

# CTPA Response to Defra Call for evidence on commonly littered and problematic plastic items February 2022



## UK Government Executive Summary

- 1. The government is committed to leaving our environment in a better state than we found it and protecting it for future generations. The 25 Year Environment Plan, published in January 2018, outlines the steps we will take to achieve that, including eliminating avoidable plastic waste by 2042.*
- 2. We are currently consulting on proposals to ban single-use plastic plates, cutlery, balloon sticks, and expanded and extruded polystyrene cups and food and beverage containers in England. We are committed to going further and addressing other sources of plastic pollution, which is why we are also launching this call for evidence, to help gather evidence on other problematic plastic items and help inform future policy making.*
- 3. We are particularly interested in wet wipes, tobacco filters, sachets, and other single-use cups. These items frequently escape waste management systems and enter the terrestrial and/or marine environment, and we are exploring whether we need to take additional action to reduce their use and tackle the problems caused by their incorrect disposal. We want to gather further evidence on these items, such as on their environmental impact, and gauge views on potential policy options to better inform our approach. In addition to these four items, we are seeking views on other potentially problematic single-use plastic items and whether there is support for future policy action for these items, as well as how to achieve a shift away from single-use culture.*
- 4. A single-use product is a product not conceived, designed, or placed on the market to accomplish multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived.*
- 5. Plastic means a material consisting of polymer to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified. We are using the definition of plastics in the Environmental Protection (Plastic Straws, Cotton Buds and Stirrers) (England) Regulations 2020. 6. Whilst the proposed ban we are currently consulting on would apply in England only, the Devolved Administrations are considering bringing forward similar regulations. We are committed to engaging closely with the Devolved Administrations in Scotland, Wales, and Northern Ireland on delivering on our shared environmental objectives across the UK and the wider impacts of these proposals, including the functioning of the UK internal market.*

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## **Wet wipes**

*Wet wipes and moist wipe products, such as moist toilet tissue, are used for a range of hygiene and other purposes. As well the plastics directly contained in many of these non-flushable items, fatbergs can result in indirect plastic pollution as they are a cause of overflows, which can disperse macro and micro plastics into the wider environment. Many wet wipes are single-use plastic items and can cause problems for sewers and the environment. Water UK research has identified that wet wipes are a frequent cause of sewer blockages as a result of being flushed down the toilet.<sup>1</sup> Indeed, wet wipes, mostly comprising baby wipes, make up 93% of the material that causes sewer blockages, which themselves cost the water industry in England and Wales £100 million a year.<sup>2</sup> Wipes often then combine with fats, oil and grease, which are also often disposed of down sinks into drains, and combine to form fatbergs.*

*Wet wipes are also often disposed of incorrectly, which can cause pollution in rivers and lead to litter on beaches. The Marine Conservation Society reports that wet wipes were the third most common type of litter found on beaches in Great Britain in 2020.<sup>3</sup> When they enter waterways they can cause harm to fish and other aquatic life.*

*The water industry has established a voluntary 'flushability' product standard for wet wipes, which enables a manufacturer to make wet wipes to a standard that is considered 'Fine to Flush'. The water industry has said this standard will be updated if understanding evolves of materials that should be considered as plastics. Wet wipes made to this standard are tested to ensure they do not cause blockages in sewers and can carry the 'Fine to Flush' logo on their packaging. Currently, some products indicate that they are 'flushable', even though they have not been made to the water industry's voluntary standard and may therefore continue to cause sewer blockages.*

*Alternatives to conventional plastic wet wipes are available, including products which are, or which claim to be, 'plastic-free'. However, when incorrectly disposed of these may have a similar impact in sewers and on the environment.*

*The government is considering various regulatory options to tackle these issues. These options include a ban on wet wipes containing plastic, a mandatory 'flushability' standard, mandatory labelling on packaging, and an extended producer responsibility scheme for wipes containing plastic.*

*Extended Producer Responsibility (EPR) is an environmental policy approach through which a producer's responsibility for a product is extended to the post-use stage. This*

