

**Submission from Community Resources Network Ireland (CRNI)
to the Department of Climate, Energy and the Environment and the
Department of Agriculture, Food and the Marine Public Consultation
on the draft Bioeconomy Strategy 2026-2030**

1. What does a successful bioeconomy in Ireland look like to you by 2030 and 2035?

CRNI believes that a successful Irish bioeconomy is one that is fully embedded within a circular economy and delivers environmental, social and economic value simultaneously, fully harnessing the potential of social enterprises and community-based organisations and initiatives.

By 2030, Ireland should have established clear policy alignment between the Bioeconomy Strategy and the Whole of Government Circular Economy Strategy, ensuring that biological resources are managed according to the waste hierarchy, with prevention, reuse and repair prioritised before recycling, bioprocessing or energy recovery.

Community-based and social enterprises should be recognised as key actors in extending product lifetimes, reducing waste generation and creating local employment, across the wider economy and the bioeconomy.

By 2035, the bioeconomy should support resilient local and regional economies through local value retention, reduced reliance on virgin resources and measurable reductions in waste generation. Public procurement should actively support reused, repaired and remanufactured bio-based products alongside sustainable bio-based innovation. Success should be measured not simply by increased production of bio-based materials, but by reducing overall resource consumption while maximising the value retained from biological resources already circulating within the economy.

2. What actions should be prioritised (in terms of time to delivery) over the lifetime of the strategy? Please identify your top 5 actions from the draft strategy.

CRNI recommends prioritising actions that establish the policy foundations needed for a genuinely circular bioeconomy, one that fully harnesses the potential of the social economy and of community-based initiatives and organisations.

Our priority actions are:

Action 5.3.1 on developing a voluntary social and community value framework for bioeconomy projects.

Action 2.3.1 on promoting existing national GPP criteria that can support the bioeconomy.

Action 1.1.1 on establishing national guidance and a decision framework with a focus on the cascading use, which per se is an application of the circular economy principles in the bioeconomy.

Action 2.1.1 on standards for bio-based products, provided it is explicitly aligned with Action A11 of the Whole of Government Circular Economy Strategy regarding standards for secondary biological resources, including compost, digestate and biowaste.

Action 4.2.2 on supporting the delivery of biowaste actions set out in the Whole of Government Circular Economy Strategy.

3. Are there any actions or priorities within the draft bioeconomy strategy where you believe your organisation, sector or community could act as a lead or supporting partner.

CRNI is well placed to support delivery in areas relating to resource efficiency, reuse, repair, community engagement, public awareness and circular economy implementation.

As the organisation at the intersection between the social and the circular economy in Ireland, CRNI has potential for taking on the same role within the bioeconomy. This would allow for increased awareness of the bioeconomy at a local and community level, while harnessing the social economy's potential.

In order to do this, CRNI would like to play a role in the actions 5.3.1 and 2.3.1, identified as priority in the reply above.

CRNI would welcome participation in governance and stakeholder structures that seek to integrate circular economy and bioeconomy policy implementation.

4. Does the draft strategy reflect the key opportunities and challenges for Ireland's bioeconomy? If not, what changes would you recommend?

The draft strategy identifies many important opportunities but should place greater emphasis on ensuring that bioeconomy development is explicitly guided by circular economy principles and includes the social economy.

The potential of circularity in the bioeconomy is underpinned by a strong body of research, including some carried out domestically by the EPA, such as the 2021 EPA study 'Circular Bioeconomy Outlook Study 2030-2050 in Support of Climate Action, Sustainable Food and Biobased Systems' and the 2025 study 'A Review of Circular Economy and Bioeconomy Governance in Ireland'.

In particular, the strategy should explicitly reference the waste hierarchy when discussing the valorisation of biomass and biowaste so that prevention, reuse and repair are prioritised before material conversion or energy recovery. Alignment with the Whole of Government Circular Economy Strategy should be strengthened, particularly where both strategies address biological resources. It's important to avoid duplication or conflicting policy signals, and to enable shared metrics and governance touchpoints.

Without explicit cooperation and engagement across levels and with the social economy, the Irish bioeconomy can't develop in a sustainable way. Social enterprises and community organisations have a strong potential to deliver resource efficiency, waste prevention and local circular economy outcomes, keeping the value of products within communities, and this should be recognised. Commitments to sustainable public procurement supporting reused and repaired bio-based products should be included.

5. How should progress under the Bioeconomy Strategy be measured, and what outcomes or indicators should be used to assess whether the strategy is delivering on its objectives?

Progress should be measured using, among others, indicators that reflect circularity, resource efficiency and social value alongside economic growth. Because of social enterprises' potential in the bioeconomy, impact measurement of the social economy should be included when measuring progress under the Bioeconomy Strategy.

