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2nd April 2020

Mr. Richard Bruton, TD
Minister
Department of Communications, Climate Action and the Environment
29-31 Adelaide Road
Dublin D02 X285

Dear Minister Bruton,

We are all under the strain of COVID-19, facing an uncertain future for both the health of Irish citizens as well as the health of the Irish economy. The third, but often forgotten strand of this uncertainty is the health of the Irish environment and the impact this virus will have in increasing unsustainable consumption levels, especially in terms of single-use plastics and the fear of reusing containers, cups, bags or even clothes and other pre-owned items. Daily, we are seeing reports of the petrochemical industry sowing fear into the minds of policy makers and consumers, lobbying for the delay or elimination of plastic bag bans in the US (please see attached letter from the Plastics Industry to the US Department of Health and Human Services).

And, their actions are getting traction as New York, Maine, New Hampshire and Massachusetts have delayed the implementation of their plastic bag bans¹. Even in the UK, they have agreed to waive the 5p charge on disposable plastic bags. Additionally, some companies, such as Starbucks, are refusing to take reusable containers.² While we understand the fear of spreading the COVID-19 virus and the uncertainty associated with how it spreads and how it lasts on different surfaces, we are concerned that the single-use packaging industry is using this opportunity to promote use of their products, thus setting back the reuse industry and reuse targets set out in the Single Use Plastic Directive and the Green New Deal's Circular Economy Action Plan. We urge you to consider the following arguments before taking any action that might undermine our progress in embracing the circular economy.

According to the New England Journal of Medicine, tests have found that the COVID-19 virus survives up to a day on cardboard and up to three days on stainless steel and plastic.³ There has been no similar testing done on cloth. Some studies have shown that bacteria have been found on reusable bags⁴, as well as in bags of pre-packaged lettuce.⁵ Bacteria are not viruses and must not be thrown into the same category as COVID-19. Just because something is wrapped in plastic does not mean that the product is sterile nor does it mean that the packaging is clean as well. Such plastic packaging has been through many hands and could carry the virus up to 3 days in the shops. We should not fall into the industry's trap of thinking that single-use items are better than reuse in this current crisis.

The recently released EU Circular Economy Action Plan sets forth systemic solutions that focus on reduction and reuse to achieve a truly circular economy, and recognises the importance of

¹<https://www.theguardian.com/environment/2020/mar/27/rightwing-thinktanks-use-fear-of-covid-19-to-fight-bans-on-plastic-bags>

²<https://www.bbc.com/news/uk-51767092>

³https://www.nejm.org/doi/full/10.1056/NEJMc2004973?query=featured_home

⁴<https://www.scopus.com/record/display.uri?eid=2-s2.0-84883679385&origin=inward&txGid=c8428838e2edf76088268b2c828988eb>

⁵<https://www.dailymail.co.uk/femail/article-8014317/Expert-reveals-washed-lettuce-10-times-bacteria-loose-leaves.html>

strong eco-design requirements, designs out toxic waste and identifies key product chains where the circular economy and reusing valuable resources will create up to 700,000 new jobs in the EU by 2030.⁶

The GHG mitigation and job potential of a Circular Economy is more important than ever since social distancing has forced the closure of many non-essential businesses. As a consequence, small retail businesses may not reopen once this crisis is over. We need to look at what is happening now and take some lessons into the future. We have several challenges ahead: how to facilitate full employment in Ireland, how to reduce our carbon emissions and reverse our devastating biodiversity loss, and how to push forward the principals of the Sustainable Development Goals.

Now is the time for government, businesses and individuals to investigate new ways of operating on this amazing but fragile Earth. We need to embrace the systemic change that has been forced on us during these uncertain times, and continue to work towards the goals and objectives set forth in the EU Green New Deal and the Sustainable Development Goals. We ask you to:

1. Stay strong and stay on course with the packaging levies and other economic incentives to reduce unnecessary plastic packaging and support reuse.
2. Delink our economic growth from material consumption. Incentivise new businesses, social enterprises, charities/non-profits and voluntary organisations that offer services such as leasing, reuse and repair, moving from an ownership paradigm to a service model.
3. Enforce **green/sustainable procurement** practices to ensure that this is the default approach for public authorities and for companies engaged in corporate social responsibility strategy.⁷
4. Support the fuller development of the reuse market which creates jobs in Ireland, shortens the supply chain, reduces emissions and supports SDG 12, responsible production and consumption. This can be done through introducing targets and tax incentives such as 0% VAT rate, liability reform and other economic incentives/grants for small businesses, social enterprises, charities/non-profits and voluntary organisations in this arena.⁸

