

Consultation on the proposed ban of the manufacture, supply and sale of wet wipes containing plastics.

Overview

<i>General Comments</i>

Detailed Response

Specific Comments

1	Would you like your response to be confidential, under the terms defined above?
No	
2	[Question]
[Response]	
3	Please provide your full name. If you are representing an organisation, you will be asked its name later.
Scottish Water	
4	Please provide your email address
Regulation@scottishwater.co.uk	
5	Which of the following best describes you? a. I am a member of the public responding to this consultation out of my own interest. b. I am a member of the public responding on behalf of a campaign or petition. c. I am responding on behalf of a business or organisation that manufactures, supplies, sells or uses wet wipes.

	<p>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.</p> <p>e. Other (please specify)</p>
	<p>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.</p>
6	<p>Where is your organisation currently based?</p> <p>a. England</p> <p>b. Scotland</p> <p>c. Wales</p> <p>d. Northern Ireland</p> <p>e. Outside the UK, within the EU</p> <p>f. Outside the UK, outside of the EU</p>
	<p>b. Scotland</p>
7	<p>[Question]</p>
	<p>[Response]</p>
8	<p>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"?</p> <p>a. Strongly agree.</p> <p>b. Agree</p> <p>c. Neither agree nor disagree</p> <p>d. Disagree</p> <p>e. Strongly disagree</p> <p>f. I don't know</p>
	<p>a. Strongly agree</p>
9	<p>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"?</p> <p>a. Strongly agree.</p> <p>b. Agree</p> <p>c. Neither agree nor disagree</p>

	<p>d. Disagree e. Strongly disagree f. I don't know</p>
<p>a. Strongly agree</p>	
<p>10</p>	<p>Please explain your answer to Q8 and Q9, referring to specific evidence as much as possible</p>
<p>Scottish Water strongly supports the proposal to ban the manufacture, sale and supply of wet wipes containing plastic. In addition, Scottish Water asks for 3 more measures to be included:</p> <ul style="list-style-type: none"> • All wet wipes should be clearly labelled “bin the wipe” so it is clear for the consumer the correct disposal method • that all wet wipes manufactured, for sale and supplied in the UK should comply with a disintegration test as defined in the Water Industry Specification 4-02-06. • that the scope of the ban should also include wet wipes made from woven fabric; it is not clear in the consultation why this type of wipe is excluded from scope. <p>The section on the ‘Rationale for a Proposed Ban’ section 14 does not include the consequences of inappropriately flushed wet wipes on the environment and the services provided by the Water Industry. Scottish Water proposes that the scope of any legislative changes specifically identify the motivation for any ban is the impact on the environment and the harm caused by sewer blockages.</p> <p>As evidence, in December 2017, Water UK reported¹ on a recent study of sewer blockages; the research revealed that approximately 93% (Drinkwater A, & Moy, F (2017), <i>Wipes in sewer blockages study. FINAL report.</i> Water UK.) of the material causing blockages was made up of inappropriately flushed wipes. There are approximately 300,000 sewer blockages and this costs the UK water industry approximately £100 million every year. In addition, costs are incurred by customers who experience sewer flooding caused by blockages (e.g. insurance, refurbishment, inconvenience etc.). Whilst these costs are unknown to the water sector, they cannot be overlooked. In addition, inappropriate flushing of wipes causes the capacity in the sewer to be reduced and increases the frequency of spills to the environment. The UKWIR report “<i>Plastics received by the Water Industry and how best to tackle them through source control</i>” identified that approximately</p>	

1 in 4 pollution incidents in England in 2019/20 were due to blockages caused by wet wipes¹ being inappropriately flushed.

The consultation identifies that 31 billion wet wipes were placed on the market in the UK in 2021. Water UK have identified from recent research that 22% of people admit to inappropriately flushing wet wipes down the toilet ([Public urged to bin 'harmful' wet wipes as over a fifth admit to flushing down the toilet | Water UK](#)).

By introducing a ban on the manufacture, sale and supply of wet wipes containing plastic, **in combination with the 3 measures identified above**, will enable consumers to dispose of wet wipes in a responsible manner, protect the services provided by the Water Industry and protect the environment.

Without the additional 3 measures identified above the ban on wet wipes containing plastic will not achieve the desired outcomes.

11	<p>Do you think that the proposed ban will have a negative impact on any specific groups of consumers?</p> <p>a. Yes b. No c. I don't know</p>
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c. Don't know

12	<p>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.</p>
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SW is not qualified to comment on specific consumer groups

13	<p>Do you think the definition of wet wipes used within this consultation is suitable?</p> <p>a. Yes b. No, please expand c. I don't know</p>
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b. No, (please expand)

The consultation proposes a definition as follows “*wet wipes containing plastic as ‘a non-woven piece of fabric that contains plastic which has been soaked and stored in a liquid’.*”

Scottish Water suggests that the proposed definition of wet wipe is insufficient and should extend to any wet wipe that may have a negative impact on the sewer system or on the environment and hence **should include a disintegration test as defined in the Water Industry Specification 4-02-06 and should include both woven and non-woven wipes.**

Containing plastic alone is not a sufficient basis for the ban, as non-plastic wipes may be made of substantial materials which do not disintegrate within a sewer if inappropriately flushed. This causes significant problems in the form of sewer blockages (where they may be inappropriately disposed of) or in landfill, where the wipes do not break down.

