LINK Consultation Response
Consultation on the proposed ban of the manufacture, supply and sale of wet wipes containing plastic.
November 2023

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Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Sustainable Economy Group and is supported by members listed at the end of the document.

Consultation 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?
N/A.

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

Q4. Please provide your email address.
phoebe@scotlink.org

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.

Q6. Where are you currently based yourself?
Scotland

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.

The Scottish Government, and other UK administrations, must take tangible steps towards fostering a circular economy. Banning plastic in wet wipes should be coupled with initiatives supporting the shift to reusable products, making them more accessible and affordable while offering guidance on maintaining hygiene standards. Regardless of their composition, single-use wet wipes consume resources, carry a carbon footprint, and lack recyclability, making them incompatible with a circular economy.

In 2022, over 30,000-wet wipes were picked up and surveyed by the Marine Conservation Society's Beachwatch volunteers with 52% of surveys finding wet wipes. It should be noted that Marine Conservation Society's volunteer beach cleaners and surveyors do not (and could not be reasonably be expected to) distinguish between types of wet wipes. The high number of wet wipes present is despite educational campaigns by Scottish Water and NGOs discouraging the flushing of wet wipes and other bathroom products. Banning plastic in wet wipes would help to alleviate the environmental damage caused by these products but does not tackle the flushing behaviour in itself, and advertising of products as plastic-free, biodegradable etc may in fact encourage flushing.

Plastic wet wipes can break down into microplastics. Marine life which ingests (micro)plastics may be exposed to higher levels of persistent organic pollutants which adsorb to the surface of microplastics.

Plastic wet wipes make a significant contribution to sewer blockages. Scottish Water state that they deal with 36,000 blockages a year with around 90% of these blockages being caused by wet wipes that contain plastic and do not decompose.Blockages can result in Storm overflows discharging sewage into the environment which has widely acknowledged repercussions for the environment[1].

Once sanitary items, particularly wet wipes, have been flushed into sewers they can combine with fats and oils, reducing capacity in the sewer. This can increase the frequency that sewers overflow and cause blockages resulting in environmental pollution and flooding of homes and gardens. Furthermore, sanitary waste on beaches impacts on tourism and can potentially weaken coastal economies.

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 Scottish Government has said it needs to embrace society-wide resource management and reuse practices[2]. The focus of the consultation is towards wet wipe manufacturers, even though there are many stakeholders who wish to input into transitioning from a single-use to a circular and sustainable economy.

The ban should be implemented as soon as practicably possible; we suggest that the ban 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.

[1] https://www.scottishwater.co.uk/About-Us/News-and-Views/2023/03/040423-Scottish-Water-celebrates-UK-plastic-wipes-ban
[2] https://www.gov.scot/publications/scottish-government-response-scotlands-climate-assembly-recommendations-action/

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

As conservation charities, we are not best equipped to answer this question and would encourage the Scottish Government and other administrations to consult relevant stakeholders and organisations representing and working with groups who may require continued use of wet wipes containing plastic, 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; this should be considered during the consultation review period and beyond. Consideration and support for proper disposal should also be given. Furthermore, governments must 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 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 teach parents how to use them. 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.
Single use wipes are not compatible with the circular economy, regardless of material. Single use wipes use 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; or where it is accepted for recycling, this 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. 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.

It is 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.[3] [4]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.[5] [6] [7] Regenerated cellulose fibres have been found in deep sea sediments; the impact of these entering the food chain is currently unknown [8] [9]. 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[10].

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.

Finally, 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

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.

Wipes from viscose are not by default suitable for flushing. 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. 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[11].

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

[4] 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

[5] 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

[6] 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

[7] 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

8 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

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

[10] 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

[11] 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

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[12] [13]. 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.

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.

c. Cotton (reconstituted cotton fibres) – no

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.

d. Other

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 reduced 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.

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.

[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.full

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

Q20. Please indicate which of these sectors you most align your organisation with for the purpose of this consultation
b. Non-governmental organisation

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

Q22. Where does your business or organisation operate?
e. Scotland

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

Many LINK 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.

This response is supported by the following LINK members:

Action for the Protection of Rural Scotland (APRS)
Fidra
Froglife
Keep Scotland Beautiful
Marine Conservation Society
RSPB
Scottish Seabird Centre
Scottish Wild Land Group (SWLG)
Scottish Wildlife Trust