

Marine Conservation Society to Welsh Government Consultation on Plastic Carrier Bags and Wet Wipes Containing Plastic

Marine Conservation Society (MCS) are grateful for the opportunity to respond to Welsh Government's consultation on plastic carrier bags and wet wipes containing plastic. MCS welcome proposals to ban the sale of these items in Wales and offer this response in support of the drafting of legislation to achieve this aim as soon as possible.

The negative impacts of plastic pollution on marine species and habitats are well documented and MCS data shows that these items are frequently found in large numbers on Welsh coastlines. In addition, wet wipes are a primary contributor to sewer blockages across the UK, at a cost of many millions of pounds.

MCS data suggests a ban on the sale of these items would enjoy great public support yet also indicates that any prohibition must be accompanied with a suite of measures to ensure long lasting positive environmental impacts. These measures must raise awareness of, incentivise and ease the transition to reusable wet wipes whilst also educating consumers about the impacts of incorrect disposal of these alternatives. These measures should be funded by the application of Extended Producer Responsibility (EPR) to all other forms of single use wipe.

These actions are coherent with and would represent tangible progress towards achieving the aims of Welsh Government's 'Beyond Recycling' strategy to make the circular economy in Wales a reality by 2050.

Consultation questions

1. Do you use wet wipes and if so what type? For example, personal care, surface wipes or others?

A survey of adults¹ in the United Kingdom conducted by YouGov for the Marine Conservation Society (MCS) in 2016* found that almost three quarters of people polled in Wales (71%) use single-use wet wipes. The most frequently used wet wipes were household cleaning wipes (44%), facial/skincare (41%), baby/toddler wipes (35%), and moist toilet tissue (24%). When asked about disposal of single-use wet wipes, in Wales 14% in general tend to flush them.

¹ All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 2022 adults. Fieldwork was undertaken between 14th - 15th June 2016. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

2. How do you dispose of wet wipes once you have used them?

Please see answer to Question 1.

3. What are your views on a potential ban of the sale of wet wipes containing plastic and plastic carrier bags in Wales?

Wet wipes: We support a ban on the sale, and manufacture, of wet wipes containing plastic. The impacts of wet wipes on the sewerage system and natural environment are well known, as outlined in our answer to Question 4, and this has resulted in some retailers already removing plastic from their wet wipes. 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 plan 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.

Furthermore, there is strong public support, with a nationally representative survey of GB adults conducted by YouGov for MCS in 2021², showing that 79% of those polled in Wales support a ban on wet wipes containing plastic, with only 7% opposed to a ban.

Wet wipes, regardless of whether using a substrate made from plastic or semisynthetic, use a huge amount of resources, and are carbon heavy, due to the transportation of wet material. They are typically packaged flexible plastic not commonly accepted for recycling. However, we recognise that a ban of all wipes has the potential to create challenges around health and accessibility. Therefore, we propose that plastic wet wipes be banned, alongside the additional measures outlined in Question 8.

Carrier bags: These can be easily replaced by reusable alternatives and therefore we support the ban.

4. What impacts (positive & negative) do you think these bans may have?

Wet wipes: A ban of wet wipes containing plastic would have a positive benefit on Wales's marine environment. During MCS's Great British Beach Clean 2021, there

² All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 2076 adults. Fieldwork was undertaken between 25th - 26th May 2021. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

was an average of six wet wipes found per 100m of beaches surveyed in Wales, making up 55% of the total sewage related debris (SRD) found. SRD represents 2.6 % of the total litter items found on Welsh beaches. SRD results result from sanitary items such as wet wipes, pads and tampons being flushed, which then enter the marine environment when combined sewers overflow due to heavy rainfall or insufficient capacity in the network, or due to misconnections in the surface water network.

In 2019 prior to the Covid-19 pandemic there were 8.3 wet wipes per 100m, of beaches surveyed in Wales, showing that this is not a problem particular to the pandemic, but a chronic, long-term issue that needs to be tackled now.

