

Tackling Scotland's Throwaway Culture Introducing Market Restrictions on Problematic Single-Use Plastic Items in Scotland Public Consultation

Overview

<i>General Comments</i>
<p>Scottish Water strongly supports introducing market restrictions on the single use products as this would reduce the likelihood of them entering the sewerage system. and the impact of littering in Scotland, which currently costs £78m per annum to address</p> <p>Scottish Water would welcome discussions on market restrictions in relation to wet wipes containing plastic and plastic tampon applicators and on clearer labelling of non-flushable items and extended producer responsibility. NOT SUBMITTED AS ALREADY MENTIONED IN BODY OF RESPONSE</p>

Detailed Response

Specific Comments
<p>Scottish Water strongly supports the consideration of market restrictions on wet wipes containing plastics and on plastic tampon applicators. These items are inappropriately flushed into the sewer system, despite many being labelled as 'non-flushable'. Once in the sewer networks, these items can cause operational difficulties for Scottish Water and can lead to blockages, flooding and environmental pollution. Some items are small enough to pass through the treatment processes and enter the river and marine environment as sewage related debris (SRD). Plastic items that are inappropriately labelled as 'flushable' can also lead to the same problems.</p> <p>Scottish Water currently deals with around 36,000 sewer blockages each year and up to 80% of these are due to inappropriately flushed items. We would welcome further discussion in relation to clearer labelling of non-flushable items and extended producer responsibility. NOT SUBMITTED AS ALREADY MENTIONED IN BODY OF RESPONSE</p>

1a	<p>Do you support the proposal to introduce a restriction on the supply by businesses in a commercial capacity in Scotland on each of the single-use plastic items listed and all oxo-degradable products? YES/NO</p>
	<p>Single-use plastic cutlery (forks, knives, spoons, chopsticks) YES Single-use plastic plates (plates, trays/platters, bowls) YES Single-use plastic straws YES Single-use plastic beverage stirrers YES Single-use plastic balloon sticks YES Single-use food containers made of expanded polystyrene YES Single-use cups and other beverage containers made of expanded polystyrene, including their covers, caps and lids YES All oxo-degradable products YES</p>

1b	Please give reasons and where possible provide evidence to support the view expressed in response to Question 1(a).
<p>Litter deposited on the land can be picked up by rainwater and flow into the aquatic environment and may be carried into the sewerage system. Scottish Water therefore supports introducing market restrictions on the single use plastic product types identified above since this would reduce the likelihood of litter entering the sewerage system and causing problems and would also reduce the impact and costs of littering in Scotland. Scottish Water supports the ban on Oxo-degradable products since these break down to form microplastics.</p>	
1c	Do you support the introduction of a restriction on the supply in a non-commercial capacity (rather than only in the course of commercial activity) of the specified single-use plastic and oxo-degradable items? YES/NO
<p>Yes. Scottish Water supports this proposal to restrict the supply of the above items.</p>	
1d	Do you support the introduction of a restriction on the manufacturing of the specified single-use plastic and oxo-degradable items, excluding those for which exemptions will be introduced? YES/NO
<p>Yes Scottish Water supports this proposed restriction on the manufacturing of the above items. We consider it is inconsistent that the items subject to market restrictions should be manufactured in Scotland to be exported elsewhere as these could cause further littering issues in other countries.</p>	
2	<p>To your knowledge, are any of the oxo-degradable products identified in this document present on the Scottish market? Are there any additional oxo-degradable products available on the Scottish market that we have not identified?</p> <p>Please provide evidence to support your answer.</p>
<p>Scottish Water has no comment</p>	
3	The SUP Directive includes limited exemptions for single-use plastic straws and balloon sticks. Are there other exemptions we should consider in relation to the market restrictions being proposed? YES/NO
<p>No. To support reduction of SUP items and possible release to the environment, exemptions should be limited by a specific defined set of criteria.</p>	
4	How can we make sure disabled people have access to plastic straws if they require them for medical reasons or to support independent living, whilst at the same time restricting wider access for environmental purposes in a way that fulfils the SUP Directive requirements?
<p>Scottish Water has no comment</p>	
5	This consultation highlights other items that the Scottish Government intends to consider market restrictions for in future (plastic wet wipes, plastic tampon applicators and those other products contained in the UK

