

CTPA Response to Scottish Government Call for Evidence on single-use food containers and other single-use items (Part 2 includes sachets for cosmetic products)

7. Do you have any evidence of the environmental impact of the single-use items set out in Part 2 of the call for evidence paper:

[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.

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.

Evidence of a problem with sachets used for personal care and cosmetic products 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 a 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.

8. Do you have any evidence of the size and nature of the market for the single-use items set out in Part 2 of the call for evidence paper:

No, CTPA does not keep information on retailing or industry trends with regard to particular cosmetic product types apart from the topline statistics that are published on the [CTPA website](#). These data are taken from an annual market report, on all categories legally classified as cosmetic products, compiled for the CTPA by Kantar Worldpanel in collaboration with market specialists, IRI.

9. Do you have any evidence on what alternatives to single-use items set out in Part 2 of the call for evidence paper are available and any negative impacts (environmental or other) that increased use of these alternatives could have:

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

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glass. Alternatives may also be less hygienic, such as the dosing of products like a shampoo or hand wash you might find in hotel bathroom. However, CTPA would stress that sachets must also 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 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.

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.

10. Do you have any evidence of effective action taken to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:

CTPA does not have any information about this. However, as highlighted in other responses, CTPA and its members do not feel that such a reduction is necessary providing other measures are in place.

11. Do you have any evidence related to barriers to implementing policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:

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, widespread access to these every-day essential products is of vital importance to us all as consumers.

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.

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.

12. Do you have any evidence related to the impact on businesses (positive or negative) of policy measures to reduce the consumption of the single-use items set out in Part 2 of the call for evidence paper:

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.

13. Do you have any evidence of the impact that policy measures to reduce the consumption of the single-use items set out in Part 2 might have on people with protected characteristics or who experience socio-economic disadvantage of the call for evidence paper:

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 trialing 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. In some cases, single-dose sachets also provide a more affordable option than a full-size product.

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.

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