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To: circulareconomy
Cc: Colm Warren
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Good afternoon,

Please see attached a response to the public consultation on the publication of the Circular Economy Strategy from Natural World Products Ltd, submitted on behalf of its CEO Colm Warren.

Regards,
Simon Cunningham

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Introduction

Natural World Products Ltd (NWP) is the largest recycler of organic waste streams on the island of Ireland, currently managing c.300,000 tonnes per annum and recycling over 50,000 tonnes of municipal organics from the Republic of Ireland annually.

In our capacity as the most experienced Irish operator recycling large volumes of organic waste, we welcome this opportunity to convey our views on Ireland's First Whole-of-Government Circular Economy Strategy.

Operating from state-of-the-art In-Vessel Composting and Recycling Facilities on the outskirts of Belfast and in Keady, Co Armagh, we also operate and work in partnership with waste transfer facilities across the island and have been in long-term contractual arrangements with some of the largest waste collection companies in the Republic of Ireland for a number of years at this point.

Counting each council authority in Northern Ireland as a customer, in addition to some of the largest waste management companies in the Republic of Ireland, our services and infrastructure play a critical role in enabling effective, and genuinely circular, recycling to occur successfully on the island at present.

With recycled product (peat-free, organic compost and soil conditioner) flowing back in the tens of thousands of tonnes to the economically crucial agri-growing and horticultural sectors, as well as local communities and the voluntary sector, NWP is a tangible Irish example of a local circular economy already operating highly successfully and making a positive ESG contribution on the island.

Responses to select consultation 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?

Natural World Products response

While a lack of awareness and understanding of the term 'circular economy' prevails, objectives should give a clear indication of the potential impacts or outcomes, particularly in relation to climate change and environmental sustainability.

So, rather than 'how it can improve their lives', why not – 'how it will change their lives and positively impact the global and local fight against climate change' thereby tapping into the public consciousness and creating greater buy-in?

An alternative objective may include:

- To promote Ireland's transition to a circular economy as key to the continued fight against climate change.

4. Would you rate Irish public awareness of the circular economy as high, medium or low? And how important do you think raising public awareness is to further developing the circular economy?

Natural World Products response

Awareness of the circular economy in Ireland remains low in the general public as illustrated in the exceptionally low circular material use rate compared to other EU countries. As such, raising public awareness is clearly imperative.

As outlined in the strategy document, those territories with a considerably higher circular material use rate benefit from the existence of an overarching circular economy policy framework. The adoption of a similar framework in Ireland will have a positive impact, but the circular economy can only flourish with an aware public convinced that they should be a part of it, for their good, and the good of their country and the planet.

5. What are the most effective awareness raising measures that could be taken under the Strategy?

Natural World Products response

We welcome the moves outlined in the consultation to develop a new recognisable branding and online platform to promote awareness of the circular economy.

However, these should be considered very much as the bare minimum – the branding should be rolled out across all communications mediums, television, radio, out of home advertising, and social media as part of an all encompassing campaign in partnership with relevant stakeholders.

Demonstration projects as described will be useful, but programmes should be developed that directly target householders and others with schools, community organisations – meeting people where they are to educate them on the circular economy.

As Ireland's leading recycler of organics, we have deep understanding and high volume experience of the contribution food and garden waste can have in fuelling the circular economy, restoring soil health and contributing positively to the fight for carbon capture and sequestration.

Awareness of this, raised through educational and PR campaigns informing householders on how organic waste can be used to fuel the circular economy and reduce carbon emissions through subsequent Carbon Sequestration in soils will prove incredibly persuasive in winning the public's buy-in of the overall strategy.

For example, highlighting that one tonne of organic compost applied to soil keeps the equivalent of 375kgs of CO₂ out of the atmosphere – and that figure is closer to 900kgs when it is used as a replacement for peat (often the case in Ireland and increasingly so with the cessation of peat harvesting by Bord na Mona) – can greatly increase awareness, by playing into the public consciousness around climate change and the need to reduce carbon emissions

In the Republic of Ireland, we are already working with our partners including some of the country's largest private collectors to raise awareness of this very issue in a bid to encourage greater compliance among householders in terms of disposing of waste appropriately in their brown bins.

In Northern Ireland, an understanding that food waste collected by the municipal authority flows back into that council area through the provision of high-quality peat-free organic compost (e.g. to parks, greenways, men's sheds, allotments, golf courses etc) has a significant influence on recycling rates.

Education or PR campaigns around food and garden waste in relation to the circular economy should include a focus on how organic compost produced from food waste can contribute to Soil Health through returning organic matter to heavily farmed soils and, now more than ever, the Carbon Sequestration benefits of organic compost. Soils are the second biggest store of carbon available to us after the oceans.

For example, food waste, when converted to high quality organic compost can positively contribute to key environmental challenges faced by Ireland through:

- Locking carbon up in soils;
- Returning organic matter to soils that have been heavily farmed over many years, thereby stripping them of their natural nutrient and organic matter base

In Northern Ireland, in our work with Local Authorities, NWP also stressed the need to emphasise the economic benefits of effective household recycling alongside the environment. For example, one tonne of food waste diverted from the residual bin to the brown bin, costs almost half as much to dispose of than when burned or sent to landfill. That is in addition to the obvious benefit that it can also be fully recycled in the Brown Bin (free from other contaminants) whereas in the residual bin there is no other (credible) option other than incineration or landfill at very high cost (both environmentally and financially).

7. What do you see as the major economic and/or social co-benefits of moving towards a more circular economy in Ireland, so that environmental improvements also provide economic and social opportunities, and vice versa?

