

Call for evidence: Single-use food containers and other single use items

Overview

<i>General Comments</i>

Detailed Response

Specific Comments

PART 1 – Single-use food containers.
Evidence relating to the questions can be uploaded to the on-line template.

1	Do you have any evidence of the environmental impact of single-use (plastic or non-plastic) food containers? Please provide your evidence below
Scottish Water has no comment.	
2	Do you have any evidence of the size and nature of the single-use (plastic and non-plastic) food containers market in Scotland? Please provide your evidence below
Scottish Water has no comment.	
3	Do you have any evidence of effective actions taken in Scotland or other nations to reduce consumption of single-use (plastic or non-plastic) food containers? Please provide your evidence below
Scottish Water has no comment.	
4	Do you have any evidence of barriers to implementing policy measures to reduce the consumption of single-use food containers? Please provide your evidence below
Scottish Water has no comment.	
5	Do you have any evidence related to the impact on businesses (positive or negative) that policy measures to reduce the consumption of single-use food containers could have? Please provide your evidence below

Scottish Water has no comment.

6

Do you have any evidence of the impact that policy measures to reduce the consumption of single-use food containers might have on people with protected characteristics or who experience socio-economic disadvantage?

The protected characteristics laid down by the Equality Act 2020 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. Your answer might also include evidence of where single-use food containers are considered essential.

Please provide your evidence below

Scottish Water has no comment.

Part 2 - Other single-use plastic products.

Evidence relating to the questions can be uploaded to the on-line template.

7

Do you have any evidence of the environmental impact of the single-use items set out in Part 2 of the call for evidence paper:

Scottish Water recommends that there needs to be a focus on reduction of many single use items to reduce material use and impact upon the environment in order to move towards a circular economy.

a) Single-use plastic bowls, trays and platters? - Scottish Water has no comment.

b) Single-use plastic period and incontinence products?

The Marine Conservation Society (MCS) carried out a Beach Watch Survey in 2021. This identified that 65% of sewage related debris (SRD) items were wet wipes, 25% were cotton bud sticks, 6% sanitary products and backing strips, 3% plastic tampon applicators and 1% other sanitary products.

In 2020 there were around 36,000 blockages within the public wastewater network, over 80% of which were due to inappropriate disposal of items such as period and incontinence products. These 36,000 blockages cost around £7 million to clear. Reducing inappropriate disposal to the wastewater network will reduce the number of blockages and thus help reduce environmental pollution and keep customer charges low.

Scottish Water launched the 'Nature Calls' campaign to raise public awareness of the problems caused to the wastewater network, treatment works and to the environment by inappropriate disposal of plastic items.

Plastic tampon applicators and plastic packaging

Tampons are typically made of up to 6% plastic¹. The applicator may be made of plastic or a biodegradable material, only plastic tampon applicators are found as sewage related debris on beaches. Scottish Water would support marketing

¹ <https://edu.rsc.org/feature/single-use-plastic-in-period-products/4013167.article>

restrictions on plastic tampon applicators and plastic packaging on sanitary products. A significant reduction of 50% in cotton bud sticks has been recorded between 2020 and 2021, indicative of the success of the introduction of a Scottish ban on plastic cotton bud sticks in 2019.

Clearer labelling of all items likely to be flushed down the toilet

Sanitary towels are typically made of up to 90% plastic² and have plastic wrappings and backing strips that may also be inappropriately flushed down the toilet.

All products and wrappings containing plastic that might be used in a domestic bathroom and in proximity of a toilet should be clearly and consistently labelled on the front of the product (e.g., this product contains plastic, DO NOT FLUSH, harmful to the environment). The range of consumer products of this type is large; appropriate labelling is vital to help inform consumers. Scottish Water would strongly recommend that the labelling introduced is in line with the marking requirements implemented by the EU reduction of the impact of certain plastic products on the environment Commission Implementing Regulations³ in 2021, so that they are easier to recognise, understand and be more impactful. Clear labelling of these products will reduce the quantity of products inappropriately flushed and reduce the number of sewer chokes within the sewerage network.

c) Single-use plastic sachets?

