

Marine Conservation Society position statement on:

# Sewage Related Debris from Flushed Items

Date of statement: March 2021, updated August 2022  
Geographical extent: UK

## Summary:

If sanitary waste, such as wet wipes, pads, tampons and tampon applicators, is incorrectly flushed down the toilet it can end up in the marine environment. These items, called sewage related debris, enter the environment when untreated sewage is discharged into rivers and the sea from storm overflows. Storm overflows were designed for use only during extreme rainfall to avoid flooding<sup>1</sup>, but recent evidence shows this is happening far more regularly. Misconnections, when the wastewater system in homes and businesses has been wrongly connected to the surface water system, can also be a pathway for sewage items to reach the environment<sup>2</sup>.

During MCS' Great British Beach Clean 2021, there was an average of 24.2 sewage related items per 100m on UK beaches, making up 6.2% of the total litter items found. Notably the number of wet wipes has increased from 1.7 per 100m (in 2005 when they were first recorded as their own category) to 4.6 per 100m a decade ago (2010) to 12.5 per 100m in 2021.

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 lifespan<sup>3</sup> and may result in greater exposure to persistent organic pollutants<sup>4</sup>. Prevention must therefore be prioritised to stop plastic entering the environment and reduce the impact it is having on the ocean.

We believe that stopping pollution at source, by preventing these items from being flushed in the first place, is the most effective way to reduce their impact and can be achieved by:

- Governments and businesses need to support consumers to move to reusable products, which reduce the number of flushed items and support a circular economy.
- Governments should ban all avoidable single-use plastic in wet wipes and other sanitary items, such as tampon applicators, where alternatives exist.
- UK Government to apply Extended Producer Responsibility (EPR) to all sanitary products (not just those that contain plastic) and clean-up costs.
- Businesses to improve, and governments to mandate for clearer labelling and consumer awareness to promote correct disposal (e.g. a requirement for products to display 'Plastic in Product' and 'Do not flush').

If these items do reach the sewage system, measures must be taken to stop them from escaping into the environment:

- Water companies must not use storm overflows as a way of routinely dealing with sewage.
- Governments must set progressive reduction targets for spills (covering frequency, duration and harm) from all\* storm overflows by the end of 2022.
- Governments should require all storm overflows to have real-time electronic monitoring installed by 2024.
- Governments should require screens to be installed on all storm overflows to stop solid debris from being released.
- Governments and environmental and water industry regulators must properly enforce existing laws and regulations to prevent pollution.



\*All storm overflows must be included. UK Government plans for reducing storm overflow discharges do not currently cover all discharges to Marine Protected Areas, Shellfish Waters or non-designated bathing waters.

## 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 cellulose<sup>5</sup>. Sanitary towels are usually made from PP, polyethylene (PE) or a combination<sup>5</sup>. PE and PP are two of the main plastics found in our oceans<sup>6</sup>.

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<sup>5</sup>.

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 lifespan<sup>3</sup> and can result in severe suffering and starvation<sup>7</sup>. Marine life which ingest microplastics may be exposed to higher levels of persistent organic pollutants which adsorb to the surface of microplastics<sup>4</sup>.

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<sup>8</sup>. Furthermore, sanitary waste on beaches impacts on tourism and can potentially weaken coastal economies<sup>9</sup>.

## Solutions to stop sewage related debris at source

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<sup>10</sup>. 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:

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. 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 commitments<sup>11</sup> to reduce greenhouse gas emissions.

In England and Scotland single-use plastic cotton buds are already banned<sup>12,13</sup>. Scottish Government consulted on banning a number of single use items in 2020 with bans implemented in June 2022<sup>14</sup>. However, this did not include any further bans on SRD items nor improvements in labelling. In autumn 2022 the Welsh Government is looking to include cotton bud sticks in its draft bill to ban single use plastics, but this does not include wet wipes, despite consulting on the issue in 2020<sup>15</sup>. Further restrictions must be put on the use of avoidable plastic due to its persistence and physical and chemical legacy in the environment.

A survey of twelve retailers who sell own brand wet wipes, conducted by the Marine Conservation Society in November 2020, found that three retailers had already removed plastic from all own brand wet wipes (flushable and non-flushable) and five committed to doing so by the end of December 2021. An update to the survey in February 2022 found that five retailers had removed plastic from all of their own brand wet wipes and a further five retailers plan to do this by the end of 2022. A ban on wet wipes containing plastics is therefore feasible, practical and financially viable.

The 10 Minute Rule Bill to ban plastic in wet wipes (Plastics (wet wipes) Bill)<sup>16</sup> proposed in the UK parliament in 24th November 2021, which the Marine Conservation Society supported, received strong cross-party support from MPs, and the public.



## 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 the costs of; educating consumers and campaigning for correct disposal (see below); ongoing research to verify engagement is effective; 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. Improved labelling and consumer information to promote correct disposal:

Labelling and consumer awareness must be improved to promote correct disposal of products i.e. a requirement for products to display 'Plastic in Product' and indicate its impact on the environment (e.g. dead turtle logo), until a ban comes into force for plastic in wet wipes, and any other appropriate products. There should also be a requirement to display 'Do not flush' for all wet wipes and other bathroom items which may be incorrectly flushed. The labelling must be clear with minimum size and contrast fonts and colours, on the front and at point of extraction. These design specifications should be mandatory with independent consumer research to ensure the specifications are effective and appropriate.

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"<sup>17</sup>. 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<sup>18</sup>, to which MCS is a signatory, to the Competition and Markets Authority consultation on Misleading Environmental Claims).

In January 2019, the UK water industry published their ‘Fine to Flush’ specification (WIS 4-02-06)<sup>19</sup> 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).<sup>19</sup> Uptake of the specification by UK retailers has been slow. A survey by MCS in February 2022, found that only five, out of ten, main UK retailers have ensured that all of their own brand flushable wet wipes meet ‘Fine to Flush’.

Although all twelve 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 the twelve confirmed that they currently do this on all of their own brand sanitary products. An update to the survey in January 2022 found that six retailers had now completed this labelling for all of their own brand sanitary products (excluding wet wipes) and a further four plan to have completed this action by the end of 2022. This highlights that not all consumers are getting the correct consistent advice regardless of where they shop.

## References:

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- [4] <https://royalsocietypublishing.org/doi/abs/10.1098/rstb.2008.0284>
- [5] <https://doi.org/10.1016/j.watres.2020.116021>
- [6] <https://www.sciencedirect.com/science/article/pii/S0025326X19300748#ab0005>
- [7] [https://www.researchgate.net/publication/315386479\\_Harm\\_caused\\_by\\_Marine\\_Litter/link/58cfb103a6fdccff68e2dc8a/download](https://www.researchgate.net/publication/315386479_Harm_caused_by_Marine_Litter/link/58cfb103a6fdccff68e2dc8a/download)
- [8] <https://www.water.org.uk/>
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- [16] <https://bills.parliament.uk/bills/3062>
- [17] [https://www.keepbritaintidy.org/sites/default/files/resources/20132\\_Journal%20of%20Litter%20and%20Environmental%20Quality\\_Vol3-V6-ONLINE.pdf](https://www.keepbritaintidy.org/sites/default/files/resources/20132_Journal%20of%20Litter%20and%20Environmental%20Quality_Vol3-V6-ONLINE.pdf)
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