

## Scottish Consultation on Water, Wastewater and Drainage Policy

**22. To what extent do you agree or disagree that more should be done to stop items being disposed of down toilets or drains?**

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

**23. How do you think we can change behaviours to avoid the disposal of substances or matter in the toilet/sewer (e.g. wet wipes, cotton buds, nappies and hygiene products etc.)?**

[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 Wet Wipes**

Cosmetic 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. Cosmetic wipes have become essential to today's hygiene practices. Some people with certain medical conditions rely heavily on wet 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 toilet wipes, the liquid on the wipe fabric is classed as a cosmetic and must adhere to strict UK cosmetics safety laws (the [UK Cosmetics Regulation](#)).

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. There is no evidence to suggest that moist toilet wipes that have passed a verified flushability specification contribute to sewer blockages.

### **Mandatory, Harmonised On-Pack Labelling**

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 believes that it is fundamental that consumers are encouraged to dispose of their cosmetic wipes correctly and 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. CTPA would also emphasise 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.

CTPA is aware of the 'Fine to Flush' specification, a Water UK industry initiative, and that the global organisation representing non-woven industries, EDANA, has a 'Do not Flush' logo supported by a specification for flushability (GD4). CTPA supports consistent and easy-to-understand labelling on all wipe products indicating how the wipe should be disposed. Therefore, cosmetic wipe packaging should either contain the 'Do Not Flush' symbol if they are to be disposed of via household waste or another symbol to signify verified flushability where this has been achieved.

If any actions are introduced, including labelling, 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 have already adapted business practices to the new UK requirements post-Brexit and are now coping with supply chain issues, and high energy prices, as well as having negative environmental impacts associated with unnecessary disposal.

CTPA would also support its members in the need for any labelling requirements to apply to all equivalent products being placed on the market, whether domestic or imported.

### **Biodegradability**

Flushability and biodegradability are two separate characteristics; however, consumers may misunderstand "biodegradable" claims on wipes to mean that a product can be safely flushed. This is not the case.

CTPA would support a UK-wide consultation on biodegradable claims.

In case of any changes to labelling requirements, sufficient implementation times must be in place to allow businesses adequate time to make changes to packaging. CTPA would also like to emphasise that any packaging that has been manufactured before regulatory changes take effect, should not be required to be withdrawn from the market. Packaging/products manufactured in advance of deadlines should be allowed to continue to be sold with no time limit, to avoid unnecessary waste.

### **Awareness Campaigns**

While 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 needed to help deliver the message on what is considered suitable, and acceptable, for flushing.

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 would be pleased to work with the Scottish Government and the Devolved Nations on a UK-wide education campaign and would welcome further engagement on this important topic.

25. We currently undertake some monitoring of pollutants, do you agree that we should extend our monitoring of wastewater to look for new pollutants, and monitor pathogens in the community?

- Strongly agree
- Agree
- **Neither agree nor disagree \*Please see CTPA's supporting document**
- Disagree
- Strongly disagree

## CTPA Supporting Information Q25

[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.

CTPA is pleased for the opportunity to contribute to this important consultation on water, wastewater and drainage policy; however, with regards to Question 25 on the monitoring of wastewater, CTPA would like to provide some additional information.

CTPA believes that it is critical that in any review into the monitoring of wastewater to look for new pollutants, there must be a clear, scientifically sound definition of pollutant, and one which ensures that any pollutants that successfully break down in, or are already treated by, existing sewer treatment facilities, are not in scope of any additional actions that may be taken forward as a result of the review. Furthermore, when deciding on what course of action to take, it is essential that both the possible harm to the environment and human health, as well as the socio-economic costs of any proposed actions, are taken into consideration when deciding on an appropriate and proportionate course of action.

If the Scottish Government decides to proceed with a review into wastewater monitoring, CTPA would welcome a separate consultation which allows stakeholders to comment in greater detail.

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