

360-9

**From:** Minister Naughten  
**Sent:** 22 February 2018 09:50  
**To:** Ministersdiary  
**Subject:** FW: ENGO letter on plastics strategy  
**Attachments:** strategy on plastic letter to min naughten.docx

**From:** Mindy O'Brien - Administrator [REDACTED]  
**Sent:** 22 February 2018 09:49  
**To:** Minister Naughten  
**Subject:** ENGO letter on plastics strategy

Dear Minister Naughten,

Please find attached a letter from three ENGOs urging you to support six key policy measures when considering the EU Plastics Strategy. We know that you are concerned about the prevalence of plastic single-use items, including disposable coffee cups, in our environment and hope that you will raise your concerns and support policy initiatives to reduce the use of such unsustainable packaging.

If you have any concerns or questions about our request, please do not hesitate to contact us.

Kind Regards,

Mindy O'Brien  
Coordinator

**VOICE**  
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[www.voiceireland.org](http://www.voiceireland.org)

Please support the **Waste Reduction Bill**: <http://voiceireland.org/general-news/support-the-waste-reduction-bill>



**Friends of  
the Earth  
Ireland**



**An Taisce**  
*The National Trust for Ireland*

Mr. Denis Naughten, T.D.  
Minister  
Department of Communications, Climate Action and the Environment  
29-31 Adelaide Rd,  
Saint Kevin's,  
Dublin, D02 X28

22<sup>nd</sup> February 2018

**Subject: EU Strategy on Plastics in a Circular Economy - 6 key asks from NGOs**

Dear Minister Naughten

On January 16th 2018, the European Commission published its *EU Strategy on Plastics in a Circular Economy*<sup>1</sup>. The Strategy represents a key milestone towards tackling our globally growing plastic pollution problem, at a time when the people of Europe are becoming more and more concerned about the consequences of our plastic usage.

VOICE, Friends of the Earth and An Taisce ask you to ensure that a plan is put in place at the EU level to reduce plastic use and reduce plastic pollution. We ask you to support the following **6 key policy measures in the *EU Strategy on Plastics*** in Council conclusions and ahead of the Environmental Council's discussion on the topic on March 5th 2018:

- **Regulatory measures to reduce single-use plastics consumption:** we cannot recycle our way out of our plastic pollution problem<sup>2</sup>, nor can we solve it by substituting fossil-based plastic feedstock. The Strategy has committed to developing legislation in the coming months that will reduce the use of single-use plastic items. *We urge that you support ambitious reduction targets on production and consumption, fees, bans and other relevant regulatory measures to ensure this happens.*
- **Economic incentives to drive circularity in plastics:** schemes such as extended producer responsibility (EPR), deposit-return schemes or a potential plastic tax, if well designed and implemented, can put in place necessary incentives to prevent plastic pollution, as well as increase the reuse and recycling of plastic waste.
- **Phase out microplastic ingredients and oxo-degradable plastics:** support a complete restriction on intentionally added microplastics in products and on oxo-

<sup>1</sup> [https://ec.europa.eu/commission/publications/legal-documents-plastics-strategy-circular-economy\\_en](https://ec.europa.eu/commission/publications/legal-documents-plastics-strategy-circular-economy_en)

<sup>2</sup> <http://www.no-burn.org/wp-content/uploads/Recycling-is-Not-Enough-online-version.pdf>

degradable plastics<sup>3</sup> through REACH. Since this is already underway in several Member States<sup>4</sup>, an equal playing field is needed for European companies. Furthermore, support legislative action that addresses other sources of microplastics, such as pre-production pellet loss across the supply chain.

- **Strengthen the reuse and recycling markets by making plastics toxic free:** the current toxicity levels of plastic results in low confidence in the quality of recycled plastics and in an uncontrolled exposure of toxics to citizens. Banned substances of very high concern are even present in children's toys. A strong plan for toxic-free plastics and clean reuse and recycling loops is needed if Ireland's commitments to move to a circular economy are going to be met. This must be paired with targets for minimum recycled content.
- **Essential requirements for plastics packaging:** the essential requirements under the EU Packaging and Packaging Waste Directive need to be modified to allow for prevention of packaging as the preferred option. Increasingly, many items are being packaged in single-use, non-reusable or non-recyclable plastics, whilst packaging-free shops are struggling to meet the EU requirements on how to sell and transport produce.
- **New eco-design measures for plastics placed on the market:** vital to support the prevention, reusability and recyclability of plastic products and packaging, including through Ecodesign, Green Public Procurement and Ecolabel instruments.

Our organisations are part of the global Break Free From Plastic movement, which consists of over 900 NGOs and millions of citizens worldwide. Collectively, this growing global movement systematically addresses the environmental, economic and social impacts of plastic pollution.

*If you would like to learn more about our view on the topic, we would be delighted to meet you and your team.*

Kind regards,

Mindy O'Brien  
Coordinator

Oisín Coghlan  
Director

Charles Stanley-Smith  
Board Director

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<sup>3</sup> <https://www.irishtimes.com/news/over-150-organisations-back-call-to-ban-oxo-degradable-plastic-packaging>

<sup>4</sup> Sweden, Finland, Italy, France, England, Wales and Scotland have introduced, or announced the introduction of, bans on microplastics added to cosmetics