

Consultation on the Proposed Ban of the Manufacture, Supply and Sale of Wet Wipes Containing Plastic – CTPA Supporting Information

[CTPA](#), the Cosmetic, Toiletry and Perfumery Association, is the trade association representing the UK's cosmetics and personal care industry. Membership covers over 85% of the UK cosmetics and personal care market by value, which in 2022 was £8.9bn, and comprises small, medium, large and multi-national companies supplying the UK market. [Companies](#) include manufacturers, distributors, ingredient suppliers, contract laboratories, contract manufacturers and retailers.

Cosmetic 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. Cosmetic wipes have become essential to today's hygiene practices. Some people 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.

Although the wipe 'fabric' is not classed as a cosmetic product, some 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 intimate hygiene wipes, the liquid on the wipe 'fabric' is classed as a cosmetic and must adhere to the strict UK cosmetics safety laws (the [UK Cosmetics Regulation](#)).

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 wipes in the environment, be they from litter or wrongful disposal and subsequent escape from waste-water systems or landfill. However, such a ban would reduce plastic pollution from cosmetic wipes.

The majority of cosmetic wipes are not designed, intended or marketed to be flushed. The exception to this is moist toilet wipes that are intended to act as moist toilet tissue, specifically designed to be flushed and break down in the sewer system quickly. Moist toilet wipes do not contain plastic, and there is no evidence to suggest that wipes that have passed a verified flushability specification contribute to sewer blockages.

However, it must be acknowledged that many consumer products used in the bathroom, including wipes, are wrongly disposed of via the toilet. CTPA is aware of the issues that arise when this happens.

CTPA, whilst supporting the principle of a ban on plastic in wipes, is concerned that announcing such a ban will wrongfully lead consumers to believe that plastic-free wipes can be safely flushed. This is not the case. Whilst there are valid concerns that it may be confusing to consumers that some wipes are flushable and others are not, this confusion can be mitigated by clear, consistent messaging and awareness campaigns. Public awareness, education and agreement is essential to help deliver the message in what is considered suitable, and acceptable, for flushing. CTPA would be pleased to work with the Government, and other stakeholders, on an education campaign. During Recycle Week 2022, CTPA launched a [bathroom campaign](#) aimed at educating consumers about bathroom recycling and the rules for disposing of cosmetic wipes. CTPA continues to use this campaign and its messaging at any appropriate opportunity.

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With reference to Question 15 on the consultation, CTPA would like to highlight that flushability and biodegradability are two separate characteristics. Consumers may misunderstand “biodegradable” claims on wipes to mean that a product can be safely flushed. This is not the case. Furthermore, CTPA would emphasise the importance of clear, harmonised on-pack labelling to advise whether products can be flushed or should never be flushed and should be disposed of with household rubbish.

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 who are coping with supply chain issues and high energy prices, as well as having negative environmental impacts associated with unnecessary disposal.

CTPA would welcome further engagement with the Government on this important topic.

Section 2: Questions on the proposal

Q1. To what extent do you agree with the following statement, “I/my organisation would support the proposal set out above to introduce a ban on the manufacture of wet wipes that contain plastic”?

- a. Strongly agree.
- b. Agree
- a. Neither agree nor disagree *However, the definition of plastic is critical and we have comments on the proposal for a manufacturing ban.
- b. Disagree
- c. Strongly disagree
- d. I don’t know

Q2. To what extent do you agree with the following statement, “I/my organisation would support the proposal set out above to introduce a ban on the supply or sale of wet wipes that contain plastic, including giving away for free”?

- a. Strongly agree.
- b. Agree * However, the definition of plastic is critical.
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. I don’t know

Q3. Please explain your answer to Q8 and Q9, referring to specific evidence as much as possible.

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Although the wipe ‘fabric’ is not classed as a cosmetic product, some 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 ‘fabric’ will be classed as a cosmetic and must adhere to the strict UK Cosmetics Regulation.

Just as any responsible industry would, the cosmetics industry shares the widespread concerns about the serious issue of plastic pollution in our environment. CTPA members that manufacture wipes have reported a significant shift with their customers requesting alternatives to cosmetic wipes that contain plastic such as more plant-based wipes, or those made of viscose and lyocell.

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 wipes in the environment, be they from litter or wrongful disposal and subsequent escape from waste-water systems or landfill. However, such a ban would reduce the opportunity for plastic pollution in the environment from cosmetic wipes.

CTPA is concerned that announcing a ban on plastic-containing wipes will wrongfully lead consumers to believe that plastic-free wipes can be safely flushed. This is not the case, and it is essential that any ban is supported by information campaigns to help deliver the message in what is considered suitable, and acceptable, for flushing. CTPA is aware of Water UK’s ‘Bin the Wipe’ campaign and supports messaging that directs consumers to dispose of non-flushable wipes in the household waste. However, CTPA believes that there is an opportunity to educate consumers about the difference between flushable and non-flushable cosmetic wipes and their disposal. CTPA would support harmonised communications on this topic, to avoid unnecessary consumer confusion.