*1 Water UK. Wipes in Sewer Blockage Study: Final Report. 2017. Available at:*

*<https://www.water.org.uk/wp-content/uploads/2018/11/Wipes-in-sewer-blockage-study.pdf>*

*2 <https://www.water.org.uk/news-item/new-proof-that-flushing-wipes-is-a-major-cause-of-sewer-blockages/>*

*3 <https://www.mcsuk.org/news/analysing-high-streets-wet-wipe-claims/>*

*encourages manufacturers to consider more sustainable design decisions at the production stage.*

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

**You will be asked about possible exemptions in the following questions.**

• Yes

• No

• Don't know

• Please give reasons and supporting evidence

There are different views held within CTPA membership.

Whilst there are members of CTPA who are in support of such a ban, having invested in the development of alternative products or materials, members have also suggested that the distinction should be between non-flushable and flushable wipes, not just those that contain plastic. A ban on wet wipes containing plastic would not necessarily solve the issue of wipes in the environment, be they from litter, wrongful disposal and subsequent escape from waste-water systems or landfill.

Wet wipes provide convenient and essential cleaning solutions to many consumers, from babies to adults both in the home, in social care situations and on the move. Wet wipes have become essential to today's hygiene practices.

Many hygiene products, including wipes are wrongly disposed of via the toilet. It is important to encourage consumers to dispose of them correctly. CTPA would suggest the requirement for clear on-pack labelling to advise whether products can be flushed or should be disposed of with household rubbish.

Robust scientific evidence including full life-cycle analysis would demonstrate whether the alternatives are indeed better for the environment and society.

CTPA would support its members in the need for harmonised requirements across the Devolved Nations, including Northern Ireland for businesses to operate freely without excessive administrative burden, to transport products to maximise efficiency and to reduce the cost of the supply chain. If any actions are introduced, such as labelling for example, sufficient implementation times must accompany any new measures and products already placed on the market should not be required to be withdrawn. This adds extra costs to companies already dealing with the new requirements of Brexit and the effects of COVID, as well as having negative environmental impacts associated with unnecessary disposal.

**7. 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.**

**You will be asked about additional exemptions in the next question.**

• Yes

• No

• Don't know

• Please give reasons and supporting evidence

Clarity of definitions is essential here.

All cosmetic products placed on the market of the United Kingdom (England, Wales, Scotland and Northern Ireland) intended for sale, or to be given away for free, in the course of a commercial activity must comply with:

- [Schedule 34](#) of the [Product Safety and Metrology Statutory Instrument](#) (hereafter 'the UK Cosmetics Regulation' or UK CR) for cosmetics marketed in Great Britain (England, Wales and Scotland);
- [Regulation EC 1223/2009](#) of the European Parliament and of the Council of 30 November 2009 on cosmetic products (hereafter 'the EU Cosmetics Regulation' or EU CPR) for cosmetics marketed in Northern Ireland. This is in accordance with the terms of the [Northern Ireland Protocol](#) to the [UK/EU Withdrawal Agreement](#).

A cosmetic product is clearly defined in the UK Cosmetics Regulation as:

“a substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to **cleaning them**, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours.”

According to the definition above, CTPA would request clarity on what would be determined as medical use rather than a cosmetic use.

Wet wipes provide convenient and essential cleaning solutions to many consumers, from babies to adults both in the home, in social care situations and on the move. Wet wipes have become essential to today's hygiene practices.

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 must 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. As this waste should still be disposed of responsibly (whether in domestic or healthcare environments) the importance is that of messaging. It is important to encourage consumers to dispose of wet wipes correctly.

**8. 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?**

• Yes

• No

**Please give reasons and provide supporting evidence.**

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

• Yes

• No

**10. 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?**

• Yes

• No

• Don't know

**• Please give reasons and supporting evidence**

CTPA is aware that the 'Fine-to-Flush' specification is a water industry initiative, and that the global organisation representing non-woven industries EDANA also has a 'Do not Flush' logo supported by a standard for flushability (GD4).

