

# Anglian Water's response to the call for evidence on commonly littered and problematic plastic items

10.02.2022

## Wet wipes

6. Would you support a ban on wet wipes containing plastic? You will be asked about possible exemptions in the following questions.

- **Yes**
- **No**
- **Don't know**
- **Please give reasons and supporting evidence. Blank text box**

Yes, we support a ban because plastic wet wipes cause blockages in the sewer network, are costly to remove and end up damaging the environment. Pollution should be addressed at source and not allowed to enter the environment.

Anglian Water serves the largest water company region in England, covering 20% of England's landmass, and is one of the most vulnerable to the impacts of climate change. Our purpose as a water company, enshrined in our Articles of Association, is *to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop*. A ban on wet wipes containing plastic has a direct link to our purpose as it would significantly reduce blockages in our sewerage system which would help minimise flooding in the region as well as protect our rivers and local environment from plastic pollution.

We believe the problem of plastic pollution should be addressed at its source; we therefore agree with Fleur Anderson's Wet Wipe Bill and have written to all MPs in the Anglian Water region encouraging them to vote in favour of it to prevent blockages in the sewers in their constituencies at the appropriate time.

Our recent 'Flush to Treatment' project in Southend-on-Sea helped us to understand the items flushed down the toilet which cause repeated blockages in the area. Our specialist team used CCTV cameras to assess the sewer pipes, and then removed 460 tonnes (the same weight as 4.5 blue whales) of unflushables and other waste from an area serving just 180,000 people. We sent samples of what we removed to be analysed, and it was no surprise to find that the main culprit was wet wipes containing plastic fibres, accounting for 85% of the material by weight together with sanitary products and other single-use items.

Following the Flush to Treatment cleansing of the pipes in Southend-on-Sea we observed a 72% drop in reactive work we normally receive in the area. During the monitoring period no pollutions or flooding was recorded. Before the pipes were cleared the area would normally suffer from hydraulic overload, since the clean the system has handled 12 heavy wet

weather events and has operated as designed. This project costed approximately £400k to deliver, so although successful, it will always be more cost effective to stop the pollution at source rather than having to remove it later down the line.

In another study, a 'skip autopsy' of unflushable material arriving at our Newmarket Water Recycling Centre found that wet wipes containing plastic fibres accounted for the majority of items wrongly flushed and 80% of these contained plastic. The study also estimated that of the 11 billion wipes sold in the UK each year, roughly 2.5 billion are wrongly flushed away. Therefore, based on this clear evidence we believe that a ban on wet wipes containing plastic is critical.

**7. In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces. You will be asked about additional exemptions in the next question.**

- Yes
- **No**
- Don't know
- Please give reasons and supporting evidence. Blank text box

No, we do not believe there is sufficient evidence to justify exemptions. Plastic free or fine-to-flush wipes can do the same job with less harm to the water networks and the environment.

It is never acceptable to flush wet wipes containing plastics down the toilet. We are opposed to all and any flushing of any wet wipes which don't meet the 'fine to flush' standard. Those containing plastic and used for medical purposes should always be binned in a bin designed to take medical waste, never down the toilet.

We appreciate that in some instances, such as when caring for someone, it can be difficult to do the right thing with wipes, which is why if someone requires a wipe to be flushed, they should purchase a wipe that meets a flushable standard, and which does not contain microplastics.

Manufacturers and government should make it as easy as possible for consumers who use wipes to purchase fine-to-flush wipes. There are already some on the market, and most supermarkets and manufacturers are working towards producing their own flushable wipes. But this shift would happen much faster if plastics in wipes were banned outright.

**8. As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation? Please give reasons and provide supporting evidence.**

- Yes
- **No**
- Blank text box

**9. Are you aware of the water industry's Fine to Flush standard?**

- **Yes**
- **No**

**10. If you answered yes to question 9, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?**

- **Yes**
- **No**
- **Don't know**
- **Please give reasons and supporting evidence. Blank text box**

No because the current uptake is not big enough to improve the issues with our sewers. The 'Fine-to-Flush' standard would be effective if it were made mandatory.

Since it was established by Water UK there has only been a small number of manufacturers who have had products accredited. Supermarkets and manufacturers are beginning to produce their own wipes without plastic in them, but this would be more beneficial if it were aligned, and all used the same accreditation.

Anglian Water wrote in a letter to all MPs in our region supporting Fleur Anderson's Bill to ban plastic in wet wipes, we would very much like to see the government move to ban plastic in wet wipes and **make the 'Fine-to-Flush' standard mandatory.**

However, we realise that saying something is fine-to-flush could encourage more of the behaviour of throwing things down the toilet. The message should still be to only flush 3 Ps down the toilet (pee, poo and paper), but if someone must use a wipe for personal care and dispose of it down the toilet then they should always look for the Fine-to-Flush standard.