The EU Single Use Plastics Directive (SUPD) [2019/904](#) and subsequent [guidance](#) 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 across the whole of the UK.

CTPA welcomes the principle of a ban on plastic in cosmetic wipes, as highlighted in our response to Q9, but would like to emphasise the importance of a scientifically sound definition of plastic, harmonisation with existing definitions, as well as information campaigns to change consumer behaviour.

With regards to Q.8 relating to a ban on the manufacture of wipes containing plastic, however, CTPA understands that this will have a huge impact on UK companies who manufacture wipes here, including some CTPA members, that could lose business with their overseas customers at a time when they are still dealing with the requirements of Brexit, the effects of COVID, as well as the cost-of-living crisis and impact of supply chain issues. If the manufacture of wipes containing plastics is banned, it not only means UK companies will lose business and revenue, but they also lose the opportunity to influence positive change away from plastic content in

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wipes destined for other markets. CTPA therefore asks the UK Government to carefully consider the impact a manufacturing ban could have on UK businesses. Whilst CTPA agrees that plastic is not essential for cosmetic wipes, if the UK Government is determined to ban the manufacture of all plastic-containing wipes, including those for export, CTPA would like to emphasise the importance of long transition periods to allow manufacturers time to adjust to the new requirements, and to give them an opportunity to work with their overseas customers and influence other nations in their transition to plastic-free alternatives.

Additionally, regarding the definition of wipes, CTPA seeks clarity as to whether the Government intends to ban plastic containing sheet masks and other facial masks that meet this definition. In the guidance issued by the EU in relation to the SUPD, plastic-containing facial masks and sheet masks that meet the definition of a wipe, are in scope of the Directive; however, the Directive does not ban these types of products, instead it imposes labelling and Extended Producer Responsibility (EPR) obligations.

CTPA would also like to emphasise that such a ban on cosmetic wipes containing plastic must apply to all equivalent products being placed on the market, whether domestic or imported, and the necessary enforcement should be place. CTPA stands ready to help liaise with enforcement authorities on this.

Consumer impacts

- Q11. Do you think that the proposed ban will have a negative impact on any specific groups of consumers?
- Yes
 - No
 - I don't know
- Q12. Please explain your answer to the previous question (Q11), referring to specific evidence where possible and whether you are part of the group impacted. Where possible, please indicate if this answer is specifically related to manufacture, supply, or sale

For wipes with a cosmetic function, there should not be any adverse impacts, provided wipes made from viscose and lyocell are excluded from the ban. There may be instances where cosmetic wipes are used for hygiene purposes by a person other than the recipient, for example, in a care situation; however, CTPA believes that it is not necessary for these wipes to contain plastic to function, and that they should be disposed of responsibly regardless of their composition.

Definitions

- Q13. Do you think the definition of wet wipes used within this consultation is suitable?
- Yes
 - No, please expand

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- c. I don't know

CTPA agrees that the definition of wet wipes is suitable; however, clarity is required regarding the intention of the regulation and whether it is intended to also ban sheet masks and other facial masks containing plastic.

In the guidance issued by the EU in relation to the SUPD, plastic-containing facial masks and sheet masks that meet the definition of a wipe, are in scope of the Directive; however, the Directive does not ban these types of products, instead it imposes labelling and EPR obligations.

- Q14. Do you think the definitions of plastic used within this consultation are suitable?
- a. Yes
 - b. No, please expand
 - c. I don't know

A scientific definition of plastic already exists in UK law, for the purposes of the ban on plastic microbeads. According to [The Environmental Protection \(Microbeads\) \(England\) Regulations 2017](#), plastic is *"a synthetic polymeric substance that can be moulded, extruded or physically manipulated into various solid forms and that retains its final manufactured shape during use in its intended applications."*

CTPA seeks clarity regarding "natural polymers that have not been chemically modified" and whether this includes materials such as viscose and lyocell. Many CTPA members sell across the UK and EU and have already invested in and transitioned to these materials in response to the SUPD. To diverge from this would pose a barrier to trade.

Under the SUPD, and subsequent [guidance](#) published by the European Commission, *"Wet wipes, which are entirely made of natural polymers that have not been chemically modified, like viscose and lyocell, fall outside the scope of the Directive."*

Aligning with existing definitions would not only be beneficial for trade purposes, but it would also help to avoid overproduction and unnecessary waste.

- Q15. Wet wipes marketed as 'natural', 'biodegradable' or 'plastic free' may be made from polymers which have undergone chemical extraction, processing and refinement processes. Do you think wet wipes marketed in this way should be considered 'plastic free' and excluded from the proposed ban? For each material, please explain why:
- d. Viscose (usually derived from wood) <Yes with reason/no with reason/I am not sure>
 - e. Lyocell (a semi synthetic cellulose fibre) <Yes with reason/no with reason/ I am not sure>
 - f. Cotton (reconstituted cotton fibres) <Yes with reason/no with reason/ I am not sure>
 - g. Other <open text box>

CTPA is the Trade Association representing the UK cosmetics industry. Article 2 of the UK Cosmetics Regulation includes the legal definition of a cosmetic product. Article 2(a) defines a 'cosmetic product' as:

“any 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”

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 'fabric' will be classed as a cosmetic and must adhere to the strict UK Cosmetics Regulation. CTPA members that have moved away from plastic in cosmetic wipes, have transitioned to materials such as viscose and lyocell in line with the SUPD. Many members of CTPA have requested harmonised alignment with this position across the whole of the UK.

