Defra call for evidence: Commonly littered and problematic plastic items

Water UK response

February 2022

www.water.org.uk

Introduction:

Water UK is the representative body and policy organisation for water and wastewater companies across England, Wales, Scotland and Northern Ireland. While this call is for evidence for England only, we have also sought views from members across the devolved nations too to inform this industry response. Due to the UK Internal Market Act 2020, Water UK considers that, in order to successfully control commonly littered and problematic plastic items, it is essential that the four nations work closely together to deliver shared environmental objectives through legislation.

As custodians of the sewerage network, we have a particular interest in issues that result in damage to these assets, and the associated environmental harm to rivers and seas. Our sector is integral to the protection and enhancement of the UK's rivers and seas and the habitats around them; we invest over £1 billion every year in environmental improvements. Certain plastic items make that harder by causing sewer blockages, spills and pollution.

That is why we strongly support Fleur Anderson MP's 'Plastics (Wet Wipes) Bill' and support the position of the Marine Conservation Society in promoting this.

We do however urge the Bill to go further than simply removing plastic from wet wipes, focusing instead on the overall environmental impact of these (and other) harmful products. Removing plastic from wet wipes is a necessary condition of reducing harm to the environment caused by wet wipes, but it is insufficient on its own, as plastic-free wipes can still cause blockages due to other aspects of their contents. The water industry's 'Fine to Flush' (WIS 4-02-06) standard is the only such accreditation which ensures no plastics are present in the product, **and** sufficiently mimics real-world forces present in the sewerage network that will ensure wipes disintegrate, reducing the risk of blockages.

In addition, we would encourage Defra to consider other problematic items not identified in the Call for Evidence for action (including but not limited to, sanitary products and colostomy bags). Please see individual water company responses for additional, company-specific views. We would also welcome the opportunity to discuss any part of this response with Defra officials in further detail.

Summary:

As custodians of the sewer network, we want to eliminate the harm caused by wet wipes entering drainage infrastructure and, by extension, inland and coastal waterways.

Our members are uniquely placed to assess risks to these assets, and advise on the question of which products could, when flushed, result in blockages and environmental harm. Water companies spend £100million every year clearing over 300,000 blockages, and cleaning up the negative environmental impacts of improperly disposed wet wipes and other unflushables. 11 billion wet wipes are used every year in the UK, evidence suggests that these wipes account for over 90% of material in blockages.

In response to the risks posed by inappropriate flushing of wet wipes, the UK water industry developed a standard, 'Fine to Flush' (WIS 4-02-06), first published in January 2019. This provides a standard that supports wet wipe manufacturers in making environmental claims around flushability and plastic content. It also provides guidance to support consumers in interpreting environmental claims of flushability by giving a clear signal as to which products can be flushed in an environmentally-friendly way. The standard assesses products through a series of rigorous tests to ascertain whether they disintegrate sufficiently in the sewer system, and whether or not the product contains plastics. This standard proves that moist toilet tissue wet wipes can be manufactured without the need for plastics, and their share of the market is increasing (having recently reached the 100th accreditation).

It is important to note that removing plastics from wet wipes will not on its own mean that wipes are then safe to flush. Whilst it is a necessary step, it is insufficient in ensuring the reduction in harm that these products cause to the environment, our customers and sewer infrastructure. We therefore call for all wet wipes that do not pass the rigorous testing for the 'Fine to Flush' standard, to be banned. Additionally, other commonly and mistakenly flushed products (see answer to Q24) should contain mandatory and clear 'DO NOT FLUSH' labelling on their packaging.

Tackling single use plastics contributing to water pollution and wider environmental harm

Wet wipes

1. Would you support a ban on wet wipes containing plastic? You will be asked about possible exemptions in the following questions.

• Yes

• No

• Don't know

• Please give reasons and supporting evidence

Yes – Our goal is to eliminate the harm caused by wet wipes entering wastewater infrastructure.

