

Bioeconomy Consultation,  
Department of the Taoiseach,  
Government Buildings,  
Merrion Street,  
Dublin 2

14<sup>th</sup> September 2017

**RE: Limerick City and County Council: Submission to the National Policy Statement on the Bio-economy**

Dear Sir / Madam,

Limerick City and County Council is delighted to contribute to the preparation of a National Policy Statement on the Bio-economy. Given the variety of organisations and agencies involved in the bio-economy sector, such a policy statement is a necessary first step in coordinating activities and avoiding unnecessary duplication.

The submission follows the format of the discussion document in that it answers the questions posed in the document. These questions are listed on page 13 of the document and the responses of Limerick City and County Council follow below:

**1. Does the broad definition outlined adequately encompass the opportunities presented by the bio-economy?**

The addition of natural habitats and landscape assets such as habitats and scenic views would be worthwhile. Apart from their intrinsic worth, these assets play a huge role in tourism and also have a role to play in climate change adaptation. This is relevant in the case of wetland habitats and forestry where they can play a role in both carbon absorption and flood management.

There is a need for clarity in the use of terminology; the word biomaterial has been used in the discussion document without definition. It is important that terms be defined so that all sectors of bio-economy can be correctly identified.

## **2. How can a high-level policy statement on the bio-economy assist in progressing the development of the priority value chains identified?**

The development of national level policy would add clarity to the whole area of the bio-economy by indicating that this area enjoys support at the highest level. Such a statement could indicate the need for support for this area, both technical in the shape of research and practical in terms of financial support. To take one example, this could take the form of REFIT tariffs being reviewed to take into account new developments in energy production that have taken place in recent years.

A high level policy statement may give some certainty to both researcher and investors as currently there is reluctance to pursue this sector.

## **3. What lessons can Ireland take from the European approach, including to the Circular Economy?**

While Ireland is fortunate in having a large number of existing strategies to inform aspects of the bio-economy, the notion of the circular economy implies a closer connection between the differing aspects of the bio-economy. The chief lesson that could be drawn is the necessity for greater coordination between aspects of the bio-economy in order to ensure optimum use of resources and to avoid wastage. The first step towards this might be the creation of a coordinating group between the different organisations and agencies which would identify opportunities for greater cooperation and exchange of knowledge and materials.

Ireland has only begun to address resource efficiency and reuse with a number of counties having access to redistribution of unused food.

Biobased products are being manufactured and becoming a statutory replacement for conventional materials in some European countries, Ireland has not really addressed the potential in this area for reprocessing these materials. There may be economies of scale which may not suit Ireland.

## **4. Given the cross-sector nature of the bio-economy, how can a national policy statement best support development?**

Our knowledge base on bio economy matters remains quite low in Ireland so maybe a national policy statement may initiate research and innovation in this area.

See 2 and 3 above. The national policy should specifically acknowledge the cross sectoral nature of the bio-economy and by suggesting the establishment of working/coordinating group, put in place a structure to support its further development and also to act as an advocate for the bio-economy sector as a whole.

## **5. Can we identify a common set of principles, including in particular the application of the cascading principle, which will assist in the development of both the bio-economy and circular economy?**

See suggestions below:

(i) Assess the production capacity of the bio-economy, e.g. food and energy production, potential for re-cycling and reuse of waste.

(ii) Having done this, ensure that the productive and regenerative capacity of the bio-economy resource is taken into account in the future development of the sector. This is important in ensuring security and consistency of the supply of raw materials.

(iii) The possibility of transfer between different sectors of the bio-economy or outside should be investigated particularly if the end usage results in a higher value product, particularly in terms of sustainability.

(iv) The multiple use of bio-economy assets should always be investigated. One long running example would be that of forestry where tree planting results not just in wood production but amenity uses and with some thought, flood protection and shelter belts which could extend the grazing season or shelter for buildings, reducing energy required for heating costs.

(v) Where competing uses exist, the one that results in a higher value end product, consistent with sustainability goals should be considered for adoption.

## **6. How can a national policy statement support local and regional cooperation around the use of renewable biological resources?**

It is suggested that this would work in much the same fashion as the former Regional Planning Guidelines (RPGs) or the Regional Assembly Guidance, currently under preparation. The Regional Waste Management Plan structure also springs to mind and perhaps with suitable modifications may be a useful vehicle to support such local and regional cooperation. The national policy statement could have regional dimensions which would promote the development of different elements of the bio-economy. It could well be that different regions would, by virtue of land quality and usage, have different specialisms which could be encouraged by an appropriate national policy content.