**11. Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?**

- **Yes**
- **No**
- **Don't know**
- **Please give reasons and supporting evidence. Blank text box**

Yes, there should be a mandatory flushable standard and the Water UK Fine-to-Flush standard should be used. There is already an established testing and accreditation process for the 'Fine-to-Flush' standard and it has the backing of the water sector.

Not all water companies support Fine-to-Flush because they only promote the do not flush message. Some believe that all wipes should be binned, and this should be the only message. But our line at Anglian Water has always been since it was introduced that if you must flush a wipe, you must choose those that have reached the Fine-to-Flush standard.

**12. Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?**

- **Yes**
- **No**
- **Don't know**
- **Please give reasons and supporting evidence. Blank text box**

Giving consumers more information (for example, telling them NOT to flush wet wipes down the toilet) to drive behaviour change would be a huge benefit to the health of our sewerage systems in the UK.

Labelling should also be clear, identifiable, and easily visible (this means not hidden in the small print on the back of a product).

However, as stated above, we appreciate the potential mixed messaging of saying something is Fine-to-Flush when message should still be to only flush 3 Ps down the toilet (pee, poo and paper).

In addition to clear labelling, we would like to see bins made available in all public toilets (men's and women's), so that there are always alternatives to throwing rubbish and sanitary items in the toilet.

Also, there are other plastic items which are relevant to this debate which we would like to see considered by the government, such as sanitary products. These such products combine with fats, oils, grease, and food waste, to cause blockages in the sewage networks. Therefore, we would like to see the government considering the labelling of sanitary products, but also oil bottles to clearly state they should not be flushed down the toilet.

**13. Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?**

- **Yes**
- **No**
- **Don't know**
- **Please provide suggestions for how this might operate. Blank text box**

Yes, we would support producers taking responsibility for whole life cycle of the items they produce.

No less than 3,000 tonnes of what we call "rag" is raked out of Anglian Water's Water Recycling Centres every year. According to Water UK, 93% of rag is made up of wet wipes and other single-use plastics like sanitary products. This includes tampons, tampon applicators, and sanitary towels (the average pack of towels contains the equivalent of five shopping bags of plastic), and tampons can be as much as 10% plastic. We worked with manufacturers to 'ban the stick' - plastic sticks in cotton buds and change to cardboard - as although only small, these cause blockages too.

Anglian Water spend in the region of £19million of customer's money clearing blockages in our sewers every year. Fatbergs caused by wet wipes and sanitary items combining with fats, oils and grease cause 80% of the 40,000 blockages we clear annually.

The manufacturer could be responsible for paying for the following:

1. The removal of blockages from the sewage network which are caused by their items.
2. The disposal of the 'rag' which we remove during the water recycling process and pay to send to landfill.
3. Wet wipes and other products being cleaned-up from environment.
4. Behavioural change campaigns to raise awareness of the message to only put the 3Ps down the toilet or fund the promotion of cloth baby wipes.

Building on the 'skip autopsy' study referred to in question 6 above, the UK Water Industry Research (UKWIR) body is tendering a piece of research "to identify and quantify streams of plastics items the water industry receives and how best to tackle plastics through source control" (<https://ukwir.org/research-projects-water-wastewater-industry>). Given the expected timescales for this work the results should be reported towards the end of 2023.

**14. What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.**

- Yes
- No
- **Don't know**
- **Please give supporting evidence on the cost and environmental impact. Blank text box**

Wet wipes can be manufactured without plastic. There are already products on the market which have achieved the Fine-to-Flush standard. These should be used as an alternative. It is important to note however that it is always preferable for wet wipes to be disposed of in a bin rather than a toilet.

Reusable options instead of wet wipes do exist as well and were used in the past – e.g., flannels, cloth baby wipes, reusable sanitary towels, period pants and menstruation cups and discs.

## **Tobacco Filters**

**15. Do you support the government taking regulatory action to tackle littering of tobacco filters?**

- **Yes**
- No
- Don't know
- **Please give reasons and supporting evidence.**

**16. If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing littered tobacco filters, if any, do you think should be covered by producers?**

- **a. campaigns aimed at promoting responsible disposal**
- **b. provision of bins and management of binned filters**
- **c. clearing up ground litter and subsequent treatment**
- **d. data gathering and reporting**
- e. none
- f. Other, please specify Please give reasons and supporting evidence.

