

MCS consultation response on the proposed ban of the manufacture supply and sale of wet wipes containing plastic – November 2023

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.**
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. I don't know

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.**
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. I don't know

Please explain your answer to Q8 and Q9, referring to specific evidence as much as possible.

a. The government 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 low-carbon resource future. The government 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.

In 2022, over 38,000 wet wipes were discovered during the Marine Conservation Society's year-round Beachwatch, with 59% of cleans 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 water companies 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.

The negative impacts of plastic litter (including plastic wet wipes) on marine wildlife are well documented. If ingested by marine life, they can damage the digestive system, prevent digestion, or stop animals from feeding, resulting in impacts on their growth, development, reproduction, and lifespan and can result in severe suffering and starvation.

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. 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 defy the principles of a circular economy. The absence of questions in the consultation regarding support for transitioning to reusable wipes is disappointing, especially given legislative initiatives in Wales and Scotland promoting long-term well-being and circular economies, respectively. The focus on wet wipe manufacturers neglects the diverse stakeholders interested in transitioning the entire single-use economy to a circular and sustainable model. Moreover, the consultation overlooks reusable alternatives like cloth pads made from organic cotton or bamboo.

A survey of 12 retailers who sell own brand wet wipes, conducted by MCS in November 2020, found that three retailers had already removed plastic from all own brand wet wipes (flushable and non-flushable) and five committed to doing so by the end of December 2021. An update to the survey in January 2022 found that five retailers have now removed plastic from all own brand wet wipes and a further five retailers planned to do this by the end of 2022. A ban on the sale of wet wipes containing plastics is therefore feasible, practical, and financially viable, and we would suggest a deadline of 18 months or less.

¹ <https://www.southwestwater.co.uk/about-us/latest-news/south-west-water-backs-plans-to-ban-plastic-based-wet-wipes>

Do you think that the proposed ban will have a negative impact on any specific groups of consumers?

- a. Yes
- b. No
- c. **I don't know**

Please explain your answer to the previous question, 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.

a. As a conservation charity, we acknowledge that we may not possess the expertise to fully address this question. Therefore, we urge the UK Government to engage in consultations with relevant stakeholders and organisations representing groups dependent on wet wipes. Their insights are pivotal in ensuring a fully inclusive policy that considers the needs of various communities. This approach ensures an inclusive process that incorporates insights from the bans on other single-use plastic items.

In addition to implementing a ban on plastic wet wipes, the government should actively support the transition to reusable products. Comprehensive guidance and information campaigns must be promoted to ensure that consumers are well-informed and equipped to embrace reusable alternatives. 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", highlighting the information gap as a significant barrier.

Do you think the definition of wet wipes used within this consultation is suitable?

- a. **Yes**
- b. No, please expand
- c. I don't know

Do you think the definitions of plastic used within this consultation are suitable?

- a. **Yes**
- b. No, please expand
- c. I don't know

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 (usually derived from wood) <Yes with reason/no with reason/I am not sure>

It's imperative to avoid false solutions. Single use wipes are not compatible with the circular economy, regardless of material. Wipes crafted from other materials like lyocell and viscose remain fundamentally single-use, and there is limited understanding of their environmental impact. Promoting them as biodegradable or plastic-free may lead consumers to flush them, negatively impacting the sewerage system and resulting in wet wipes entering the environment. If the government opts not to ban semi-synthetic wipes, they must do so with a commitment to conduct analysis and monitoring.

The Marine Conservation Society wet wipe survey data has showed in 2022 that 1 wet wipe was found per 100m/38,871 wet wipes were found, with 59% of all cleans finding wet wipes. 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.

Single use wet wipes use a huge amount of 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 and, where it is, results in downcycling. Wipes from viscose are not by default suitable for flushing. 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 (1).

During her PhD, Dr. Napper (2) included research into the fragmentation and biodegradability of wet wipes stated, "rayon fibres behave like a synthetic fibre as rayon is widely reported in the marine environment (Comnea-Stancu et al., 2017 (3))". She goes on to highlight the work of Lusher et al 2013 which identified rayon / viscose fibres in the gastrointestinal tract of fish and that previous research (Woodall et al. 2014) had concluded that rayon fibres are a major source of microplastic debris even in the deep sea. (Comnea-Stancu et al., 2017 (3); Lusher et al., 2013 (4); Woodall et al., 2014) (5). Regenerated cellulose fibres have been found in deep sea sediments and the impact of these entering the food chain is currently unknown (6,7).

