



Department  
for Environment  
Food & Rural Affairs

# Consultation on the proposed ban of the manufacture, supply and sale of wet wipes containing plastic October 2023

DRAFT



Llywodraeth Cymru  
Welsh Government



Scottish Government  
Riaghaltas na h-Alba  
gov.scot



Department of  
**Agriculture, Environment  
and Rural Affairs**

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)



© Crown copyright 2023

This information is licensed under the Open Government Licence v3.0. To view this licence, visit [www.nationalarchives.gov.uk/doc/open-government-licence/](http://www.nationalarchives.gov.uk/doc/open-government-licence/)

This publication is available at [www.gov.uk/government/publications](http://www.gov.uk/government/publications)

Any enquiries regarding this publication should be sent to us at [wwconsultation@defra.gov.uk](mailto:wwconsultation@defra.gov.uk)

Please respond to this consultation using the citizen space consultation hub at: <https://consult.defra.gov.uk/wet-wipes-1/wet-wipes-containing-plastic> or using the alternative contact methods as detailed in paragraph 41. [www.gov.uk/defra](http://www.gov.uk/defra)

## Contents

Executive summary	4
Rationale for the proposed ban	7
Details of the proposal	8
Responding to this consultation	10
Questions	13

DRAFT

## Executive summary

1. The UK Government, Welsh Government, Scottish Government and the Department of Agriculture, Environment and Rural Affairs for Northern Ireland are all committed to tackling plastic pollution and its impact on our environment, economy and health. Our goal is to maximise resource efficiency and minimise plastic waste, by following the principles of the waste hierarchy: Reduce, Reuse, Recycle. This includes moving away from a take, make, waste model and towards a circular economy for plastic.
2. Across the UK, action has been taken to reduce plastic waste through a number of measures, including bans and restrictions on certain single use plastic products and making producers more responsible for the plastic they produce.
3. This consultation is focused on wet wipes containing plastic and addressing their impact on the environment. The UK Government and Devolved Administrations are seeking views on a proposed ban on the manufacture, supply and sale of wet wipes containing plastic. The proposed ban, subject to consultation outcomes, would be applied by individual countries in the UK and be implemented via their own legislative mechanisms.
4. There are already existing alternatives to wet wipes containing plastic. Major brands are already removing plastic from wet wipes. Boots, Tesco and Aldi are among other retailers that have stopped selling wet wipes containing plastic in their stores. We need to build on these initiatives with action to accelerate the shift away from wet wipes containing plastic.
5. Defra's Plan for Water, published 4 April 2023, included a proposal from the Government to consult on banning wet wipes containing plastic. In a 2021 Call for Evidence for England on commonly littered single-use plastic items, 96% of respondents stated they would support a ban on wet wipes containing plastic<sup>1</sup>. This proposal is in line with the Resources and Waste Strategy for England, published 18 December 2018, in which Defra committed to banning the most problematic plastic products where there is a clear case for it and there are suitable plastic-free alternatives<sup>2</sup>.
6. The Welsh Government included a question on wet wipes in their 2020 consultation Reducing Single-use Plastic<sup>3</sup>. Most respondents supported future action on wet wipes containing plastic, including a potential ban. The Welsh Government's Circular Economy Strategy, Beyond Recycling<sup>4</sup>, published in March

---

<sup>1</sup> [Summary of responses and government response - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/summary-of-responses-and-government-response)

<sup>2</sup> [Resources and waste strategy for England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/resources-and-waste-strategy-for-england)

<sup>3</sup> [Reducing single use plastic in Wales | GOV.WALES](https://gov.wales/consultations/reducing-single-use-plastic-in-wales)

<sup>4</sup> [Beyond recycling | GOV.WALES](https://gov.wales/consultations/beyond-recycling)

2021, included an aim to phase out unnecessary single-use plastics. To help achieve this, the Welsh Government has introduced The Environmental Protection (Single-use Plastic Products) (Wales) Act 2023. This legislation requires Welsh Ministers to consider taking action on wet wipes and this consultation is intended to help inform the next steps.