Whilst wipes can end up in waste-water systems, many of these wipes are not designed to be flushed down the toilet. CTPA members have advised that despite the adoption of the 'Fine-to-Flush' for flushable products, many wipes found in blockages are not designed to be, and are not marketed as, flushable. Public awareness, education and agreement is needed to help deliver the message in what is considered suitable, and acceptable, for flushing along with better control of pollution incidents and sewage overflow discharges from sewage treatment plants to prevent wipes that are not designed or marketed as flushable ending up in the environment.

**11. 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?**

• Yes

• No

• Don't know

**• Please give reasons and supporting evidence**

A specification for flushability, such as 'Fine-to-Flush' is only used for products that are specifically designed to be flushed. However, it is important to consider that a products flushability is not the only way to reduce its impact on the environment.

CTPA would question whether a 'flushability standard' changes consumer behaviour regarding those wipes that are not designed to be flushed. It is confusing to consumers that some wipes are flushable.

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

a. Yes

**b. No**

**c. Don't know**

**d. Please give reasons and supporting evidence**

It is important to encourage consumers to dispose of wipes correctly. CTPA would suggest the requirement for clear, consistent, on-pack labelling to advise whether products can be flushed or should be disposed of with household rubbish. CTPA would be happy to work with Defra to raise consumer awareness on which wipes must and must not be flushed.

CTPA would support its members in the need for any labelling to apply to all equivalent products being placed on the market, whether domestic or imported. Any new labelling requirements must have sufficient time for implementation and products already placed on the market should not be required to be withdrawn. This adds extra costs to companies, already dealing with the new requirements of Brexit and the effects of COVID, as well as having negative environmental impacts associated with unnecessary disposal/destruction.

CTPA would also support its members in the need for harmonised requirements across the Devolved Nations, including Northern Ireland for businesses to operate freely without excessive administrative burden and cost. This would also encourage widespread consumer understanding of the meaning of symbols or labels.

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

• Yes

• No

• Don't know

**Please provide suggestions for how this might operate.**

Whilst wipes containing plastics might incur a higher rate through the Moderated Fees, this scheme is designed for packaging. Therefore, CTPA would question how this would work for wipes, as the wipe fabric is not packaging but a substrate for the liquor.

In addition, used as hygiene products, wipes would not be reused or recycled for reasons of public health implications. Therefore, it is likely that the collected revenue would not be reinvested in enabling their recycling, a key aspect of proposed reforms to Extended Producer Responsibility.

CTPA would support its members in the need for any fees to be proportionate and to apply to all equivalent products being placed on the market, whether domestic or imported.

**14. 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.**

**Please give supporting evidence on the cost and environmental impact.**

Robust scientific evidence including full life-cycle analysis would be required to demonstrate whether alternatives are indeed better for the environment and society.

CTPA members that manufacture wipes have reported a significant shift with their customers requesting alternatives to wet wipes that contain plastic such as more biodegradable plant-based wipes, or those made of viscose and lyocell. In addition, there are more product formats being marketed that use reusable alternatives to wipes, such as woven cloths.

CTPA stresses the need for harmonised definitions of terms such as “plastic”, and “biodegradable” for example, and therefore what would be considered an alternative material.

The [EU Single Use Plastics Directive 2019/904](#) states that materials entirely made of natural polymers that have not been chemically modified, like viscose and lyocell, fall outside the scope of the Directive. Many members of CTPA have requested harmonised alignment with this position.

### *Single-use plastic sachets*

*Single-use plastic sachets are a form of packaging under the category of plastic film and flexibles, used for packaging single servings of a product. These include sachets used for food and drink, for example milk, salad dressing used in on-the-go salads, condiments and those used for cosmetics and healthcare.*

*Single-use plastic sachets can cause considerable harm to the marine and terrestrial environment when disposed of incorrectly. They are unlikely to be recycled due to their small size, which makes it difficult to segregate and clean them.*

*The public has already shown support for the government taking action, with a One Poll survey of 2,000 Britons finding that almost 8/10 Britons surveyed said plastic sample sachets should be banned in the UK, and more than 4/5 said the government should not ignore their impact on plastic pollution.<sup>5</sup>*

### **22. What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?**

There is no place for any waste sachets in the environment. However, whilst it is stated that ‘*single-use plastic sachets can cause considerable harm to the marine and terrestrial environment when disposed of incorrectly*’, evidence of a problem with sachets in the UK is not clear.

