

Link response: Consultation on the proposed ban of the manufacture, supply and sale of wet wipes containing plastic

24th November 2023

This consultation response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link (Link).

This response is supported by A Rocha UK, Angling Trust, British Canoeing, EIA-UK, Friends of the Earth, Froglife, Institute of Fisheries Management, Marine Conservation Society, National Trust, Rivers Trust, Surfers Against Sewage, Sustainability First, Wales Environment Link, The Wildlife Trusts, Waterwise, WWF, Zoological Society of London.

Summary

We welcome the opportunity to respond to this consultation, and are in favour of banning plastic in wet wipes due to their widespread negative impact on the environment. However, this step alone will neither solve the issue of wet wipes blockages, nor eliminate the environmental impact of single-use wet wipes - whether they are flushed or not.

Single-use wet wipes, regardless of the material they are made from, utilise resources, have an associated carbon footprint, and are not recyclable. Single-use wet wipes are not aligned with a low-carbon resource future. There are three core tenets to our response which must be taken in consideration with our support of the ban.

Firstly, we must stress the importance of avoiding **false solutions**. Wipes made of—for example—lyocell and viscose are still ultimately single-use items, and understanding of their impact on the environment is limited. Importantly, wipes made from these materials can also contribute to blockages. Advertising them as biodegradable, plastic-free, or similar may in fact encourage consumers to flush them in the belief that they will not cause environmental harm, thereby increasing the number of blockages and associated harm to the environment. If the Government decides not to ban semi-synthetic wipes such as lyocell and viscose, this should only be under the condition that their impact on the environment and behaviour in sewerage systems is fully analysed, understood and every effort is made to educate consumers on these aspects of the product.

Secondly, the Government must take real action to support a more **circular economy**, which would align with the Sustainable Development Goals[1] as well as the individual devolved nation's commitments. Banning plastic in wet wipes must be twinned with efforts to support the transition towards reusable products. This includes making reusable products more accessible and more affordable, as well as providing guidance on how to ensure the same levels of hygiene.

Thirdly, **inclusivity** must form the foundation of a ban on plastic in wet wipes. The Government must consult stakeholders and organisations representing and working with groups who may require continued use of wet wipes, as their voices will be pivotal in ensuring the policy is fully inclusive.

Questions

Q1. Would you like your response to be confidential, under the terms defined above?

No.

Q2. If you answered yes to this question, which information would you like to keep confidential and why? (optional)

N/A.

Q3. Please provide your full name. If you are representing an organisation, you will be asked its name later.

Ellie Ward.

Q4. Please provide your email address.

eleanor@wcl.org.uk

Q5. Which of the following best describes you?

d. I am responding on behalf of a business or organisation, that doesn't directly manufacture, supply, sell or use wet wipes. This includes advocacy groups.

[1] SDG Goal 12 'Ensure sustainable consumption and production patterns': https://www.un.org/sustainabledevelopment/sustainable-consumption-production/



Q6. Where are you currently based yourself?

Wildlife and Countryside Link is the largest environment and wildlife coalition in England, bringing together 80 organisations to use their strong joint voice for the protection of nature.

Q7. What is the name of the campaign or petition that you are responding on behalf of?

N/A.

Q8. To what extent do you agree with the following statement, "I/my organisation would support the proposal set out above to introduce a ban on the manufacture of wet wipes that contain plastic"?

a. Strongly agree.

Q9. To what extent do you agree with the following statement, "I/my organisation would support the proposal set out above to introduce a ban on the supply or sale of wet wipes that contain plastic, including giving away for free"?

a. Strongly agree.

Q10. Please explain your answer to Q8 and Q9, referring to specific evidence as much as possible.

Plastic wet wipes have sadly become ubiquitous in our environment throughout the UK, recorded in multiple long term, extensive surveys ranging from city streets and rivers all the way to the sea.

In 2022 alone, over 38,000 wet wipes were found on the Marine Conservation Society's year-round Beachwatch. In addition, every year, Keep Wales Tidy conducts litter surveys by sampling 6% of streets across Wales. In 2022-23, 447 wet wipes were found on 317 of 3230 streets across Wales (9.8% of streets). This equates to there being almost 7,500 wet wipes littered on the streets of Wales at any one time. The picture is much the same for the water environment. The Rivers Trust movement carries out litter-picks along rivers across the UK, and Thames21 calculates that their volunteers have removed around 135,000 wet wipes from the Thames riverbank in 5 years. Surfers Against Sewage found that 4.5% of all items found by over 4,240 volunteers participating in almost 400 litter picks across the country were wet wipes. This equates to 1,321 wet wipes found across the UKs beaches last year in community clean ups.