With regards to 'free from' claims, the [European Commission's Technical Document on Cosmetic Claims](#) presents a collection of best practices, providing guidance for the case-by-case application of the Common Criteria. The Technical Document is not legally-binding and does not reflect an official position of the European Commission. However, it reflects a common understanding of national competent authorities who may apply the guidance given in the document. Annex III of the Technical Document looks at how the six Common Criteria apply to 'free from' claims.

Exemptions

- Q16. To what extent do you agree with the following statement, “I/my organisation supports an exemption for plastic-containing wet wipes that are used in hospitals and have certain clinical and/or medical uses”?
- Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - I don't know
- Q17. To what extent do you agree with the following statement “I/my organisation supports an exemption for plastic-containing wet wipes in certain industrial and professional uses (business to business sales only)”?
- Strongly agree
 - Agree
 - Neither agree nor disagree
 - Disagree

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- e. Strongly disagree
- f. I don't know

Q18. Please explain your answers to Q16 and Q17, referring to specific evidence as much as possible.

Wipes intended for uses other than cosmetic, as defined under Article 2 of the UK Cosmetics Regulation are not within CTPA's remit.

Manufacture, supply and sale of wet wipes

Q23. If you are a manufacturer of wet wipes containing plastic, where are your UK production facilities based? (Select all that apply)

- a. England
- b. Scotland
- c. Wales
- d. Northern Ireland
- e. Not applicable

Q24. If you are a retailer and/or distributor of wet wipes containing plastic, where in the UK do you sell/supply and in what proportion between England, Scotland, Wales, and Northern Ireland?

N/A

Q25. Does your business/organisation currently manufacture, supply, sell or frequently use wet wipes? (Select all that apply)

- a. Manufacture
- b. Supply/sell to businesses / organisations
- c. Supply/sell to consumers
- d. Frequently use
- e. Other (please specify below) - CTPA represents manufacturers, suppliers and sellers of cosmetic wipes to consumers and other organisations.

Q26. (If manufacturer) What proportion of plastic-containing wet wipes do you supply/sell annually to retailers and what proportion to wholesalers? Please give your figure as a percentage if possible.

N/A

Q28. Approximately what proportion of these wet wipes your organisation / business manufactures, supplies/sells or frequently uses contain plastic? If possible, please give your figure as a percentage, and indicate for each percentage whether you are referring to manufacture, supply/sale or frequent use. State "Unsure" if you do not have information on this.

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Market composition

Q36. Do you agree with the turnover market split for ONS categories "G: wholesale and retail trade; repair of motor" and "C: Manufacturing" respectively to estimate the split of business size by number of employees¹?

To estimate the market share held by businesses of different sizes we use the turnover data by SIC codes published by the Office for National Statistics (ONS). The proportion of turnover by "G: wholesale and retail trade; repair of motor" can be used as a proxy for the market share split of wet wipe retailers/wholesalers and "C: Manufacturing" turnover split can be used as a proxy for the market share split of wet wipe manufacturers. This market split is displayed in the table below.

UK Market share by turnover	Employment size band			
	Micro (0–9 employees)	Small (10–49 employees)	Medium (50–249 employees)	Large (250 or more employees)
G : Wholesale and retail trade; repair of motor	12%	17%	20%	50%
C : Manufacturing	5%	9%	18%	68%

- a. Yes, the market split looks appropriate
- b. No - please expand with what you think would be more appropriate <open text box>
- c. Don't know

¹[Enterprises by employment and turnover size - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)
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Q37. The following 4-digit Standard Industrial Classification codes by the Office for National Statistics² have been identified by Defra as businesses that may be impacted by a ban on wet wipes containing plastic wet wipes.

- 2229: Manufacture of other plastic products
- 4649: Wholesalers of other household goods
- 4673: Wholesale of wood, construction materials and sanitary equipment
- 4711: Retail sale in non-specialised stores with food, beverages or tobacco predominating
- 4719: Other retail sale in non-specialised stores
- 4774: Retail sale of cosmetic and toilet articles in specialised stores

Do you agree that these business sectors are those that are likely to be impacted?

- a. Yes, these codes look suitable
- b. Yes, these sectors are likely to be impacted
- c. No, these sectors are not likely to be impacted. If so, what else should be included/excluded?
- d. I don't know

²<https://www.ons.gov.uk/methodology/classificationsandstandards/ukstandardindustrialclassificationofeconomicactivities/uksic2007>