

ZERO WASTE ALLIANCE IRELAND

Towards Sustainable Resource Management



Submission by Zero Waste Alliance Ireland to the European Commission on Proposed Targeted Simplification of the EU Framework of Regulatory Measures in the Areas of Agriculture and Food Safety

14 October 2025

Zero Waste Alliance Ireland is funded by the Department of the Environment, Climate and Communications through the Irish Environmental Network, and is a member of



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APPENDICES

APPENDIX I European Commission's Call for Evidence on the proposed initiative and Regulation for simplification of the administrative burden on Member States required for authorisation of plant protection and other products.

APPENDIX II Email from the European Commission acknowledging receipt of our submission on 14 October 2025 .

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1. INTRODUCTION

On 16 September 2025, the European Commission issued a Call for Evidence on a proposed Regulation which would have the effect of amending Regulation (EC) No 1107/2009, Regulation (EC) No 396/2005, Regulation (EU) No 528/2012, Regulation (EC) 1829/2003, Regulation (EC) No 1831/2003, Regulation (EC) No 852/2004, Regulation (EC) No 853/2004, Regulation 1099/2009, Regulation (EC) No 999/2001, Regulation (EC) No 1069/2009, Regulation (EU) 2017/625, Directive 98/58/EC and Directive 2009/128/EC, for the purpose of simplifying and strengthening food and feed safety.

This proposed initiative, if implemented, would have far-reaching effects on agriculture, the use of biocides and other synthetic substances in agriculture, and on food production and food safety. The environmental consequences of the proposed Regulation, even though not yet drafted, could also be wide-ranging.

The Commission's Call for Evidence¹ outlined the purposes of the proposed Regulation as:

- i) increasing the competitiveness of EU farmers and the food and feed industry;
- ii) reducing the administrative burden on Member States authorities related to marketing authorisations of products;

¹ Ares(2025)7724078, 16 September 2025.

- iii) accelerating access to the EU market for biocontrol substances and products;
- iv) simplifying and clarifying regulatory requirements on plant protection products, biocidal products, feed additives, food hygiene and official controls as well as other measures to simplify EU food law..

The Commission's Call for Evidence also stated that the proposed initiative and Regulation would reduce administrative burdens for economic operators and Member State authorities, and would help European farmers to become more competitive, while a high level of safety for human health, animal health and the environment would continue to be maintained. While we agree that a reasonable level of administrative efficiency and competitiveness are important, Zero Waste Alliance Ireland is concerned there is a serious risk of these priorities weakening nature protection standards.

By way of an important background to the Commission's proposal, ZWAI wishes to draw the Commission's attention to a recent communication from the United Nations Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, pursuant to Human Rights Council resolution 54/10.²

The Special Rapporteur stated that he was –

“particularly concerned about articles relating to the formatting of labelling allowing for derogations from labelling requirements for small packaging, especially for very small containers under 10 ml (Article 29(2) and section 1.5.2.4 of Annex I). The amendment to Article 29(2) will allow economic operators to provide less information on the label for packaging containing smaller quantities of chemical substances or mixtures without the need to prove that this packaging is either in such a shape or form or is so small that it is impossible to meet full labelling requirements. Moreover, the amendment deletes minimum requirements concerning the dimensions of labels and pictograms for packages not exceeding 0,5 litres and packages greater than 0,5 litres but not exceeding 3 litres, introduced with Regulation (EU) 2024/2865 to ensure that labels on substances and mixtures are legible”.

The Special Rapporteur expressed further concern about –

² Mandate of the United Nations Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes, 25 September 2025. Palais Des Nations, 1211 Geneva 10, Switzerland.

“the proposed amendment relating to advertisement and online sales of chemicals sold to the general public (Article 48 and 48a). In order to allow consumers to make an informed decision, information on the hazards of a substance or mixture needs to be available upfront during advertisement”;

And he also expressed concern about substances which have been classified as carcinogenic, mutagenic or reprotoxic (CMR) in Annex VI to the Regulation are prohibited for use in cosmetic products, unless an exemption has been granted, and especially about –

“weakened safeguards preventing the use of CMRs in cosmetics. In particular, the proposed amendment would allow selling products that contain CMRs for years longer than is currently permitted.”

