

Marine Conservation Society position statement on:

Sewage Related Debris from Flushed Items

Date of statement: March 2021

Geographical extent: UK

Sewage related debris result from sanitary items such as wet wipes, pads and tampons being flushed, which then enter the marine environment. We believe that stopping pollution at source is the most effective way to reduce the amount of sewage related debris entering the marine environment and can be achieved via the following measures:

- Supporting consumers to move to reusable products to support a circular economy.
- Banning all avoidable single-use plastic in wet wipes and other sanitary items, such as tampon applicators, where alternatives exist.
- Applying Extended Producer Responsibility (EPR) to all sanitary products (not just those that contain plastic) and clean-up costs.
- Making the water industry's 'Fine to Flush' specification¹ a legal requirement for flushable products.
- Improved labelling and consumer awareness to promote correct disposal (e.g. a requirement for products to display 'Plastic in Product' and 'Do not flush').

Sanitary items often contain plastics, which persist for long periods in the marine environment, breaking down over time into smaller and smaller pieces eventually becoming secondary micro plastics (<5mm). The ingestion of plastic pollution by marine life can negatively impact feeding behaviour, growth, development, reproduction and lifespan² and may result in greater exposure to persistent organic pollutants.³ Prevention must therefore be prioritised to stop plastic entering the environment and reduce the impact it is having on the ocean.

We are calling on UK Governments to fulfil their commitments to implement the Single-Use Plastic (SUP) Directive⁴ and to meet or go further than any EU legislation. These actions would reduce the amount of plastic and other litter entering the ocean and, as many of these actions support a circular economy, they also align with UK climate commitments⁵ to reduce greenhouse gas emissions.

Background

Pathways to the marine environment:

If sanitary waste (e.g. wet wipes, sanitary pads, tampons, tampon applicators and cotton bud sticks) are incorrectly disposed of in the toilet it can end up in the marine environment. These items, termed sewage related debris, enter the environment when either sewers overflow, due to heavy rainfall or insufficient capacity in the network⁶, or due to misconnections if the wastewater system in homes and businesses has been wrongly connected to the surface water system.⁷

During MCS' Great British Beach Clean 2020, there was an average of 36.7 SRD items on UK beaches, making up 8.6% of the total litter items found. Notably the number of wet wipes has increased from 1.7 (in 2005 when they were first recorded as their own category) to 4.6 a decade ago (2010) to 17.7 in 2020.



Environmental and socio-economic impacts:

Sanitary items often contain plastics. Wet wipes are usually manufactured from polyethylene terephthalate (PET), polypropylene (PP), cellulose or a combination of PET and cellulose⁸. Sanitary towels are usually made from PP, polyethylene (PE) or a combination.⁸ PE and PP are two of the main plastics found in our oceans.⁹ A recent study looking at the presence of fibres in sediments adjacent to a wastewater treatment plant consistently found white microplastic fibres that were comparable with the white fibres from wet wipes and sanitary towels, demonstrating that sanitary waste is a source of microfibre pollution in the marine environment.⁸

The negative impacts of plastic litter (including microplastics) on marine wildlife are well documented. If ingested by marine life they can damage the digestive system, prevent digestion or stop animals from feeding, resulting in impacts on their growth, development, reproduction and lifespan² and can result in severe suffering and starvation.¹⁰ Marine life which ingest microplastics may be exposed to higher levels of persistent organic pollutants which adsorb to the surface of microplastics.³

Once sanitary items, particularly wet wipes, have been flushed into sewers they can combine with fats and oils, reducing capacity in the sewer. This can increase the frequency that sewers overflow and cause blockages resulting in environmental pollution and flooding of homes and gardens. There are over 300,000 sewer blockages throughout the UK every year, costing £100 million to clear up. A study by Water UK in 2017 found that non-flushable wet wipes make up around 93% of the material causing sewer blockages.¹¹ Furthermore, sanitary waste on beaches impacts on tourism and can potentially weaken coastal economies.¹²

The Solutions

We believe that stopping pollution at source is the most effective way to reduce the amount of sewage related debris entering the marine environment and can be achieved via the following measures:



1. Supporting consumers to move to reusable products to support a circular economy:

Our ocean is currently facing the twin climate and biodiversity crises which are partly being fuelled by the single-use plastics problem. In the UK, the use of tampons, pads and applicators generates 200,000 tonnes of waste per year.¹³ We need to move away from our current single-use society. We should not simply replace plastic with another single use material, but shift to reusable products, especially for sanitary products which are generally not recycled.