**17. Are there other regulatory approaches that government should consider? Please give reasons and supporting evidence.**

N/A

**18. What are the financial costs of managing waste tobacco filters? Please give supporting evidence including quantified data where possible.**

At Anglian Water we fund the RiverCare and BeachCare Programme, a partnership programme with Keep Britain Tidy, where community volunteers adopt a stretch of river or beach and collect litter (<https://www.rivercare.org.uk/home/2773>). Cigarette butts are one of the most common forms of litter collected. We would like to see producers and tobacco companies paying charities such as these to pick up their disposed of products.

Across 28 groups and since June 2020 our RiverCare and BeachCare volunteers have collected 15,737 plastic bottles, 21,855 cans with 3,091 bags of litter filled. The number of times other key litter items were mentioned from a total of 750 submissions is as follows; rope, net and line 157, balloons 36, masks 359, PPE 296, cotton buds 52, wipe 72 and cigarette butts 159.

**19. What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal? Please give supporting evidence.**

N/A

**20. What are the environmental impacts of tobacco filters made from alternative materials to cellulose acetate, including those associated with inappropriate disposal? Please give supporting evidence.**

Tobacco filters littered on the ground find their way into surface water drains and combined sewers. Meaning that they are often put straight back into the environment as surface water drains are not treated and in significant rainfall events combined sewers overflow into water courses.

**21. What are the environmental impacts of smoking alternatives such as heated tobacco, disposable e-cigarettes, vape pods and oral nicotine pouches, including those associated with inappropriate disposal? Please give supporting evidence.**

N/A

**Single-use plastic sachets**

**22. What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?**

Many single use items end up in the sewer systems. Preventing any and all plastic litter from entering the water ways is a priority for the water sector. Any small plastic items littered on the ground find their way into surface water drains and combined sewers. Meaning that they are often put straight back into the environment as surface water drains are not treated.

As a water company maintaining the sewage network, we have repeated problems with food service establishments where we see all sorts of plastic waste and FOG (fats, oils and grease) ending up in the sewers. We are also aware that plastic waste of this kind will have increased as a result of the Covid pandemic causing people to switch to single-use items, such as single-use plastic sachets, on the grounds of reducing handling a ketchup bottle for example.

As part of the quantification and categorisation of plastic items for the skip autopsy project at Newmarket Water Recycling Centre (referenced in a previous questions) we have evidence of instances of small items such as ketchup bottle lids entering the sewerage system. So, these small items are finding their way into the sewers any into our sewerage treatment works.

**23. Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?**

N/A

**24. Do you support consulting on introducing a ban of single-use plastic sachets used for:**

- a. Food and drink: permanent food outlets including restaurants and cafes, and sachets provided with ready meals
- b. Food and drink: mobile outlets including trains, airplanes, food trucks
- c. Beauty industry: providing free samples at the point of sale or single-use quantities provided within a multipack
- **d. Support all of the above**
- e. Do not support any of the above
- f. Please give any evidence to support your views

**25. Do you support consulting on introducing a charge on single-use plastic sachets used for:**

- a. Food and drink: stationary outlets including restaurants and cafes
- b. Food and drink: mobile outlets including trains, airplanes, mobile food vendors
- c. Beauty industry: providing free samples at the point of sale
- **d. Support all of the above**
- e. Do not support any of the above

- **f. Please give any evidence to support your views**

**26. Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?**

Sachets which contain screen wipes, e.g. for phones and computer monitors.

**27. Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?**

N/A

## **Single-use cups**

**28. Would you support the government consulting on a proposal to introduce a charge for single-use cups?**

- **Yes**
- No
- Don't know
- Please give reasons and supporting evidence.

**29. Do you think this charge should be for both hot and cold drinks?**

- **Yes**
- No
- Don't know
- Please give reasons and supporting evidence.

**30. Do you think this charge should apply to businesses of all sizes?**

- **Yes**
- No
- Don't know
- Please give reasons and supporting evidence.

**31. Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup.**

**Please give reasons and supporting evidence.**

Although we are in favour of banning single use plastic wherever possible we do acknowledge that there might be some instances, in light of the Covid pandemic, where recyclable products might be needed to prevent the spread or maintain social distancing. However, we only consider this needed in extremely rare circumstances.

We are also aware that our customers are facing cost of living challenges so provisions should be put in place to shield the most vulnerable from the cost of buying reusable or disposable items.



## **Additional items**

### **32. Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.**

We feel strongly that this conversation shouldn't end at wet wipes.

Anglian Water established and currently funds the East of England Plastics Coalition, consisting of 24 partners, across local authorities, NGOs and private businesses. In 2019 a prioritisation exercise was carried out to identify the plastic pollution considered to cause the most harm at a regional level and the top six were:

1. Clothing fibres
2. Wet wipes
3. Drinks bottles, caps and lids
4. Food containers
5. Fishing gear
6. Cigarette filters

A re-prioritisation exercise undertaken towards the end of 2021 saw cigarette filters and sanitary items become more of a priority for partners.