One of the Rapporteur’s most significant concerns, from the perspective of ZWAI, is in the area of agriculture, where he noted that –

“The [proposed] amendment seeks to remove the requirement that all substances incorporated into an EU fertilizing product, on their own or in a mixture, except polymers, shall be registered pursuant to REACH Regulation (EC) No. 1907/2006. In absence of any specific requirements under the Fertilizing Products Regulation, the general REACH provisions, including the relevant gradations depending on quantity, would apply to substances used in EU fertilizing products”.

“I am concerned that the amendment would weaken safety controls related to substances used in fertilizers. As noted by the Special Rapporteur on the right to food in his communication concerning the European Union’s Common Agricultural Policy Simplification Package (OTH 78/2025, 12 June 2025) fertilizers negatively impact soil depletion, water and air pollution, biodiversity loss, and overall public health”.

The latter concerns have been expressed on several previous occasions by Zero Waste Alliance Ireland in our submissions to the European Commission on the subjects of soil health and the effects of intensive fertiliser-based agriculture on biodiversity. It is therefore our submission that the European Commission should take note of these concerns, as they are scientifically based, and shared by ourselves, the United Nations and other environmental NGOs.

One of the most obvious omissions which we have noted in the Commission’s Call for Evidence is the absence of any detailed proposals for measures to protect the environment and biodiversity; and it does not surprise us to find that this concern is also expressed in the communication from the United Nations Special Rapporteur on management and disposal of hazardous substances and wastes. He stated that –

“I am concerned that there has not been a full impact assessment of the proposed omnibus package. In relation to the impact assessment, the Commission’s proposal itself notes that “Given the need to urgently put forward a proposal to address the identified problems in order to reduce administrative burden and excessive costs for businesses it has not been possible to prepare a full impact assessment.” I am concerned that due to the lack of a full impact assessment, there has not been an opportunity to evaluate the potential detrimental human rights and environmental impacts”.

It is therefore our submission that the Commission’s proposed “omnibus package” must be subjected to a complete and thorough environmental impact assessment, an appropriate assessment as required by the Habitats and Birds Directives, and a social impact assessment.

One of our further concerns about the proposed initiative and Regulation, and the “omnibus package” of which it forms a part, is that the Commission’s stakeholder consultation did not adequately include representation by environmental NGOs. As stated by the UN Special Rapporteur stated so clearly –

“The workshop on the CLP regulation on 16 May [2025] reportedly included 450 participants, mostly representing industry interests. Only a handful of consumer and environmental NGOs took part, which undermines the credibility of the process. NGOs have raised concern that the accelerated timeline for the chemicals omnibus package is an intent to fast-track legislative amendments without a proper impact assessment or stakeholder consultation.”

The Rapporteur expressed further concern that –

“... public input, especially from those potentially affected, has been bypassed, and the impact assessment draws mainly on data provided by industry. In this context, it is important to address the concerns raised by civil society, including by ensuring the right to participation. I also note that some groups in the European Parliament have expressed concern that the European Commission’s proposal prioritizes industrial interests and rolls back vital health and environmental protections across several key areas of EU chemicals legislation. They further expressed concern that the proposal counters the precautionary principle and is likely to increase exposure to hazardous chemicals for both people and the environment ...”

The Rapporteur summarised his concerns very appropriately, by stating that –

“Respect for human rights lies at the core of the just transition to a chemically safe circular economy. The regulation of chemicals is closely linked to the effective enjoyment of human rights, as states have a duty to

prevent harm by ensuring that toxic substances do not endanger people's life, health, safety, or environment. Exposure to hazardous chemicals can compromise the full enjoyment of human rights and constitute violations of international human rights norms and standards, including the right to life, the right to the highest attainable standard of health, the right to a clean, safe, healthy and sustainable environment, the right to adequate food and the right to clean water".

"Simplicity and efficiency should not come at the expense of retrogressive measures or the health of the population, especially those that are the most vulnerable to toxics and pollution such as children. Weakening the current regulatory framework would be a step backward when it comes to environmental standards, hence a potentially retrogressive measure as per the Framework Principles on Human Rights and the Environment, which set out basic obligations of States under human rights law as they relate to the enjoyment of a safe, clean, healthy and sustainable environment".