7. The Scottish Government's Marine Litter Strategy<sup>5</sup> identified wet wipes containing plastic as a source of plastic pollution that needed to be reduced in order to protect our seas from harm. An action was agreed to investigate a legislative approach following a call for evidence on a variety of plastic products often found as litter on land and on beaches<sup>6</sup>.
8. The Northern Ireland Executive in its January 2020 New Decade, New Approach document made a commitment to create a plan to eliminate plastic pollution. The current plan is in draft and includes a range of ongoing and proposed actions on plastic though does not include a proposal to ban wet wipes. This consultation on wet wipes containing plastic will help inform future Executive decisions to contribute to a NI plastic pollution elimination plan.
9. This consultation aims to seek views on our proposals to prevent the environmental harms caused by wet wipes which contain plastic. We are also intending to use this to expand our knowledge on how these proposals may impact on supply chains and consumers, particularly groups such as parents, carers and those needing care, who may be high volume users of wet wipes.
10. We are interested in receiving your views and evidence on the potential impacts of the proposed ban. In particular:
  - a. The likely impact of the proposed ban on the businesses who manufacture, supply or sell wet wipes containing plastic;
  - b. The likely impact of the proposed ban for consumers, particularly for those with protected characteristics, e.g. disabled people;
  - c. Any wider impacts of keeping plastic containing wet wipes in circulation;
  - d. Any wider impacts of wipes marketed as alternative or plastic-free;
  - e. The composition of alternative wet wipes;
  - f. If any exemptions are needed for wet wipes containing plastic; and
  - g. The proposed timeframe for the commencement of the ban.

---

<sup>5</sup> [Marine litter strategy - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/marine-litter-strategy/pages/1-2-introduction.aspx)

<sup>6</sup> [Call for evidence: Single-use food containers and other single-use items - Scottish Government - Citizen Space \(consult.gov.scot\)](https://www.gov.scot/publications/call-for-evidence-single-use-food-containers-and-other-single-use-items/pages/1-introduction.aspx)

## Proposal to ban the manufacture, supply and sale of wet wipes containing plastic

### Rationale for the proposed ban

11. Wet wipes and moist wipe products, such as moist toilet tissue, are used for hygiene and other purposes. This covers a range of products including any baby wipe, cosmetic wipe, moist toilet tissue or other personal hygiene wipe, in addition to wipe-based cleaning products. Wet wipes can be made from plastic fibres or from non-plastic materials such as polymers derived from natural substances such as wood pulp or cotton.
12. In a Defra-commissioned project, Valpak estimated that 31 billion single-use wet wipes (both plastic-containing and plastic-free wet wipes) were placed on the market in the UK in 2021, an 18% increase since 2012. Defra estimates that plastic-free wipes made up 36% of wet wipes placed on the UK market in 2021<sup>7</sup>.
13. Major brands are already making the move towards removing plastic from wet wipes. Boots, one of the biggest sellers of wet wipes in the UK selling over 800m in 2021, ended the sale of plastic-based wipes last year.<sup>8</sup> Tesco, Waitrose, Holland & Barrett and Aldi are among other retailers that have also stopped selling wet wipes containing plastic in their stores. The Valpak report found there to be no significant price difference between wipes labelled as 'plastic-free' and those that were not.
14. Once used, wet wipes, including those containing plastic, are frequently incorrectly flushed down the toilet where they enter the sewers. Some wet wipes may wash into our waterways. Once in our water, they can accumulate biological and chemical pollutants, increasing the risk of harm to the animals and humans who encounter them. Additionally, wet wipes containing plastic contribute to the problem of marine plastic pollution and have been found in beach litter surveys conducted for Defra by the Marine Conservation Society. For the period 2015 to 2020, an average of 20.4 wet wipes were found per 100m of beach surveyed across the UK<sup>9</sup>. The Marine Conservation Society also collects data from the Great British Beach Clean, a citizen science beach clean and data collection exercise. During the Great British Beach Clean in 2022, wet wipes (including plastic-containing and plastic-free wet wipes) were the 5th most commonly found item<sup>10</sup>.

