

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

Members of The Worshipful Company of 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 one of its members to provide a more examination of the issues involved (https://www.linkedin.com/posts/peter-matthews-043050147_modified-essay-on-sewage-borne-litter-activity-6894371711400099843-KSkJ)

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.

But 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.

Defra is calling for evidence on commonly littered and problematic plastic items and the proposal that wet wipes should not contain single use plastics, but the Call for Evidence fails to recognise that a number of the questions posed will not be answered by the strategy to avoid single use plastics, but will be answered by other criteria which need assembling into a proper separate strategy, which will apply to all used care products. This is elaborated below.

We all need to get way 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 throw 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.

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.
- Solutions will be expressed in the national strategy, and will interface with the strategy for eliminating single use plastics.
- The principle must be to make it ‘easy to act’ for users of products, but care for the consequences
- 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 ,and as back up, to minimise the problems arising as sewage borne litter, they 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, pro tem, from the standards, because of the lack of alternative materials, an example being condoms. But the presumption will be that 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 kitemark,
- All products will be labelled very clearly to ‘bag and bin’ under the appropriate Regulations to help consumers, but designated products will carry the kitemark.
- 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. A current commercial example is Fab Little bags. Bathroom and toilet designers and product suppliers must be involved to ensure that facilities embrace the need for used care products to be disposed properly.
- Consideration needs to be given on good practice on toilet and bathroom facilities outside of homes.
- And messaging will be very important and could include inclusion in a national broadsheet on coping with the day to day issues of environmental change and possibly a Code of Practice.

Worshipful Company of Water Conservators

February 2022

Water UK 2017 [Wipes-in-sewer-blockage-study.pdf](#)
[EDANA the voice of nonwovens](#)

[EDANA guidelines-for-assessing-the-flushability-of-disposable-nonwoven-products-ed-4-finalb76f3ccdd5286df88968ff0000bfc5c0.pdf](#)

EDANA [Flushability](#)

[Fine-to-Flush-Issue-1.2-November-2019.pdf](#)

<https://grist.org/Array/those-flushable-bathroom-wipes-may-not-be-so-flushable-after-all/>

[International Water Services Flushability Group – International Water Services](#)

[Flushability Group](#)

United Utilities [20132 Journal of Litter and Environmental Quality Vol3-V6-](#)

[ONLINE.pdf](#)

Thames Water [Bin it | Responsibility | About us | Thames Water](#)

Northumbrian Water [Bin the wipe | Behaviour Change : Behaviour Change](#)

Anglian Water [kic-activity-booklet-ks2.pdf](#)

Flushability Launch [Anglian Water Praises Key Wet Wipes Manufacturer for Meeting](#)

[Flushability Standard](#)

[Illegal sewage spills into River Tame linked to world's highest concentration of](#)

[microplastics | News | The Times](#)

[https://deframedia.blog.gov.uk/2022/01/13/environmental-audit-committee-report-on-](https://deframedia.blog.gov.uk/2022/01/13/environmental-audit-committee-report-on-water-quality-in-rivers)

[water-quality-in-rivers](#)

Defra Gov. UK [Call for evidence document.pdf](#)

.([https://www.linkedin.com/posts/peter-matthews-043050147_essay-on-the-future-of-](https://www.linkedin.com/posts/peter-matthews-043050147_essay-on-the-future-of-biosolids-management-activity-6833462209230737408-6ukW)

[biosolids-management-activity-6833462209230737408-6ukW](#) and

<https://www.ciwem.org/news/aligning-policy-and-priority-on-biosolids>)

([https://www.ciwem.org/news/we-can-and-must-maintain-momentum-post-cop26-heres-](https://www.ciwem.org/news/we-can-and-must-maintain-momentum-post-cop26-heres-how)

[how](#))

[Product labelling: the law - GOV.UK](#)