The UN Rapporteur further added that –

"The proposal also seems to conflict with rights set out in the Charter of Fundamental Rights of the European Union, including the rights to health and environmental protection. Additionally, it undermines the European Union's credibility as a global leader in green policy and the rule of law".

We have quoted somewhat at length from the UN Special Rapporteur's observations on the proposed initiative and Regulation for the simple reason that he has stated precisely our own concerns as an environmental NGO. While our aims and objectives are focussed on wise use of resources, on sustainability, the circular economy and on recycling and repairing, we recognise that support for human rights must also be central to our mission.

It is therefore our submission that the proposed initiative and Regulation, and indeed the entire "omnibus package", does not contain adequate safeguards for the protection of the environment and biodiversity.

2. ZERO WASTE ALLIANCE IRELAND (ZWAI)

At this point we consider that it is appropriate to mention briefly the background, aims, activities, policies and strategy of ZWAI, and to list some of our previous submissions to Irish Government departments and to the European Commission.

2.1 Origin and Early Activities of ZWAI

Zero Waste Alliance Ireland (ZWAI), established in 1999, and registered as an Irish company limited by guarantee in 2004, is a Non-Government Environmental Organisation (eNGO) and a charity registered in Ireland. ZWAI has prepared and submitted to the European Commission, the Irish Government and to Irish State Agencies many policy documents on waste management and waste elimination, and continues to lobby the Irish Government and the European Commission on using resources more sustainably, on promoting re-use, repair and recycling, and on development and implementation of the Circular Economy.

One of our basic guiding principles is that human societies must behave like natural ecosystems, living within the sustainable flow of energy from the sun and plants, producing no materials or objects which cannot be recycled back into the earth's systems, or reused or recycled into our technical systems, and should be guided by economic systems and practices which are in harmony with personal and ecological values.

Our principal objectives are:

- i) sharing information, ideas and contacts,
- ii) finding and recommending environmentally sustainable and practical solutions for domestic, municipal, industrial and agricultural waste management and for more efficient and ecologically appropriate uses of natural resources such as scarce minerals, water and soil;
- iii) lobbying Government and local authorities to implement environmentally sustainable waste management practices, including clean production, elimination of toxic substances from products, re-use, recycling, segregation of discarded materials at source, and other environmentally and socially beneficial practices;
- iv) lobbying Government to follow the best international practice and EU recommendations by introducing fiscal and economic measures designed to penalise the manufacturers of products which cannot be re-used, recycled or composted at the end of their useful lives, and to financially support companies making products which can be re-used, repaired, recycled or are made from recycled materials;

- v) raising public awareness about the long-term damaging human and animal health and economic consequences of landfilling and of the destruction by mass burning or incineration of potentially recyclable or reusable materials;
- vi) investigating, raising public awareness and lobbying Irish Government departments and agencies about our country's failure to take adequate care of vulnerable and essential natural resources, including clean water and air, biodiversity, and soil;
- vii) advocating changes in domestic and EU legislation to provide for more ecologically appropriate, environmentally sustainable and efficient uses of natural resources; and,
- vi) maintaining contact and exchanging information with similar NGOs and national networks in the European Union and in other countries, and with international zero waste organisations.

2.2 Our Basic Principles

In nature, the waste products of every living organism serve as raw materials to be transformed by other living creatures, or benefit the planet in other ways. Instead of organising systems that efficiently dispose of or recycle our waste, we need to design systems of production that have little or no waste to begin with.

There are no technical barriers to achieving a “zero waste society”, only our habits, our greed as a society, and the current economic structures and policies which have led to the present environmental, social and economic difficulties.

“Zero Waste” is a realistic whole-system approach to addressing the problem of society’s unsustainable resource flows – it encompasses waste elimination at source through product design and producer responsibility, together with waste reduction strategies further down the supply chain, such as cleaner production, product repairing, dismantling, recycling, re-use and composting.

ZWAI strongly believes that Ireland should have a policy of not sending to other countries our discarded materials for further treatment or recycling, particularly to developing countries where local populations are exposed to dioxins and other toxic POPs. Relying on other countries’ infrastructure to achieve our “recycling” targets is not acceptable from a global ecological and societal perspective.

