

287-44

From: [REDACTED]
Sent: 24 October 2018 13:42
To: Reps
Subject: FW: Rep CG-2018 141
Attachments: CG-2018 141.pdf

Hi

In relation to this Rep CG 2018 141, can it be closed off please. Former Minister Naughten met with Ms Byrns O'Brien post receipt of this letter so we are happy that she is up to date on the issues raised in this Rep.

Thanks

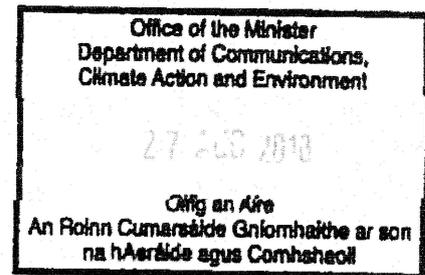
[REDACTED]
From: Reps
Sent: 27 August 2018 12:11
To: [REDACTED]
Cc: [REDACTED]
Subject: Rep CG-2018 141

Please see Rep CG-2018 141
A draft reply should be sent to
[REDACTED] on or before 17/09/18.

Regards,
[REDACTED]

24th August, 2018

Mr. Denis Naughten, TD
Minister
Department on Communication, Climate Action and Environment
29-31 Adelaide Road
Dublin
D02 X285



Dear Minister Naughten,

VOICE welcomes the publication of the *Proposal for a Directive on the reduction of the impact of certain plastic products on the environment* by the European Commission in May 2018. However, given the scale and urgency of the plastic pollution crisis we urge you to strengthen this proposed piece of legislation.

EU citizens, including our fellow Irish citizens, want action from you to tackle the plastic pollution crisis. Over 90% of citizens highlighted this in a Eurobarometer poll¹ and almost 700,000 citizens signed a petition² asking for action at the EU level. The European Parliament has also requested legislation to be ambitious in solving the plastic pollution crisis³.

We ask the Irish government to

- **Put single use plastic reduction and reuse first:** Ensure that the prevention and reduction of single use plastics and incentivising reusable alternatives is a priority, in line with the waste hierarchy, notably by:
 - Supporting the proposed market restrictions and extending the list of products covered to include plastic lollipop sticks, expanded polystyrene and very lightweight plastic bags;
 - Setting Union wide quantitative consumption reduction targets for food containers, cups for beverages and their lids of 50% by 2025 and 80% by 2030 and a reduction of 30% by 2025 and 50% by 2030 for single use plastic bottles;
 - Ensuring reusable menstrual products are made widely available in the EU; and
 - Requiring reusable tableware for instore consumption in food and drink outlets.
- **Not fall for bio-based or biodegradable plastics:** Avoid the substitution of single use plastics with bio-based and/or biodegradable single use plastics, notably by supporting the proposed definition of plastics and discouraging the development of a "marine biodegradable" standard.
- **Strengthen EPR measures:** Support strong Extended Producer Responsibility (EPR) schemes, including for fishing gear. Schemes must include full cost coverage i.e. of waste collection, subsequent transport and treatment, clean-up of litter, hazardous

¹ European Commission, 2014. Attitudes of Europeans towards Waste Management and Resource Efficiency, Flash Eurobarometer 388. http://ec.europa.eu/commfrontoffice/publicopinion/flash/fl_388_en.pdf

² <https://act.wemove.eu/campaigns/483>

³ European Parliament, 2018. Final copy of consolidated text to be made available after summer recess here [http://www.europarl.europa.eu/cejl/popups/ficheprocedure.do?reference=2018/2035\(INI\)&lang=en](http://www.europarl.europa.eu/cejl/popups/ficheprocedure.do?reference=2018/2035(INI)&lang=en)

chemicals management and awareness raising measures. This would require producers who place plastic packaging onto the Irish market to pay significantly more per tonne. At present, such producers pay only €89/tonne of plastic packaging while in the Netherlands, Spain and Germany, they pay between €355-€1,296. In addition, modulation of fees should be introduced, as in the EU Waste Framework Directive, in order to incentivise better product design and better use of sustainable materials.

- **High collection, better marking and strengthened product requirements:** Ensure high collection rates are achieved, inappropriate disposal is reduced and public awareness is increased by supporting deposit-refund schemes (DRS), and better marking requirements, including of the available alternatives to single use items and the presence of hazardous chemicals. Ensure that the requirement to 'connect the cap' applies to all beverage bottles and that a minimum recycled content target of 30% by 2025 is introduced.

The EU and Member States have already taken strong and successful action to curb one problematic type of single-use plastic, with the adoption of *Directive (EU) 2015/720 on lightweight plastic carrier bags*. Early implementation of this Directive shows that reduction targets, fees and bans are extremely effective at reducing the consumption of these single-use bags. As you well know, Ireland took the lead to reduce plastic bag consumption by imposing an effective plastic bag levy. As a result, we saw reductions of single-use plastic bag use of 90% in 5 months. Other countries and jurisdictions have followed our example and have experienced similar results. Furthermore, the measures have proven to be very popular with the public.

Ireland has shown leadership on waste issues before and I urge you to lead again in supporting strong policies that will reduce plastic use and eliminate plastic pollution. In the EU, per capita plastic consumption is amongst the highest globally at around 100kg per person per year, and the EU ranks 18th globally in sources of plastic waste to the environment.⁴ Little more than 30% of plastic waste in the EU is collected for recycling⁵, with around half of this exported outside of Europe impacting third countries, and almost 70% is landfilled or incinerated. This points to the urgent need to reduce plastic consumption and waste generation, recycling can only take us so far. In terms of plastic packaging, Ireland is the largest consumer in the EU at 61 kg per person per year, double the EU average.

Rethinking plastic production, design and use (as well as waste management), along the lines of the proposed legislation, will not only have a positive impact on the environment, it will also provide significant socio-economic benefits to industry and citizens. For businesses, it will create the framework for new business models that promote a healthier environment and a *circular economy, creating opportunities for innovation and job creation*. For citizens, it will engage them in the shift away from linear models of consumption and production, towards more circular and sustainable consumption patterns.

Economies, societies and citizens are ready - even demanding - to change their relationship with plastic and to take bold action to eliminate plastic pollution. This has been seen around Ireland with many plastic free communities popping up and the success of the recent Sick of Plastic Day of Action where shoppers throughout the country left their unwanted plastic packaging behind in supermarkets. This can and will only happen if you, take the necessary and

⁴ Jambeck et al. 2015. Plastic waste inputs from land into the ocean, *Science*, 347, pp.768-771, available online.

⁵ PlasticsEurope, 2018. *Plastics - the facts 2017*

appropriate steps at policy level. We, and countless Europeans, are counting on you to make possible the change we all want to see.

If you would like more information or have questions on the points above, I would be delighted to meet with you in the coming weeks.

Yours sincerely,

Windy Byrnes O'Brien
Coordinator