circularity, increasing certification/recertification, funding production and storage infrastructure, and finally build capacity by offering capital funding for built demonstrator projects. For example, the Netherlands, the leading circular economy in Europe, supports its bio-based construction strategy with a €200 million activation fund to help simultaneously tackle supply,

production and demand. On the private sector side, companies will need investment, and financial institutions need to understand the value of investing in the circular economy. Research from the Bocconi University, Ellen MacArthur Foundation, Intesa Sanpaolo (2021) showed the opportunities for financial institutions investing in companies, including those producing construction materials with a high circularity score.

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

In relation to construction and the built environment:

- Funding for research and pilot projects focusing on reducing Critical Raw Materials (CRM) dependency through material substitution, product redesign, and greater efficiency in CRM use is needed, as well as a complete piece of research into implications in relation to liability, indemnity, and insurance as it relates to the mechanisms of the implementation of circular economy principles.

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?

Please see responses to previous questions.