

Reduction of the Impact of Certain Plastic Products on the Environment

Comments on the draft Single Use Plastics Directive

Summary

EurEau supports the proposal of the European Commission to reduce the environmental impact of single-use plastics (SUP).

It is in line with article 191.2 of the foundation treaties 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.

1. 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, 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 annually. This represents about 18% of the total turnover of the EU's waste water sector.

Hence, apart from contradicting Article 191 of the Treaties Founding the EU, 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 release single-use plastics to the environment.

2. 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 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:

- ~ DK: Kun 3 ting i dit lokum: <https://www.kun3tingiditlokum.dk/>.
- ~ DE: Feuchttücher gehören nicht in die Toilette und Kanalisation: <https://www.youtube.com/watch?v=OPQ4Tfx0HCk>.
- ~ DE: Feuchtes Toilettenpapier verstopft Kläranlagen | Servicezeit | WDR: <https://www.youtube.com/watch?v=T4IFGTZ6aSI>.
- ~ ES: Matilda - Las toallitas a la papelera:

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

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<https://www.youtube.com/watch?v=vXkMK76UE50>.

- ~ ES: Las toallitas no deben ser desechadas por el WC: <https://www.youtube.com/watch?v=7j2Tw7b5Fsc>.
- ~ UK: Can't flush this! <https://www.youtube.com/watch?v=X-FB46km7bo>.



About EurEau

EurEau is the voice of Europe's water sector. We represent drinking and waste water service providers from 29 countries in Europe, from both the private and the public sectors.

Our members are the national associations of water services in Europe. At EurEau, we bring national water professionals together to agree European water industry positions regarding the management of water quality, resource efficiency and access to water for Europe's citizens and businesses. The EurEau secretariat is based in Brussels, from where we coordinate the work of around 200 experts from member organisations and utilities and advocate common positions with EU decision makers.

Our members are fully committed to the continuous supply of clean water and its safe return into the water cycle. We have a role in raising awareness of threats to the water environment. With a direct employment of around 476,000 people, the European water sector makes a significant contribution to the European economy.



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