



Consultation Coordinator
Defra
2nd Floor
Foss House, Kings Pool
1-2 Peasholme Green
YORK YO1 7PX

Anglian Water Services Ltd
Lancaster House
Lancaster Way
Ermine Business Park
Huntingdon
PE29 6XU

Tel 01480 323000
www.anglianwater.co.uk

Sent via email: packaging@defra.gov.uk

2 June 2021

Dear Sir/Madam,

Defra consultation: Extended Producer Responsibility Scheme for Packaging

We welcome the opportunity to respond to the consultation on the development of an Extended Producer Responsibility (EPR) Scheme for packaging. Our interest in this consultation relates to the serious omission of moist wipes and sanitary items from the proposals.

Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries, and includes around a fifth of the English coastline, including over 3,300 km of rivers and the UK's only wetland national park – the Norfolk Broads. We understand that managing these delicate environments requires all stakeholders to play their part, including land managers, water companies, regulators, and the public at large.

As a water company, we play a crucial role treating water and returning it back into the environment through more than 1,100 water recycling centres and through our 76,000 km of sewer pipes. However, the safe return of water to environment is too frequently disrupted by sewer blockages caused by unflushable items, with the chief culprits being wet wipes and sanitary items combining with discarded fats, oil and grease to create fatbergs. Most wipes and sanitary products on the market today contain plastic, and therefore sewer blockages and storm overflows cause plastic pollution to be released into the environment. Many wipe manufacturers continue to market their products as 'flushable' even though they have not met the water industry's ['Fine to Flush' standard](#). Wipes that are 'Fine to Flush' do not contain plastic and readily fragment in sewers. Wipes account for 95% of the material found when wastewater pumps get clogged. Genuinely flushable material accounts for less than 0.1%.

The UK water industry spends circa £100million of customers' money each year to find, clear, repair and clean up the environmental damage caused by blockages associated with unflushable wipes. In the Anglian Water region alone, we spend around £19 million every year clearing blockages, which cause a third of our pollution incidents. [Research](#) by the University of East Anglia also found that up to a quarter of the 11 billion wet wipes sold each year in the UK end up in sewers. It is difficult to put a figure on the environmental damage caused by wipes forming 'reefs' like those [on the banks of the Rover Thames](#), and being washed out to sea.



Blockages from unflushables are the single biggest cause of pollution incidents, as outlined in our [Pollution Incident Reduction Plan](#). We should not be locked into a cycle of spending customers' money on repairing the negative environmental impacts of unflushables when regulation could so effectively address the problem at source.

The first step would be to use clauses in the Environment Bill to ban from sale wipes and sanitary products that contain plastic and plastic microfibres. With modern more sustainable materials there is no need for plastic to be in these products.

The second step would be to include all wet wipes and sanitary items within the scope of EPR, in order to recover the costs of sewer repairs and environmental clean up. Sanitary products should never be flushed, and even without plastic in them, some types of heavy duty wipe will not fragment quickly enough in sewers to meet 'Fine to Flush'. Therefore, even when products containing plastic are banned, there is a need for EPR to internalise the external costs of unflushable wipes and sanitary products. Manufacturers with certified 'Fine to Flush' products would be able to exempt sales of such products from their share of cost recovery.

Applying EPR, together with a specific ban on products containing plastic, will:

- End plastic pollution caused by wipes and sanitary items.
- Encourage manufacturers of wipes capable of meeting the Fine to Flush standard to remanufacture and certify their products as soon as possible.
- Incentivise manufacturers to educate their customers and clearly label all non-Fine to Flush certified wipes and sanitary products as 'not flushable', in order to reduce the scale of environmental damage caused that has to be recovered through EPR.

Including wipes and sanitary products within EPR is wholly in line with the government's wider plans for environmental improvement. Its inclusion would align with the government's [proposed environmental principles](#), including precaution, prevention at source, and polluter pays, and ensure that these are adhered to as the Environment Bill passes through Parliament.

It also aligns with the work of Defra's Storm Overflow Taskforce and the new goal to eliminate harm from storm overflows. The inclusion of wipes and sanitary products within EPR proposals is a critical part of improving river quality, whilst delivering on the government's target to eliminate all avoidable plastic waste by 2042.

Implementing an EPR scheme for wet wipes marks a clear opportunity for the UK to signal the seriousness with which it takes its environmental obligations. It is the area where policy intervention can have a significant material impact, delivering the greatest benefit for the environment, consumers, and waterway users alike in a fair and equitable way.

We would of course welcome the opportunity to discuss this further with ministers and officials. Please do not hesitate to get it touch should you have any questions.

With every best wish,

Daniel Johns FCIWEM
Head of Public Affairs
djohns2@anglianwater.co.uk