Wet wipes are usually manufactured from polyethylene terephthalate (PET), polypropylene (PP), cellulose or a combination of PET and cellulose³. PET and PP are two of the main plastics found in our oceans⁴ and a recent study looking at the presence of fibres in sediments adjacent to a wastewater treatment plant consistently found white microplastic fibres that were comparable with the white fibres from wet wipes and sanitary towels, demonstrating that sanitary waste is a source of microfibre pollution in the marine environment³.

The negative impacts of plastic litter (including microplastics) 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 lifespan⁵ and can result in severe suffering and starvation⁶. Marine life which ingest microplastics may be exposed to higher levels of persistent organic pollutants which adsorb to the surface of microplastics⁷.

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 economies⁸

Carrier bags: During MCS's Great British Beach Clean 2021, there was an average of 2.5 carrier bags found per 100m of beaches surveyed in Wales. MCS inland litter picks found 64% of sites surveyed had single use plastic bags, with 36% finding a

³ <https://doi.org/10.1016/j.watres.2020.116021>

⁴ <https://www.sciencedirect.com/science/article/pii/S0025326X19300748#ab0005>

⁵ <https://www.sciencedirect.com/science/article/pii/S0269749118333190>

⁶ https://www.researchgate.net/publication/315386479_Harm_caused_by_Marine_Litter/link/58cfb103a6fdccff68e2dc8a/download

⁷ <https://royalsocietypublishing.org/doi/abs/10.1098/rstb.2008.0284>

⁸ https://www.keepbritaintidy.org/ImgLibrary/beach_segmentation_2005_637.pdf

plastic bag for life. This shows that without a ban on plastic bags we will continue to find them due to the continued relatively high rate of use in Wales with 94.1 million single use plastic bags issued (2017-2018)⁹

5. Do you think a ban on the sale of these items is necessary or are there alternatives to bans?

Wet wipes: We believe that a ban on the sale of wet wipes containing plastic is necessary, along with other measures outlined in question 8. Despite numerous behaviour change campaigns run by water companies and environmental organisations aimed at stopping incorrect flushing behaviour, wet wipes continue to cause problems with sewer blockages. The number of wet wipes found on beaches in Wales remains high (see information on levels found on beaches in Question 4). There are over 300,000 sewer blockages throughout the UK every year, costing £100 million to clear up. A study by Water UK in 2017 found that non-flushable wet wipes make up around 93% of the material causing sewer blockages¹⁰. Welsh Water reported that 25% of flooding was caused by wet wipes in August 2020.

Carrier bags: We need to see a move to reusable products. Exemption should be made where recommended for health & safety/disease control.

6. What are your views on plant based / plastic free wet wipes or alternatives to plastic carrier bags?

Wet wipes: Single use wet wipes, regardless of material, use a huge amount of resources and are carbon heavy, due to the transportation of wet material. They are typically packaged in flexible plastic not commonly accepted for recycling. Where this packaging is accepted, it is usually downcycled instead.

Therefore, in line with the waste hierarchy we would advocate for reusable wipes. Banning plastic wipes alone will not remove the issue of incorrect disposal of wipes into the sewer system. Whilst semi-synthetic wipes are overall more sustainable; they are not by default suitable for flushing and have the potential to contribute to blockages. They also contribute directly to pollution as shown by the discovery of regenerated cellulose fibres in deep sea sediments, and the impact of these entering the food chain is currently unknown^{11,12}. In addition, it has been highlighted that cellulose is particularly prone to adsorbing heavy materials, a characteristic exploited

⁹ <https://gov.wales/research-sale-and-use-carrier-bags-wales>

¹⁰ <https://www.water.org.uk/>

¹¹ <https://advances.sciencemag.org/content/6/23/eaay8493.full>

¹² 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

in the wastewater treatment process to prevent them escaping beyond the treatment works¹³.

