

## Response ID ANON-WGGP-UZ5U-E

Submitted to Call for evidence on commonly littered and problematic plastic items  
Submitted on 2022-02-10 17:45:55

### Introduction

1 Would you like your response to be confidential?

No

Blank free text box for answer:

2 What is your name?

Name:  
Professor Martin Bigg

3 What is your email address?

Email:  
martin2.bigg@uwe.ac.uk

4 It would be helpful for our analysis if you could indicate which of these sectors you most align yourself/your organisation with for the purpose of this consultation (please tick one which is most applicable to you):

non-governmental organisation

Blank free text box for answer:

5 If you are responding on behalf of an organisation, what is its name?

Organisation:  
Worshipful Company of Water Conservators

### Wet wipes

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

Yes

Blank free text box for answer:

Despite all good intentions, labelling, and the provision of alternative disposal options including bins, wet wipes will continue to be flushed and continue to cause the current problems and damage to the environment. Therefore as a minimum the non-biodegradable plastic component must be banned.

We, the Worshipful Company of Water Conservators, do not consider that this consultation and responses will address the problems of sewage borne litter. We have therefore produced the position statement below to identify the issues and propose solutions.

#### POSITION STATEMENT ON THE NEED FOR A HOLISTIC APPROACH TO SOLVING THE PROBLEMS OF SEWAGE BORNE LITTER

##### Introduction

The Worshipful Company of Water Conservators is a City of London Livery Company focussed on the long term health of our water resources and the broader environment. Our members include senior professionals from water, environmental and related industries along with others who share our passion for water and the environment.

##### Summary

Water Conservators are very much aware of the water company operational costs, the ecological damage, and public angst over the presence of sewage borne litter in the environment. The Company, therefore, recognises that it is time to tackle this problem in a holistic way and is proposing such an approach as part of its response to the Defra Call for Evidence on commonly littered and problematic plastic items with particular focus on wet wipes. The Company supports the Thames21 campaign to ban plastic in wet wipes.

This note draws on a longer essay prepared by a Company member to provide a more examination of the issues involved ([https://www.linkedin.com/posts/peter-matthews-043050147\\_sewage-borne-litter-we-need-a-national-activity-6893966060693938176-ybdV](https://www.linkedin.com/posts/peter-matthews-043050147_sewage-borne-litter-we-need-a-national-activity-6893966060693938176-ybdV)).

##### Current problem

There is intense interest in the presence of used care products in sewage, which cause sewer blockages, and environmental litter and pollution from sewer overflows. This was highlighted in the recent Environmental Audit Committee Report 'Water Quality in Rivers', published in January 2022. The essay reviews the types of products found, the physical problems they cause, and the actions which have been taken by the water companies so far. The essay looks at some of the behavioural issues which have prevented this whole topic from being confronted properly to date.

Research for the essay found that the current messaging is confusing and the labelling of products is poor. Is 'bag it and bin it' or 'fine to flush' the most important message to get over to the public.

#### Call for evidence

Defra is calling for evidence on commonly littered and problematic plastic items and the proposal that wet wipes should not contain single use plastics. The call for evidence, the questions posed and answers, and the focus on single use plastics, will fail to address the problem of used care products in sewage. A wider strategy which will apply to all used care products is required.

#### Change in approach

We all need to get away from the mind-set of 'out of sight out of mind', whether it is for toilet, or even bin, disposal. We need to think of the sewers as a transit system for our wastes not just hand over to the authorities: water companies and environmental regulators. We need to stop thinking that the water company has to take whatever we flush and then blame it for anything which goes wrong. If we do this, we can use the analogy of applying the philosophy of restrictions on what can be posted in the mail system to protect public safety.

Solving the problem is not just the responsibility of the water companies, they are facilitators. In a tenuous analogy we need a set of policies and practices, which mirror, but not mimic, the controls exercised for trade effluents, to use a medical analogy we need a holistic approach in which a symptom (wet wipe pollution) is dealt with not in isolation, but as a visible part of a condition (a lack of integrated management of used care products). In fact, the approach should sit in a much bigger picture of sustainable water management, in which all the contents of sewage are recovered, and recycled.

#### Need for a national strategy

A national problem needs a national solution involving everyone in the process, including bathroom and toilet product suppliers and designers to accommodate more acceptable approaches to bagging and binning.

