

Commonly littered single- use plastic items: call for evidence

Yorkshire Water Response



Yorkshire Water Position

Wipes are a large and growing market, including baby and toddler wipes, cleaning wipes, and facial and hand wipes. Around 200 million packs are sold in Britain each year and, pre-covid, the global market for wipes was expected to grow by 8% annually between up to 2026.

The inappropriate disposal of wipes by flushing them down the toilet is creating around 300,000 sewer blockages per year, which costs the UK water industry around £100m to clear. UK wide, wipes are reported as accounting for 40-60% of sewer blockages. A study by Water UK in 2017 found that non-flushable wet wipes make up around 93% of the material causing sewer blockages.

Blockages can result in internal and external flooding, which impact customers and the environment. By reducing the capacity of the sewers, blockages can cause sewers to back up and flood customer's homes, cause flooding from manholes and result in increased spills from storm overflows.

In Yorkshire, over the last three years there were on average 244 internal and 3106 external sewer flooding incidents a year as a result of blockages. In the same period there were an average of 17 pollution incidents each resulting from blockages. It is hard to quantify the cost of this environmental damage, but we estimate that the annual environmental impact of sewer blockages due to wipes in Yorkshire is between £137m and £154m a year.

In recent years, as this environmental damage has become more widely recognised, efforts have been made to change customer behaviours around the disposal of wipes and to influence manufacturers to change both the labelling of packages and the materials used in wet wipes. Some retailers have already removed plastics from their wipes, with others making commitments to do so in the coming years, showing that plastic free is feasible and financially viable.

Targeted behaviour change campaigns have been shown to be effective in the short term, Yorkshire Water's own campaigns are estimated to have reduced blockages by between 15% and 25% in blockage hotspots. At the same time, the Water UK Fine to Flush standard has encouraged the production of some wipes which meet the flushability tests.



However, despite some progress in these areas, blockages are a significant and growing problem. We therefore feel there is a need for a step change in the approach to wipes and other commonly flushed sanitary products.

Relying on water companies to fund behaviour change campaigns is a fundamental departure from the polluter pays principle and means that campaigns will be limited in scale by other competing priorities. Research shows that campaigns need to be large scale and sustained over a long period of time to have an ongoing impact.

We also have concerns that the current Fine to Flush standard is not reflective of real-world customer behaviour and means many products that pass the standard still have the potential to cause blockages. We are also concerned that Fine to Flush sends a confusing message to customers that some items are ok to flush, and therefore makes behaviour change more difficult.

Without a significant change in approach, blockages will continue to grow as a problem and their impacts will be more severe as climate change brings more extreme weather. If the Government is to achieve the ambitions set out in the 25 Year Environment Plan and the Environment Act, swift action is needed.

We welcome the Government's recent call for evidence on commonly littered single use plastic items and the Government's commitment to considering a ban on problematic items. Likewise, a YouGov survey found that 82% of people in England support a ban on wet wipes containing plastic. However, we are concerned that the call for evidence takes a piecemeal approach to the issue, considering only some items and focusing particularly on plastic elements, rather than their overall environmental impact.

We believe that there are three main steps the Government must take to help address the problem of blockages caused by wipes and other commonly flushed single use items. These steps will also help achieve 'Resources and waste strategy for England' goals, namely, 'eliminating avoidable plastic waste over the lifetime of the 25 Year Plan', with avoidable defined, as '...when the plastic could have been reused or recycled; when a reusable or recyclable alternative could have been used instead; or when it could have been composted or biodegraded in the open environment'.



1. Ban the use of plastics in single use sanitary items.

We welcome the Government's proposal to ban the use of plastic in wet wipes and believe it is an important step in reducing environmental harm. However, rather than considering individual items such as wet wipes, we believe the ban should be extended to all commonly flushed single use sanitary items.

2. Introduce mandatory labelling of single use sanitary items.

Analysis of labelling on products shows that messages are confusing for customers with various uses of terms like flushable and biodegradable which imply products can be flushed without any impact. Where warnings not to flush are used, they are not always prominent.

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". Therefore, mandatory 'Do Not Flush' labelling on all single use sanitary items should be introduced to help improve customer awareness and ensure consistency across products. It should also be required that the label is prominently positioned and of reasonable scale.

We recognise this will impact the current Fine to Flush standard, which allows certain products to be labelled as Fine to Flush, if they meet the criteria. Many of the wipes that have passed the standard advise that wipes should only be flushed one at a time, which is unlikely to be how customers dispose of wipes in the real world and therefore means even Fine to Flush products still risk causing blockages.

Therefore, to ensure consistency of message for customers, and in line with our view that there needs to be a step change in how the issue of blockages is dealt with, it is our view that the Fine to Flush standard should be discontinued in favour of mandatory 'Do Not Flush' labelling.

3. Apply extended producer responsibility to all single use sanitary items

Whilst banning the use of plastics in single use sanitary items would help reduce some of the environmental impact of items which are flushed or



otherwise disposed of incorrectly, it is not a complete solution. Single use sanitary items which are flushed can still cause blockages, regardless of whether they contain plastic and therefore can still have a significant impact on the environment.

We would like the Government to apply extended producer responsibility to manufacturers of all single use sanitary items. Extended producer responsibility should cover both the cost of educating customers about correct methods of disposal, and the clean up costs which result from incorrect disposal.