The single most impactful change would be for Government to ban harmful wipes – those which contain plastic and do not break down in the sewer. This would have a huge effect on reducing the number of sewer blockages – more so than strategies based on behaviour change or other approaches, which are currently having an insufficient impact on their own. Harmful wipes are those that fail (or have not been tested via) the rigorous water industry 'Fine to Flush' (WIS 4-02-06) standard. Banning harmful wipes would mean that the only moist toilet tissue wipes available for purchase are those carrying the 'Fine to Flush' logo, which are shown to carry a reduced impact on the sewer network.

Research demonstrates the scale of pollution caused by wet wipes and other products that are wrongly marketed as 'flushable', or that are mistakenly flushed by consumers. We want to reduce plastic entering the environment, and wipes containing plastic are more likely to cause damage to our infrastructure, increasing the risk of blockages, which in turn leads to environmental harm.

The Wipes in Sewer Blockage Study, jointly commissioned by Water UK, EDANA and Defra, demonstrates the contribution of wet wipes to sewer blockages and can be found here: http://www.water.org.uk/publication/wipes-in-sewers-blockage-study/.

Banning plastic in wipes alone is insufficient, we therefore call for mandatory, clear 'DO NOT FLUSH' labelling to be present on the packaging for commonly flushed items that should not enter the sewer network. These include wipes that have not passed the 'Fine to Flush' standard, and other commonly (and mistakenly) flushed items, like sanitary items, as they also pose an unacceptable risk to wastewater infrastructure by increasing the likelihood of blockages and environmental harm.

2. In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces. You will be asked about additional exemptions in the next question.

- Yes
- No
- **Don't know**
- Please give reasons and supporting evidence

We would only like to see exemptions used when there is a wholly justifiable set of circumstances, if at all. This must be evidenced and subject to Government decision. In such cases, these wipes must not be flushed, and mandatory and clear 'DO NOT FLUSH' labelling should be present on the front of packaging. It is important for this labelling to conform to a standard requiring clearly visible text (formatting and size), which is clear to the customer.

3. As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation?

• Yes

• No

Please give reasons and provide supporting evidence.

No – Given the increase in uptake from manufacturers and retailers on the water industry 'Fine to Flush' (WIS 4-02-06) standard, and the availability of reusable products, we are not aware of wipes that would need to contain plastic. Where products cannot be reusable due to reduced quality of life factors, these products should pass the 'Fine to Flush' standard if they are wet wipes, be banned if they do not, or have a mandatory and clear 'DO NOT FLUSH' label for other commonly and mistakenly flushed items.

4. Are you aware of the water industry's Fine to Flush standard?

• Yes

• No

5. If you answered yes to question 4, do you think the current water industry 'Fine to Flush' standard is effective in reducing sewer blockages caused by wet wipes?

• Yes

• No

• Don't know

Please give reasons and supporting evidence

Yes – we consider the Fine to Flush standard to be an effective tool in reducing blockages as it has helped change the design of an increasing number of products on which have historically contributed to sewer blockages and pollutions. It has also proven that an alternative way forward does exist for product design, but policy intervention is now needed to complete the market transition to more environmentally-friendly products.

As custodians of the sewer network, our members are uniquely placed to assess risks to these assets, and advise on the question of which products could, when flushed, result in blockages and environmental harm. Our goal is to eliminate the harm caused by wet wipes inappropriately entering wastewater infrastructure.

As mentioned, the single most impactful change would be for Government to ban harmful wipes. This would have a huge effect on blockages – more so than strategies based on behaviour change or other approaches. Harmful wipes are those that fail (or have not been tested via) the rigorous water industry 'Fine to Flush' (WIS 4-02-06) standard. Banning harmful wipes would mean that the only wipes available for purchase are those carrying the 'Fine to Flush' logo, which are proven to carry a reduced impact on the sewer.

In response to the risks posed by inappropriate flushing of wet wipes, the UK water industry developed the 'Fine to Flush' standard, first published in January 2019. This provides an accreditation that supports wet wipe manufacturers in making environmental claims around flushability. It also provides guidance to support consumers in interpreting environmental claims of flushability by giving a clear signal as to which products can safely be flushed. The standard assesses products through a series of rigorous tests to ascertain whether they disintegrate sufficiently in the sewer system by mimicking real-world forces present in sewerage infrastructure. Additionally, products must not contain plastics in order to comply with the standard.

