

CTPA Response to Welsh Government Consultation - Plastic Carrier Bags and Wet Wipes Containing Plastic / Ymgynghoriad Llywodraeth Cymru - Bagiau Siopa Plastig a Weips Gwlyb sy'n Gynnwys Plastig

[CTPA](#), the Cosmetic, Toiletry and Perfumery Association, is the trade association representing the UK's cosmetics industry. [Membership](#) covers over 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.

Although the wipe 'fabric' is not classed as a cosmetic product, wipes are closely associated with cosmetic use. Where the intended use performs a cosmetic function, for example in baby, face, hand, body care, and moist toilet wipes, then the liquor on the wipe platform will be classed as a cosmetic and must adhere to the strict UK Cosmetics Regulation.

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, manufacturers of wipes are innovating to develop alternatives to plastic content of wipes.

Just as any responsible industry would, the cosmetics industry shares the widespread concerns about the serious issue of plastic pollution in our environment. Whilst there are members of CTPA who are in support of a ban on wipes containing plastic, having invested in the development of alternative products or materials, members have also suggested that such a ban would not necessarily solve the issue of either plastic or waste wipes in the environment, be this from littering, wrongful disposal and/or subsequent escape from waste-water systems or landfill.

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.

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

The Cosmetic, Toiletry and Perfumery Association Limited

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

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, 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.

It must be acknowledged that many hygiene products, including wipes (irrespective of whether they contain plastic or not) are wrongly disposed of via the toilet. Waste should still be disposed of responsibly (whether in domestic or healthcare environments). Therefore, CTPA believes that it is fundamental that consumers are encouraged to dispose of wipes correctly. CTPA would emphasise the importance of clear, consistent on-pack labelling to advise whether products can be flushed or should be disposed of with household rubbish.

Many of the wipes in waste water systems are not designed to be flushed down the toilet and 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.

CTPA - 18 May 2022