We also recognise that there is an environmental case to be made for such a scheme to help support a move towards reusable alternatives to single use items as part of a circular economy. However, whilst we support the principle of such a move, it raises questions around inclusion as in some cases single use items are required to support to people's quality of life. We would welcome more research into this issue, and we will be talking to our own customers to understand their views on this aspect of the issue.



Call for evidence response

1. Would you support a ban on wet wipes containing plastic?

Yes

Please give reasons and supporting evidence

Plastics in wipes play a significant role in causing sewer blockages, as the plastics prevent wipes from breaking down in the sewer network. Across the UK there are around 300,000 sewer blockages per year, which costs the UK water industry around £100m to clear.

Wipes are reported as accounting for 40-60% of these 300,000 sewer blockages and their impact is significant. Blockages can result in internal and external flooding, which impact customers and the environment. By reducing the capacity of the sewers, blockages can cause sewers to back up and flood customer's homes, cause flooding from manholes and result in increased spills from storm overflows.

Over the last three years there were on average 244 internal and 3106 external sewer flooding incidents a year as a result of blockages. In the same period there were an average of 17 pollution incidents each resulting from blockages.

It is hard to quantify the cost of this environmental damage, but we estimate that the annual environmental impact of sewer blockages due to wipes in Yorkshire is between £137m and £154m a year.

The use of plastics in wipes has wider environmental impacts too, as plastics break down into smaller particles which persist in the environment for a long time, impacting wildlife.

For these reasons, we believe a ban on plastics in wipes would be an important step forward. However, we would encourage the Government to look holistically and take measures covering all commonly flushed single use sanitary items, not just wipes.



2. 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.

Don't know

Please give reasons and supporting evidence

We do not feel we are best placed to comment on this aspect. However, if the Government were to introduce an extended producer responsibility scheme for wipes and other commonly flushed sanitary products, along with mandatory 'Do Not Flush' labelling, then this would help to offset the impact from some wipes being exempt from the ban on plastics.

3. 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?

No

Please give reasons and provide supporting evidence.

This is not an area in which we have relevant expertise.

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

Yes

5. If you answered yes to question 4, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?

No

Please give reasons and supporting evidence

Since the introduction of the Fine to Flush standard, only a small number of products have passed the standard. Only one of these products, is a baby wipe, and apart from one medical wipe they are all marketed as moist toilet



tissue or toddler toilet training wipes. No facial cleansing wipes or household cleaning wipes have been certified Fine to Flush.

Whilst these products have passed the flushable test it should be noted that many specify in the instructions for use that they should only be flushed one wipe at a time on a full flush. This advice could still contribute to sewer blockages if customers do not read and follow this guidance which is often found in small print on the back of the packaging. In fact Yorkshire Water customer research found that, of those who were aware of the 'Fine to Flush' message, only half think that flushing only one wipe at a time is true. If customers do not follow the advice and use more than one wipe than this will lead to an increase in water consumption. They are also not suitable for use with macerator toilets and toilets which drain to septic tanks.

The Fine to Flush criteria means that even wipes which pass the certification tests rely on customer behaviours to flush them in accordance with the instructions. The test criteria of clearing the bowl on two flushes and allowing surcharge within the level of the toilet bowl indicates that Fine to Flush wipes still present a risk of causing sewer blockages.

We also have concerns that Fine to Flush sends a confusing message to customers that some items are ok to flush, and therefore makes behaviour change more difficult. For example, Yorkshire Water customer research found that, even of those aware of Fine to Flush, 1 in 5 still thought wipes without the Fine to Flush standard could be flushed.

Therefore, to ensure consistency of message for customers, and in line with our view that there needs to be a step change in how the issue of blockages is dealt with, it is our view that the Fine to Flush standard should be discontinued in favour of mandatory 'Do Not Flush' labelling.

6. 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?

No

Please give reasons and supporting evidence

See answer to question 6.



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

Yes

Please give reasons and supporting evidence

Analysis of labelling on products shows that messages are confusing for customers with various uses of terms like flushable and biodegradable which imply products can be flushed without any impact. Where warnings not to flush are used, they are not always prominent.

Mandatory 'Do Not Flush' labelling on all single use sanitary items (not just wipes) should be introduced to help improve customer awareness and ensure consistency across products. It should also be mandatory that the label is prominently positioned on the front of the packaging.

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

Yes

Please provide suggestions for how this might operate.

We would like the Government to apply extended producer responsibility to manufacturers of all single use sanitary items, not just wipes and not just those containing plastic.

Extended producer responsibility should cover both the cost of educating customers about correct methods of disposal, and the clean-up costs which result from incorrect disposal.

Customer research by Yorkshire Water in 2022 found that customers support extended producer responsibility, believing that those who are making a profit from the sale of wipes should be contributing to any repercussions from use.

9. 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.

Don't know

Please give supporting evidence on the cost and environmental impact.

A survey, conducted by the Marine Conservation Society in November 2020, of 12 retailers who sell own brand wet wipes found that three retailers have already removed plastic from all own brand wet wipes (flushable and non-flushable) and five committed to doing so by end of December 2021. A ban on wet wipes containing plastics is therefore feasible, practical and financially viable.

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