# Friends of the Earth Cymru's consultation response

# To:

# Consultation on the proposed ban of the manufacture, supply and sale of wet wipes containing plastic

**(https://www.gov.wales/proposed-ban-manufacture-supply-and-sale-wet-wipes-containing-plastic and https://consult.defra.gov.uk/wet-wipes-1/wet-wipes-containing-plastic/ )**

a. **The likely impact of the proposed ban on the businesses who manufacture, supply or sell wet wipes containing plastic;**

We note the background information supplied to this consultation. We feel it is important to reiterate that a variety of retailers and businesses have already switched to manufacturing or stocking plastic free wet wipes. Aldi, Boots and Tesco for example have all started to stock only plastic free wet wipes.

b. **The likely impact of the proposed ban for consumers, particularly for those with protected characteristics, e.g. disabled people;**

Whilst it is important to note here that this proposal would simply be to ban the sale of plastic containing wet wipes rather than a ban on all wet wipes, we do obviously support consultation with relevant organisations, individuals, and groups to determine whether there are cases to be made for certain exemptions based on medical or disability needs.

c. **Any wider impacts of keeping plastic containing wet wipes in circulation;**

The issues of plastic use generally, the increasing awareness and therefore concern about microplastics and also the issue of wet wipes causing 'fat berg' blockages in our sewer systems, are all well-known and are covered in the supplementary information in this consultation.

We would like to make the additional point that most plastic (99%) is derived from fossil fuels and that 4-8% of global oil and gas production is used to make plastic. This is projected to rise to around 20% (https://carbonliteracy.com/climate-change-the-plastic-crisis/#:~:text=From%20the%20extraction%20of%20raw,consumption%20if%20this%20reliance%20persists .) as global plastic use increases. It is predicted that plastic use will double by 2050 (https://www.reuters.com/business/environment/plastic-consumption-course-nearly-double-by-2050-research-2023-02-27/). The OECD even predicts that global plastic waste will triple by 2060 (https://www.oecd.org/environment/global-plastic-waste-set-to-almost-triple-by-2060.htm) unless action is taken.

Anything we can do to reduce plastic use, especially single use and avoidable, is therefore welcome and desperately needed.

https://friendsoftheearth.uk/sustainable-living/wet-wipes-keeping-them-out-our-seas-and-sewers

There is of course another issue that requires urgent action at all levels, namely microplastic pollution. These tiny particles of plastic come from a wide variety of sources, including the breakdown of plastic containing wet wipes (https://www.sciencedirect.com/science/article/pii/S2667010021002468 ).

Studies on the prevalence and impact of microplastics are increasing rapidly but the issues are already plain to see. They have even been found in clouds (https://www.theguardian.com/environment/2023/nov/16/microplastic-pollution-changing-weather-climate ) and in human blood (https://www.theguardian.com/environment/2022/mar/24/microplastics-found-in-human-blood-for-first-time ).

There continue to be a steady stream of scientific and news reports on the issue and the United Nations Environment Programme (UNEP) states that:

*"When ingested by marine life such as birds, fish, mammals and plants, microplastics have both toxic and mechanical effects, leading to issues including reduced food intake, suffocation, behavioural changes and genetic alteration.*

*In addition to entering the food chain through seafood, people can inhale microplastics from the air, ingest them from water and absorb them through the skin. Microplastics have been found in various human organs, and even in the placenta of newborn babies.*

*UNEP's 2021 report From Pollution to Solution warned that chemicals in microplastics "are associated with serious health impacts, especially in women". These can include changes to human genetics, brain development and respiration rates, among other health issues.*

*"The impacts of hazardous chemicals and microplastics on the physiology of both humans and marine organisms is still nascent and must be prioritized and accelerated in this Decade of Ocean Science for Sustainable Development," said Leticia Carvalho, Head of the Marine and Freshwater Branch at UNEP."*

https://www.unep.org/news-and-stories/story/microplastics-long-legacy-left-behind-plastic-pollution

d. Any wider impacts of wipes marketed as alternative or plastic-free;

There is some concern about the use of 'regenerated cellulose' in some wet wipes. Although from a natural source, the many chemicals used in the regenerative processes (such as dyes,

flame retardants, and light stabilizers, among others) are causing some concern. https://www.sciencedirect.com/science/article/abs/pii/B9781845699314000040

It is also important to take into account the various other chemicals potentially used in the manufacture of some wipes. Studies have suggested the presence of endocrine disruptors in some wipes (https://chemtrust.org/news/wet-wipes/) so it is important that future legislation also considers these chemicals.

There is also concern about the environmental impacts of large scale cotton production (https://www.theworldcounts.com/challenges/consumption/clothing/cotton-farming-water-consumption) in various parts of the world (intensive water use, pesticide and synthetic fertiliser runoff into water courses) https://www.trvst.world/sustainable-living/fashion/environmental-impact-of-cotton/

There is an opportunity however to look into alternate sources of fibre, in this country namely Hemp. It has high carbon sequestration properties, removes the need for pesticides and fertilisers, increases biodiversity and can help reduce soil erosion (https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/hemp_en). Hemp fibres could be used in wet wipes (amongst many many other uses) so surely it makes sense to help support the growing of hemp in the UK.

The ultimate end goal however of a truly circular economy should see a move to reusable wipes rather than any type of single use ones.

**e. If any exemptions are needed for wet wipes containing plastic**

As stated above, it is worth noting that this legislation is simply seeking to ban plastic containing wet wipes rather than wet wipes generally. There will still be wet wipes on the market, they merely won't contain plastic resins such as polyethylene, polyester, and polypropylene. It is estimated that surgical and medical uses of wet wipes make up only around 3% of the total number used (https://friendsoftheearth.uk/sustainable-living/wet-wipes-keeping-them-out-our-seas-and-sewers ).

**f. The proposed timeframe for the commencement of the ban.**

We support this approach and would of course support the earliest possible introduction of this in Wales.