2. Banning avoidable single-use plastic in wet wipes and other sanitary items:

England and Scotland have already banned single-use plastic cotton buds.^{14,15} At the end of 2020 Scotland and Wales consulted (separately) on the ban of a number of specific single use plastic products including, for Wales, cotton bud sticks, as well as consideration of additional items including wet wipes.^{16,17} Further restrictions must be put on the use of avoidable plastic due to its persistence and physical and chemical legacy in the environment.

Plastic wet wipes should be banned, with Extended Producer Responsibility (EPR) applied to all other types of wipes. In addition, other sanitary items where plastic is avoidable should be removed from market e.g., plastic in tampon applicators. A survey, conducted by MCS in November 2020, of 12 retailers who sell own brand wet wipes found that three retailers have already removed plastic from all own brand wet wipes (flushable and non-flushable) and five committed to doing so by end of December 2021.

These actions would align with the 'Resources and waste strategy for England' which commits to 'eliminating avoidable plastic waste over the lifetime of the 25 Year Plan', with avoidable defined, as '...when the plastic could have been reused or recycled; when a reusable or recyclable alternative could have been used instead; or when it could have been composted or biodegraded in the open environment'.¹⁸



3. Applying Extended Producer Responsibility (EPR) to all single-use sanitary products (not just those that contain plastic):

All single-use sanitary items, regardless of material, should have EPR applied and funds should be used to promote reusable alternatives and provide support to make it as easy as possible for consumers to choose reuse over single-use. Reusable sanitary products reduce waste and have a lower carbon footprint. They can last a number of years and therefore are cost efficient in the long term, but can represent an expensive upfront cost: any measures need to be carefully implemented to ensure that they support ambitions to reduce period poverty and those living below the poverty line.

Industry should also cover education of consumers and cost of campaigns for correct disposal (see below), ongoing research to verify engagement is effective, cost of clean-up (regardless of by whom the clean-up is undertaken and could include, but is not limited to, water companies, local councils, governments and their agencies and NGOs) and subsidising reusable wet wipes and other sanitary products in line with the concept of the circular economy.



4. Making the water industry's 'Fine to Flush' specification a legal requirement for flushable products:

In January 2019, the UK water industry published their 'Fine to Flush' specification (WIS 4-02-06)¹ in response to an increasing number of products being labelled as flushable, but which could still potentially cause blockages in the sewer system. The specification tests whether a product is suitable to flush in UK sewers, alongside its biodegradability (thereby precluding the inclusion of plastic).¹

However, a survey conducted by MCS in November 2020, found that only one, out of the ten, main UK retailers has ensured that all of their own brand flushable wet wipes meet the 'Fine to Flush' specification, and of the other nine retailers, only four would commit to doing so by June 2021. Due to the slow voluntary uptake of the 'Fine to Flush' specification we believe that legislation is needed to make it a mandatory requirement for any items labelled or market as 'flushable', or any similar labelling that indicates they can be disposed of in the toilet.



5. Improved labelling and consumer information to promote correct disposal:

We believe that responsible disposal of sanitary products would significantly reduce the amount of sewage related debris entering the marine environment by stopping it at source. Inconsistent and poor labelling of products has led to confusion amongst consumers regarding which products can be safely flushed. For instance, research commissioned by United Utilities found that “one in five women (20%) said they had never been told how to dispose of sanitary items such as tampons and sanitary towels” and for baby or child wet wipes it was “almost a third (32%) of respondents”.¹⁹ Furthermore, there are issues around the use of the term biodegradability and other so called “green” claims, which adds further confusion to consumers, for further information see the [Wildlife and Countryside LINK response](#)²⁰ (to which MCS is a signatory) to the Competition and Markets Authority consultation on Misleading Environmental Claims.

Although all 12 retailers, surveyed by MCS in November 2020, who sell own brand non flushable wipes confirmed that these wipes clearly state, ‘Do not flush’ on the front of the packet, only three out of 12 confirmed that they currently do this on all of their own brand sanitary products. This highlights the inconsistency of advice being given to consumers.

References:

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