Therefore, it is important that a ban on plastic in wet wipes is accompanied by the additional measures outlined in our answers to Question 8, with particular emphasis given to supporting people in the transition to, correct use and disposal of reusable wipes. This could include practical information to new carers, as well as financial support such as reducing initial outlay costs through VAT exemptions, direct financial support, products such as baby boxes or incentives such as discounts offered by some councils for reusable nappies¹⁴. Furthermore, re-introduction of schemes for the collection of reusable nappies should include reusable wet wipe collection, thereby reducing the barrier of laundering - particularly for lower income households. Water companies currently provide FOG (Fat, Oils and Grease) traps and investigating bathroom bins to change consumer behaviour. We suggest that companies could help their customers to move to reusable wipes by providing starter packs.

Carrier bags: We do not want to see substitution of one single use item for another as this is not in line with the waste hierarchy. We need to see a shift to bags that are viewed by the public as reusable as opposed to those which are labelled as “reusable” or “bag for life” but are in fact viewed as single use product by the general public.

We note that where paper bags have been used as an alternative it is important that they are PFAS free. PFAS (Per- and poly- fluorinated alkyl substances), nicknamed the ‘forever chemical’ are a highly persistent group of over 4000 chemicals. PFAS chemicals are known to bio-accumulate, bio-magnify and are extremely unreactive, resulting in their high persistence. For more information on PFAS and its environmental impacts please see MCS PFAS briefing: https://www.mcsuk.org/documents/29/2021_PFAS_7wdOhfq.pdf

7. Do you think there should be exemptions to a ban on wet wipes containing plastic in some circumstances, for example, in health care environments?

We would only support an exemption for wipes used for medical purposes if alternative products were not suitable. The list of successfully certified Fine to Flush products published by the Water Research Centre¹⁵ includes a medical wipe which suggests that alternatives may be suitable for some medical situations, however we would recommend further investigation to ensure that this is the case for all medical purposes. We are not aware of any further uses which would require an exemption.

¹³ 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

¹⁴ <https://www.fill-your-pants.com/councilnappyincentives.html>

¹⁵ Successful Fine to Flush - Water Research Centre Limited <https://www.wrcplc.co.uk/successful-fine-to-flush>

8. Do you think other measures need to be combined with a ban of these products? For example, awareness raising campaigns associated with their impact of these items on our environment?

Wet wipes: Simply substituting plastic with another single-use material will not be enough by itself to reduce the harm caused by single-use wet wipes (as outlined in our answer to Question 6) and a number of other measures must be implemented alongside a ban on wet wipes containing plastic, including:

- We should not simply replace plastic with another single use material, but shift to reusable products, especially for sanitary products which are generally not recycled. Supporting consumers to move to reusable products would support a circular economy by reducing waste and has a lower carbon footprint. Reusable products can last a number of years and therefore are cost efficient in the long term but can represent a greater upfront cost. In a YouGov survey¹⁶ of GB adults, conducted on behalf of the Marine Conservation Society in 2022, we asked respondents who use single-use wipes ‘Which, if any, of the following would make you consider using reusable wipes more than you do now?’ respondents were asked to select all that apply with barriers to switching to reusables were highlighted around hygiene and costs:
 - If I saved money by using reusable wipes (21%)
 - If I knew more about how to ensure the same levels of hygiene (19%)
 - If reusable wipes were more affordable to buy (19%)

We would recommend this information is used to tailor future behavioural change campaigns and to encourage a wider shift to reuse as part of a circular economy. This should include more information around hygiene and cost for the public including savings calculations.

- Beyond a ban on plastic in wet wipes, Extended Producer Responsibility (EPR) should be applied to all other single use wipes. EPR should include clean-up costs (regardless of by whom the clean-up is undertaken) and could include, but is not limited to, water companies, local councils, governments and their agencies and NGOs. EPR should also extend to consumer education, cost of campaigns for correct disposal (see below), ongoing research to verify engagement is effective and subsidising reusable wet wipes in line with the concept of the circular economy.
- A YouGov survey of GB adults, conducted on behalf of the MCS in 2022¹⁶, found, of those people who had stopped flushing items that are not labelled as flushable down the toilet, ‘information by a water company’ was the top reason for stopping

¹⁶ All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1,690 adults. Fieldwork was undertaken between 14th - 15th February 2022. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

flushing (39%), followed by 'Information on TV' (35%), 'Other' (18%) and 'I no longer use the product' (15%) Encouragingly, 'I moved to reusables' was selected by (10%) as a reason for why they had stopped flushing products. Funding campaigns through EPR would place the burden of responsibility and cost on the manufacturers rather than customer water bills.