---

<sup>7</sup> Defra assumption based on data from unpublished market report by Valpak. 16% of wet wipes in that report were labelled as plastic-free and another 39% were labelled as biodegradable. There are no current standards on what can be labelled as "biodegradable" so these could still contain plastic.

<sup>8</sup> [Boots to stop selling plastic-based wet wipes in UK | Retail industry | The Guardian](#)

<sup>9</sup> Defra UK Marine Strategy/OSPAR Beach Litter Monitoring Data Collection ME5438, unpublished

<sup>10</sup> [Beachwatch 2022: What you found | Marine Conservation Society \(mcsuk.org\)](#)

15. A 2021 research project found that long microplastic fibres released into the environment could disrupt the health of the aquatic ecosystem<sup>11</sup>. Further research from the Water Industry has also shown how bacteria appear to bind to plastic wet wipes more often than to naturally occurring materials such as seaweed and sand, therefore prolonging their persistence in the water and at the beach.
16. Across the UK, additional actions have been taken to tackle the environmental issues caused by the incorrect disposal of both plastic and non-plastic containing wet wipes. Earlier in the year, the Environment Secretary wrote to the manufacturers and retailers of wet wipes across the UK to set out her concerns around the labelling of wet wipes as 'flushable'. Additionally, as per Defra's commitment in the Plan for Water, Defra will support Water UK's 'Bin the Wipe' campaign to help reduce pressure on the sewerage system. The Welsh Government continue to support water industry campaigns in relation to the inappropriate flushing of wet wipes and other products.

## **Details of the proposal**

### Scope and definitions

17. The proposed ban will relate to the manufacture, supply and sale of wet wipes containing plastic, with potential exemptions, across the UK.
18. In England, Scotland and Northern Ireland, we are proposing to define plastic as "a material consisting of polymer to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified". Chemical modification occurs during processing rather than extraction. A 'not chemically modified substance' is defined as "a substance whose chemical structure remains unchanged, even if it has undergone a chemical process or treatment, or a physical mineralogical transformation, for instance to remove impurities". This definition is internationally recognised and is consistent with the definition used in UK registration, evaluation, authorisation and restriction of chemicals (REACH)<sup>12</sup>.
19. In Wales, the definition of plastic intends to capture the same types of material as the English, Scottish and Northern Irish definition, however it is worded

---

<sup>11</sup> Jieun Lee, Sanghyun Jeong and Kyu-Jung Chae: Discharge of microplastics fibres from wet wipes in aquatic and solid environments under different release conditions (2021) Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0048969721022142> (Accessed 18 May 2023)

<sup>12</sup> [UK REACH - HSE](#)

differently in the Environmental Protection (Single-use Plastic Products) (Wales) Act 2023:

- a. "Plastic" means a material consisting of a polymer, other than an adhesive, paint or ink, and includes a material consisting of a polymer that has other substances added to it.
  - b. "Polymer" means a polymer that can function as the main structural component of a product and does not include a natural polymer that has not been chemically modified."
20. For the purposes of this consultation, we define wet wipes containing plastic as 'a non-woven piece of fabric that contains plastic which has been soaked and stored in a liquid'.

Exemptions suggested by respondents to the Call for Evidence and Welsh Government consultation

21. We would welcome additional evidence on whether any exemptions to the proposed ban are required. As part of Defra's Call for Evidence on Commonly Littered Single-use Plastic Items and the Welsh Government's 2020 Reducing Single Use Plastic consultation, we received evidence on possible exemptions from any ban on wet wipes containing plastic. This included:

a. **Wet wipes intended for medical or clinical uses**

Evidence has been provided that some wet wipes intended for medical or clinical use rely on plastic content for their function and that plastic-free alternatives would be inappropriate or not possible to assess as suitably appropriate within the timeframe of implementing this policy. This exemption would potentially cover use of plastic wet wipes for medical/clinical uses in all settings, including but not limited to healthcare, beauty (e.g, cosmetic surgery, piercing salons etc), and in private homes. The user would not have to be a medical professional (and could for example capture those individuals that are home carers), but the wipe would have to be used for a medical/clinical purpose only.

b. **Wet wipes for specified industrial, professional and commercial settings**

Evidence was submitted that products for some professional and industrial environments rely on plastic contents for their function. These exemptions include strong grease-removing wipes in the manufacturing industry, commercial spill kits and wipes for dealing with hazardous substances, industrial wipes use in aerospace and automotive industries and professional kitchens. Our understanding is that wet wipes used in these settings will mostly be disposed of appropriately as industrial waste. We envisage that this



exemption would only allow business to business sales of plastic containing wet wipes.