	<p>Plastics Pact's list of items to be eliminated by end of 2020 which are not currently subject to existing or proposed market restrictions). Would you support the consideration of market restrictions on these items or any other items we haven't listed?</p> <p>Please provide reasons and evidence where possible.</p>
<p>Scottish Water strongly supports the consideration of market restrictions on wet wipes containing plastics and plastic tampon applicators because these are often inappropriately flushed into the sewer system, despite many being labelled as 'non-flushable'. Once in the sewer networks, these items can cause operational difficulties for Scottish Water and can lead to blockages, flooding and environmental pollution. Some items are small enough to pass through the treatment processes and enter the river and marine environment as sewage related debris (SRD). Plastic items that are inappropriately labelled as 'flushable' can also lead to the same problems.</p> <p>Wet wipes containing plastic</p> <p>Scottish Water considers that wet wipes containing plastic should be included in future proposals for further market restrictions. A Water UK article identified that wet wipes make up 93% of the material causing sewer blockages and that sewer blockages cost customers in the UK £100m in 2017(https://www.water.org.uk/news-item/new-proof-that-flushing-wipes-is-a-major-cause-of-sewer-blockages/).</p> <p>These wipes are not designed to be flushed. Approximately 300,000 properties suffer sewer flooding caused by blockages every year in the UK, creating impacts on customers and generating clean-up costs for homeowners and for businesses. When wet wipes combine with the fats, oils and grease that are often inappropriately disposed of to the sewerage system, these can cause significant 'fat bergs' which may completely block sewers.</p> <p>Scottish Water has to deal with approximately 36,000 chokes in the sewerage system on an annual basis of which 80% are caused by items inappropriately flushed down the toilet. These items can also cause operational difficulties at pumps and at the wastewater treatment works and release sewage related debris to the environment.</p> <p>The majority of wet wipes sold in the UK contain plastic. Wet wipes containing plastic are commonly made of polyester and polypropylene and the plastic parts can take up to 500 years to breakdown in a landfill (https://zerowasteurope.eu/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf)</p> <p>Wet wipes cause persistent blockages and impact on the environment. Wet wipes containing plastic will breakdown to form microplastics impacting the environment. A market restriction on wet wipes containing plastic would significantly reduce sewer blockages and the release of plastic to our environment.</p> <p>Plastic tampon applicators</p> <p>Scottish Water considers that single use plastic tampon applicators should be banned as these are often wrongly flushed down the toilet. An increasing number of brands make tampon applicators out of cardboard and plastic applicators could be easily substituted for biodegradable alternatives.</p>	

6	Taking into account the accompanying Impact Assessments, can you identify any environmental, economic or social impacts we have not identified when developing the proposals contained in this consultation? YES/NO
No.	
7	Do you believe the COVID-19 pandemic has resulted in changes to the market or wider economy not fully accounted for through this consultation? YES/NO
<p>Yes.</p> <p>As a result of Covid 19, the Marine Conservation Society has identified that wet wipes are increasingly being littered in the terrestrial environment.</p> <p>The Marine Conservation Society Inland Source to Sea Litter Quest data 2020 shows a presence of masks and gloves, with more than two thirds (69%) of litter picks across the UK finding PPE items. Scottish Water considers the marking requirements under Article 7 should also be extended to these products.</p>	
8	Do you have any other comments that you would like to make, relevant to the subject of this consultation, not covered in your answers to other questions?
<p>Scottish Water would like to be considered as a key stakeholder in how the remaining Directive Articles should be implemented.</p> <p>Clearer labelling on non-flushable plastic products</p> <p>In addition, Scottish Water looks forward to wider discussion on Article 7 of the Directive covering the Reduction of the Impact of Certain Plastic Products on the Environment which sets out marking requirements. Clearer marking will help inform consumers that a product contains plastic, that it should not be flushed down the toilet and that the product will harm the environment. Article 7 applies to sanitary towels (pads), tampons, tampon applicators and wet wipes, i.e. pre-wetted personal care and domestic wipes. Scottish Water considers that labelling should also apply to plastic backing strips, wrappings and should include incontinence products and other items inappropriately flushed down the toilet.</p> <p>Scottish Water considers that implementation of Article 7 across the EU and in the UK is essential to reduce the quantity of items wrongly flushed down the toilet. Having a consistent label message throughout many countries will make the message easier to recognise and to be more impactful. This labelling allows consumers to make an informed choice on which product to purchase and how it should be responsibly disposed of. Labelling needs to be of a suitable size and on the front of packaging so that customers are clearly able to read these.</p> <p>Extended producer responsibility</p> <p>Scottish Water considers that Article 8 (3) covering extended producer responsibility (EPR) should be implemented in relation to wet wipes as this would encourage</p>	

manufacturers to produce products to a standard that will not cause blockages within the sewerage system. Introducing EPR would reduce the frequency of blockages and the risk of flooding and environmental pollution and the cost of clean-up operations ultimately placed upon the customer through increased charges.

Scottish Water proposes that products that have met the WRc “Fine to Flush” standard should be exempt from EPR. The WRc “Fine to Flush” standard means that it does not contain petro chemical derived plastic fibres and that it has passed a stringent set of tests to prove that it will not cause a choke within the sewerage system. Details of the WRc standard can be found at:-

<https://www.water.org.uk/wp-content/uploads/2019/01/Fine-to-flush-WIS-4-02-06-January-2019.pdf>

Awareness raising

Scottish Water is committed to raising awareness of the environmental impact risk and financial cost caused by flushing inappropriate items down the toilet. Only pee, poo & toilet paper (3Ps) should be flushed to protect customers from sewer blockages and to protect the environment. SW has for several years engaged customers in a high profile campaign to exercise responsible behaviour around 3Ps, however further changes to behaviour are needed to continue to have any impact in addition to the restrictions proposed.

Where alternative materials to plastic are available, it is important to maximise the use of these, to reduce single use items, minimising the risk to the environment and reducing the quantity of products disposed of to landfill. Reducing the number of blockages through market restrictions, labelling, EPR and substituting biodegradable material for plastic will all help reduce our impact on the environment.

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