
From: Dublin Friends of the Earth <dublin@foe.ie>
Sent: Thursday 10 June 2021 15:02
To: circulareconomy
Subject: Circular Economy Strategy Submission - June 2021
Attachments: Dublin Friends of the Earth Circular Economy Strategy Submission June 2021.docx;
Dublin Friends of the Earth Circular Economy Strategy Submission June 2021.pdf

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To Whom It May Concern,

Please find attached Dublin Friends of Earth's submission to the Public Consultation on the proposed publication of the Circular Economy Strategy.

Thank you for the opportunity to participate in this submission.

Best wishes,
Steering Committee

Dublin Friends of the Earth
c/o Friends of the Earth Ireland, 9 Upper Mount Street, Dublin 2
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**Dublin
Friends of
the Earth**

Dublin Friends of the Earth
C/O Friends of the Earth Ireland
9 Mount Street Upper
Dublin 2

dublin@foe.ie

09/06/2021

FAO: Department of the Environment, Climate and Communications

Re: Public Consultation on the proposed publication of the Circular Economy Strategy
circulareconomy@decc.gov.ie

Dear Sir/ Madam,

Dublin Friends of the Earth (DFoE) is an active group of volunteers who work together to champion urgent environmental causes that have a positive and practical effect in helping our environment in Dublin, Ireland and globally. We are the volunteering arm of Friends of the Earth Ireland and focus on general climate action issues as well as pursuing environmentally related projects as the need arises. We would like to thank the department for the opportunity to provide a response in relation to the above public consultation review.

Following the recent Climate Action Plan public consultation, it is important to note the inextricable link between Climate Change and overconsumption which leads to problematic pollution and environmental destruction as well as damage to human and animal health which can be alleviated by a strong and well rolled out Circular Economy Strategy.

Below are our considerations in relation to the Circular Economy Strategy:

REDUCING WASTE/ CONSUMPTION LEVELS:

In relation to the current Circular Economy targets: Reuse, Repair, Resource Consumption and Reduction of Contamination Levels there should be a strong focus on reducing consumption of clothes, unhealthy convenience foods and drinks and unnecessary electronics, among other products. Making electronics repairable by legislation is an aspiration we must see come into effect as soon as possible to avoid both the loss of valuable materials, reduce unnecessary consumption and avoid contamination of landfill which results in environmental damage. Much is to be done to tackle the throw away culture which has developed as a result

of cheap products across a range of industries that are too easily available irresponsibly marketed. Education is essential here and should begin at Early Childhood Education (ECE) and Primary School level.

Strategy for the implementation of a waste reduction strategy should include:

- Implementation of institutions modelled on The Library of Things which currently operates successfully in the UK. The Library of Things provides a service where objects/ items/ appliances/ tools can be borrowed and returned in a rental system. This could be implemented in community centres, libraries and through environmental groups. Members of the public could be encouraged to donate to their local service which has the potential to reduce waste in landfill and early recycling of electrical items.
- Repair Cafes are also a growing institution and could become more common and successful with sufficient funding and support. Repairs are carried out for free by volunteers or for a small fee.
- Food Waste Campaigns and Strategies to increase public awareness – this should be evident in supermarkets and shops and should highlight the benefits of home composting and using your brown bin. It is important to include that compostable materials require anaerobic digestion and some aren't suitable for garden compost systems.
- Increased access to composting services at community level to ensure those who do not have access to household brown bins (e.g. apartment dwellers etc.) are not losing the opportunity to compost their food waste.
- Strengthen legislation to ensure that supermarkets are insured in the context of providing reuse and refill options. Issues with insurance are currently allowing an 'opt out' option for many supermarkets which DFoE has engaged with.
- Introduction of a Waste Reduction Scheme at corporate level which holds relevant industries to account for improving their supply chains and production lines with government issues targets.
- Increased funding/support/awareness for Food Cloud Services

REDEFINING RECYCLING:

There are serious issues in relation to public awareness of and engagement with recycling in Ireland. Obviously, contamination is a huge issue and strong campaigns around how and what to recycle are necessary. This has become a tired issue in Ireland with many people completely disengaging from correct disposal of valuable resources. Technically speaking recycling should be termed "downcycling" and in essence should be wound down as a common practice and solution to unnecessary packaging. It should be largely replaced by the refill and reuse concepts. Implementing this cannot come without supports for supermarkets and suppliers to make these options accessible and affordable to ensure majority uptake and a change in the culture of how we shop and eat. Education campaigns and legislation are essential here – top down policy must lead and indeed obligate suppliers and supermarkets to implement change.

Strategy for increasing the efficacy of recycling in Ireland should include:

- Eventual complete removal of Single Use Plastics (SUPs) from our food industry. This may involve a complete change in the supply chain of our food, therefore,

supermarkets and suppliers should be adequately supported financially and in terms of insurance to make these necessary changes.