### Enforcement

22. In England, subject to consultation, we envisage that the proposed ban will be enforced principally through civil sanctions set out in regulations, using powers in Part 3 of the Regulatory Enforcement and Sanctions Act 2008. This will be done by Trading Standards Services and local authorities using an intelligence led model. This is consistent with the approach to enforcement taken for bans on various other single-use plastic products and the ban on microbeads in various cosmetic products.
23. In Wales and Northern Ireland, subject to the outcome of the consultation, any regulations could be enforced through either criminal sanctions or civil sanctions (or both) depending on the nature of the offence. In Scotland, subject to the consultation, Scottish Ministers can introduce secondary legislation under section 140 of the Environmental Protection Act 1990 which was previously used to draft the Environmental Protection (Microbeads) (Scotland) Regulations 2018. It is anticipated enforcement will be undertaken by Trading Standards and Local Authorities.

### Timings of ban

24. Depending on the outcome of the consultation, each administration would seek to introduce regulations, if appropriate, via their respective legislative mechanisms subject to required timescales.

### Information

25. This consultation is being carried out by Defra, on behalf of the UK Government, Welsh Government, Scottish Government and Department of Agriculture, Environment and Rural Affairs for Northern Ireland.
26. In the Regulatory Reform and Sanctions Act 2008, there is a duty to consult before making regulations imposing civil sanctions under Part 3 of that Act.
27. This is a public consultation and it is open to anyone with an interest to provide comments. The consultation should be of particular interest to users with specific needs, businesses involved in the manufacture or provision of single-use plastic wet wipes, the water industry and non-governmental organisations (NGOs) concerned about the environmental impact of single use plastic wet wipes.

28. This consultation will run for 6 weeks. This is in line with the UK Government's Cabinet Office's 'Consultation Principles', which advises government departments to adopt proportionate consultation procedures. The consultation opens 14 October 2023 and closes on 25 November 2023.

### **Responding to this consultation**

29. Responses should be submitted online via the survey <https://consult.defra.gov.uk/wet-wipes-1/wet-wipes-containing-plastic>.
30. Responses can be submitted in writing to: Consultation on proposal to ban the manufacture, supply and sale of wet wipes containing plastic in the UK, Consultation Coordinator, Defra, 2nd Floor, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX.
31. If required, additional information can be submitted via email to [wwconsultation@defra.gov.uk](mailto:wwconsultation@defra.gov.uk).
32. A summary of responses to this consultation and the resulting government response will be published on the government website at: [www.gov.uk/defra](http://www.gov.uk/defra). An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.
33. Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (e.g., home address, email address, etc).
34. If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality.
35. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting

confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

36. If you answer 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we will not make your personal name and private contact details publicly available.
37. There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only. Your responses and personal information may be shared in full with the other governments involved in this consultation.
38. Please find our latest privacy notice uploaded as a related document alongside our consultation document.
39. If you have any comments or complaints about the consultation process, please address them in writing to Consultation on proposals to ban the manufacture, supply and sale of wet wipes containing plastic in England, Consultation Coordinator, Defra, 2nd Floor, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX

or by email to [consultation.coordinator@defra.gov.uk](mailto:consultation.coordinator@defra.gov.uk).

## Questions

### Section 1: About you

Q1. Would you like your response to be confidential, under the terms defined above?

a. Yes

**b. No**

Q2. If you answered yes to this question, which information would you like to keep confidential and why? (optional)

**n/a**

Q3. Please provide your full name. If you are representing an organisation, you will be asked its name later.