We acknowledge that medical products which are single items might need exemptions, for example stoma bags. But we feel strongly that the education around how to dispose of these and other products like sanitary items properly should be stronger. They should never be put down the toilet and we believe if people are aware of the impacts they would agree.

We would also like to see the conversations about fat, oil and grease (FOG) in the sewers part of this wider conversation as the plastics in question congeal with the FOG to be considered as part of the wider picture.

### **33. Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?**

Clothing fibres find their way into the sewage through the wastewater from our washing machines. This can be reduced by buying clothes from sustainable clothing brands that use natural fibres. Or more conveniently, adding fibre catchers to the washing machine bowl or washing clothes in a bag designed to catch microfibers from your wash.

There is a wealth of reusable sanitary products on the market now and they are becoming more mainstream and more affordable e.g. reusable sanitary towels, period pants, menstruation/moon cups and discs. There are also disposable options available which don't contain plastic.

## **Re-use and refill**

**In line with the waste hierarchy (priority goes to preventing the creation of waste, followed by preparing waste for reuse; to recycling, and then recovery, with disposal regarded as the worst option), we would like to see a shift away from single-use items to**

reusable or refillable alternatives. Therefore, in this section, we are scoping out views on how this could be achieved.

#### **34. What are the barriers to reuse and how could they be addressed?**

**Please provide any supporting evidence.**

We appreciate although there are reusable options for many disposable items (e.g., reusable coffee cups, straws, cloths for makeup removal etc) when it comes to using wet wipes to take care of babies reusable options are unlikely to be the most **convenient**.

Through the East of England Plastics Coalition Anglian Water is planning to work with Cambridge County Council and Ramsey Nappy Library to run a trial with new parents of reusable wipes to further explore the convenience angle.

As a reuse option might not be the most convenient for every family, we still think the Fine-to-Flush products could play a big part of the solution in these situations as they have the same level of convenience but do not harm the environment.

#### **35. What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.**

We fully support the refill campaign and, as a supplier of plastic free tap water, we fully endorse people saving their money as well as the environment and drinking tap water rather than buying hugely expensive bottled water.

Barriers to people refilling bottles of water are convenience and locating a tap. The Refill campaign tries to combat this by encouraging cafes, shops etc to put a refill sticker in their windows demonstrating that you can ask for tap water for free. We would love to see further roll out of this initiative. As an organisation we have reservations around owning and maintaining water fountains, due to the potential problems around hygiene, vandalism and maintenance, so we feel that the refill sticker scheme is the best approach.

#### **36. How can government incentivise increased reuse and refill?**

Banning single use options will always be the strongest approach to driving the use of reuse and refillable options. We support the government taking a strong approach to the problem of plastic pollution and litter.

We would like to see refills and reuse options the default and made as cheap as possible, so that they are not an elite or expensive option but are accessible to everyone. We would like to see the cheaper option always being the most sustainable, i.e., where a disposable item is needed then a premium cost would be incurred – for example the charge for plastic carrier bags.

We want to see the government continue to drive behaviour change away from disposable items. We would like to get to a point where choosing a disposable item when a refill option is available, is not socially acceptable.

The government should look to extend manufacture/ producer responsibility. Where a producer makes an item which is disposable (especially if not recyclable, such as polystyrene

or not easily recyclable like coffee cups) they should have a responsibility to see that product through its whole life to disposal or recycling. In addition, the government should be encouraging manufacturers to build things which last and can be reused many many times. Built in obsolescence should not be allowed to occur in products manufactured or sold in the UK. Producer responsibility is highlighted in the Environment Act, and we await to see what targets and measures Defra and the OEP (Office for Environmental Protection) will enforce.

### **37. How could businesses incentivise customers to support reuse and refill?**

Businesses should offer lower prices for their products which do not have a disposable element, such as coffee cups or other food containers. They could also display the cost of the item without its packaging then adding an additional cost for those people who want a disposable cup/bowl/straw etc.

Businesses can do more to communicate the negative social and environmental impacts of disposable products at point of sale. A potential way to do this could be to use evocative images of marine life or local wildlife interacting with litter could be used on disposable items to discourage their usage (like the way the harmful impacts of smoking are displayed on a cigarette packet).

### **38. Please provide information about any successful case studies of reuse and refill.**

The water industry has backed and funded the successful initiative by City to Sea to reduce the need to buy plastic bottles of water.

### **39. Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.**

- Yes
- No
- Don't know