

ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management



ZERO WASTE ALLIANCE IRELAND (ZWA) ACTIVITIES DURING THE 12 MONTHS FROM SEPTEMBER 2019 TO SEPTEMBER 2020

1. On 21 November 2019, Jack O'Sullivan gave a public lecture, by invitation from the Food Safety Authority of Ireland, on the topic of "Plastics and Food – Friends or Enemies", at the 2019 Food Safety Consultative Council Open Meeting, Dublin; the lecture was followed by a discussion, and the PowerPoint presentation is available on the ZWA website.
2. In November 2019, ZWA was selected as a relevant key stakeholder whose perspective and experience could contribute to the regulatory impact assessment (RIA) process for a proposed single use disposable cup levy; this consultation was in response to the EU Directive 2019/904, the aims of which are to reduce plastic waste, drive the promotion and development of alternative materials, and promote the design and production of plastics and plastic products that are re-usable, repairable, and recyclable. Seán Cronin, on behalf of ZWA, made a detailed submission to the Department of Communications, Climate Action and Environment, on 20 December 2019.
3. On 20 December 2019, Ollan Herr, Jack O'Sullivan & Dalia Smelstoriūtė made a detailed and lengthy submission on behalf of ZWA to the Department of Communications, Climate Action and Environment in response to a public consultation on the proposed introduction of new environmental levies. We made many suggestions, including:
 - a levy on plastic packaging for food;
 - the levy on the disposal of waste by landfilling should be increased;
 - a levy on the incineration of "waste" and on the incineration or burning of potentially recyclable materials as "waste" or as "refuse derived fuel" or "solid recovered fuel" in cement kilns should be immediately

introduced, and should be at a level similar to the levy on the landfilling of waste;

- Ireland “as a developed country” should fully adopt a Zero Waste programme for all materials used in the economy;
- Plastic products that are intended only for a few years use or for single use only, should be banned altogether or be progressively priced out of the economy; and,
- Stack emission monitoring should be carried out by the EPA itself -- not by the licensed operators (which we term “self-monitoring”), as this will be the most transparent way to integrate sustainable information in their reporting cycles.

4. On 21 February 2020, Jack O’Sullivan, on behalf of Zero Waste Alliance Ireland, made a lengthy and detailed submission (46 pages) to the Department of Communications, Climate Action and Environment, providing observations on a new Waste Action Plan for Ireland as part of the transition to a Circular Economy. These observations included:

- Managing our discarded materials and goods must not be viewed as a problem, or as a means of private gain or profit, but as a comprehensive and integrated method for more effectively using valued community resources of skills and materials, encouraging people to assimilate and modify technologies to suit their own needs, improving rural health and quality of life, keeping wealth within the community, increasing productivity by re-using and recycling objects and materials, and saving energy;
- While ZWAI is happy to acknowledge that many of the waste prevention initiatives operated or funded by the EPA or by local authorities are effective, we stated that they are significantly under-funded and under-utilised;
- Consumers and businesses should be incentivised to change to a more sustainable consumption pattern by means of balanced financial supports, encouragement and penalties, coupled with strong enforcement (and we provided many practical examples of how this can be achieved);
- We strongly urged that Ireland should implement the Packaging Waste Directive by insisting that all larger shops and supermarkets should have a facility within the shop where customers can deposit excess packaging waste before leaving the shop; and can also deposit packaging waste when returning to the store on the next shopping trip;
- We strongly recommended that Civic Amenity Sites should be multi-purpose, depending on the available space for the necessary activities, and that Civic Amenity Sites are ideally placed to provide

re-use opportunities, so that people can take away for re-use or recycling some of the materials which have been discarded by other people; and, while this is currently prevented in Ireland, this re-use is widespread in other EU Member States, and we gave several examples;

- We made suggestions about how domestic waste generated in apartment blocks and other multi-family living environments could be utilised, pointing out that in Ireland more than 77,500 tonnes of potentially recyclable packaging waste and over 29,000 tonnes of food waste are generated annually by apartment dwellers, and nearly all of this waste is incinerated or landfilled;
 - We made many other detailed suggestions about food waste, plastic packaging waste, single use plastics, PET beverage and food containers, and the increasing amounts of discarded textiles and garments;
 - We provided many examples of the Circular Economy in action in other EU Member States, and we urged the Department and the Government to take action and to implement the Circular Economy principles, noting that in Ireland *“the circular economy is a long way off – almost beyond the horizon”*; and,
 - We hoped that a new Waste Action Plan, supported by appropriate policies and fiscal changes, would help to move Ireland away from its current low position in the *“waste hierarchy of European countries”*, so that we might become a leader.
5. On 08 August 2020, Ollan Herr and Jack O’Sullivan made a detailed and lengthy submission (85 pages) on behalf of ZWAI to the Department of Housing, Planning and Local Government in response to a public consultation on Significant Water Management Issues (SWMI) in Ireland. Recommendations in our submission included:
- Ensuring compliance with the requirements of the Water Framework Directive requires a concerted approach, as the problems of water quality, water use, environmental issues and other water-related problems are interconnected, and must be dealt with through a multi-disciplinary and multi-agency action plan, with very much more inter-agency and inter-departmental cooperation than exists at present in Ireland, and there are no legal or administrative barriers to such integration;
 - We strongly advocated a new approach, that the proposed new river basin management plan (or plans) for the third cycle of the WFD should include not only the management of water resources, but should follow the principle of multifunctionality, to provide environmentally and socially sustainable management of a wide range of ecosystem services and goods, such as fresh water, timber,

agricultural crops, other types of human and animal foods, fibres and useful plant species, together with protection and enhancement of terrestrial biodiversity, water storage, support for nutrient cycling, regulation of water flows, mitigation of climate change effects, and protection of air quality;