**Tom McBeth**

Q4. Please provide your email address.

**tom.mcbeth@recoup.org**

Q5. Which of the following best describes you?

a. I am a member of the public responding to this consultation out of my own interest.

b. I am a member of the public responding on behalf of a campaign or petition.

c. I am responding on behalf of a business or organisation that manufactures, supplies, sells or uses wet wipes.

**d. I am responding on behalf of a business or organisation, that doesn't directly manufacture, supply, sell or use wet wipes. This includes advocacy groups.**

e. Other (please specify)

Q6. Where are you currently based yourself?

**a. England**

b. Scotland

c. Wales

d. Northern Ireland

e. Outside the UK, within the EU

f. Outside the UK, outside of the EU

### About your campaign or petition

Q7. What is the name of the campaign or petition that you are responding on behalf of?

**n/a**

## Section 2: Questions on the proposal

Q8. To what extent do you agree with the following statement, “I/my organisation would support the proposal set out above to introduce a ban on the manufacture of wet wipes that contain plastic”?

- a. Strongly agree.
- b. Agree
- c. Neither agree nor disagree
- d. Disagree**
- e. Strongly disagree
- f. I don't know

Q9. To what extent do you agree with the following statement, “I/my organisation would support the proposal set out above to introduce a ban on the supply or sale of wet wipes that contain plastic, including giving away for free”?

- a. Strongly agree.
- b. Agree
- c. Neither agree nor disagree
- d. Disagree**
- e. Strongly disagree
- f. I don't know

Q10. Please explain your answer to Q8 and Q9, referring to specific evidence as much as possible.

**RECOUP supports the general aims of the proposed bans as outlined in this consultation. The impact of plastics, and indeed any material in the environment is a cause for concern and steps should be taken to prevent this.**

**It is recorded that wet wipes ending up in the environment is due to incorrect disposal and the actions of the consumer. This is in part fuelled by interpretive labelling, such as ‘flushable’ products. In these instances, material substitution away from wet wipes containing plastics would not prevent these items ending up in the environment, all-be-it made of a different material or mixture of materials.**

**Consumer engagement should be a key, primary aim in tackling this challenge, and before an outright ban is considered, it is vital that the impact of alternative materials and formats are considered (e.g. how compostable and/or biodegradable alternatives break down in the various possible environments they may end up in).**

**It is also essential to consider industries where these formats are required in order to fulfil their purpose, such as in the medical sector, and what the impact would be (whether it be safety, financial or other) if they were to be banned.**

## Consumer impacts

Q11. Do you think that the proposed ban will have a negative impact on any specific groups of consumers?

- a. **Yes**
- b. No
- c. I don't know

Q12. Please explain your answer to the previous question (Q11), referring to specific evidence where possible and whether you are part of the group impacted. Where possible, please indicate if this answer is specifically related to manufacture, supply, or sale

**Some sectors, such as the medical industry, rely on wet wipes for their sterile and cleaning properties. Further to this, all sectors that require disposable wet wipes for cleaning (e.g. food services) will be impacted by material substitution and potentially increased costs.**

## Definitions

Q13. Do you think the definition of wet wipes used within this consultation is suitable?

- a. **Yes**
- b. No, please expand
- c. I don't know

Q14. Do you think the definitions of plastic used within this consultation are suitable?

- a. Yes
- b. **No, please expand**
- c. I don't know

**The definition of plastics should be aligned with that in other areas of legislation and in other consultations, including (but not limited to) the UK Plastic Packaging Tax, and Extended Producer Responsibility (EPR).**

Q15. Wet wipes marketed as 'natural', 'biodegradable' or 'plastic free' may be made from polymers which have undergone chemical extraction, processing and refinement processes. Do you think wet wipes marketed in this way should be considered 'plastic free' and excluded from the proposed ban? For each material, please explain why:

- a. Viscose (usually derived from wood) <Yes with reason/no with reason/I am not sure>
- b. Lyocell (a semi synthetic cellulose fibre) <Yes with reason/no with reason/ I am not sure>