CTPA therefore recommends that evidence is compiled on the contribution of sachets to plastic waste versus the benefits of their use and that consultation is conducted when such evidence is available. Any future legislative action must be based on robust science.

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

Within the cosmetics sector, cosmetic products presented in sachets are designed for use in a domestic, mainly bathroom, setting rather than being used outside where they might more likely be littered.



As a responsible industry we recognise that there is no place for plastic waste in the environment, be it in the aquatic environment, on a beach or in landfill. Sachets must be designed to maximise the potential for them to be recycled and the appropriate method of disposal clearly communicated to the user.

CTPA understands that some sachets; PP laminates, classed as polyolefins, are now also recyclable through front of store collection and the recycling of films and flexible plastic. In addition to the roll-out of flexible plastic collection, many CTPA members operate in-store collection or 'take-back' schemes, some include sachets, and CTPA members have been working with [WRAP's Recycle Now Recycling Locator Tool](#) to communicate the acceptance of sachets at these schemes and highlights the nearest collection point to consumers.

Greater use of take-back models by cosmetic brands and retailers and planned consumer awareness campaigns will increase the use of such facilities and help to build positive recycling behaviour in consumers.

In addition, CTPA has spearheaded a take-back scheme stakeholder roundtable to identify the next steps to be taken to harmonise the sector's take-back schemes and maximise the collection of otherwise, currently, unrecycled cosmetic product packaging, including flexibles and films. These industry-wide discussions, involving the whole packaging value chain, are aimed at maximising the meaningful recycling of otherwise unrecycled cosmetic packaging, including sachets

**23. Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?**

The beauty and personal care industry is always introducing new and innovative ways to reduce waste and careful and thoughtful design ensures our cosmetic products are kept safe during their use and remain effective, whilst minimising the packaging. There may be instances when the responsible use of sachets may be more sustainable than other options, using less material and having a lower carbon footprint than tube, small bottle or jar alternatives in plastic or glass. Alternatives may also be less hygienic, such as the dosing of product like a shampoo or hand wash you might find in hotel bathroom.

CTPA understands that some alternative materials have undergone testing and will shortly be available for use, though trials indicate a trade-off against efficacy when it comes to longer term compatibility and product stability, meaning that the products will have a shorter shelf life within these sachets.

Some members have informed CTPA that in many cases, having conducted comparative Life Cycle Assessments for sachets, current sachet materials are ultimately fit for purpose with a lower carbon footprint than alternative formats. Therefore, CTPA would encourage all its members to determine the appropriate format for their specific product according to robust assessment of the environmental impacts throughout its life and communicate the best way of disposal to the consumer.

**24. Do you support consulting on introducing a ban of single-use plastic sachets used for:**

**a. Food and drink: permanent food outlets including restaurants and cafes, and sachets provided with ready meals**

**b. Food and drink: mobile outlets including trains, airplanes, food trucks**



**c. Beauty industry: providing free samples at the point of sale or single-use quantities provided within a multipack**

Firstly, CTPA would question reference to the 'beauty' industry and would wish to emphasise the importance of this sector. The hair, grooming, beauty and personal care industry makes a significant positive impact on the economy and wider society. From toothpaste and shaving cream to deodorant and sun protection, hand washes to shampoo, every one of us uses the products legally defined as 'cosmetic', every day. Not only are they vital for personal hygiene, but they also have an important contribution to our self-esteem. Affordable, accessible access to these every-day essential products is of vital importance to us all as consumers.

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A cosmetic product is clearly defined in the UK Cosmetics Regulation as:

"a substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours."