Sachets when littered may be washed into drains and enter the surface water system, which will flow to and litter the local water course or Sustainable Urban Drainage System (SUDs). Those sachets which enter the combined sewer system will flow to the Wastewater Treatment Works (WWTWs) where they may be removed by screens and sent to landfill or released to the water environment.

d) Single-use plastic tobacco filters?

Zero Waste Scotland (ZWS) have highlighted the 120 tonnes of smoking related debris discarded on Britain's streets every day. 50% of Scotland's streets are affected by smoking related debris⁴. £34 million is spent on clearing up smoking related debris on Scottish streets⁵.

Tobacco filters contain toxic chemicals such as nicotine which are harmful when mistakenly eaten by wildlife.

Tobacco filters when littered may be washed into drains and enter the surface water system which will flow to and litter the local water course or SUDs. Those tobacco filters which enter the combined sewer system will flow to the WWTWs where they may be removed by screens and sent to landfill or released to the water environment.

Plastic Tobacco Filters

² <https://edu.rsc.org/feature/single-use-plastic-in-period-products/4013167.article>

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R2151&rid=1>

⁴ [ZWS guide booklet, Cigarettes_AW2.pdf \(zerowastescotland.org.uk\)](#)

⁵ [cus-smoking-litter-v2.pdf \(keepsotlandbeautiful.org\)](#)

Tobacco filters contain plastic in the form of cellulose acetate which can take up to 12 years to break down². We propose that tobacco filters could be made out of cellulose which would take 2-3 weeks to break down reducing the impact on the environment⁶ and cost to clear up littering⁷.

We would therefore support marketing restriction on tobacco filters containing plastic.

Vaping related debris

Single use vaping devices contain plastic, nicotine, e- liquid, coils and batteries. In 2018 7% of adults in Scotland e smoked up from 5% in 2014⁸. Scottish Water consider the increasing issue of littering single use vaping devices should be considered for further action and tackled through source control and improvements in recyclability or return schemes.

e) Single-use plastic packaging on fruit and vegetables? - Scottish Water has no comment.

8 Do you have any evidence of the size and nature of the market for the single-use items set out in Part 2 of the call for evidence paper:

a) Single-use plastic bowls, trays and platters? - Scottish Water has no comment.

b) Single-use plastic period and incontinence products?
ZWS ran the 'Trial Period' campaign which highlighted those 427.5 million period products are disposed of in Scotland per year.

c) Single-use plastic sachets? - Scottish Water has no comment.

d) Single-use plastic tobacco filters?
It is estimated that 120 tonnes of smoking related litter per day are thrown away every day by UK smokers⁹. The cost to the Water Industry involves clearing litter from SUDs ponds and disposal of screenings at the WWTW.

e) Single-use plastic packaging on fruit and vegetables? - Scottish Water has no comment.

9 Do you have any evidence on what alternatives to single-use items set out in Part 2 of the call for evidence paper are available and any negative impacts (environmental or other) that increased use of these alternatives could have:

a) Single-use plastic bowls, trays and platters? - Scottish Water has no comment.

b) Single-use plastic period and incontinence products?

⁶ [alternative-cigarette-filter-materials.pdf \(genia-filter.com\)](#)

⁷ [alternative-cigarette-filter-materials.pdf \(genia-filter.com\)](#)

⁸ [Chapter 4 Smoking - Scottish Health Survey 2018: summary report - gov.scot \(www.gov.scot\)](#)

⁹ [ZWS guide booklet Cigarettes AW2.pdf \(zerowastescotland.org.uk\)](#)

Many brands of tampon applicators are made of cardboard and thus there is already a more sustainable option if tampon applicators containing plastic were to be banned.

The ZWS 'Trial Period' campaign focused on raising awareness of the alternatives to single use period products such as reusable pads, period pants and menstrual cups. Nine out of ten respondents to the ZWS #TrialPeriod survey stated they are now using reusable period products¹⁰. Scottish Water supported promoting ZWS's Trial Period Campaign through social media, raising awareness of reusable alternatives.