Relevant indicators could include reductions in biological waste generation; increased prevention and reuse of bio-based products; quantity of biological resources retained at higher levels of the waste hierarchy; greenhouse gas emissions avoided through reuse and waste prevention; number of community enterprises and SMEs participating in the bioeconomy; employment created in circular and social enterprise activities within the bioeconomy; implementation of common standards across both the Bioeconomy and Circular Economy Strategies.

6. How can the strategy encourage greater public awareness and understanding of the bioeconomy? What information, education or engagement activities would be most effective?

Public understanding will improve where the bioeconomy is connected to everyday actions rather than presented solely as an industrial opportunity, which in turn has the potential to strongly influence behavioural change.

The strategy should support community-based demonstration projects; repair and reuse initiatives and other educational programmes linking the bioeconomy with circular economy principles; partnerships with local authorities, schools, social enterprises and community organisations.

With CRNI being the link between the social and the circular economy in Ireland, it can take on a similar role within the bioeconomy. This would reflect and harness the important role of the social economy in retaining value within communities.

7. How should Ireland ensure sustainable, efficient and circular use of biomass from land, sea and organic waste streams?

The strategy should explicitly apply the waste hierarchy and the cascading use to all biological resources.

Priority should be given to preventing waste generation, extending product lifetimes through reuse and repair where appropriate, redistributing surplus resources and recovering materials before considering industrial processing or energy generation.

Clear guidance is needed on how "valorisation" should be interpreted to ensure higher-value circular uses are not displaced by lower-value conversion pathways.

Standards, procurement policies and governance arrangements should support this hierarchy consistently across Government strategies, in particular across waste and circular economy legislation.

8. Are the proposed five key sectors the right areas of focus for Ireland's bioeconomy to 2030?

The proposed sectors broadly reflect Ireland's comparative strengths.

However, greater recognition should be given to the enabling role of the circular economy, including reuse, repair, remanufacturing and resource efficiency, which support sustainable outcomes across all sectors rather than operating as a separate activity.

At the same time, the role of the application of circular economy principles for the success of the bioeconomy and for increased competitiveness of the Irish bioeconomy industry should be recognised.

The potential of the social economy for the sustainable and circular development of the bioeconomy should be better reflected across the five key sectors.

9. Are there any key sector actions that should be added, removed, combined or revised?

Actions relating to standards (B5, D6), procurement (A5) and governance should be coordinated with existing Circular Economy Strategy commitments to avoid duplication and inconsistent implementation.

Increased attention should be given to the social economy across the key sector actions and its role in developing the circular economy at a local level.

10. What opportunities exist for the key sectors that the draft strategy does not include?

The strategy could better recognise opportunities associated with community-led circular economy activities, including reuse enterprises, repair networks, social enterprises and local value retention.

These activities reduce waste, extend product lifetimes, create employment, build local resilience and support public engagement with sustainable resource management.

Recognising these contributions would strengthen both environmental and social outcomes from the bioeconomy.

11. What barriers are preventing these key sectors from moving from research and demonstration to wider deployment and commercial scale?

Key barriers include fragmented policy implementation, limited demand-side incentives, insufficient public procurement measures and a lack of integration between related Government strategies.

Without stronger alignment between the Bioeconomy Strategy and the Whole of Government Circular Economy Strategy, businesses and community organisations may receive conflicting signals regarding the highest-value uses of biological resources.

For social enterprises and community-based organisations and initiatives, which have strong potential to play a role in the development of the bioeconomy, barriers include access to suitable material streams, competition from subsidised or higher-capital treatment pathways; limited access to innovation and capital funding; procurement processes designed around larger commercial suppliers; premises and infrastructure constraints; regulatory and insurance costs; skills and data capacity; and short-term project funding that does not fund the organisational capacity required to deliver at scale.

12. What further measures would most help scale sustainable development in these sectors?

Priority measures include:

- Stronger alignment between the Bioeconomy Strategy and Circular Economy Strategy through shared governance, common metrics and coordinated implementation;
- Explicit application of the waste hierarchy to biological resources;
- Procurement policies supporting reused and repaired bio-based products;
- Using public procurement and other demand-side measures to create reliable markets for reused, repaired, refurbished and secondary bio-based products;
- Investment in community enterprises and social enterprises delivering circular economy outcomes, ensuring they are eligible for demonstration, innovation and scale-up funding, including provision for full organisational and overhead costs where they deliver public policy outcomes;
- Continued development of standards for secondary biological resources;
- Long-term support for education, skills and public engagement;

These measures would improve policy coherence while ensuring that Ireland's bioeconomy delivers environmental, economic and social benefits in line with circular economy objectives.