2.3 What We are Doing

Zero Waste Alliance Ireland has prepared many policy documents on waste management, we continue to lobby the Government of Ireland on the issue of

sustainable resource management, and to express our concern at the failure to address Ireland's waste problems at a fundamental level.

In recent decades, as many older landfills were closed or became better managed (primarily as a consequence of the implementation of European Directives, Irish legislation transposing these Directives, the development of a waste licensing regime by the Environmental Protection Agency, and the establishment of the Office of Environmental Enforcement in 2003), concern about the public health effects of landfills decreased considerably.

ZWAI therefore concentrated more on the objectives of ensuring that Ireland's government agencies, local authorities and other organisations will develop and implement environmentally sustainable resources and waste management policies, especially resource efficiency, waste reduction and elimination, the promotion of re-use, repair and recycling, and the development and implementation of the Circular Economy.

As an environmental NGO, and a not-for-profit company with charitable status since 2005, ZWAI also campaigns for the implementation of the UN **Sustainable Development Goals**, including (but not limited to) Goal 12, Responsible Consumption and Production, and Goal 6, Clean Water and Sanitation (having particular regard to the need to avoid wasting water, and to wasting nutrients contained in our wastewater); and Goal 15, to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, to halt and reverse land degradation and to halt biodiversity loss

Our work therefore became more focused on responding to public consultations, giving presentations on waste-related topics, and evaluating Irish Government and EU policies on the use, reuse, and recycling of materials and energy, on identifying wasteful practices, and on promoting the Circular Economy. Examples of our submissions and presentations include:

- How Ireland, the European Union and the Irish food industry should address the problems of single-use plastic packaging and plastic waste (March & Nov. 2019);
- Transforming the construction industry so that it could become climate-neutral (instead of being a major emitter of greenhouse gases & toxicants);
- Several observations and submissions addressing the need for recovery and reuse of the phosphorus and nitrogen content of wastewater (2019 to 2023);
- Observations to the European Commission on a proposed revision of the EU Regulation on Shipments of Waste (January 2022);

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- Feedback to the European Commission on a proposed Directive on Soil Health – protecting, sustainably managing and restoring EU soils (March 2022);³
- Submission in response to a public consultation on the review of Ireland's security of energy supplies (October 2022);⁴
- Submission in response to a public consultation on Ireland's Fourth National Biodiversity Action Plan (November 2022);⁵
- Submission in response to a public consultation on Ireland's National Bioeconomy Action Plan 2023-2025 (January 2023);⁶
- Presentation and illustrated talk on the topic of “*One Earth for All – A Plea for Sustainability*”, given at the National Sustainability Summit, Leopardstown, Dublin (February 2023);⁷
- Submission in response to a public consultation on Ireland's draft Waste Management Plan for a Circular Economy (July 2023);⁸
- Submission in response to a public consultation on the problem of disposable vaping devices (July 2023);⁹
- Observations and recommendations on the increasing European and global problem of waste electronic & electric equipment (WEEE, Sept. 2023);¹⁰

³ <https://www.zwai.ie/resources/2022/protecting-sustainably-managing-and-restoring-eu-soils/>

⁴ Submission to the Department of the Environment, Climate and Communications in Response to the Public Consultation on a Review of the Security of Energy Supply of Ireland's Electricity and Natural Gas Systems; <https://www.zwai.ie/resources/2022/public-consultation-on-a-review-of-the-security-of-energy-supply-of-irelands-electricity-and-natural-gas-systems/>

⁵ <https://www.zwai.ie/resources/2022/submit-to-the-department-of-housing-local-government-and-heritage-in-response-to-the-public-consultation-on-irelands-fourth-national-biodiversity-action-plan-nbap/>

⁶ <https://www.zwai.ie/resources/2023/zwai-submission-on-irelands-national-bioeconomy-action-plan-2023-2025/>

⁷ <https://www.zwai.ie/resources/2023/the-national-sustainability-summit-one-earth-for-all-a-plea-for-sustainability/>

⁸ Submission to the Regional Waste Management Planning Offices on the draft Waste Management Plan for a Circular Economy; ZWAI, 05 July 2023; <https://www.zwai.ie/resources/2023/submit-on-the-draft-waste-management-plan-for-a-circular-economy/>

