

Call for Evidence: Independent Commission on the Water Regulatory Sector System

[CTPA](#), the Cosmetic, Toiletry and Perfumery Association, is the Trade Association representing the UK's cosmetics and personal care industry. [Membership](#) covers an estimated 85% of the UK cosmetics and personal care market by value, which in 2023 was £9.5bn, 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 welcomes the opportunity to contribute to the consultation on the Water Regulatory Sector System and would like to highlight the significant role of water throughout the cosmetics supply chain, as well as the importance of maintaining a healthy water environment and ensuring a sustainable water supply.

Resilient and Reliable Water Supply for Businesses

Water is intrinsically linked to the cosmetics industry, playing a crucial role at every stage of the product lifecycle, from raw material cultivation, to manufacturing, formulation, and consumer use. A reliable and high-quality water supply is essential, not only for the production process, but also for ensuring the safety, performance, and functionality of cosmetic products.

Many cosmetic ingredients, such as botanical extracts, essential oils, and plant-based ingredients, rely on agriculture. Adequate water supply is essential for growing these raw materials, ensuring consistent quality and availability. Shortages or poor water quality can affect crop yields and, in turn, disrupt the supply chain for key ingredients.

Furthermore, water is essential in cosmetic manufacturing, serving as both a key ingredient in products, and a necessity for cleaning and sanitising equipment. In many cases, particularly where used as an ingredient, high-quality water is required to meet strict safety and hygiene standards, ensuring that products are free from contaminants and safe to use. Whilst innovation has led to alternative hygiene procedures and the development of some waterless product formats, such as shampoo bars, or concentrated products that contain less water, many products still rely on water as a fundamental component, so a reliable supply of water to businesses is essential.

Water also plays a significant role in the consumer use phase for many cosmetic products; for example, products that are used in a bathroom setting and require water for application and rinsing. In February 2022, CTPA commissioned research that found that 84% of people feel that using toiletries for cleanliness and personal hygiene was important for their self-esteem, demonstrating that these types of products are essential for consumer wellbeing. Given the importance of cosmetic products, and the importance of water across the entire cosmetics supply chain, ensuring a consistent, sustainable, and high-quality water supply, is critical for cosmetics manufacturers and consumers alike.

Cosmetic Wet Wipes

Cosmetic wet wipes offer convenient and essential cleaning solutions for a wide range of consumers, from babies to adults, whether at home, in social care settings, or on the move. They have become a vital part of modern hygiene practices. For individuals with certain disabilities or medical conditions, wet wipes play a crucial role in maintaining hygiene, especially when mobility is limited.

The Cosmetic Toiletry and Perfumery Association Limited

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, such as EDANA’s GD4 flushability specification for non-woven products, contribute to sewer blockages.

CTPA has always supported the move away from plastic in wipes and welcomes the upcoming UK-wide ban on wipes containing plastic; many of CTPA’s members have already transitioned away from using plastic in cosmetic wipes. However, removing plastic from wipes will not resolve the issue of improper disposal through toilets, which can contribute to blockages and environmental pollution. CTPA would support targeted action on labelling, misleading biodegradable claims, and consumer awareness campaigns, as detailed below.

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 problems this causes and believes it is essential to encourage consumers to dispose of cosmetic wipes correctly. Clear and consistent on-pack labelling is crucial to inform consumers whether a product can be flushed or should be disposed of with household waste.

During Recycle Week 2022, CTPA launched a [bathroom campaign](#) aimed at educating consumers about bathroom recycling and the rules for disposing cosmetic wipes. To support consumer understanding, cosmetic wipe packaging should display an appropriate label if intended for disposal via household waste, or a verified flushability symbol where applicable. In 2023, the Department for Environment, Food and Rural Affairs (Defra) sought detailed information on wipes in preparation for its response to the consultation proposing to ban wipes containing plastic. CTPA engaged with its members that manufacture or market non-flushable wipes to determine whether on-pack labelling was provided; all of those that provided a response confirmed that they voluntarily label their products to indicate that they should not be flushed.