In creating this standard, we have sought to provide a reputational incentive for responsible manufacturers and retailers to improve their products, reducing the risk of blockages and environmental harm. We are pleased that manufacturers and retailers are increasingly responding to this incentive. The standard has expanded significantly since its launch, having recently reached the 100 'Fine to Flush' accreditation. These include market leaders (Kimberly-Clark/Andrex), and major retailers such as Aldi and Waitrose. We recognise the leadership shown by these organisations and encourage all manufacturers and retailers to follow suit. A list of Fine to Flush certified products can be found here: https://www.wrcplc.co.uk/successful-fine-to-flush

The 'Fine to Flush' standard is a helpful tool for reducing the proportion of harmful and damaging wipes being sold on the market, and the increase in its uptake will therefore reduce the absolute number of blockages. Above all, it has helped stimulate and incentivise alternate product designs in a market where no products previously were considered 'flushable'.

It therefore remains the agreed position of the water industry to support the standard and we want to see it on as many products as possible. We also still remain committed to seeing Government ban all harmful wipes as soon as possible.

6. Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?

• Yes

• No

• Don't know

• Please give reasons and supporting evidence

Yes – We strongly support the 'Fine to Flush' standard becoming mandatory for wet wipe products to indicate more clearly which wipe products are truly flushable. We support this move as soon as practicable.

We are uniquely placed to advise on the question of which products could, when flushed, result in risks to the sewer network, blockages and environmental harm, as our members are custodians of these assets. Laboratory testing demonstrates that 'Fine to Flush' is the only standard that sufficiently mimics real-world forces present in the sewerage network. We are aware that other standards exist, however the only products we consider to be 'flushable' are those that have passed the Fine to Flush standard. All other references to, or claims of flushability should be banned.

Indeed, in October 2019, the Advertising Standards Authority (ASA) ruled that Kimberly-Clark had misled consumers in claims of flushability, having not included information on Fine to Flush in their advertising. The ruling stated that in order to make an informed decision, it was material for consumers to know that that the Fine to Flush accreditation existed to determine a product's 'flushability'. Without qualifying information to that effect, the ASA concluded that the claim 'flushable' was misleading. Kimberly-Clark subsequently announced that they would be adopting the 'Fine to Flush'.

In the absence of a single mandatory standard, products that claim flushability without passing the Fine to Flush standard exaggerate the positive environmental impact of the product and exacerbate consumer confusion around disposal of wet wipes. Our view is therefore that only products that meet Fine to Flush should be marketed as 'flushable', and that adequate mechanisms of enforcement should be in place to ensure that consumers are not misled by other standards.

We continue to encourage the adoption of the 'Fine to Flush' standard by retailers and manufacturers, and we will continue to press governments across the UK to recognise 'Fine to Flush' as the only standard relevant to claims of flushability.

We have called for legislative backing for the 'Fine to Flush' standard throughout the Environment Act's passage through Parliament, in order to reach market saturation and reduce the risk of environmental harm caused by these products. This means mandated 'Fine to Flush' accreditation for any wet wipe product that is currently marketed as flushable. There would also be a requirement for wet wipes that have not passed the 'Fine to Flush' standard to be banned (removing incorrect 'flushability' claims), and other products that might mistakenly be flushed, (for example sanitary products, see our response to Q24 for further products) to have clear mandatory 'DO NOT FLUSH' labelling.

7. Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?

a. Yes

b. No

c. Don't know

d. Please give reasons and supporting evidence

Yes – As custodians of the sewer network, our members are uniquely placed to assess risks to these assets, and advise on the question of which products could, when flushed, result in blockages and environmental harm.

Water UK published a report on our Wipes in sewers blockage study, the biggest ever in-depth investigation of sewer blockages in the UK. It revealed that wipes being flushed down toilets are causing serious problems in the sewerage system. It recommends that manufacturers and retailers of wet wipes, provide responsible disposal information in their advertising and awareness campaigns.

