

Waste Prevention Programme Consultation - CTPA Response

Chapter 1: Introduction

Refers to pages 1-13 in the draft Waste Prevention Programme

Question 8: Do you agree or disagree with our choice of impacts and outcomes as the right goals for us to be aiming to achieve?

- a. Strongly agree
- **b. Agree**
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

If you disagree, please briefly explain why.

The UK cosmetic and personal care industry is a highly creative, engaged, responsible industry which is fully committed to reducing its environmental impact.

CTPA is fully aligned with the two overarching objectives of maximizing the value of resource use and minimising waste and its impact on the environment by encouraging more sustainable product design, use and reuse, and responsible disposal, making it easier for consumers to do the right thing.

CTPA, through its [Sustainability Strategy](#), 'Driving Towards a Net Positive Cosmetics Industry' is bringing members together to share best practice and drive system-wide change to represent a balanced, conscientious, world-leading industry.

It is imperative that Government departments communicate to align parallel legislation to ensure cohesive policies whilst understanding all applicable safety standards and responsibilities to sustainable initiatives.

There is a great opportunity to reform the manufacture, consumption, and disposal of consumer goods. These reforms should be designed to last for years to reduce further costly adaptations and additional confusion for consumers.

Chapter 2: Designing out Waste: Ecodesign, Extended Producer Responsibility and Consumer Information

Refers to pages 14-18 in the draft Waste Prevention Programme

Question 10: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree
- **b. Agree**
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree

- **f. Not answered**

Please provide details / explain your answer

The UK cosmetic and personal care industry is a highly creative, engaged, responsible industry which is fully committed to reducing its environmental impact.

In principle, CTPA agrees that producers should recognise the cost of management of their waste; they are often able to influence its design to reduce packaging, improve its recyclability and communicate with their consumers to encourage good disposal habits.

Whilst CTPA understands the benefits of setting design requirements to support sustainable production, it would welcome the proposal to 'encourage industry to set their own standards to reduce the need for regulation', to allow any framework to adapt to a sector but still commit to responsible design and durability.

The cosmetics industry welcomes the principle of providing consumer information digitally. One advantage being that it allows efficient information updating and editing when necessary while reducing packaging and labelling sizes, engages consumers and encourages responsible use and disposal habits.

Chapter 3: Reuse, Repair, Refill, Remanufacture: local services and facilities

Refers to pages 19-22 in the draft Waste Prevention Programme

Question 11: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- **a. Strongly agree**
- **b. Agree**
- **c. Neither agree nor disagree**
- **d. Disagree**
- **e. Strongly disagree f. Not answered**

Please provide details / explain your answer

Although CTPA agrees in principle to the adoption of re-fillable and re-usable packaging models, this is not always an option owing to necessarily stringent, regulated, hygiene, safety, and practical considerations for cosmetic products.

Under the UK Cosmetics Regulation, specific requirements ensure safety, manufacturing and labelling requirements are understood and met. Recognising the risks that refill/reuse models could present, CTPA has developed guidance to explain the key considerations to members, particularly around product safety, manufacture, retail and labelling requirements.

Owing to hygiene and safety requirements, refill/reuse models are not always appropriate. This would be the case for certain cosmetic products. Businesses should not feel obliged to create unsuitable refill/reuse models. Refill/reuse initiatives may affect the safety of the product and consequently, consumer safety.

It should be considered whether reuse/refill models distort the market towards recognised, well-established brands. Such models represent a significant investment, from companies to facilitate the refilling and consumers to 'buy into' the brand for successive refills. Consumers should be free to try new products and refill/reuse might limit the consumer's appetite to try a product.

Ultimately, businesses should consider refill and re-use wherever it can be done safely and without increasing the overall impact of the product as reuse comes above recycling in the waste hierarchy.

Chapter 10: Packaging, Plastics and Single-use Items

Refers to pages 52-55 in the draft Waste Prevention Programme

Question 18: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

- a. Strongly agree
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. Not answered

Please provide details / explain your answer

CTPA supports a shift away from hard to recycle and single-use products. CTPA, through its [Sustainability Strategy](#), 'Driving Towards a Net Positive Cosmetics Industry' is working with key stakeholders to be a catalyst for change, bringing our members together to share best practice and drive system-wide change.

CTPA engages with like-minded organisations, such as INCPEN (Industry Council for Packaging and the Environment), The British Plastics Federation, the British Retail Consortium, Cosmetics Europe and recycling charity Wrap (supporting the the UK Plastics Pact, Clear on Plastics and Recycle Now) to actively progress the aims and objectives of its Sustainability Strategy. Through working together, we can better navigate challenges that the sector faces and drive systemic change.

One of the key areas of focus for the strategy is the drive to reduce waste, including plastic, by rethinking packaging and encouraging meaningful recycling. Many members support voluntary initiatives such as the UK Plastics Pact and have developed take-back schemes to collect otherwise unrecycled cosmetic product packaging.

With respect to the review of the Packaging (Essential Requirements) Regulation of 2015, CTPA supports the promotion of reusable packaging where possible as referenced in CTPA's response to Q11.

Cosmetic and personal care producers are keen to use recycled materials wherever possible taking into consideration safety implications; the strict safety requirements

necessary for cosmetics and personal care products and packaging mean that the detailed composition of the packaging must be known and so in some cases, recycled packaging cannot be used.