

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

wwconsultation@defra.gov.uk

20th November 2023

Dear Sir/Madam,

Consultation on proposal to ban the manufacture, supply and sale of wet wipes containing plastic in the UK

Thank you for consulting on the above proposal.

These comments are from Dŵr Cymru Cyfyngedig (Welsh Water), the statutory water and sewerage undertaker that supplies over three million people in Wales and some adjoining parts of England. We are owned by Glas Cymru, a single purpose, not-for-profit company with no shareholders. We provide essential public services to our customers by supplying their drinking water and then carrying away and dealing sustainably with their wastewater. In this way we make a major contribution to public health and to the protection of the Welsh environment. Our services are also essential to sustainable economic development.

We are very supportive of the proposals detailed within the consultation to introduce a ban on the manufacture, supply and sale of wet wipes that contain plastic. We know from a YouGov poll that 84% of Welsh Water customers also believe that wet wipes containing plastics should be banned.¹ Similarly, having discussed this matter with a wide range of environmental NGOs here in Wales, we know that such a ban has universal support from such bodies. We would also refer you [to the data gathered](#) by Welsh Government in response to the consultation they held as to whether wet wipes should be added to the list of single use plastics to be banned – again with overwhelming support for such a ban from the public.

Such a ban will undoubtedly be a positive step in reducing the impact of wet wipes on the environment, not only in as much as they will no longer introduce microplastics into the environment, either directly or via our assets as a conduit, but also in that the number of pollution incidents we have due to blockages will be reduced. We know that many retailers have already phased out plastic from their wipes, yet wipes still cause significant problems for our network and can cause pollution either directly or indirectly as wet wipes are generally designed not to break down easily, whether they use plastic or plastic free alternatives.

We deal with nearly 2000 sewer blockages a month, at a cost of over £7 million a year. Not untypical as we understand it, of other Water and Sewerage Companies throughout the UK. The cause of these blockages are overwhelmingly due to what we refer to as 'sewer misuse'. Misuse can include improper fat, oil and grease disposal

¹ 1 All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1001 adults. Fieldwork was undertaken between 8th - 10th September 2020. The survey was carried out online. The figures have been weighted and are representative of all Wales adults (aged 18+)

and other causes with approximately 30% of blockages identified as being directly caused by wet wipes. It should also be noted that the majority (80-90%) of all blockages have wet wipes as a component.

If wet wipes do not cause a blockage, then they will end up at a Wastewater Treatment Works where they are screened out prior to wastewater treatment. Removal of these incurs costs in terms of both energy and carbon and once separated, the wipes go ultimately for incineration at a cost to our customers of circa £1m per year. Most of this investment could be alternatively deployed for the benefit of the environment or at the direction of our customers.

We are very conscious that our customers find such products useful and in order to reduce the improper disposal of such wet wipes, Water UK our trade association, has developed a campaign [‘Bin the Wipe’](#). We are happy to note that Defra will support Water UK’s ‘Bin the Wipe’ campaign and that the Welsh Government continue to support water industry campaigns in relation to the inappropriate flushing of wet wipes and other products. Even if wet wipes that contain plastics are banned, we would urge Defra and Welsh Government to continue to support such campaigns, as those made from plastic free alternatives will continue to be sold and will continue no doubt to block our sewers and create pollution.

At a company level our current campaign is called [‘Stop the Block’](#) where we identify items including wet wipes that most often cause blockages and encourage customers not to flush them. We also enable many visits from schools on educational visits where we discuss what can and cannot go down the toilet. We have recently started a trial promoting reusable wipes in a specific area suffering with repeat blockages caused by wet wipes. These alternative wipes can be washed, dried and reused. The uptake was generally positive with customers supporting the initiative. We hope that by providing a reusable alternative, which should be too big to flush, may encourage some behavioural change or at least get the sewer abuse conversation going. We are monitoring the area closely for any reduction in call outs and changes in removing screening material. Whilst these actions can be partially successful despite all our efforts, they have not yet delivered the step change we would like to see.

If the ban is successful, actions should also be put in place to ensure that wipes are labelled boldly and clearly on the front of the packaging to state how they should be disposed of properly and reduce the potential for people thinking that they could be safe to flush.

In summary, we are supportive of the proposals outlined in the consultation but would like to strongly emphasise that all stakeholders must work together to raise public awareness around the proper disposal of wet wipes, both plastic and alternatives, to both reduce impacts on the environment but also costs to our customers. Only the 3 Ps (pee, poo and paper) should be flushed down the toilet.

Thank you for the opportunity to comment on this important topic, if you have any further questions or comments, I would be happy to meet.

Yours faithfully,

A handwritten signature in black ink, reading "Tony Harrington". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Tony Harrington
Director of Environment
Dŵr Cymru Welsh Water