Plastic wet wipes make a significant contribution to sewer blockages. Welsh Water state that they deal with 2,000 blockages a month, costing over £3 million pounds a year to clear, with South West Water citing "Around 93% of all sewer blockages are caused by wet wipes being flushed down toilets and cost around £100 million a year to clear up across the country".[2] Northern Ireland Water have gone as far as calling wipes "The main enemy of sewers". Blockages can result in storm overflows discharging sewage into the environment which has widely acknowledged repercussions for the environment.

If ingested by wildlife, wet wipes and the microplastics they break down into can damage the digestive system or stop animals from feeding, with implications for growth, development, reproduction and lifespan.[3] Microplastics can also pass through from the gut into other tissues with, for example, neurotoxic and genotoxic impacts and even mortality recorded in fish.[4] Wildlife which ingest microplastics may also be exposed to higher levels of metals, endocrine disrupting chemicals and persistent organic pollutants such as pesticides and PFAS, all of which adsorb to the surface of microplastics, causing issues including reduced fertility, organ damage and cancers. Furthermore, in freshwater and estuarine habitats, the formation of "wet wipe islands" can actually change the shape and flow of rivers - impacting water quality, habitat formation and migration.

Sewage Related Debris (SRD) including wet wipes enters our rivers, waterways and oceans through discharges of storm overflows. Anecdotal reports of gastroenteritis from recreational users are increasing.[5] There is potential for viruses to be transmitted in raw untreated sewage and hitchhike on materials; given the recent impacts of the COVID-19 pandemic, never has there been a more pertinent time to end the flushing of wipes. Recreational users including anglers, paddlers and walkers frequently witness the debris from wipes hanging from riverside trees following periods of high-water flows and/or flooding. The NGO community has extensively advocated for improvements in wastewater facilities to reduce these discharges. These improvements must be undertaken alongside action on wet wipes.

Single-use wet wipes are not compliant with a circular economy. We are therefore disappointed that the consultation did not include any questions on supporting the shift towards reusable wipes, particularly given the Well-Being of Future Generations Act in Wales which aims to "take account of the long term" and "help to prevent problems occurring or getting worse", and in Scotland, the commitments in the Circular Economy (Scotland) Bill to introduce new powers to "tackle waste and increase reuse and recycling rates". The focus of the consultation is toward wet wipe manufacturers, even though there are many stakeholders who wish to contribute to transitioning from a single-use to a circular

[2] https://www.southwestwater.co.uk/about-us/latest-news/south-west-water-backs-plans-to-ban-plastic-based-wet-wipes

[3] McGoran et al. (2020). 'High prevalence of plastic ingestion by Eriocheir sinensis and Carcinus maenas (Crustacea: Decapoda: Brachyura) in the Thames Estuary'. https://www.sciencedirect.com/science/article/pii/S0269749120307120

[4] Frontiers | Effects of Microplastics on Fish and in Human Health (frontiersin.org)

[5] https://www.sas.org.uk/waterquality2022/human-health/sickness-reports/

and sustainable economy. The consultation also fails to address access to reusable alternatives, like reusable and washable cloth pads, often made with organic cotton or bamboo.

Any ban should be implemented as soon as practicably possible; we suggest that a ban on plastic wet wipes should come into place in 2024, with a 12-month maximum buffer to sell through existing products. This would balance environmental concerns with manufacturer and consumer preparedness for the change. This is a realistic timeframe, given that data provided by EDANA states that over 70% of wet wipes are now plastic free, with the majority of high-street retailers already having switched to 'plastic free' alternatives. However, a ban that also encompassed viscose or lyocell (see our response to Q.15) may benefit from a longer lead-in time, to allow for support to be put in place for users, to aid the transition to a more circular economy.

Q11. Do you think that the proposed ban will have a negative impact on any specific groups of consumers?

c. I don't know

Q12. Please explain your answer to the previous question (Q11), referring to specific evidence where possible and whether you are part of the group impacted. Where possible, please indicate if this answer is specifically related to manufacture, supply, or sale

We would encourage the UK Government to consult relevant stakeholders and organisations representing and working with groups who may require continued use of wet wipes, to ensure an inclusive process and to take into account learnings from bans of other single-use plastic items.