It is suggested that there needs to be a national strategy for dealing with used care products:

- Driven by a national consensus group with a wider range of parties than just the water and woven fabric industries. It must include behavioural scientists.
- The solution to the problem must be recognised as being not just the responsibility of the water industry. The national attitude must change from 'out of sight out of mind' and it must be accepted that controls must be exercised over what is put into the sewerage system.
- The principle must be to make it easy to product users to do the right thing and be aware of the consequences of not doing so.
- All used care products must be disposed by bagging and binning. Designated products must meet standards of degradability and biodegradability. This recognises that used products will still be flushed away from time to time. As back up, to minimise the problems arising as sewage borne litter, products must meet these standards, which will also be relevant to ultimate disposal of solid waste. This builds on the principles laid down in the Water UK report of 2017 and follows the advocacy of City to Sea.
- Some products will be exempted, temporarily, from the standards, because of the lack of alternative materials, eg condoms. Research should be directed at removal of products from the exempted list.
- Designated product standards will be regulated using a recognised system drawing on the experiences of REACH, possibly using a BSI Standard kitemark.
- All products will be labelled very clearly 'bag and bin' under the appropriate regulations to help consumers.
- Monitoring compliance would probably lay with Trading Standards.
- The strategy will build on the foundations laid by Water UK, but the terms 'flushability' and 'fine to flush' should be dropped.
- The object of 'nudging' will be to encourage 'bag and bin' all used products
- Consideration should be given as to how biodegradable disposal bags can be made very accessible, including their inclusion with the retail products, or even with water bills. Bathroom and toilet designers and product suppliers should be involved to ensure that facilities embrace the need for used care products to be disposed properly.
- Consideration needs to be given to good practice on toilet and bathroom facilities outside of homes.
- Messaging will be very important and could include regular communications on social and print media on current issues.

Worshipful Company of Water Conservators

10 February 2022

7 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.

No

Blank free text box for answer:

There is no technical justification for the exemption.

8 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? Please give reasons and provide supporting evidence.

Blank free text box for answer:

There is no technical justification for the exemption.

No

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

Yes

10 If you answered yes to question 9, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?

No

Blank free text box for answer:

The standard could only make a partial difference if every producer and retailer co-operates. However, many products are sourced globally so a UK based scheme is unlikely to be effective. The use of the term Fine-to Flush and the standard can be misleading and confusing when put in the context of the use of other terminology and whether or not to flush other products. The time has come to evolve the system of control and use the testing protocol in a different way. Only toilet paper should be flushed with human waste. All used personal health products must be disposed of by other means.

11 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

Blank free text box for answer:

The use of a mandatory standard for flushability is a minimum, the principle must be not to flush anything other than toilet paper.

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

Yes

Blank free text box for answer:

The problems with the disposal and impact of wet wipes are well known both in terms of the problems that they cause in the waste water collection and treatment process but also in the wider impact of plastics in the environment.

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

No

Blank free text box for answer:

A producer responsibility scheme for wipes containing plastic will not work as the origin of the wet wipes cannot be identified and producers have no control over how the wet wipes are used.

14 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.

Yes

Blank free text box for answer:

A change in practise is required from general use of wet wipes to the use of reusable cleaning materials. The use of disposable, single use, biodegradable wipes should be limited to when there are no alternatives and the wipes binned for subsequent disposal, not flushed.

## Tobacco filters

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

Not Answered

Blank free text box for answer:

16 If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing of littered tobacco filters, if any, do you think should be covered by producers?

Blank free text box for answer:

Blank free text box for answer:

17 Are there other regulatory approaches that government should consider?

Blank free text box for answer:

18 What are the financial costs of managing waste tobacco filters? Please give supporting evidence including quantified data where possible.

Blank free text box for answer:

19 What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

20 What are the environmental impacts of tobacco filters made from alternative materials to cellulose acetate, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

21 What are the environmental impacts of smoking alternatives such as heated tobacco, disposable e-cigarettes, vape pods and oral nicotine pouches, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

### Single-use plastic sachets

22 What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?

Blank free text box for answer:

23 Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?

Blank free text box for answer:

24 Do you support consulting on introducing a ban of single-use plastic sachets used for:

Blank free text box for answer:

25 Do you support consulting on introducing a charge on single-use plastic sachets used for:

Blank free text box for answer:

26 Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?

Blank free text box for answer:

27 Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?

Blank free text box for answer:

### Single-use cups

28 Would you support the government consulting on a proposal to introduce a charge for single-use cups?

Not Answered

Blank free text box for answer:

29 Do you think this charge should be for both hot and cold drinks?

Not Answered

Blank free text box for answer:

30 Do you think this charge should apply to businesses of all sizes?

Not Answered

Blank free text box for answer:

31 Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup. Please give reasons and supporting evidence.

Blank free text box for answer:

### Additional items

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

Blank free text box for answer:

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

Blank free text box for answer:

### Re-use and Refill

34 What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.

Blank free text box for answer:

35 What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.

Blank free text box for answer:

36 How can government incentivise increased reuse and refill?

Blank free text box for answer:

37 How could businesses incentivise customers to support reuse and refill?

Blank free text box for answer:

38 Please provide information about any successful case studies of reuse and refill.

Blank free text box for answer:

39 Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.

Not Answered