- c. Cotton (reconstituted cotton fibres) <Yes with reason/no with reason/ I am not sure>
- d. Other**

**Whilst the definition of 'plastic free' needs to be clear and consistent, it is important to consider the impact that disposal of these items will have, in the same way as a wet wipe containing plastic. The removal of plastic should not be considered a complete solution to the issue of these items ending up in the environment, and the messaging to, and action of the consumer at the point of disposal should be strongly considered.**

### Exemptions

Q16. To what extent do you agree with the following statement, "I/my organisation supports an exemption for plastic-containing wet wipes that are used in hospitals and have certain clinical and/or medical uses"?

- a. Strongly agree**
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. I don't know

Q17. To what extent do you agree with the following statement "I/my organisation supports an exemption for plastic-containing wet wipes in certain industrial and professional uses (business to business sales only)"?

- a. Strongly agree**
- b. Agree
- c. Neither agree nor disagree
- d. Disagree
- e. Strongly disagree
- f. I don't know

Q18. Please explain your answers to Q16 and Q17, referring to specific evidence as much as possible.

**As stated previously, sectors will require wet wipes to fulfil functions in regards to being sterile and durable (e.g. medical), and therefore would be at least subject to increased costs, or at worse an impact on the safety of these environments, if these items were to be banned.**

### **Section 3: Questions for organisations or businesses**

About your organisation or business

Q19. What is the name of the organisation or business that you are responding on behalf of?

**RECOUP**

Q20. Please indicate which of these sectors you most align your organisation with for the purpose of this consultation (please tick all that apply):

- a. Public body
- b. Non-governmental organisation
- c. Retail industry
- d. Manufacturing industry
- e. Wholesaler
- f. Other (please state)**

**Charity and membership organisation representing organisations from across the plastic supply chain.**

Q21. How many employees does the organisation/business you are representing have?

- a. 0-9 employees
- b. 10-49 employees**
- c. 50-249 employees
- d. 250-499 employees
- e. 500 or more employees

Q22. Where does your business or organisation operate? (Select all that apply)

- a. England**
- b. Scotland
- c. Wales
- d. Northern Ireland
- e. UK-wide
- f. Outside the UK, within the EU
- g. Outside the UK, outside of the EU

Manufacture, supply and sale of wet wipes

Q23. If you are a manufacturer of wet wipes containing plastic, where are your UK production facilities based? (Select all that apply)

- a. England
- b. Scotland
- c. Wales
- d. Northern Ireland
- e. Not applicable**



Q24. If you are a retailer and/or distributor of wet wipes containing plastic, where in the UK do you sell/supply and in what proportion between England, Scotland, Wales, and Northern Ireland?

n/a

Q25. Does your business/organisation currently manufacture, supply, sell or frequently use wet wipes? (Select all that apply)

- a. Manufacture
- b. Supply/sell to businesses / organisations
- c. Supply/sell to consumers
- d. Frequently use
- e. Other (please specify below)

**RECOUP uses limited number of wet-wipes as part of its material analyses and other projects.**

Q26. (If manufacturer) What proportion of plastic-containing wet wipes do you supply/sell annually to retailers and what proportion to wholesalers? Please give your figure as a percentage if possible.

n/a

Q27. (If supply or frequently use) Are the wet wipes that your business/organisation, supplies/sells, or frequently uses wet wipes, are they sourced directly from manufacturers?

- a. Yes, entirely
- b. Yes, mostly
- c. Yes, partially
- d. No, they are sourced entirely from wholesalers
- e. No, they are sourced entirely from elsewhere
- f. I don't know

Q28. Approximately what proportion of these wet wipes your organisation / business manufactures, supplies/sells or frequently uses contain plastic? If possible, please give your figure as a percentage, and indicate for each percentage whether you are referring to manufacture, supply/sale or frequent use. State "Unsure" if you do not have information on this.

**Minimal volumes of wet wipes used within RECOUP.**

Q29. (If manufacturer) Does the production of plastic-containing wet wipes use the same machinery and process as non-plastic wet wipes? If not, could you please briefly describe any differences and if significant capital or fixed cost investment would be required?

n/a

Q30. What is the average unit dry weight for plastic wet wipes versus their plastic-free equivalent in grams?