Reducing avoidable waste, including plastic and other waste from products is a key issue that CTPA is helping its members to tackle, as one part of the Association's Sustainability Strategy: [Driving Towards a Net Positive Cosmetics Industry](#). The challenge of sachets is one such area.

Plastic sachets, as all packaging, will be subject to the UK Plastic Packaging Tax and Extended Producer Responsibility reforms for packaging, which will include modulated fees to disincentivise the placing on the market of non-recyclable or difficult to recycle packaging and foster more harmonised labelling requirements. Time should be given for these policy initiatives to impact on packaging and product formats, in addition to other policy initiatives such as consistency in collection of waste, and labelling.

CTPA would stress that it is important to clearly define single-use plastic sachets; single use sachets are those which are designed to provide consumers with a single product dose and are expected to be disposed of immediately after use. Sachets are often utilised to package products that are sold (singly or as multipacks) to deliver single doses of 'pre-wetted' products such as hair masks, serums or body scrubs where it is important that a measured dose is administered or to retain the integrity of the contents that might be susceptible to degradation, perhaps through oxidation or dehydration.

Whilst sample sachets may be used to help market a product by demonstrating what a product is like to use, there is an economic and social aspect of trialling a product; sachets provide an invaluable, lightweight, hygienic sampling delivery system for consumers who need to try a cosmetic product to see that it is suitable before buying particularly for those who might be sensitive or allergic to certain ingredients, and thus potentially wasting a purchased full-size version.

Sample sachets play a significant role in terms of making our products accessible to a wider market and not just those who are able to visit a retail store. This is becoming ever-more important with rapidly growing e-commerce activities within the industry and the awareness of enhanced hygiene practices within retail environments, meaning that the previous use of 'tester' products is now not considered appropriate by many consumers.

CTPA would stress that a ban on all sachets could lead to unintended consequences, such as replacements with an ultimately higher carbon footprint. The UK Government's drive for Net Zero and the removal of problematic plastic waste are not necessarily aligned.

**d. Support all of the above**

**e. Do not support any of the above**

**f. Please give any evidence to support your views**

**25. Do you support consulting on introducing a charge on single-use plastic sachets used for:**

**a. Food and drink: stationary outlets including restaurants and cafes**

**b. Food and drink: mobile outlets including trains, airplanes, mobile food vendors**

**c. Beauty industry: providing free samples at the point of sale**

As in response to Question 19, plastic sachets, as all packaging, will be subject to the UK Plastic Packaging Tax and Extended Producer Responsibility reforms for packaging, which will include modulated fees to disincentivise the placing on the market of non-recyclable or difficult to recycle packaging and foster more harmonised labelling requirements.

CTPA would stress that such a charge, or a ban, could lead to unintended consequences such as replacements with an ultimately higher carbon footprint. The UK Government's drive for Net Zero and the removal of problematic plastic waste are not necessarily aligned.

**d. Support all of the above**

**e. Do not support any of the above**

**f. Please give any evidence to support your views**

**26. Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?**

**27. Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?**

If the UK Government's priority is the drive for Net Zero, and many members of CTPA will conduct and report environmental audits based on carbon, then sachets represent a lightweight, low resource, safe way to transport, protect and offer a product.

**Additional items**

*We are interested in seeking your views on future targeted action. Please provide evidence in support of your response, including the environmental impact of these items.*

**32. Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.**

CTPA recommends that evidence is compiled on the composition of plastic litter and waste, and a consultation conducted when such evidence is available so that any future legislative action is based on robust scientific evidence.

**33. Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?**

**Re-use and Refill**

*In line with the waste hierarchy (priority goes to preventing the creation of waste, followed by preparing waste for reuse; to recycling, and then recovery, with disposal regarded as the worst option), we would like to see a shift away from single-use items to reusable or refillable alternatives. Therefore, in this section, we are scoping out views on how this could be achieved.*

**34. What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.**

All cosmetic products placed on the market of the United Kingdom (England, Wales, Scotland and Northern Ireland) intended for sale, or to be given away for free, in the course of a commercial activity must comply with:

- [Schedule 34](#) of the [Product Safety and Metrology Statutory Instrument](#) (hereafter 'the UK Cosmetics Regulation' or UK CR) for cosmetics marketed in Great Britain (England, Wales and Scotland);
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All cosmetic products must be safe to use and must be manufactured according to Good Manufacturing Processes. The stringent UK cosmetics legislation equally applies to refills of cosmetic products. Therefore, manufacturers must design their reuse/refill systems so that product contamination is avoided under multi-use conditions.

