

FH WETLAND SYSTEMS Ltd.

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18 February 2020

Waste Action Plan Consultation
Waste Policy & Resource Efficiency
Department of Communications, Climate Action & Environment
Newtown Road
Wexford
Y35 AP90

Re. Consultation submission from FH Wetland Systems Ltd.

Dear sir/madam,

It is great to see that waste and the circular economy are being explored via a consultation process and that the Department is actively seeking input into how Ireland shapes policy in these areas in the coming years. There is much in the document that is very encouraging, but I wish to highlight a number of brief points that are currently leaving gaps in the current proposals, as follows:

1. The only deposit and return scheme mentioned in the document is in the context of plastic bottles – which are not reusable. It is vital for a circular economy that we reduce our dependence on recycling to the absolute minimum, to be used only as a last resort after other avenues for circularity have been embraced. Thus single use items, whether packaging, batteries, disposal cutlery or other products, must be steadily removed from the supply chain to avoid the inevitable linear movement from resource extraction to incineration, with recycling as only a stopgap *en route* to disposal. Even where incineration has a heat recovery element, it is not sufficient to stem the use of fossil fuels or the erosion of pristine habitats.

Thus we need to have extensive deposit and return systems for glass jars and bottles for washing and reuse. There is merit in having a deposit scheme for all other plastic packaging as well, but one that has a levy associated with it as well as a deposit, to pay the inherent environmental costs associated with its use and to encourage a steady phase-out over time.

2. There is no mention of effluent, sewage or wastewater in the document. These are all potential sources of nutrients and biomass, and the reuse of these is essential in any circular society. The methodologies and technologies to facilitate separation and capture for fertiliser or composting are already in place in Scandinavia, as an option within the standard infrastructure. Options there include source separation (in-sewer separation for composting) of faecal solids and source separation of urine (built into the toilet bowl) for reuse as a clean agricultural fertiliser. For standard toilet and sewer systems there is also the potential for uptake of nutrients by biomass willows as a fuel crop; thus displacing imports of fossil energy and the carbon cost of same.

For more detail on carbon sequestration potential and fertiliser GHG emission savings on use of urine and separated compost as a fertiliser source see my report¹ to the

¹ Harty F (2016) *Closed Loop Agriculture for Environmental Enhancement: Returning Biomass and Nutrients from Humanure and Urine for Agriculture*. Feasta – The Foundation for The Economics of Sustainability,

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Foundation for the Economics of Sustainability. For more detail on carbon uptake by short rotation willows see Teagasc best practice guidelines², (section 5.1 carbon mitigation and capture).

3. In terms of funding the required infrastructure: the cost of disposal could easily be included in the sale price of the items on the shop shelf. Thus if the packaging or product ends up as litter, there is a fully funded Local Authority department with the resources to simply tidy it up. The current problems of microplastics from artificial fabrics and from tyre bits on roads are going to be very costly to clean up, and sufficient funding will be difficult to find.

As an example, if both artificial fibre clothing and tyres had a specific clean-up levy included in their cost on the shop shelves it would encourage the use of natural fibre clothing and make public transport more financially attractive; and would also provide a fund for road runoff filters and for effluent treatment plant outlet micro-filters to prevent microplastic runoff into watercourses.

4. Finally, its worth noting that for as long as it remains government policy and practice to provide subsidies for fossil fuels, we will not achieve a circular society. An RTE report³ cited a figure of €4.1bn in 2016 as being spent by the state on “environmentally damaging subsidies”. While subsidies continue to remain in place to provide tax-payer funding for fossil fuels and fossil fuel infrastructure, we will perpetuate to the oversupply of cheap plastics onto the shop shelves, and perpetuate the waste of both resources and energy at the direct expense of a circular economy, a clean environment and a healthy population. The EU have already agreed to phase out fossil fuel funding from the EU Bank⁴ and the day of fossil fuel subsidies are numbered, and Ireland could make a bold political statement by leading the way.

I encourage you to push out the boat on this circular economy process and really stretch for policies that actively support return and reuse on multiple levels; an indigenous returnables glass packaging industry; a complete phase out of single use packaging and other items; a levy on plastics devoted and actively used for clean-ups of historic pollution; and an upgrade of sewage management to allow for an encourage biomass and nutrient recovery.

Please do not hesitate to call or email with any questions on any of the above information.

Yours sincerely,



Féidhlim Harty

Dublin.

- 2 Caslin B, J Finnan and A McCracken (2010) *Short Rotation Coppice Willow Best Practice Guidelines*. Teagasc, Carlow & AFBI, Belfast.
- 3 Lee, G (2019) *€4.1bn spent on environmentally damaging subsidies – CSO*. RTE.
<https://www.rte.ie/news/environment/2019/0604/1053483-damaging-subsidies/>
- 4 Guarascio F (2019) *In books to climate policy, EU makes first move to end fossil fuel funding*. Reuters.
<https://www.reuters.com/article/us-climatechange-europe-eib/in-boost-to-climate-policy-eu-makes-first-move-to-end-fossil-fuel-funding-idUSKBN1XG21N>

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