The messaging around the disposal of wet wipes is very confusing for all consumers; for example, research led by Yorkshire Water in 2022 showed that 1 in 5 people believe wet wipes without the 'Fine to Flush' label can be flushed, and 38% people said they would flush biodegradable wipes. 1 in 4 under 35s surveyed in the research believed that 'biodegradable' meant the same as 'Fine to Flush'.[6] This should be considered during the consultation review period and beyond. Consideration and support for proper disposal should also be given. Furthermore, the Government must also supplement a ban on plastic wet wipes with support for the transition to reusable products. Guidance and information must also be promoted to ensure that all consumers have the relevant information to help and support this. For instance, a nationally representative survey of GB adults conducted by YouGov for the Marine Conservation Society in 2022 showed that nearly 20% of

[6] https://www.watermagazine.co.uk/2022/06/16/yorkshire-water-calls-for-do-not-flush-labelling-on-wet-wipes-after-research-reveals-consumer-confusion/

respondents would use reusable wipes more often "If I knew more about how to ensure the same levels of hygiene".

This lack of information is as significant a barrier as the initial cost of reusable products. For example, the Welsh Government conducted a small pilot of 'baby boxes' for new parents, half of which contained reusable nappies - another product where there are washable cloth alternatives that aren't well taken up by the wider population. The evaluation did highlight a lack of use of the reusables, but there was also a lack of instruction, mentoring and peer-support from other parents who could show parents how to use them and support a change of daily product use. Thought must be given as to what consumers will use instead of single-use products, rather than solely focusing on the materials that our sewerage system can cope with. All systems would cope better with zero wet wipes flushed, rather than continued flushing of slightly improved wipes.

Q13. Do you think the definition of wet wipes used within this consultation is suitable?

a. Yes

Q14. Do you think the definitions of plastic used within this consultation are suitable?

a. Yes

Q15. Wet wipes marketed as 'natural', 'biodegradable' or 'plastic free' may be made from polymers which have undergone chemical extraction, processing and refinement processes. Do you think wet wipes marketed in this way should be considered 'plastic free' and excluded from the proposed ban? For each material, please explain why:

a. Viscose – no (reason given below).

Viscose should be included in the proposed ban. In summary, wipes made from viscose have potential to cause blockages, may still cause harm to wildlife and the environment, and should be defined as plastic due to the fact that viscose undergoes chemical modification.

Single-use wipes are not compatible with the circular economy, regardless of material. Single-use wipes use a huge amount of resources regardless of material, and are carbon heavy, due to the transportation of wet material. They are packaged in plastic, typically a flexible plastic which is usually not acceptable for recycling; where it is accepted for recycling, this most likely results in downcycling.

Wipes from viscose, by default, do not pass the disintegration test as defined under the Fine to Flush standard - i.e., they have the potential to cause blockages. Consumers may in fact be encouraged by labelling such as plastic free, natural, or biodegradable to flush,

particularly with this information often featuring more prominently on pack than the information not to flush.

It is reasonable to assume that consumers *will* flush wipes made from viscose and labelled Fine to Flush. It is therefore important to note the distinction between biodegradation and fragmentation. Fragmentation might permit material to break up and therefore reduce blockages, but it may still result in an environmental impact. Research from University of Plymouth in 2019 reported that "rayon fibres behave like a synthetic fibre as rayon is widely reported in the marine environment.[7] [8] Further research has already reported the identification of rayon / viscose fibres in the gastrointestinal tract of fish, and that rayon fibres are a major source of microplastic debris even in the deep sea.[9] [10] [11] Regenerated cellulose fibres have been found in deep sea sediments; the impact of these entering the food chain is currently unknown.[12] [13] In addition, it has been highlighted that cellulose is particularly prone to adsorbing heavy materials, a characteristic exploited in the wastewater treatment process to prevent them escaping beyond the treatment works.[14]

Claims for biodegradation would not typically comply with Competition and Markets Authority (CMA) Green Claims Code, as correct safe disposal with wipes with faecal/human contaminants would require them to be landfilled or incinerated. Furthermore, claims of 'natural', 'biodegradable' and 'plastic free' should not be used as this has the potential to increase consumer confusion and result in greater flushing of wet wipes.