⁹ Submission to the Department of the Environment, Climate and Communications in Response to the Department's Public Consultation on Disposable Vaping Devices; ZWAI, 27 July 2023; <https://www.zwai.ie/resources/2023/submit-to-the-decc-on-disposable-vapes-and-why-they-should-be-banned/>

¹⁰ Submission by ZWAI to the European Commission on Waste from Electrical and Electronic Equipment — Evaluating the EU Rules; ZWAI, 22 September 2023. <https://www.zwai.ie/resources/2023/waste-from-electrical-and-electronic-equipment-weee-evaluating-eu-rules/>

- Observations to the European Commission on a Proposed EU Directive on Soil Monitoring and Resilience (November 2023);¹¹
- Observations on the Irish Government's draft Green Public Procurement Strategy & Plan (November 2023);¹²
- Observations and feedback to the European Commission on the proposed revision of the EU Waste Framework Directive (November 2023);¹³
- Observations & feedback to the European Commission on revision of Directives 2000/53/EC & 2005/64/EC on End-of-Life Vehicles (December 2023);¹⁴
- Submission by ZWAI to the Department of the Environment, Climate and Communications in response to the Department's public consultation on proposed amendments to the Access to Information on the Environment (AIE) Regulations 2007-2018 (January 2024);¹⁵
- Response to the first Public Consultation by the Department of the Environment, Climate and Communications on Ireland's draft National Energy and Climate Plan (March 2024);¹⁶
- Submission by ZWAI to the European Commission in response to the Commission's public consultation on the evaluation of the Nitrates Directive (91 / 676 / EEC) on Protection of Waters against Pollution caused by Nitrates from Agricultural Sources (March 2024);¹⁷
- Response to the second Public Consultation by the Department of the Environment, Climate and Communications on Ireland's updated draft National Energy and Climate Plan (June 2024);¹⁸

¹¹ Observations and Feedback to the European Commission on the Proposed EU Directive on Soil Monitoring and Resilience; ZWAI, 03 November 2023.

<https://www.zwai.ie/resources/2023/submission-on-the-proposed-eu-directive-on-soil-monitoring-and-resilience/>

¹² <https://www.zwai.ie/resources/2023/submission-to-the-decc-on-the-draft-green-public-procurement-strategy-and-action-plan/>

¹³ <https://www.zwai.ie/resources/2023/observations-and-feedback-to-the-european-commission-on-the-proposed-revision-of-the-eu-waste-framework/>

¹⁴ <https://www.zwai.ie/resources/2023/end-of-life-vehicles-observations-and-feedback-to-the-european-commission/>

¹⁵ <https://www.zwai.ie/resources/2024/submission-to-the-decc-on-the-proposed-amendments-to-the-access-to-information-on-the-environment-aie-regulations-2007-2018/>

¹⁶ <https://www.zwai.ie/resources/2024/submission-by-zwai-to-decc-on-irelands-national-energy-climate-plan-necp/>

¹⁷ <https://www.zwai.ie/resources/2024/submission-by-zwai-to-the-eu-public-consultation-on-the-evaluation-of-the-nitrates-directive/>

¹⁸ <https://www.zwai.ie/resources/2024/draft-update-of-irelands-national-energy-and-climateplan-necp-submission-by-zwai-to-decc/>

- Submission by ZWAI to the European Commission in response to the Commission’s public consultation on proposed ecodesign and ecolabelling requirements for computers (July 2024);¹⁹
- Submission by ZWAI and the Waterford Environmental Forum to the Department of Transport in response to the Department’s Public Consultation: “*Moving Together – A Strategic Approach to Improving the Efficiency of the Transport System in Ireland*” (August 2024);²⁰
- Submission by ZWAI to the Irish Department of Housing, Local Government and Heritage in response to the Department’s Public Consultation on Draft Proposed Additional Measures for Ireland’s Fifth Nitrates Action Programme (December 2024);²¹
- Submission by ZWAI to the European Commission in response to the Commission’s public consultation on the European Union Ocean Pact, emphasising the importance of Europe’s surrounding seas and the Atlantic ocean, and their fundamental in sustaining life on our planet (February 2025);²²
- Submission by ZWAI to the Department of the Environment, Climate and Communications, in response to a public consultation on Ireland’s draft National Implementation Report 2025 to the Aarhus Convention Secretariat (April 2025);²³
- Submission by Zero Waste Alliance Ireland to the Department for Infrastructure, Northern Ireland, in response to a Transboundary EIA Public Consultation on a Proposed Gold Mine Project in the Sperrin Mountains, County Tyrone (April 2025);²⁴
- Submission by ZWAI to the European Commission on proposed draft amendments to Delegated Regulation (EU) 2019/1122 for the purpose of improving carbon accounting in the European Union Registry under Regulation (EU) 2018/841 for the Land use, Land Use Change And Forestry (LULUCF) Sector (May 2025);²⁵