**RECOUP is not able to provide this information.**

Q31. (If manufacturer) In the event of a ban on the manufacturing of wet wipes containing plastic, would you switch production to non-plastic wet wipes?

- a. Yes
- b. No, please expand

**n/a**

Q32. (If manufacturer) Is there a difference in the material input costs in the manufacturing of non-plastic wet wipes as opposed to wet wipes containing plastic? If so, how much?

- a. No
- b. Yes, <open text box>

**n/a**

#### The proposed ban

Q33. Would your business/organisation have transitioned entirely to manufacturing/supplying/selling/frequently using plastic-free wet wipes if this ban was not to come into effect?

- a. Yes, within the next 6 months
- b. Yes, within the next 6 months to a year
- c. Between one and three years
- d. Between three and five years
- e. Between five and ten years
- f. No, we wouldn't have transitioned within the next ten years
- g. We only make/supply/frequently use plastic-free wet wipes already

**h. I don't know**

Q34. What would be the expected cost to your business/organisation entirely transitioning to manufacturing/supplying/selling/frequently using plastic-free wipes within the following time frames? If you were already planning to transition, please give the additional cost to your business/organisation (if any).

- a. Between 9 and 12 months time**
- b. Between 1 to 2 years time
- c. Between 2 to 3 years time

Q35. Is there a cost of not being able to manufacture for the purposes of export?

**RECOUP is not able to provide this information.**

#### Market composition

Q36. Do you agree with the turnover market split for ONS categories "G: wholesale and retail trade; repair of motor" and "C: Manufacturing" respectively to estimate the split of business size by number of employees<sup>13</sup>?

To estimate the market share held by businesses of different sizes we use the turnover data by SIC codes published by the Office for National Statistics (ONS). The proportion of turnover by "G: wholesale and retail trade; repair of motor" can be used as a proxy for the market share split of wet wipe retailers/wholesalers and "C: Manufacturing" turnover split can be used as a proxy for the market share split of wet wipe manufacturers. This market split is displayed in the table below.

UK Market share by turnover	Employment size band			
	Micro (0–9 employees)	Small (10–49 employees)	Medium (50–249 employees)	Large (250 or more employees)
<b>G : Wholesale and retail trade; repair of motor</b>	12%	17%	20%	50%
<b>C : Manufacturing</b>	5%	9%	18%	68%

- a. Yes, the market split looks appropriate
- b. No - please expand with what you think would be more appropriate <open text box>
- c. Don't know**

Q37. The following 4 digit Standard Industrial Classification codes by the Office for National Statistics<sup>14</sup> have been identified by Defra as businesses that may be impacted by a ban on wet wipes containing plastic wet wipes.

- 2229: Manufacture of other plastic products
- 4649: Wholesalers of other household goods
- 4673: Wholesale of wood, construction materials and sanitary equipment
- 4711: Retail sale in non-specialised stores with food, beverages or tobacco predominating
- 4719: Other retail sale in non-specialised stores
- 4774: Retail sale of cosmetic and toilet articles in specialised stores

Do you agree that these business sectors are those that are likely to be impacted?

- a. Yes, these codes look suitable

<sup>13</sup>[Enterprises by employment and turnover size - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/methodology/classificationsandstandards/ukstandardindustrialclassificationofeconomicactivities/uksic2007)

<sup>14</sup><https://www.ons.gov.uk/methodology/classificationsandstandards/ukstandardindustrialclassificationofeconomicactivities/uksic2007>

- b. Yes, these sectors are likely to be impacted
- c. No, these sectors are not likely to be impacted. If so, what else should be included/excluded?
- d. I don't know**

**The care sector has not been considered in these codes. Below is a non-exhaustive list of these codes.**

**87100 residential nursing care facilities**

**87200 residential care activities for learning difficulties, mental health and substance abuse**

**87300 Residential care activities for the elderly and disabled**

**87900 Other residential care activities**