

13<sup>th</sup> September 2020

Dear Minister Ryan,

RE: The Urgent Need for Restriction of Availability of Single Use Plastics

The prevalence of single use plastic, and the burden it presents to our waste management processes and our environment, mean that the provisions set out for Waste Management under Galway County Council's Byelaws 2011 are not being met. They read:

*“Every person presenting household or commercial waste shall ensure no environmental pollution is caused as a result of presentation of waste for collection.”*

Adding to the ongoing violations of these Byelaws, **the COVID-19 response is exacerbating an already hazardous source of plastic pollution: wet wipes.**

Currently, due to the inability of sewage treatment to break down wet wipes containing plastic, and the fact these wipes are not biodegradable, they manifest as environmental pollution. **Wet wipes are washing up on the shores of Galway bay in alarming quantities.**

While we are encouraged that Directive ***(EU 2019/904 of the 5<sup>th</sup> of June) on the reduction of the impact of certain plastic products on the environment***, when implemented, will restrict the items cited in the Annex Part B of the directive from the 3<sup>rd</sup> of July next year, we note, these “wet wipes” are not on this list. **We wholeheartedly endorse, for those items already contained in Annex Part B, the prompt implementation of the restrictions set out under article 5 therein as soon as possible and well in advance of the July 2021 deadline. Furthermore, we want plastic-containing wet wipes to be treated in the same way as the other single use plastic products covered by article 5 and restricted.**

Currently, wet wipes are addressed in the much less rigorous, and frankly tokenistic provisions, outlined in Articles 7 and 8 of this directive, meaning that the only obligations on the producer are on product marking, content awareness, and funding litter collection. Given that the deadline for some of these provisions is the 31<sup>st</sup> December 2024, and that manufacturers are currently mis-representing several products as flushable or biodegradable, these provisions cannot be relied on. They are too little, too late, for Galway beaches and wildlife.

Galway enjoys a stellar reputation as a tourist destination and our beautiful beaches are integral to that. The Galway community depends on the reputation and quality, of our waters and shoreline, for tourism, oyster harvesting, sea swimming and many other recreational and business endeavors. Members of the Galway public want to see the sale of plastic containing wet wipes restricted in order to protect their right to live in an environment which is adequate for personal health and well-being.

This proposal complements the Marine Strategy Framework Directive. The European background document to the 2019/904 directive states that Member States have a wide margin of discretion in deciding on national measures as appropriate, **depending on local conditions**, to implement the EU

objective of a significant reduction in consumption of certain items. Hence, the expansion of restrictions to products identified as a threat to our local environment falls squarely in the directive's intent.

The product list in Annex B of the 2019/904 Directive was drafted and agreed based on 2016 beach survey data from the beaches of European countries.

In June 2020, Dr. Liam Morrison of NUIG published peer reviewed paper (**attached to this letter**) in the high impact factor international journal "Water Research" on sanitary products in the intertidal environment of three locations on the west coast of Ireland. This research identified wet wipes as a significant contributor to the waste; hence, in line with the intent of the directive to restrict the availability of plastic containing single use products that are polluting European waters, these should be banned.

Dr. Morrison's team reported that 50 % of those wipes labelled flushable contained plastic. This reflects the complete lack of regulation of labelling currently. We want regulation, sampling, and testing for accuracy of labelling to be **implemented immediately with penalties for misrepresentation**.

We welcome your departments' 4<sup>th</sup> of September announcement committing to ban Wet wipes. We note no timeline was included, and urge that you include Wet Wipes, together with the other SUP items mentioned, as restricted items in the legislation to be introduced in July 2021.

This request has been endorsed by Galway sea swimming groups, the environmental pillar of the PPN representing twenty six organizations through its Climate Change and Biodiversity Committee representative, the members of the "Working group for a Green recovery in Galway" and Plastic Free Kinvara.

Thank you for ensuring that the voice of the people is listened to and the blight of single use plastic addressed,

Yours sincerely,