Natural World Products response

From the perspective of an organics recycling business, the collection of organic waste to be processed and converted into high-quality peat-free organic compost has the potential to be hugely transformative and perfectly exemplify the circular economy.

There are significant economic and social benefits.

With our waste management partners in the Republic of Ireland, we are already making a huge impact in driving efficiencies in the sector that have significant economic benefits.

Increased rates of recycling of food and garden waste obviously diverts such material from landfill by keeping it from the residual waste stream, the most costly to process.

Working with local authorities in Northern Ireland, quantities of the high-quality compost we produce from organics collected from households is then circulated back to council bodies for use in municipal projects, landscaping, parks etc – a clear economic saving and a tangible benefit local communities can also touch and feel to increase their confidence in the household recycling behaviours they are being asked to adopt.

Annex 3 of the consultation document provides a 'Preliminary Outline of Actions for Inclusion in Sectoral Circular Economy Roadmaps'.

In terms of the agri-food sector, it should be noted how its prosperity could be greatly improved through the application of organic compost produced from food waste by:

- Helping to replenish vital nutrients and organic matter lost through the ravages of historically intensive farming practices
- Significantly improving crop yields and workability
- Achieving further financial savings for farmers by reducing the amount of lime, synthetic and chemical fertilisers added to soil

Regarding social benefits, our experience in Northern Ireland is that by circulating compost back to the very communities that contributed to its creation through the correct segregation of household organic waste streams, it is not only a key tool in the education piece, but also has a major social and mental well-being impact.

With a growing appreciation of the benefits of gardening and horticulture on mental health and wellbeing, the projects we support, from community allotments, school gardens, social enterprises, alleyway greening initiatives to mental health groups, have an incredibly positive social benefit.

Considering the circular economy more widely, and understanding among the public at large that they are participating in a global movement that can positively impact the planet is of itself a major social benefit.

In the Republic of Ireland NWP is now rolling out a trial scheme with one of Dublin's largest waste collectors whereby the waste collector will supply sample 10L bags of organic compost made from its best brown bin customers back to those households directly as part of their bin collection service. NWP sees this as an incredible opportunity to educate and allow householders in the Republic of Ireland to see and feel the benefits of their own household recycling practices in their own gardens and to increase public confidence in the recycling process as it pertains to Brown Bins in particular.

11. What would be the most effective action Government could take to promote/support and incentivise the further development of the circular economy?

Natural World Products response

There is a major opportunity to incentivise farmers and the wider agri-food sector to adopt practices that will develop the circular economy, such as moving to more arable farming and the application of truly organic soil conditioners that help to lock-up carbon and release key nutrients in a controlled and slow-release fashion. In a nutshell, help the agri-growing sector move away from the application of all sorts of chemical and synthetic fertilisers that are so damaging over the longer term to our wider environment.

Using organic compost, properly managed, in place of synthetic fertilisers, in turn provides optimal growing conditions for crops, that enter the food chain before a portion is discarded back in to the organic waste stream, from which it can again be processed into compost which then goes back into the earth, re-starting the whole process as an incredible example of a genuinely circular economy in action.

Consideration should be given to subsidy arrangements and grant schemes that provide the encouragement required to adopt the application of organic compost in the short term, so that growers might reap the economic benefits that come over the medium to longer period of sustained and appropriately managed application and that will help the country transition from an over-reliance on methane based farming practices and start to seek to replenish organic matter in heavily farmed soils so that Ireland can really look to a successful future of growing sustainability and food security on our own island.

12. Which sectors do you think can make the biggest contribution to making Ireland's economy more circular?

Natural World Products response

The consultation document makes numerous references to the re-use, repair, community sharing and re-manufacturing elements of the circular economy.

While these are all valid components, the organics recycling sector has a huge role to play, and should be a prominent element of any circular economy strategy. In Northern Ireland, for example, NWP and the organics sector is responsible for over half of all recycling from Local Authority Collected Municipal Waste streams – making a phenomenal and critical contribution to helping the country meet its statutory recycling and landfill diversion targets. That experience on the same island must be leveraged, or at least appropriately consulted, in any future strategy/policy direction to be adopted by the Republic of Ireland government going forward. NWP stands ready to play its part in feeding in our experience to the process in as tangible and effective a way as possible.

As iterated throughout our comments in this response, the collection of organic waste to be processed and converted into high-quality peat-free organic compost has the potential to be hugely transformative and perfectly exemplify the circular economy in action. The benefits to soil health and carbon capture are also huge – and these will increasingly become a key area of focus also in the short-term for policy-makers across Europe.

14. Any other comments?

Natural World Products response

Food waste collections have been mandatory in Northern Ireland from April 2017 which immediately contributed to a 5-percentage point increase in composting and recycling rates between Q4 2016 and Q4 2017¹, thereby making a significant contribution to the circular economy.

The Northern Ireland experience, should therefore be examined closely and NWP is willing to play its full part as a key leader on the island in this area in any requested engagement.

A key difference between the United Kingdom and the Republic of Ireland is the existence of national compost and digestate quality standards, independently certified and audited.

The Compost Quality Protocol (properly managed and enforced) and PAS100 (Publicly Available Specification for Composted Materials) have been absolutely critical to raising the standard of organic compost being produced in Northern Ireland.

More importantly, once that product starts to flow back out into communities and amenities, it helps instil a high degree of confidence and interest from the general public in how to use their household waste receptacles most effectively.

The introduction of similar certification in the Republic of Ireland along with a greater focus on seeking to reduce contamination levels in household brown bin collections could, we believe, result in a sea change in compliance, greatly increasing feedstocks for organic compost producers and enhancing the quality of the end product, and accelerating the transition to a circular economy.

¹ Food waste 'boost' to Northern Ireland's recycling rate