¹⁹ <https://www.zwai.ie/resources/2024/ecodesign-and-ecolabelling-requirements-for-computers-zwai-submission-to-eu-commission-ecodesign-and-ecolabelling-requirements-for-computers/>

²⁰ <https://www.zwai.ie/resources/2024/moving-together-a-strategic-approach-to-improving-irelands-transport-system/>

²¹ <https://www.zwai.ie/resources/2024/proposed-additional-measures-for-irelands-fifth-nitrates-action-programme-nap/>

²² <https://www.zwai.ie/resources/2025/eu-oceans-pact-submission-by-zwai/>

²³ <https://www.zwai.ie/resources/2025/aarhus-convention-national-implementation-report-2025/>

²⁴ <https://www.zwai.ie/resources/2025/consultation-on-a-proposed-dalradian-gold-mine-project-in-the-sperrin-mountains-county-tyrone/>

²⁵ <https://www.zwai.ie/resources/2025/submission-on-proposed-eu-carbon-accounting-amendments-for-the-lulucf-sector/>

- Submission by ZWAI to the European Commission in response to the Commission’s call for evidence on a New Policy Initiative and a New Agenda for Cities and Urban Areas (May 2025);²⁶ and,
- Submission by ZWAI to Department of Climate, Energy and the Environment on the draft National Policy Statement and Roadmap on Circular Textiles (July 2025).²⁷

It will be clear that ZWAI is primarily concerned with the very serious issue of discarded substances, materials and goods, whether from domestic, commercial or industrial sources, how these become “waste”, and how such “waste” may be prevented by re-design along ecological principles. These same ecological principles can be applied to the many ways in which we abstract and use water as a resource, and to the equivalent volumes of wastewater produced as a consequence of these uses. ZWAI is also very concerned about the effectiveness and appropriateness of Irish and EU policies, legislation, programmes and plans which are the prime determinants of how these “wastes” are managed, controlled and monitored for environmental and societal benefits.

In-depth examination and analysis of national policies have made us very aware of the many disconnections and conflicts between economic, environmental, land-use planning and social policies, frequently resulting in failure to implement necessary changes. While making the submissions listed above, we have welcomed many proposed policy changes; but at the same time we have also considered that it was very necessary to evaluate all proposals in the context of what is best for the environment and society.

ZWAI is represented on the Irish Government’s Waste Forum and Water Forum (An Fóram Uisce), is a member of the Irish Environmental Network and the Environmental Pillar, and is funded by the **Department of Communications, Climate Action and the Environment** through the **Irish Environmental Network**.

ZWAI is also a not-for-profit company limited by guarantee (Company registration number **394205**), and a registered charity (CRN number **20057244**). Membership has been growing in recent years, and is currently slightly more than 50 individuals, and the company’s affairs and activities are supervised by a 6-person Board of Management (Directors), some of whom are regular contributors to submissions, or make presentations at conferences.

²⁶ <https://www.zwai.ie/resources/2025/submission-to-eu-commission-on-a-new-policy-initiative-and-a-new-agenda-for-cities-and-urban-areas/>

²⁷ <https://www.zwai.ie/resources/2025/submission-on-the-draft-national-policy-statement-and-roadmap-on-circular-textiles/>

In 2019 ZWAI became a full member of the **European Environment Bureau** (EEB); and a member of the **Waste Working Group** of the EEB. Through the EEB, we contribute to the development of European Union policy on waste and the Circular Economy. In November 2021, the EEB established a **Task Force on the Built Environment**; ZWAI is a member of this group, and we contribute to continuing discussions on the sustainability of construction materials, buildings and on the built environment.

