



Reduction of the Impact of Certain Plastic Products on the Environment

EurEau Comments on the draft Directive

Summary

EurEau supports the proposal of the European Commission to reduce the environmental impact of single-use plastics (SUP). Producers must be held economically responsible for the substantial economic damage wet wipes cause to the waste water infrastructure.

It is in line with article 191.2 of the Treaty regarding the application of the precautionary principle and the principles that preventive action should be taken, that environmental damage should be rectified at source and that the polluter should pay. It also complies with directive 2000/60/EC.

Certain SUP, especially wet wipes, may end up in the sewer network. EurEau agrees to the Commission's assessment that remedial action at the level of waste water collection and treatment would be economically unsustainable.

Wet wipes cause substantial economic damage to the sewer network. This should be explicitly covered by extended producer responsibility schemes. Non-flushability labelling alone will not resolve the problem.

Single use plastics and urban waste water treatment

As outlined in the proposal, certain SUP, for example wet wipes, tobacco product filters and cotton bud sticks, may end up in the sewer network due to inappropriate disposal practices.

As current waste water collection and treatment plants are not consistently designed to remove SUP and combined sewer overflows may lead to direct release,

Reduction of the Impact of Certain Plastic Products on the Environment EurEau Comments on the draft Directive

a part of these plastics may find their way to water bodies with all the negative environmental impacts.

The Commission's impact assessment estimates the cost of remedial action at the level of waste water collection and treatment at €7.7 billion p.a. This represents about 18% of the total turnover of the EU's waste water sector.

Hence, apart from contradicting art. 191 of the Treaty, this solution would be disproportionate from an economic point of view and would seriously jeopardise the affordability of water services and the investment capacity of operators.

Even if waste water treatment plants (WWTP) removed all SUP it would not make them disappear. Even worse, the burden of waste disposal would be placed on waste water operators. Moreover, the mechanical forces in the sewer network (flow, friction, pumping) may lead to the continuous release of microplastics from these products (especially from wet wipes).

Hence, measures must be taken at the source and the polluter pays principle must be applied.

The impact assessment omits one highly relevant cost factor. Wet wipes regularly cause the clogging of pumps and the blockage of pipes in the sewer network. For the UK alone, the cost of clearing blockages in the sewer network are estimated at €115 million per year¹.

Furthermore, clogged pumps may cause sewer overflows and, thus, release single-use plastics to the environment.

EPR schemes must include the waste water infrastructure

EurEau welcomes the Commission's proposal of including wet wipes and tobacco product filters in EPR schemes and awareness raising measures, and requiring the compulsory do not flush labelling of all plastic-containing wet wipes.

Experience clearly tells us that labelling alone will not be effective, and inappropriate disposal by consumers seems difficult to control. In Belgium, wet wipes have carried a "do not flush" label since July 2016, if they fail flushability tests. However, no significant improvement was noticed in the sewer network.

The Commission proposal remains unclear as to whether the "costs of waste management and clean-up of litter" (article 8 on EPR schemes) includes littering

¹ [Water UK: Wipes in sewer blockage study - Final Report, Report Ref. No. 21CDP.WS \(2017\)](#)

Reduction of the Impact of Certain Plastic Products on the Environment EurEau Comments on the draft Directive

into the sewer network and the actions of waste water operators to unblock the pipes and pumps and dispose of the recovered wet wipes. With a view to effectively implementing the polluter pays principle, EPR schemes must explicitly cover this littering pathway including the related environmental harm and economic damage for waste water operators. This would incentivise plastic-containing wet wipe manufacturers to develop products that respect the environment, i.e. that are easily biodegradable and dispersible and that do not release microplastics.

Examples for awareness raising campaigns regarding wet wipes:

- UK: Can't flush this! <https://www.youtube.com/watch?v=X-FB46km7bo>
- D: Feuchttücher gehören nicht in die Toilette und Kanalisation: <https://www.youtube.com/watch?v=OPQ4Tfx0HCK>
- D: Feuchtes Toilettenpapier verstopft Kläranlagen | Servicezeit | WDR: <https://www.youtube.com/watch?v=T4IFGTZ6aSI>
- E: Matilda - Las toallitas a la papelera: <https://www.youtube.com/watch?v=vXkMK76UE50>
- E: Las toallitas no deben ser desechadas por el WC: <https://www.youtube.com/watch?v=7j2Tw7b5Fsc>
- DK: Kun 3 ting i dit lokum: <https://www.kun3tingiditlokum.dk/>