

## CTPA Response to Scottish Government Single-use Plastic Items - Market Restrictions: Consultation

### Introduction

CTPA, the [Cosmetic, Toiletry and Perfumery Association](#), is the trade association representing the UK's cosmetics industry. Membership covers 80 - 85% of the UK cosmetics and personal care market by value, and comprises small, medium, large and multi-national companies supplying the UK market. Companies include manufacturers, distributors, ingredient suppliers, contract laboratories, contract manufacturers and own brand retailers. The UK cosmetics and personal care market was worth £9.35 billion at retail sales price in 2019 [1].

Just as any responsible industry would, the cosmetics industry shares the widespread concerns about the serious issue of plastic pollution in our environment.

CTPA has not commented on the single use plastic objects being proposed for a ban in Scotland because they are outside CTPA's remit. However, CTPA is commenting on the question of whether the Scottish Government should consider market restrictions for wipes in future proposals.

### Legislative background

In the UK and across the EU the manufacture and supply of cosmetic and personal care products is governed by the EU Cosmetic Products Regulation (EU No. 1223/2009), 'CPR'. The primary objective of the CPR is maintaining a high level of human safety, and each cosmetic product must be the subject of a safety assessment performed by a duly qualified professional before it is placed on the market. In addition to this, ingredients are subject to the European chemicals legislation, REACH (Registration, Evaluation & Authorisation of Chemicals Regulation), which looks at the safety in the work place and the environmental impact of all chemicals placed on the EU market – including cosmetic ingredients. The principles and standards of these regulations will continue to apply in the UK under the UK Cosmetics Regulation and UK REACH, transposed from EU laws.

Although wipes are not cosmetic products they are closely associated with cosmetic use. Where the intended use performs a cosmetic function, for example in baby-care, face, hand, body and moist toilet wipes, then the liquor on the wipe platform will be classed as a cosmetic and must adhere to the strict cosmetics legislation.

The wipe fabric is not classed as a cosmetic product. The international association for nonwoven and engineered fabrics, EDANA, represents this industry and campaigns on the correct disposal of wipes and guidance to Industry on 'Do not flush' labelling. CTPA is happy to support EDANA in this and promotes the correct disposal of non-flushable wipes.

**The Cosmetic, Toiletry and Perfumery Association Limited**

**Question 5      Would you support the consideration of market restrictions on these items (plastic wet wipes) or any other items we haven't listed?**

CTPA believes that, without understanding what such marketing restrictions would be, it is too soon to ask such a binary question.

Cosmetic wipes provide a convenient solution to helping people keep clean and refreshed when soap or hand washes are not readily available. Consumers require wipes to be strong enough not to disintegrate during use.

Some people with certain medical conditions rely heavily on wipes as they have an essential role in maintaining hygiene particularly where mobility is reduced or if the body's normal defence mechanisms are compromised. Wipes have to be strong enough to last for their intended use without disintegrating. While in these circumstances plastic material might be required to maintain the integrity of the wipe during use, it is important to note that **not all wipes contain plastic** and so contribute to plastic waste. Manufacturers of wipes are innovating to develop alternatives to plastic content of wipes and create biodegradable wipes.

Certain single-use hygiene products, such as wipes, cannot be reused for reasons of public health. It is important to encourage consumers to dispose of them correctly. There is clear on-pack labelling to advise whether products can be flushed or should be disposed of with household rubbish. To reiterate, we cannot make the assumption that all wipes are plastic waste.

The cosmetics industry urgently encourages the use of sound science in tackling the major causes of plastic waste, in order to deliver real, meaningful benefits for the environment.

CTPA therefore recommends that evidence is compiled on the contribution of wipes to plastic waste, a consultation is conducted when such evidence is available and any future legislative action be based on robust science.

[1] The Cosmetic, Toiletry and Perfumery Association "[Cosmetics Industry in Figures](#)" Kantar Worldpanel April 2020