We have contended for some time that labelling products as 'flushable' when they do not disintegrate adequately in the sewer network is misleading. Products that are marketed as 'flushable' or that are mistakenly considered to be flushable due to poor labelling or mis-labelled packaging, are causing environmental harm and contributing to poor consumer behaviour. There is a growth in the market of a range of products that are wrongly advertised as 'flushable' (e.g. wet wipes, sanitary products, and colostomy bags, please see our response to Q24 for further products). These single use products do not break down in the same way as toilet paper (with the exception of wet wipes that have passed the 'Fine to Flush' standard), and instead cause blockages in drainage infrastructure. Wet wipes, which are frequently misleadingly branded as 'flushable', are particularly problematic, accounting for over 90% of material in blockages. These blockages then lead to sewer flooding, pollutions and avoidable discharges from storm overflows. Water companies spend £100million every year clearing blockages and cleaning up the negative environmental impacts of these improperly disposed wet wipes.

The 'Fine to Flush' standard is the only standard that sufficiently mimics real-world forces present in the sewerage network. Our view is that 'Fine to Flush' should be the only standard that governs flushability. In short, unless wet wipes meet the 'Fine to Flush' standard, they should be banned because of the harmful impacts on drainage infrastructure and the natural environment (this would remove any products incorrectly claiming to be flushable). Other products that might mistakenly be considered to be flushable – either by their nature (e.g. sanitary products), or by their advertising (e.g. sanitary pads and colostomy bags) – should have mandatory and clear 'DO NOT FLUSH' labelling on their packaging.

It is important for this labelling to conform to a standard requiring clearly visible text (formatting and size), which is clear to the consumer.

Consumer awareness around this issue remains low despite years and millions of pounds spent on customer awareness campaigns undertaken by water companies, Water UK and environmental groups. It is clear that mandating the 'Fine to Flush' standard for wet wipes, banning the sale of those which do not meet 'Fine to Flush', and introducing clear, mandatory 'do not flush' labelling on other commonly misflushed products is the only way to reduce the harmful pressures unflushables place on sewers and waterways. These measures will reduce the number of sewer blockages and the associated environmental harm, as well as providing consistent messaging to consumers on product suitability. This will vastly reduce consumer confusion which exists in the market at present.

8. Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?

• Yes

• No

• Don't know Please provide suggestions for how this might operate.

Yes – Customers unfairly bear the cost of dealing with pollution caused by environmentally-damaging products, like wipes. It is important that Defra embraces the 'polluter pays' principle on this issue. We believe that manufacturers and retailers of unflushables items (including, but not limited to, wet wipe and sanitary products) should play their part in ensuring the responsible disposal of their products.

We therefore call for an extended producer responsibility scheme to ensure manufacturers meet the full costs of the monitoring of the environmental harm of their products, as well as funding awareness-raising campaigns and fixing the damage caused to waterways and sewers. We have provided further details on this in our 21st Century Rivers report. This should be set out in law as soon as is practicable with clear timings on its implementation.

The water sector across Europe has considered the desirability, feasibility and approach to delivering a producer responsibility scheme of this kind, and further details can be found here. Moreover, we understand that the recent Environment Act's resource efficiency clauses will make it easier than ever to introduce schemes of this kind, further reducing any argument against action. We urge the Government to implement an internationally leading EPR scheme to tackle the scourge of unflushables.

9. What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.

Please give supporting evidence on the cost and environmental impact.

We urge Defra to focus on circular economy to promote reusable products. Where products cannot be reusable due to reduced quality of life factors, these products should pass the 'Fine to Flush' standard if they are wet wipes (or be banned if they do not), and have a mandatory and clear 'DO NOT FLUSH' label for other commonly flushed items. There are an increasing number of products on the market which have received the Fine to Flush accreditation, so it is clear there a many viable alternatives.

We would welcome more research and innovation from researchers, manufacturers and retailers to improve their products and provide more choice for reusable items that would not then make their way into sewer network. This includes, but is not limited to single use cleaning wipes and sanitary products.

Tobacco filters

10. Do you support the government taking regulatory action to tackle littering of tobacco filters?

• Yes

• No

• Don't know

Yes – The Water Industry would support action to tackle littering of tobacco filters.