For companies that do not voluntarily label their products, if new labelling requirements for wipes were introduced, sufficient implementation times must accompany any new measures, and products already placed on the market should not be required to be withdrawn. Imposing retrospective changes would increase costs for companies, who are already faced with increased operational costs, while also causing unnecessary environmental waste. CTPA would also emphasise the need for harmonised requirements across the UK, to minimise administrative burdens, enhance supply chain efficiency, and reduce costs. Any labelling requirements should also be applied consistently to all equivalent products on the market, whether produced domestically or imported.

Biodegradability

Biodegradability and flushability are two separate properties; however, CTPA understands that some consumers misinterpret “biodegradable” claims on wipes as an indication that they can be safely

flushed. This is not the case, and CTPA would support a UK-wide consultation on biodegradable claims in relation to wipes.

If, however, companies were required to make changes to their labelling, sufficient implementation times must accompany any new measures, and products already placed on the market should not be required to be withdrawn. Products manufactured in advance of compliance deadlines, should remain available for sale indefinitely to prevent 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.

As previously highlighted, during Recycle Week 2022, CTPA launched a [bathroom campaign](#) aimed at educating consumers about bathroom recycling and the rules for disposing cosmetic wipes. CTPA would be pleased to work with the four nations on a UK-wide education campaign and would welcome further engagement on this important topic.

Monitoring for Pollutants

CTPA recognises the importance of monitoring for potential pollutants to enable necessary action in reducing environmental pollution. However, any review of wastewater monitoring must be based on a clear, scientifically sound definition of "pollutant." This definition should exclude substances that effectively break down, or are already treated by existing sewer treatment facilities, from the scope of additional regulatory measures. Furthermore, once a substance is identified, there must be clear evidence that the substance meets the definition, and that it can be technically or feasibly removed. Any policy or legislative action introduced must be based on robust science.

The cosmetics industry strives to act responsibly. A key example of the industry proactively addressing an emerging issue is the use of per- and polyfluoroalkyl substances (PFAS). The use of PFAS in cosmetics is limited; according to a 2021 CTPA membership survey, only nine substances were identified in cosmetic and personal care products, and PFAS-free alternatives are now widely used to achieve the same product benefits, so their presence is becoming increasingly rare. However, Cosmetics Europe [has recommended](#) a full phase-out of intentionally added PFAS in products sold in the EU, EEA, and UK, by 31 December 2025. This recommendation, developed in collaboration with CTPA and its members, reflects a shared commitment to responsible product stewardship. CTPA fully supports this initiative, which is applicable to the UK, and members are actively working towards achieving this goal.

Another example of the industry's proactive approach can be seen with plastic microbeads. The UK's ban on manufacturing rinse-off cosmetic products containing plastic microbeads took effect on 9 January 2018; however, the cosmetics industry had already taken voluntary action in 2015 to remove plastic microbeads from rinse-off products across Europe, resulting in their phase-out from most products before the ban was officially implemented. The ban was, however, still welcomed, as it ensures all companies are legally prohibited from including plastic microbeads in rinse-off products.

Regarding microplastics, the contribution from cosmetic products is already very low; however, the EU REACH restriction published in August 2023 will lead to an even greater reduction in their use

within cosmetics. Defra has also carried out an evidence-gathering project to support potential regulatory measures under UK REACH, with outcomes expected in 2025.

When determining appropriate actions in relation to potential pollutants, it is essential to consider both potential environmental and human health risks, as well as the socio-economic impact of proposed measures, to ensure a balanced and proportionate approach.

Summary

CTPA appreciates the opportunity to contribute to this Call for Evidence and would again like to emphasise the essential role of water throughout the cosmetics and personal care supply chain. A resilient and high-quality water supply is vital for ingredient cultivation, manufacturing, and consumer use.

While the industry supports measures to reduce environmental impact, including clear labelling for wipes, educating consumers on responsible disposal of wipes, and ongoing monitoring of pollutants in wastewater, any regulatory changes must be scientifically justified, proportionate, and allow for practical implementation timelines. CTPA remains committed to collaboration with policymakers, to ensure that regulatory frameworks support both environmental sustainability and business viability, while maintaining consumer access to essential products.