What is required is a regulatory and policy framework that extends into the future to provide stability for the bio-economy. A suggested time frame is until 2050. The policy framework should be revised in line with the development of the sector both in Ireland and Europe.

The national policy statement needs to call for a close cooperation between the research institutions, regional, national and local authorities and the business sector as well as the general public to ensure that awareness of the circle of bio-based goods and raw materials and waste can be established.

## **7. How can waste policy, including an examination of the definition of waste, best support developments in the bio and wider circular economy?**

Municipal Waste definitions have been well debated and a lot of time and effort is already put into finalising these definitions so this would not support the bio or wider circular economy. Time should be spent bringing the actors together that are producing by-products waste and items that may be reused and finding ways that make it easier and more acceptable to exchange materials and reuse materials and make renewable fuels. Consumers currently find it difficult to even separate their own food waste in accordance with the legislation. There is a need to find ways to show the benefits of this segregation and its potential to become a bio-product.

One of the big challenges to support the waste industry and its role in the bio-economy is encouraging bio-economy companies and chemical companies to work together to unite by-products with new processes. Sugars and oils in some bio-waste products are valuable commodities in their own right as they can be converted to pharmaceuticals and solvents for example.

Financial incentives such as tax breaks should be implemented by Government to encourage diversion of suitable bio-waste stocks into further uses, such as energy production or perhaps into bio-products where this is feasible.

We need to be careful not to exaggerate the bio-waste opportunities that could be realised using currently-available technology. While high value products might result, they might be extremely expensive to produce in terms of cost and energy expenditure and hence might not be viable. This may change as knowledge and technology advances.

#### **8. How can we stimulate market demand for bio-economy products? What is in it for the consumer?**

A similar situation exists for niche agricultural products or organic production and a similar approach to promote the environmental advantages of bio-economy products should be adopted. UK sources indicate that the use of bio-based products gives a marketing advantage to the producer. It should also be stressed that the use of home sourced products rather than imported materials guarantees security of supply and local employment.

The consumer, by purchasing such products, would have the benefit of knowing that they are contributing to environmental sustainability and creating local jobs.

Regulations and taxation can encourage producers and consumers to substitute fossil based products and services to bio based alternatives.

Green public procurement schemes may be effective – both in terms of creating new immediate markets and well as by encouraging private sector activities leading to a higher future supply of bio economy products and services.

Public awareness campaigns that encourage end-users to substitute consumption towards more sustainable alternatives should be encouraged. This may be difficult in Ireland due to price as consumers really don't care to pay more for the sustainable product. Part of the future challenge is how to change that mind set.

The planning sector could, where feasible, encourage the use of district heating systems, in residential and other developments. This might help boost demand for local bio-mass fuel sources.

#### **9. What is the most appropriate mechanism to coordinate development and monitor progress?**

See 3 and 4 above, regarding the creation of coordinating group to foster closer working relationships between different sectors of the bio-economy. This could also have a monitoring function.

This could be integrated into the work of the NESC who are currently the advisors to the Dept of an Taoiseach and they should continue to workshop with stakeholders as they did with their workshop in April 2017- *"Moving Towards the Circular Economy in Ireland"* and this format might prove useful for the bio-economy progress.

**10. Are there any other issues to be addressed through a national policy statement?**

We need to consider external factors – such as population and incomes, demographics and education, energy consumption, the availability and cost of key resources such as food and water, access to healthcare and both supporting and competing technologies. All of this needs to be considered as they will also play an important role in the bio-economy. All these factors will influence the location and the size and types of markets for food, feed, fibre, fuel, plastics, fine chemicals, pharmaceuticals and other biotechnology products.

We also need to look at funding opportunities in Europe to stimulate the bio-economy and can links be made with other countries. It is necessary to further examine Horizon 2020 funding opportunities.

There is a need to promote the use of compounds that can be sourced through the bio-economy, as companies traditionally use the compounds that have a long and proven record. A strategy to encourage the substitution of traditional inputs such as fossil fuel based products with those sourced from the bio-economy should be encouraged.

It is likely too that the sciences that are involved in the bio-economy will need support in order to develop future technologies and products which will come from the bio-economy.

In addition to possible financial support (e.g. tax reliefs) mentioned in 2 above, further support mechanisms such as a mentoring network could be established to help new businesses. This could take the form of discussion groups, like the knowledge transfer scheme which is already in place in the agricultural sector. The mentoring could also involve links with the educational and training sectors.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Pat Daly', is written over a horizontal line.

Pat Daly,  
Director, Economic Development