CTPA requests clarity on what would be determined as refill and reuse. '[Reuse Rethinking Packaging](#)' by the Ellen MacArthur Foundation 2019, defines reuse as the operation by which packaging is refilled or used for the same purpose for which it was conceived, with or without the support of auxiliary products present on the market, enabling the packaging to be refilled. This includes refill at home, refill on the go, return from home and return on the go.

While packaging reuse could contribute under certain conditions to the prevention and reduction of waste and use of resources, initiatives in that field should always be compliant with hygiene and safety requirements of all applicable legislation including the UK Cosmetics Regulation as well as demonstrating a truly positive impact on environment. In addition, under The UK Packaging (Essential Requirements) Regulations 2003, packaging must be reduced to the minimum weight and volume necessary for its safe and hygienic use.

Whilst more robust packaging may be required to enable sufficient reuse, to determine whether a reusable packaging model is the best option for the environment, consideration should also be given to any additional transportation and cleaning requirements. It is also important that companies consider the mechanism by which the reuse of packaging can be determined. Full life-cycle assessments, including realistic expectations on how many times the packaging will be reused should demonstrate that the option is more sustainable than an equivalent recyclable option.

### **35. What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.**

The refilling of cosmetic products in reusable/reused packaging must be in accordance with the high hygienic requirements under the UK Cosmetics Regulation and may not be appropriate for all cosmetic product types.

When considering whether to launch a refillable product it may be appropriate to consider the various scenarios available before selecting the most suitable with which to move forward. There should be consideration of the longevity and practicality of a refill/re-use scheme and it is important to consider the whole product life cycle when deciding upon a refill model.

The Responsible Person manufacturing a cosmetic product must ensure GMP (Good Manufacturing Practice) is complied with throughout manufacture, which helps ensure product, and so consumer, safety. This also applies to refills available in-store for customer use. GMP should form part of the defined procedures made available in the legally required cosmetic Product Information File.

Under GMP and quality controls, possible product contamination in retail environments should be addressed. Best practice and risk minimising strategies should be put in place, and for each individual business the risk assessment, and subsequent practices, are likely to differ owing to different circumstances and operating models.

In 2019, CTPA published guidance on refillable packaging to assist members in understanding the key considerations when developing such initiatives. A multi-disciplinary approach is recommended, and members are advised to seek expert assistance in each key area, such as;

- cleaning and sanitisation,
- Good Manufacturing Practice and filling instructions,
- compliance with Weights and Measures,
- labelling for the consumer,
- reformulation considerations,
- shelf-life determination,
- safety assessments, and
- packaging and sustainability.

### **36. How can government incentivise increased reuse and refill?**

All packaging will be subject to the proposed UK Extended Producer Responsibility reforms for packaging, which should include modulated fees to incentivise the placing on the market of refillable or reusable packaging and foster more harmonised labelling requirements.

However, product categories for which reuse and refill models are not appropriate should not be penalised for not adopting such models where consumer safety would be compromised.

### **37. How could businesses incentivise customers to support reuse and refill?**

To build consumer confidence, there is the opportunity for companies to consider their communication, being transparent around the specifics of their model. Consumers will seek convenient, trust-worthy solutions.

Other considerations could be:

- Providing a benefit to consumers beyond sustainability, such as limited-edition packaging design for the refillable container or a loyalty scheme.
- Consumers should not be financially penalised for choosing a refillable product compared with its non-refillable equivalent.
- Refill-exclusive formulations.
- Seamless usage and refilling.
- Availability of a sufficiently broad range of products for a sustained amount of time.