- It should be made a priority to remove focus from individual responsibility in relation to the production and consumption of unnecessary plastic - legislation should ensure supermarkets and food suppliers do not use SUP in any context and that they only use “recyclable” or compostable options where packaging is absolutely necessary – compostable packaging should be clearly labelled as such to ensure they do not end up in landfill where they will emit methane. This should be coupled with an increase in public brown bins suitable for compostable materials. This is particularly relevant for establishments selling compostable coffee cups which have seen a huge increase in recent years and are mistakenly seen as “greener” alternative to plastic takeaway cups.
- Education/ awareness posters in supermarkets around the unnecessary nature of plastic packaging.
- Public Awareness Campaign for WEEE collection – send boxes to the participating households and arrange local authority pick up or convenient drop off.
- Increase bottle bank availability and collection ASAP.
- Reform of PPE numbers on packaging is essential. Currently they are problematic and misleading and should be adequately supplemented with necessary information i.e. plastic is not recycled, rather it is continuously “downcycled” until it becomes soft plastic which is not recyclable at all and creates severe litter issues in Ireland’s waterways. The damaging nature of downcycled, ‘soft’ plastic should be highlighted on products.
- Recycling/ recyclability markings and symbols should only be applied to packaging that it is possible to recycle in Ireland - Repak have the potential to implement a consistent and uniform system which should correctly inform consumers about the recyclability or non-recyclability of products they are buying. Symbols which mean that it is generally possible to recycle an item are often confused as something that is going to be recycled in Ireland or is made from recycled materials.
- Ultimately, non-recyclable packaging should be removed from the market in order to create a truly circular economy.
- Development of a system of standardised reusable containers for products requiring packaging that can be returned in a convenient manner in a centralized way similar to the new Deposit Refund Scheme (DRS) for plastic bottles and aluminum cans but extended to include products requiring packaging such as convenience foods.

REFORMING WASTE:

While reliance on recycling is not a long term solution to dealing with our waste and shouldn’t remove the focus from reducing and reusing, transitioning to a circular economy is inevitably tied up with how we deal with our waste. The recent announcement of a DRS in Ireland is a fantastic step towards ensuring the public place a value on materials that are largely considered single use and disposable. The roll out and education around this campaign is essential for ensuring the public are engaged in the right way to ensure high participation levels.

Waste to Energy plants are of huge concern due to the potential for negative health and environmental impacts. Energy from Waste to Energy Plants produces CO2 emissions, in addition to Nitrogen Oxide and Sulphur Dioxide which is in conflict with the Climate targets and goes against commitments made in the recent Climate Bill. Furthermore, such emissions pose huge threat to our air quality. Additionally, Waste to Energy Plants are expensive to run and are not worth the small amount of energy they produce. Whatever recyclable materials are mined in advance of incineration are then at risk of being lost due to the lack of recycling infrastructure in Ireland. We desperately need an upheaval of this system in Ireland. Funding should be diverted away from problematic Waste to Energy systems and used to provide an infrastructure which supports consumers to easily and cheaply purchase responsibly.

On a side note, we must end the practice of shipping our “recyclables” abroad to countries who will accept the payment to accept the waste but do not have the infrastructure to extend the life of the materials. This is hugely important for Climate Justice; the plastic problem is inextricably linked with Climate Change issues such as environmental destruction and food insecurity due to ocean life being put at risk when recyclables shipped from rich, Western countries are dumped in countries that cannot afford the infrastructure.

The SUP Directive 2021 is a positive piece of work and we greatly look forward to the SUPs included on the ban list being eradicated from markets effectively and quickly. We would like to see the inclusion of viscose products in the SUP Directive and eradication of any loopholes which allow for greenwashing and marketing tricks that allow companies to continue producing environmentally damaging products. Ideally the Directive would be expanded to include any soft plastic which cannot be recycled in Ireland, including food packaging on fruit and veg which is completely unnecessary and can easily be replaced by loose fruit and vegetables.

We desperately need similar action in relation to the regulation of polyester clothing. Polyester clothing is known to leach micro and nano-plastics into our environment by machine washing. These pollutants are becoming increasingly more evident in the stories we see on a daily basis about ocean wildlife being found with their stomachs bursting with plastics. (<https://www.nationalgeographic.com/photography/article/animals-wildlife-plastic-pollution>). The Pristine Seas project named polyester clothing as the main cause of nano-plastics in Ocean ecosystems which is resulting in the unnatural death ocean flora. Furthermore, research has revealed micro plastics can also be found in the placentas of unborn babies (<https://www.theguardian.com/environment/2020/dec/22/microplastics-revealed-in-placentas-unborn-babies#:~:text=Microplastic%20particles%20have%20been%20revealed.a%20matter%20of%20great%20concern%E2%80%9D.&text=The%20particles%20were%20found%20in,had%20normal%20pregnancies%20and%20births>). While we applaud the positive and ambitious nature of the SUP Directive, policy must extend outside the box and deal with the unseen impacts of plastic on our health and in our environment.

BIO-MATERIALS/ COMPOSTABLE PACKAGING:

The replacement of plastic packaging with biomaterials or compostable packaging is not a suitable long term solution to waste reduction or management. Where packaging is absolutely necessary biomaterials/ compostable packaging are clearly a better option however it should be clearly labelled in relation to correct disposal. This should be coupled with an increase in brown bins and brown bin collection in cities, towns and villages. In this vein compostable coffee cups should also be subject to the SUP Directive coffee cup levy as they should not become the “greener option”, rather the focus should remain on the refill concept as standard (i.e. reusable cups). This could also include coffee cup rental increase for coffee shops to remove reliance on consumers to carry keep cups with them.

Thank you for the opportunity to participate in this public consultation.

Best wishes,

Dublin Friends of the Earth.