Wipes made from viscose may also have the potential to cause blockages as the material doesn't necessarily break up like toilet paper. If they *have* passed a disintegration test which results in fragmentation of the product, like the Fine to Flush certification, they may not result in blockages, but they may still have environmental impacts. It is therefore important to note the distinction between biodegradation and fragmentation.

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 result them to be landfilled/incinerated. Furthermore, claims of natural, biodegradable, and plastic free should not be used as this has the potential to increase consumer confusion, thereby resulting in greater flushing of wet wipes.

In addition, utilising the definition, viscose undergoes chemical modification as outlined in the 2021 Eunomia Report "What is Plastic?", and therefore should be defined as a plastic.

1 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

2 <https://pearl.plymouth.ac.uk/bitstream/handle/10026.1/14729/2019Napper10511016PhD.pdf?sequence=1&isAllowed=y>

3 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:10.1177/00037028166660725

4 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

5 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

6 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

7 <https://advances.sciencemag.org/content/6/23/eaay8493.full>

b. Lyocell (a semi synthetic cellulose fibre) <Yes with reason/no with reason/ I am not sure>

We note similar concerns as viscose in that it's imperative to avoid false solutions. Wipes crafted from other materials like lyocell and viscose remain fundamentally single-use, and there is limited understanding of their environmental impact. Promoting them as

biodegradable or plastic-free may lead consumers to flush them, negatively impacting the sewerage system and resulting in wet wipes entering the environment. If the government opts not to ban semi-synthetic wipes, they must do so with a commitment to conduct analysis and monitoring.

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 (unless they have passed Fine to Flush certification). If they *have* passed the Fine to Flush certification, it is reasonable to assume that consumers *will* flush the wipes. Single use wipes are not compatible with the circular economy, regardless of material.

Single use wet wipes use a huge amount of 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 and, where it is, results in downcycling. Wipes from viscose are not by default suitable for flushing. 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 (1).

It is important to note the distinction between biodegradation and fragmentation. Fragmentation might permit material to breakup and therefore reduce blockages, but 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 (2,3).

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 result them to be landfilled/incinerated. Furthermore, claims of natural, biodegradable, and plastic free should not be used as this has the potential to increase consumer confusion, and thereby resulting in greater flushing of wet wipes. the numbers flushed.

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.

1 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

2 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

3 <https://advances.sciencemag.org/content/6/23/eaay8493.full>

c. Cotton (reconstituted cotton fibres) <Yes with reason/no with reason/ I am not sure>

While cotton is not a plastic by nature, the flushing of single-use cotton wipes carries the potential to contribute to blockages, warranting their inclusion in a ban. While we are not currently aware of any single-use wipes made from cotton, we would discourage any developments in this area as it contradicts the principles of a circular economy. The inclusion of materials in the ban should not hinge on the technical classification as plastic; rather, it should consider whether the material poses problems when flushed.

Marketing these wipes as 'natural,' 'biodegradable,' or 'plastic-free' could lead to consumer confusion. Similar to other materials, the production of single-use wet wipes using cotton would consume substantial resources. We strongly endorse the use of cotton in reusable wipes, aligning with sustainable and circular practices.

d. Other <open text box>

The government should implement measures to promote the adoption of reusable wipes. This may involve offering practical guidance to new caregivers and providing financial support, such as reducing initial costs through measures like VAT reductions, direct financial aid, or the provision of products like baby boxes. Additionally, if reusable nappy collection schemes are reintroduced, they should encompass the collection of reusable wet wipes, helping alleviate the laundering barrier – particularly for households with lower incomes.

Our other concern is the presence of harmful chemicals on wipes, either intentionally added chemicals or chemicals that adsorb to the surface of the wipe after being flushed. We would not want to see wipes intended for household cleaning for example being labelled as Fine to Flush.

Exemptions

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”?

- a. Strongly agree
- b. Agree
- c. **Neither agree nor disagree**
- d. Disagree
- e. Strongly disagree
- f. I don't know

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)”?

- a. Strongly agree
- b. Agree
- c. **Neither agree nor disagree**
- d. Disagree
- e. Strongly disagree
- f. I don't know

Please explain your answers to Q16 and Q17, referring to specific evidence as much as possible.

a. We have selected neither agree nor disagree. We believe that a blanket ban on plastic in wet wipes is generally feasible. However, we recommend that the government consults with relevant disease and hygiene specialists. If exemptions are deemed necessary, they should be time-bound and subject to periodic reviews to accommodate advancements in material science. The precautionary principle should guide the introduction of new products to the market. Additionally, any exempt items should be clearly labelled, and the appropriate disposal method clearly displayed.