Lastly, plastic contributes hugely to climate change from the fossil fuel extraction, plastic processing, transport, consumption and disposal. A recent [report released by CIEL](#), states:

“If plastic production and use grow as currently planned, by 2030, these emissions could reach 1.34 gigatons per year—equivalent to the emissions released by more than 295 new 500-megawatt coal-fired power plants. By 2050, the cumulation of these greenhouse gas emissions from plastic could reach over 56 gigatons—10–13 percent of the entire remaining carbon budget.

Nearly every piece of plastic begins as a fossil fuel, and greenhouse gases are emitted at each stage of the plastic lifecycle: 1) fossil fuel extraction and transport, 2) plastic

⁶ https://eur-lex.europa.eu/resource.html?uri=cellar:9903b325-6388-11ea-b735-01aa75ed71a1.0017.02/DOC_1&format=PDF

⁷ An example green and social procurement project is described in CRNI webpage for green/social procurement: <https://crni.ie/green-and-social-procurement/>

⁸ See <https://crni.ie/key-policy-areas/>

refining and manufacture, 3) managing plastic waste, and 4) its ongoing impact in our oceans, waterways, and landscape.”

Humans are resilient and resourceful. We will get through this, but we must change how we move forward and take the opportunity to turn this huge disruption to the global economy into an opportunity to make a better more resource efficient world.

Kind Regards,

Mindy Byrns O'Brien
Coordinator

Cc: Philip Nugent

Attachment

Background Information:

Reusables can be used safely

There are businesses that have “already developed reusable to-go services for take-out and food delivery” and “provide clean, sanitized reusable cups and to-go containers.” This crisis is showing that society would greatly benefit from the expansion of such models, especially if similar outbreaks occur again in the future, which is reasonable to assume. UPSTREAM concluded that “while the coronavirus will change many things in our lives for a time, it won’t change our core values like working for healthy people, a healthy planet and a sustainable economy.” <https://www.upstreamolutions.org/blogs/plastic-pollution-reuse-and-covid-19>

Waste Dive BYO Coffee Cup Reusables Corona Virus

Jessica Heiges, who studies reusable business models with Dr. Kate O’Neill at the University of California at Berkeley, questioned the notion that disposables are always more hygienic.

“In a doctor’s or a dentist’s office, if they’re pulling things out of plastic, consumers get conditioned to think that if it comes out of plastic, it’s automatically sterile,” she explained to Waste Dive. “And there are cases, like those, in which disposable is [surgically] sterile. But that sterility is not translated into all industries, and it’s certainly not the case when it comes to foodware.” More invisible, Heiges argues, is the lengthy supply chain most disposable cups endure, which is rarely a factor in consumer perceptions about cleanliness.

But for the concept of reuse as a third-party operated, health code-certified, circular economy mechanism, it could be an opportunity to fill the void those programs left behind. A new study in The New England Journal of Medicine has indicated that the virus could be stable on plastic surfaces for as long as 72 hours..

“How is it that an item produced tens of thousands of miles away in a factory, touched by multiple unknown personnel, shipped a great distance, and which has sat on a shelf for an

undetermined amount of time is now perceived in the customer and business's eyes as being more hygienic," she asked, "compared to something that's washed on-site at high temperatures that kills all bacteria, and it's just handled by the barista going from the dishwasher to the beverage?" <https://www.wastedive.com/news/byo-coffe-cup-reusables-coronavirus-covid-19-574817/>

In other words: Buying new rather than secondhand won't protect you from Covid-19. You're more likely to get coronavirus buying something new that got coughed on by the last person to walk down the aisle than from a secondhand item that's been washed with soap and water or wiped down with sanitizing wipes.

Don't touch your face.

The bottom line, Menachery said, is that the best way to avoid getting Covid-19 from an inanimate object—whether it's new or used—is not to touch your eyes, nose, or mouth after you touch it. "The inanimate object could be coated," he said. "And as long as you don't bring it to the mucosal surface, it's hard to get infected that way." <https://www.wired.com/story/covid-19-fears-shouldnt-trash-your-zero-waste-efforts/>