In 2025, ZWAI became a member of **Climate Action Network (CAN) Europe**, a strong coalition of some 200 environmental member organisations, representing over 1,700 NGOs, and more than 40 million citizens, in 40 European countries. CAN Europe works in the area of climate action, especially climate mitigation, socially just transition to clean energy, advocacy and awareness raising.

In preparing this submission, we worked with CAN Europe, and contributed to their submission, while they worked together with ZWAI. Other Irish NGOs have also given us their support, and their logos are in **Appendix I**.

3. OUR OBSERVATIONS AND RECOMMENDATIONS IN RESPONSE TO THE EUROPEAN COMMISSION'S PROPOSED INITIATIVE AND REGULATION

3.1 Ecological and Technical Oversights in Land Use Accounting

The proposed regulatory changes may have far-reaching implications for biodiversity, soil, and water quality, as accelerated approval processes could allow potentially harmful substances to enter ecosystems with insufficient risk assessment. Such changes risk undermining the long-term sustainability of agricultural and natural environments by opening the door to increased chemical use and diminished oversight.

“Highly industrialised diets pose health issues for the world’s most affluent inhabitants, further drive up carbon emissions and threaten biodiversity, whereas undernourishment and hunger still threaten large parts of the world’s population (OECD, 2021).”, p.4.

<https://weall.org/wp-content/uploads/WeAll-BRIEFINGS-PAPERS-agriculture.pdf>

Complexity

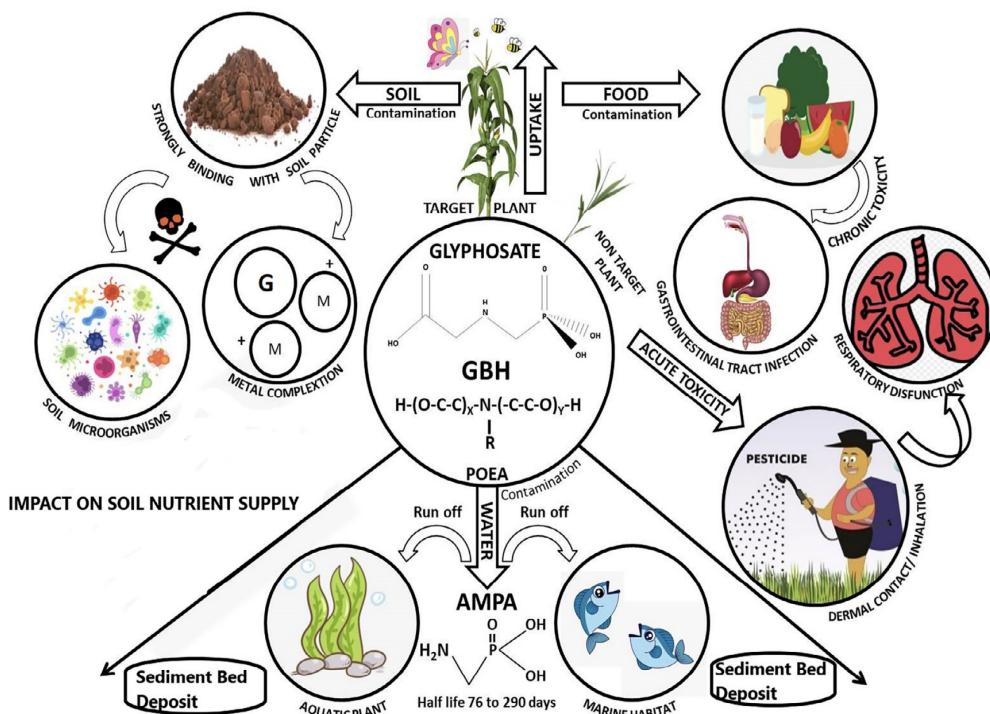


Fig. 2. Environmental contamination of glyphosate.
G: Glyphosate, M: Metal ion, GBH: Glyphosate Based Herbicide, POEA: Polyoxyethyleneamine, AMPA: Aminomethylphosphonic acid.

The above figure shows how many ways in which pesticides, such as Glyphosate, get into the natural systems. Once it's released, it's hard to trace. The interconnectedness of soil and water systems means that weakening protections in one area may cascade into broader ecological disruptions, ultimately threatening the integrity of local and regional biodiversity.

