

Melissa Dring
Director of Policy
Chartered Trading Standards Institute
01268 888052
07899 890656
Melissad@tsi.org.uk

26th October 2016

Dear Ms Dring,

The inappropriate marketing and labelling of 'flushable' products disposed of via the toilet.

I am writing to you to seek your assistance on a trading standards matter which adversely affects many customers in the UK and our environment.

I am the Chairman of the 21st Century Drainage Programme Board, which is a Water UK sponsored sector group whose purpose is to deliver more resilient urban drainage systems here in the UK, which meet the long term needs of our customers and the environment. The group comprises over 40 members, including representatives of both national and devolved UK governments, regulators, the UK water industry, environmental NGOs, and representatives of local authorities.

The Board have asked me to highlight to you the very real challenges drainage systems have in the UK due to the inappropriate advertising and labelling of certain wet wipes and other products as 'flushable' or where no or inadequate disposal guidance is provided. These products end up in our sewers causing blockages which then result in the flooding of homes and pollution incidents which affect our environment. In the case of labelling them as 'flushable', (as opposed to no labelling at all) this is misleading to consumers who purchase these products in the belief that flushing them down the toilet would have no negative consequences for them or the environment.

We have discussed this matter with other sewerage service providers internationally and have now made the following statement which has support in 15 Countries and from over 200 organisations. This is available at the attached website:

<https://dl.dropboxusercontent.com/u/299993612/Publications/Policy%20positions%20%2B%20briefing%20Flushable%20products/International%20flushability%20statement.PDF>

The statement makes clear what should and should not be disposed of via a toilet, and supports the view that wet wipes and or similar products should only be marketed with prominent and clear 'do not flush / bin it' labelling. They certainly should not be marketed as flushable.

Despite this background, we have seen in recent years that there has been an increase in the number of products which are seen by consumers as 'flushable'. These products have inadequate labelling, and whilst they have been highly successful in the marketplace, manufacturers have failed to consider the significant impact they can have on the infrastructure we and our customers rely on and on the environment we value. In the UK alone, water companies spend approximately £88 million of our customer's money clearing something like 360,000 blockages that occur annually in the sewerage network. It is estimated that perhaps half of these blockages are avoidable and are caused by the incorrect disposal of wet wipes and other hygiene products via the toilet. Furthermore, this substantial cost of removing blockages does not take into account the increased maintenance costs of mechanical equipment at sewage treatment works or the damage and distress that is caused by the flooding of homes and pollution incidents; the effects on the sewage treatment process, or the huge tonnage of waste screenings which have to be disposed of to landfill as a result.

Wet wipes and other products which find their way into our sewers are not dissolvable like standard toilet paper, but instead may contain materials which do not disintegrate in the same way that a paper based tissue does. This can lead to materials like plastics being released into the environment (similar to microbeads, a product that has received considerable media attention, and which the government has committed to ban for cosmetics), substances which we are now aware could have consequences for the human food chain.

It is our belief that whilst manufacturers are still able to advertise their products as being 'flushable', or sell them with no suitable guidance on the label as to disposal, consumers will continue to dispose of them by incorrectly flushing them into the sewer system. As far as we can see having clear and prominently visible 'Do Not Flush' labelling and removing the word 'flushable' from all packaging is the only acceptable and environmentally responsible way forward, while available products fail to meet water industry standards for flushability. In the meantime the industry will continue to work with manufacturers and retailers to agree a common standard for flushability and to encourage the development of a truly flushable wipe.

We hope that you will thoroughly investigate this matter, and will seek to ensure that manufacturers give the correct and accurate information to consumers by ensuring that all such products are correctly and prominently labelled as NOT flushable and for disposal to a bin.

I have copied this letter to the Retail Ombudsman as I am aware that colleagues at the Programme Board have been in contact with him regarding this issue, and he has had complaints from a number of consumers regarding the misleading labelling of wipes and the cost to them of fixing blocked toilets and drains.

Yours faithfully,



Tony Harrington
Chairman - 21st Century Drainage Programme Board

cc. Dean Dunham, Chief Executive and Chief Ombudsman, The Retail Ombudsman, (Consumer Dispute Resolution Ltd), 33rd Floor, Euston Towers, 286 Euston Road, London, NW1 3DP