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[7] https://pearl.plymouth.ac.uk/bitstream/handle/10026.1/14729/2019Napper10511016PhD.pdf?sequence=1&isAllowed=y

[8] Comnea-Stancu, I.R., Wieland, K., Ramer, G., Schwaighofer, A., Lendl, B., 2017. On the Identification of Rayon/Viscose as a Major Fraction of Microplastics in the Marine Environment: Discrimination between Natural and Manmade Cellulosic Fibers Using Fourier Transform Infrared Spectroscopy. Appl. Spectrosc. 71, 939–950. doi:10.1177/0003702816660725

[9] Comnea-Stancu, I.R., Wieland, K., Ramer, G., Schwaighofer, A., Lendl, B., 2017. On the Identification of Rayon/Viscose as a Major Fraction of Microplastics in the Marine Environment: Discrimination between Natural and Manmade Cellulosic Fibers Using Fourier Transform Infrared Spectroscopy. Appl. Spectrosc. 71, 939–950. doi:10.1177/0003702816660725

[10] Lusher, A.L.L., McHugh, M., Thompson, R.C.C., 2013. Occurrence of microplastics in the gastrointestinal tract of pelagic and demersal fish from the English Channel. Mar. Pollut. Bull. 67, 94–99. doi:10.1016/j.marpolbul.2012.11.028

[11] Woodall, L.C., Sanchez-Vidal, A., Canals, M., Paterson, G.L.J., Coppock, R., Sleight, V., Calafat, A., Rogers, A.D., Narayanaswamy, B.E., Thompson, R.C., 2014. The deep sea is a major sink for microplastic debris. R. Soc. Open Sci. 1, 140317–140317. doi:10.1098/rsos.140317

[12] Jamieson, A.J., Brooks, L.S.R., Reid, W.D.K., Piertney, S.B., Narayanaswamy, B.E., and Linley, T.D. (2019) Microplastics and synthetic particles ingested by deep-sea amphipods in six of the deepest marine into the food chain of such organisms with unknown effects

[13] https://advances.sciencemag.org/content/6/23/eaay8493.ful

[14] Jamshaid, A., Hamid, A., Muhammad, N., et al. (2017) Cellulose-based Materials for the Removal of Heavy Metals from Wastewater - An Overview, ChemBioEng Reviews, Vol.4, No.4, pp.240–256

Lastly, as per the definition of a plastic outlined, viscose undergoes chemical modification (discussed in depth in the 2021 Eunomia Report "What is Plastic?"), and therefore should be defined as a plastic.

b. Lyocell (a semi synthetic cellulose fibre) – no (reason given below).

We note similar concerns as highlighted with viscose. If the purpose of the proposed ban is to reduce blockages caused by wipes, wipes made from lyocell also have the potential to cause blockages. Single-use wipes are not compatible with the circular economy, regardless of material.

Single-use wet wipes use a huge quantity of resources regardless of material, and are carbon heavy, due to the transportation of wet material. They are packaged in plastic, typically a flexible plastic which is usually not acceptable for recycling; where it is accepted for recycling, this results in downcycling. Wipes from viscose are not by default suitable for flushing. In addition, it has been highlighted that cellulose is particularly prone to adsorbing heavy materials, a characteristic exploited in the wastewater treatment process to prevent them escaping beyond the treatment works.[15]

It is important to note the distinction between biodegradation and fragmentation. Fragmentation might permit material to breakup and therefore reduce blockages, but it may still result in an environmental impact. Regenerated cellulose fibres have been found in deep sea sediments and the impact of these entering the food chain is currently unknown.[16] [17] Those products which pass Fine to Flush may therefore still have an environmental impact in the waterways and marine environments in which they are discharged.

Claims for biodegradation would not typically comply with Competition and Markets Authority (CMA) Green Claims Code, as correct safe disposal with wipes with faecal/human contaminants would require them to be landfilled or incinerated. Furthermore, claims of 'natural', 'biodegradable' and 'plastic free' should not be used as this has the potential to increase consumer confusion and result in greater flushing of wet wipes.

The Eunomia Report "What is Plastic?" states that "the categorisation of lyocell depends on whether the chemical structure has been modified and, as discussed above, the certainty around either assertion is mixed". As such, we believe that the precautionary principle should be applied.