An estimated 120 million tonnes of tobacco waste is discarded in the UK every day. Tobacco filters are one of the most commonly littered items in the UK, costing millions to clear up. The littering of tobacco filters results in them entering into watercourses, as well as increasing the likelihood of blockages when they enter our sewer infrastructure. They also contain plastic, but research shows they do not need to. Cellulose acetate tobacco filters contain plastic which can take up to 12 years to breakdown, whereas research shows that they can be made of pure cellulose instead, which breaks down in a matter of weeks. We would therefore support a ban on plastics in these products as well as action on reducing littering of these products.

Additional items

24. Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.

Water UK published a report on our Wipes in sewers blockage study, which is the biggest ever in-depth investigation of sewer blockages in the UK. As well as the commonly littered and problematic plastic items picked out in this call for evidence, analysis of sewer network blockages and items collected at treatments works include, but are not limited to:

- Cleaning/kitchen/bathroom/floor wipes
- Makeup removal pads and facial wipes
- Sanitary products (including tampons, tampon applicators and pads)
- Incontinence pad and panty liners
- Condoms
- Earbuds (despite the banning of plastic stems)
- Plasters
- Dental floss
- Cotton pads
- Plastic razors
- Nappies
- Colostomy bags
- Cat litter
- Masks, gloves and other personal protective equipment
- Masks

- Clothing fibres

Please note, the above products are a mix of single use products, products that contain plastic, and single use products that contain plastic. They all contribute towards environmental harm when mistakenly flushed.

For all of the above products, we support banning the use of plastics as a necessary step. Evidence does however show that only removing plastics is an insufficient condition of reducing harm caused to the environment (e.g. paper based ear buds still contributing towards blockages). All of these products (whether they contain plastic or not) are products that might be used in a domestic bathroom and in proximity of a toilet. They should therefore contain mandatory and clear 'DO NOT FLUSH' labelling on their packaging to provide clarity to consumers and lessen the confusion over what can and cannot be flushed.

The three P's remains the simplest messaging to consumers whereby only 'Poo, Pee and Paper' should be flushed down the toilet (where Fine to Flush accredited moist toilet wet wipes fall under paper). Mandatory and clear 'DO NOT FLUSH' labelling on all other commonly and mistakenly flushed items would help support consumers in interpreting environmental claims of flushability, provide consistent messaging to consumers on product suitability, and put the onus on manufacturers to provide full and accurate information on their products. These steps would vastly reduce consumer confusion and therefore lessen the likelihood of blockages and harm to the environment.

UKWIR have commissioned a project "to identify and quantify plastic items received by the water industry and how best to tackle these through source control". This project aims to provide robust evidence of the types of plastic items commonly found at sewerage treatment work inlets. This research will facilitate Government decisions to be made to support regulatory change in relation to plastics. This project will identify how best to control these plastics through source control, including potential policy interventions. This project will develop knowledge and provide recommendations on source control of plastic items in order to promote the circular economy, protect the environment, wastewater operations and our bioresources from plastic. The project is due to complete in September 2023 and the report will be publicly available.

Finally, whilst not a single use item, clothing fibres are an increasing problem for our infrastructure, and are contributing towards a build-up of plastic microfibres in waterways. France has taken legislative steps in the fight against this type of pollution and as of January 2025, all new washing machines in France will have to include a microfiber filter to stop synthetic clothes from polluting waterways. We would urge the exploration of a similar scheme in the UK if the UK is to continue lead the world on this issue.

25. Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?

We would welcome more research and innovation on reusable products, with a particular focus on circular economy.

In the case of tampon applicators that are now made out of plastic, returning to the previous cardboard applicator versions would be a significant improvement, as these would be biodegradable. The Marine Conservation Society Beach Watch Survey in 2021 identified that the average number of tampons and plastic tampon applicators accounted for 6% of sewage related debris found per 100m of English beaches

surveyed. The vast majority of these are plastic tampon applicators which float and take a long time to breakdown in the environment.

Tampon packaging would however still need to include mandatory and clear 'DO NOT FLUSH' labelling, as even if the use of plastic is banned, flushing these products will still increase the likelihood of blockages and environmental harm.

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