- c) **Single-use plastic sachets?** - Scottish Water has no comment.
- d) **Single-use plastic tobacco filters?** - Research shows that these can be made of cellulose instead, which breaks down in a matter of weeks.¹¹
- e) **Single-use plastic packaging on fruit and vegetables?** - Scottish Water has no comment.

10	Do you have any evidence of effective action taken to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:
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- a) **Single-use plastic bowls, trays and platters?** - Scottish Water has no comment.
- b) **Single-use plastic period and incontinence products?** – ZWS ran the 'Trial Period' campaign which highlighted those 427.5 million period products are disposed of in Scotland per year. This campaign focused on raising awareness of the alternatives to single use period products such as reusable pads, period pants and menstrual cups. Nine out of ten respondents to the ZWS #TrialPeriod survey stated they are now using reusable period products¹². We also supported promoting ZWS's Trial Period which raises awareness of reusable alternatives

Scottish Water Nature Calls Campaign.
We believe that behaviour change campaigns are very important in raising awareness of the impact of consumption and reducing litter. Campaigns must be carried out in conjunction with other activities, such as source control including removing unnecessary plastics from the supply chain.

The sewer system is only one of many pathways for mobilising litter to freshwater and marine environments. Extra treatment/screening at WWTW may reduce overall release into the environment but comes with a significant financial and environmental cost (construction, maintenance, and operation).

- c) **Single-use plastic sachets?** - Scottish Water has no comment.
- d) **Single-use plastic tobacco filters?** - Scottish Water has no comment.
- e) **Single-use plastic packaging on fruit and vegetables?** - Scottish Water

¹⁰ [Trial Period | Zero Waste Scotland](#)
¹¹ [alternative-cigarette-filter-materials.pdf \(genia-filter.com\)](#)
¹² [Trial Period | Zero Waste Scotland](#)

has no comment.	
11	Do you have any evidence related to barriers to implementing policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:
<p>a) Single-use plastic bowls, trays and platters? - Scottish Water has no comment.</p> <p>b) Single-use plastic period and incontinence products? - Scottish Water has no comment.</p> <p>c) Single-use plastic sachets? - Scottish Water has no comment.</p> <p>d) Single-use plastic tobacco filters? - Scottish Water has no comment.</p> <p>e) Single-use plastic packaging on fruit and vegetables? - Scottish Water has no comment.</p>	
12	Do you have any evidence related to the impact on businesses (positive or negative) of policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:
<p>a) Single-use plastic bowls, trays and platters? - Scottish Water has no comment.</p> <p>b) Single-use plastic period and incontinence products? - Scottish Water has no comment.</p> <p>c) Single-use plastic sachets? - Scottish Water has no comment.</p> <p>d) Single-use plastic tobacco filters? If a marketing restriction on plastic tobacco filters was introduced, then the current cost of clearing smoking related debris in Scotland of £34 million per year may be significantly reduced.</p> <p>Tobacco filters when littered may be washed into drains and enter the surface water system which will flow to and litter the local water course or SUDs. Those tobacco filters which enter the combined sewer system will flow to the WWTWs where they may be removed by screens and sent to landfill or released to the water environment.</p> <p>e) Single-use plastic packaging on fruit and vegetables? - Scottish Water has no comment.</p>	
13	Do you have any evidence of the impact that policy measures to reduce the consumption of the single-use items set out in Part 2 might have on people with protected characteristics or who experience socio-economic disadvantage of the call for evidence paper: The protected characteristics laid down by the Equality Act 2020 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
<p>a) Single-use plastic bowls, trays and platters? - Scottish Water has no comment.</p> <p>b) Single-use plastic period and incontinence products? - Scottish Water has no comment.</p> <p>c) Single-use plastic sachets? - Scottish Water has no comment.</p> <p>d) Single-use plastic tobacco filters? - Scottish Water has no comment.</p>	



e) **Single-use plastic packaging on fruit and vegetables?** - Scottish Water has no comment.

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