Estimated levels of glyphosate in soil, water and air and a full risk assessment should be undertaken for non-target organisms (for example: birds, mammals, insects).

Biopesticides are still pesticides:

Without releasing resources and acceleration of approval for current and future biopesticides we are depending on the good will of the companies who are producing these pesticides. XX

<https://www.sciencedirect.com/science/article/pii/S0169772225002323>

https://www.sciencedirect.com/science/article/pii/S2667010021001281?via%3Di_hub

Less roles - less controls - more damage:

“In early 2024, French Senator Laurent Duplomb introduced a bill promising to “simplify administrative procedures” for farmers. Officially titled “Bill for the Simplification and Reduction of Regulations Applicable to Local Authorities and Businesses”,

<https://www.greeneuropeanjournal.eu/pesticide-politics/>

<https://www.publicsenat.fr/actualites/politique/loi-duplomb-un-texte-qui-permet-de-mettre-les-agriculteurs-francais-au-meme-niveau-que-les-agriculteurs-europeens-assure-laurent-duplomb>

3.2 Recommendations for Reform

We can understand that the industry for farmers are getting harder, driven by economic pressure.

Zero Waste Alliance Ireland recommends retaining science-based safeguards within all regulatory simplification efforts to ensure environmental and public health protection is not sacrificed for administrative convenience.

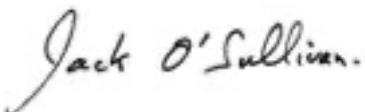
We urge the Commission to ensure thorough stakeholder engagement, including environmental NGOs and affected communities, to build trust and accountability in future policy developments.

4. CONCLUSION

It is our conclusion that the proposed initiative and Regulation will disempower local food systems. Furthermore it risks justifying loosening environmental standards and pushing protectionist trade measures.

The newly planned regulations aim to have a rapid effect, ignoring long-term and protective rules for the environment and nature. If nature is damaged “a little more” in the short term by pesticides for better harvests and profit, then we will not be able to use “the solutions” of Pesticides again. Nature's capital will be exhausted.

And if nature can no longer provide food - even with pesticides - , what then?



Jack O'Sullivan

Zero Waste Alliance Ireland

14 October 2025

This submission was researched and written by Janine Boscheinen (ZWAI intern) and Jack O'Sullivan (ZWAI founder and Vice-chair); with final editing by Jack O'Sullivan.

ZWAI-FSPA-03 Submission by ZWAI to the EU Consultation on simplifying food safety regulations.docx



In preparation



Feedback period

16 September 2025 - 14
October 2025

Feedback: Open



Upcoming



Planned for

Fourth quarter 2025

Feedback: Upcoming

About this initiative

Appendix I

Summary

This initiative aims to increase the competitiveness of EU farmers and the food and feed industry, as well as reduce the administrative burden on Member States authorities related to marketing authorisations of products. It will:

- accelerate access to the EU market for biocontrol substances and products
- simplify and clarify regulatory requirements on plant protection products, biocidal products, feed additives, food hygiene and official controls as well as other measures to simplify EU food law.

Topic

Food safety

Type of act

Proposal for a regulation

Call for evidence

Feedback: Open

Feedback period

16 September 2025 - 14 October 2025 (midnight Brussels time)

The Commission would like to hear your views.

This call for evidence is open for feedback. Your input will be taken into account as we further develop and fine-tune this initiative. Feedback received will be published on this site and therefore must adhere to the [feedback rules](#).

[More about call for evidence](#)

Give feedback >



Appendix II

'Have your say' - Acknowledgement of receipt

European Commission - 'Have your say' <DO-NOT-REPLY@ec.europa.eu>
To: jack@zwai.ie

14 October 2025 at 22:44



Have your say



Dear Sir or Madam,

Thank you for submitting your feedback on [Have your say](#).

We acknowledge receipt of your feedback which may be used to improve the proposed legislation.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14824-Maisto_ir_pašarų_sauga_Bendrasis_supaprastinimas/F33089193_en

To make corrections, you can unpublish your feedback and send a new one, if the feedback period is still open.

This is an automatic notification message. Please do not reply to it.

With kind regards,

European Commission
Secretariat-General