[15] Jamshaid, A., Hamid, A., Muhammad, N., et al. (2017) Cellulose-based Materials for the Removal of Heavy Metals from Wastewater - An Overview, ChemBioEng Reviews, Vol.4, No.4, pp.240–256

[16] Jamieson, A.J., Brooks, L.S.R., Reid, W.D.K., Piertney, S.B., Narayanaswamy, B.E., and Linley, T.D. (2019) Microplastics and synthetic particles ingested by deep-sea amphipods in six of the deepest marine into the food chain of such organisms with unknown effects

[17] https://advances.sciencemag.org/content/6/23/eaay8493.full

c. Cotton (reconstituted cotton fibres) – no (reason given below).

Cotton is not a plastic due to the nature of the material. However, should single-use cotton wipes be flushed, there is a potential for them to contribute to blockages and therefore should be included in a ban. We are not aware of any single-use wipes made from cotton, but do not want to see the development of such a market as it does not align with the values of the circular economy. The impetus to change material should not be purely focused on whether it is technically a plastic or not; the focus should be on whether it causes problems when flushed, regardless of the material.

Therefore, cotton should also not be marketed as 'natural', 'biodegradable' or 'plastic free' as this has the potential to cause confusion among consumers. Like the other materials, cotton used in single-use wet wipes is highly resource-intensive, and are carbon heavy, due to the transportation of wet material. They are packaged in plastic, typically a flexible plastic which is usually not acceptable for recycling; where it is accepted for recycling, this most likely results in downcycling. Wipes from cotton are not by default suitable for flushing. We strongly support the use of cotton in reusable wipes.

d. Other <open text box>

Government must take steps to support people in transitioning to using reusable wipes. This could include practical information provided to new carers, as well as financial support such as reducing initial outlay costs through VAT, direct financial support, or products e.g. baby boxes. Furthermore, re-introduction of collection reusable nappy schemes should include reusable wet wipe collection, thereby reducing the barrier of laundering - particularly for lower income households.

Q16. To what extent do you agree with the following statement, "I/my organisation supports an exemption for plastic-containing wet wipes that are used in hospitals and have certain clinical and/or medical uses"?

c. Neither agree nor disagree

Q17. To what extent do you agree with the following statement "I/my organisation supports an exemption for plastic-containing wet wipes in certain industrial and professional uses (business to business sales only)"?

c. Neither agree nor disagree

Q18. Please explain your answers to Q16 and Q17, referring to specific evidence as much as possible.

a. We have selected neither agree/disagree.

We believe that a ban on plastic in wet wipes regardless of setting is generally feasible and that exemptions would be extremely difficult to manage. However, we would advise the Government to check with relevant disease and hygiene specialists.

Any exemptions should be time-bound and reviewed to reflect future developments in material science. As part of these exemptions, there must be a requirement to demonstrate that appropriate disposal training and implementation are in place. The precautionary principle should be applied before new products are brought to market. Any items with exemption should only be clearly labelled indicating in large format the disposal method.

Q19. What is the name of the organisation or business that you are responding on behalf of?

This response is on behalf of Wildlife and Countryside Link.

This response is supported by:

- A Rocha UK
- Angling Trust
- British Canoeing
- Friends of the Earth
- Froglife
- Institute of Fisheries Management
- Marine Conservation Society
- National Trust
- Rivers Trust
- Surfers Against Sewage
- Sustainability First
- The Wildlife Trusts
- Waterwise
- WWF
- Zoological Society of London

Q20. Please indicate which of these sectors you most align your organisation with for the purpose of this consultation (please tick all that apply):

b. Non-governmental organisation



Q21. How many employees does the organisation/business you are representing have?

Wildlife and Countryside Link's members are supported by over 8 million people in the UK.

Q22. Where does your business or organisation operate? (Select all that apply)

e. UK-wide

Q25. Does your business/organisation currently manufacture, supply, sell or frequently use wet wipes? (Select all that apply)

e. Other (please specify below)

Many Environment Link UK members manage their own nature reserves or sites across the UK, and many carry out beach cleans, river clean ups and litter picks. On the contrary to supplying or using wet wipes, eNGOs are often responsible for cleaning them up and having to absorb the knock-on clean-up costs, with impacts on site visitors, NGO staff and their time and capacity.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 80 organisations to use their joint voice for the protection of the natural world and animals.

For questions or further information please contact:
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This response is supported by the following organisations:

- A Rocha UK
- Angling Trust
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- Surfers Against Sewage
- Sustainability First
- Wales Environment Link
- The Wildlife Trusts
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