Limiting the ban to only non-woven wipes will mean single use woven wipes containing plastic will still be manufactured, supplied and sold. If these are inappropriately flushed down the toilet, these will continue to cause sewer blockages and adversely impact the environment.

14	<p>Do you think the definitions of plastic used within this consultation are suitable?</p> <p style="padding-left: 40px;">a. Yes</p> <p style="padding-left: 40px;">b. No, please expand</p> <p>Wet wipes marketed as ‘natural’, ‘biodegradable’ or ‘plastic free’ may be made from polymers which have undergone chemical extraction, processing and refinement processes.</p> <p>Do you think wet wipes marketed in this way should be considered ‘plastic free’ and excluded from the proposed ban?</p> <p>For each material, please explain why:</p> <p style="padding-left: 40px;">c. Viscose (usually derived from wood) <Yes with reason/no with reason/I am not sure></p> <p style="padding-left: 40px;">d. Lyocell (a semi synthetic cellulose fibre) <Yes with reason/no with reason/ I am not sure></p> <p style="padding-left: 40px;">e. Cotton (reconstituted cotton fibres) <Yes with reason/no with reason/ I am not sure></p> <p style="padding-left: 40px;">f. Other</p>
	<p>a. Yes</p> <p>b. No, please expand. I don't know</p> <p>c. Viscose (usually derived from wood) <Yes with reason/no with reason/I am not sure></p>

- d. Lyocell (a semi synthetic cellulose fibre) <Yes with reason/no with reason/ I am not sure>
- e. Cotton (reconstituted cotton fibres) <Yes with reason/no with reason/ I am not sure>
- f. Other

No, we do not believe that wet wipes marketed as “natural” and “biodegradable” should be considered “plastic free”. Scottish Water is not aware, that the terms “natural” and “biodegradable” have standard or recognised definitions as applied to wet wipes (and may never do so under this proposed legislation). Therefore, these terms on marketing material should not be used as a justification for exclusion from the ban.

Scottish Water agrees with the definition of plastic identified in para 18 of the document. **It is essential that the future legislation clearly defines what constitutes “plastic” and “plastic free”, where “plastic free” additionally includes the disintegration test WIS 4-02-06. Therefore, any wet wipes marketed as “plastic free” will not contain plastic and will disintegrate readily.**

If a ban is implemented only on wet wipes that contain plastic without the 3 additional measures, **(labelling, disintegration test and inclusion of woven products)** there will still be very significant sewer blockages and harm to the environment will continue.

15	<p>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”?</p> <ul style="list-style-type: none"> a. Strongly agree b. Agree c. Neither agree nor disagree d. Disagree e. Strongly disagree f. I don’t know.
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f. Don’t know

16	<p>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)”?</p>
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	<ul style="list-style-type: none"> a. Strongly agree b. Agree c. Neither agree nor disagree d. Disagree e. Strongly disagree f. I don't know
	f. Don't know
17	Please explain your answers to Q15 and Q16, referring to specific evidence as much as possible.
	<p>Scottish Water has concerns about exemptions for plastic-containing wipes that are used in hospitals or have certain clinical, medical or industrial/professional uses. Allowing exemptions will discourage/stifle the development of viable plastic-free substitution products. If exemptions are considered essential, these could be for a defined period of time to allow suitable alternatives to be developed, tested and marketed before those containing plastic are phased out.</p> <p>If exemptions are to be applied to any wet wipe containing plastic, the labelling should be clearly marked "plastic in product" and "bin the wipe". All labelling of "plastic in product" and "bin the wipe" should be clear, large enough to easily read and on the front of packaging to inform the consumer.</p> <p>If exemptions are applied to certain categories of wipes for clinical, medical or industrial/professional uses Scottish Water strongly recommends that all of these exemptions comply with the WIS 4-02-06 disintegration test.</p>
18	What is the name of the organisation or business that you are responding on behalf of?
	Scottish Water
19	<p>Please indicate which of these sectors you most align your organisation with for the purpose of this consultation (please tick all that apply):</p> <ul style="list-style-type: none"> a. Public body b. Non-governmental organisation c. Retail industry d. Manufacturing industry e. Wholesaler



	f. Other (please state) public water authority
	f. Other (please state) public water authority
20	How many employees does the organisation/business you are representing have? <ul style="list-style-type: none"> a. 0-9 employees b. 10-49 employees c. 50-249 employees d. 250-499 employees e. 500 or more employees
	e. 500 or more employees
21	Where does your business or organisation operate? (Select all that apply) <ul style="list-style-type: none"> a. England b. Scotland c. Wales d. Northern Ireland e. UK-wide f. Outside the UK, within the EU g. Outside the UK, outside of the EU
	b. Scotland
22	If you are a manufacturer of wet wipes containing plastic, where are your UK production facilities based? (Select all that apply) <ul style="list-style-type: none"> a. England b. Scotland c. Wales d. Northern Ireland e. Not applicable
	e. not applicable
24-36	

Questions 24 to 36 are not applicable

- End of Document -

ⁱ [Plastics received by the Water Industry & how best to tackle them through source control \(ukwir.org\)](https://www.ukwir.org)