- Improved labelling and consumer awareness to promote correct disposal for wet wipes, i.e. a requirement for products to display 'Plastic in Product' and indicate its impact on the environment (e.g., dead turtle logo). This must be held in place until a ban comes into force for plastic in wet wipes with mandatory 'Do not flush' labelling for all wet wipes. The labelling must be clear with minimum size and contrast fonts and colours, on the front and at point of extraction. These design specifications should be mandatory with independent consumer research to ensure the specifications are effective and appropriate. Inconsistent and poor labelling of products has led to confusion amongst consumers regarding which products can be safely flushed. For instance, research commissioned by United Utilities found that "one in five women (20%) said they had never been told how to dispose of sanitary items such as tampons and sanitary towels" and for baby or child wet wipes it was "almost a third (32%) of respondents"¹⁷.
- For products labelled as flushable, 79.4% of people in Wales, questioned in a nationally representative YouGov poll of GB adults for MCS in 2016¹⁸, support the removal of the claim of 'flushable' from all wet wipes if they do not meet water industry standards for what can be safely flushed down the toilet without causing blockages. Furthermore, there are issues around the use of the term 'biodegradable' and other so called "green" claims, which adds further confusion to consumers and increases the likelihood of these products being misflushed. For further information see the Wildlife and Countryside LINK response to the Competition and Markets Authority consultation on Misleading Environmental Claims^{19,20}
- Finally, we would emphasise that stopping pollution at source, as outlined above, should be the primary steps taken to reduce sanitary waste impacts. The amount of sanitary waste recorded on beaches highlights a failing within the sewerage system and urgent action is needed to stop sewage being discharged from storm

¹⁷https://www.keepbritaintidy.org/sites/default/files/resource/20132_Journal%20of%20Litter%20and%20Environmental%20Quality_Vol3-V6-ONLINE.pdf

¹⁸ All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 2022 adults. Fieldwork was undertaken between 14th - 15th June 2016. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

¹⁹https://www.wcl.org.uk/docs/assets/uploads/WCL_Draft_CMA_guidance_on_environmental_claims_on_goods_and_services_consultation.pdf

²⁰https://www.wcl.org.uk/docs/assets/uploads/Misleading_Environmental_Claims_Link_evidence_14.12.2020.pdf

overflows. Natural solutions to reduce the amount of rainwater run-off going into the sewerage network should be used to provide wider benefits to society and biodiversity.

These actions are coherent with and would represent tangible progress towards achieving the aims of Welsh Government's 'Beyond Recycling' strategy to make the circular economy in Wales a reality by 2050.

9. Are there any other issues that you think we should be aware of as we consider introducing bans to wet wipes containing plastic and plastic carrier bags?

Wet wipes: Any measures put in place for wet wipes should be applied to all sanitary items due to the similarity in issues with disposal and associated solutions.

Mandatory labelling on packaging about disposal and the impact of on the environment should be applied to all sanitary items, not just wet wipes due to the similar issues regarding disposal and impacts on the sewerage system and environment. Although all 12 major high street retailers surveyed by MCS in November 2020, who sell own brand non flushable wipes confirmed that these wipes clearly state, 'Do not flush' on the front of the packet, only three out of 12 confirmed that they currently do this on all of their own brand sanitary products. An update to the survey in January 2022 found that six retailers had now completed this labelling for all their own brand sanitary products (excluding wet wipes) and a further four plan to have completed this action by the end of 2022. This highlights the inconsistency of advice being given to consumers regarding disposal of sanitary items.

We are happy to discuss and expand upon any points raised in this response – please contact sean.clement@mcsuk.org to arrange a meeting.