- We welcomed the statement that the Government will promote an All-Ireland approach to land use and river basin management planning, but we pointed out that the currently proposed River Basin Management Plan for Ireland, 2018 -2021, fails utterly to achieve the status of a unified All-Ireland river basin management plan, and the administration system proposed by the Department was complex, messy and unworkable;
- We therefore strongly recommended that a single River Basin Management Plan for all of Ireland, under a single authority, would be the optimum approach; and we suggested Waterways Ireland, a single All-Ireland authority responsible for the maintenance and regulation of all navigable waterways, North and South, and with two offices, one in each jurisdiction, as an excellent example to be followed;
- We emphasised that water, including wastewater, is a valuable resource which should be conserved or re-used to the maximum extent; and the nitrogen and phosphorus removed from wastewater during the treatment process should be recovered and re-used; we further emphasised the necessity to recycle phosphorus, the high risk of future phosphorus shortages in Ireland and Europe, and the impacts of these on food security; and we pointed out that the manufacture of nitrogenous fertilisers from fossil fuels (about 2% of the world's energy resources are used just to make ammonia and nitrate fertiliser from coal and natural gas) has an adverse effect on the Earth's climate, and will have to cease;
- We pointed out that recovering dissolved nitrogen from wastewater would save energy, and should be an additional priority for the new river basin management plans; and nitrogen recovery would also have the benefit of reducing eutrophication of rivers, lakes and coastal waters;
- We noted that major barriers to the design of effective water, land management and conservation programmes include the limited accessibility and fragmentation of scientific evidence, and the multiplicity of noncooperating (and often competing) government agencies;
- We made many suggestions on the topics of land use, water use and biodiversity impacts of agriculture, suggesting ways to improve water quality by reducing pollution caused by agriculture;

- We urged that separated human urine and faeces which contain the majority of nutrients in domestic waste water should be individually treated in a safe hygienic way to become a bio-material that can be composted and re-used; that growing of plants in separated and diluted urine should be an option for single houses in the future, and we pointed out that Nordic countries have for many years been using the nitrogen and phosphorus contained in human urine to grow crops and plants which can be composted; and,
 - We made practical suggestions for the removal of pharmaceuticals and toxic substances from wastewater.
6. Other activities during the past 12 months included participating in several webinars on waste-related environmental issues, and embarking on a drive to recruit new members. To assist in the latter task, Seán and Jack prepared a membership application form in July 2020, while Jack prepared a background document for intending or prospective members, giving a brief description of the origin and early activities of ZWAI, together with our aims and current activities. Keerthana Sreenivasan, a young engineer, with a Masters Degree in energy management and a specific interest in waste matters, and currently working as an intern with Environmental Management Services, helped in the membership recruitment process. ZWAI now has at least four new members, and we hope that all of them will be able to participate in our forthcoming Annual General Meeting.
7. Other activities during the last 12 months included:
- maintaining an active **web page** (<http://zerowasteireland.com/>); managed principally by Seán;
 - a **Facebook page** (<https://www.facebook.com/ZeroWasteAllianceIreland/>); and,
 - a **Twitter account** (<https://twitter.com/zerowaster>),
- as a way of raising public awareness of the Zero Waste approach, Zero Waste news and activities (in Ireland and other EU Member States), and reaching out to our supporters and members of the public.
8. ZWAI is represented on the Government's **Waste Forum** and on the Water Forum (**An Fóram Uisce**) by Ollan Herr; and, because of the Covid-19 restrictions, Ollan attended the online meetings of these organisations; and Jack O'Sullivan attended online meetings of the **Climate Research Co-ordination Group**, established under the Environmental Protection Agency's 2014–2020 Research Strategy.
9. In November 2019, ZWAI was accepted as a full member of the **European Environment Bureau (EEB)**; and we intend to participate (as far as our resources will allow) in the development of European Union policy on waste and the Circular Economy. In the meantime, Jack O'Sullivan has

continued to participate in EEB discussions on waste policy, but only when time permits.

Between the Waste Working Group of the EEB and mailings from Zero Waste Europe (ZWE), ZWAI is receiving emails nearly every day (on some days several emails -- 497 emails since we joined the EEB last year !). There are almost continuous discussions in Zero Waste Europe (ZWE) and in the Waste Working Group of the EEB, and IEN considers it important that we should participate in these discussions. Unfortunately we can do no more than just file these emails, and reply to the occasional one or two.

Jack O'Sullivan

16 September 2020

If other members of ZWAI can find events or activities which I have omitted, please add them to the list, or give details verbally during our forthcoming Annual General Meeting, planned for Saturday 19 September 2020.