

Written Evidence on the Environment Bill (EB10)

1.1 Introduction

1.2 The Nappy Alliance welcomes both the reintroduction of the Environment Bill and the opportunity to submit written evidence to the Bill Committee. The Nappy Alliance is a coalition of independent providers of reusable nappies, existing to promote the economic and environmental benefits of reusable nappies and greater consumer choice for new parents. We do not seek a ban on disposable nappies, as we understand that they are a very helpful product and an essential part of managing busy lives for many new parents and carers. We do believe that the Government is right to look at reducing reliance on disposable nappies along with other single-use plastics.

1.3 In the last Parliament, we supported David Linden MP's [Nappies \(Environmental Standards\) Bill](#) which received cross party support before the election was called in 2019. The Bill sought to:

- Establish environmental standards for nappies that would define the characteristics required for a nappy to be traded, advertised or promoted as “reusable”, “biodegradable”, “eco-friendly” “environmentally friendly” and other similar terms.
- Establish a collaborative scheme between public bodies and the nappy industry to promote nappies that meet these environmental standards and that would provide public information on the effects of disposable nappies on the environment, the financial advantages of reusable nappies for families and local authorities, and other advantages.
- Incentivise local authorities to operate schemes to promote the use of reusable nappies and reduce disposable nappy waste.

1.4 The Nappy Alliance is now seeking for the clauses of the Nappies (Environmental Standards) Bill to be tabled as amendments to the Environment Bill 2019-21.

2.1 Proposed amendments

2.2 This submission addresses Section 47 (Schedule 4: Producer Responsibility Obligations), Section 49 (Schedule 6: Resource Efficiency Information) and Section 50 (Schedule 7: Resource Efficiency Requirements) of the Environment Bill 2019-21. We are particularly interested in the Government's single-use plastics waste strategy and, in particular, how the Government intends to tackle the environmental impact of disposable nappy waste in the UK.

2.3 We propose the following amendments to the Environment Bill:

1 Environmental standards for nappies

- (1) The Secretary of State must by regulations establish environmental standards for nappies.
- (2) The standards must define the characteristics required for a nappy to be traded, advertised or promoted as –
 - (a) “reusable”;
 - (b) “biodegradable”;
 - (c) “eco-friendly”;
 - (d) “environmentally friendly”;
 - (e) other such similar terms as may be defined in the standards.
- (3) The regulations may provide for nappies or the packaging in which they are contained to bear a mark signifying that they meet the standards.
- (4) The trading, advertising or promotion of a nappy is an unfair commercial practice for the purposes of the Consumer Protection from Unfair Trading regulations 2008 (S.I. 2008/1277) if –
 - (a) that nappy is described using a term used in subsections (2)(a) to (d) or a similar term defined in regulations under subsection (1) but does not meet the relevant standards, or
 - (b) that nappy or its packaging bears the mark in subsection (3) but does not meet the relevant standards.

2 Promotion of nappies that meet environmental standards

- (1) The Secretary of State must by regulations establish a scheme to promote nappies that meet the environmental standards in section 1.
- (2) The scheme must be a collaboration between public bodies and the nappy industry.
- (3) The Secretary of State may by regulations make provision for a levy to be paid by persons who manufacture or trade in nappies for the purpose of meeting the operating expenses of the scheme.
- (4) The scheme must provide public information on—
 - (a) the effects of disposable nappies on the environment;
 - (b) the financial advantages of reusable nappies for families and local authorities;
 - (c) other advantages of nappies that meet the standards in section 1.

3 Local authority reusable nappy schemes

- (1) The Secretary of State must prepare a report on steps that will be taken to encourage local authorities to operate schemes to—
 - (a) promote the use of reusable nappies, and
 - (b) reduce nappy waste.
- (2) In preparing the report, the Secretary of State must consult –
 - (a) operators of existing reusable nappy schemes,
 - (b) local authorities involved in those schemes,
 - (c) parents who have participated in such schemes,
 - (d) manufacturers of reusable nappies,
 - (e) the Scottish Ministers,
 - (f) the Welsh Ministers, and
 - (g) the Department of the Environment in Northern Ireland.
- (3) The report must be laid before Parliament within six months of this section coming into force.

3.1 Explanation

3.2 Reducing the UK's reliance on disposable nappies supports the Government's objective of eliminating avoidable plastic waste by 2042, as set out in the [25 Year Environment Plan](#). Every year, nearly 3 billion nappies are thrown away in the UK, costing local authorities £60 million per annum for disposal. On average, a baby will get through around 4,380 disposable nappies by the time they are potty trained (compared to an estimated 24 if only reusable nappies are used), which is the equivalent of seven super market bags being thrown away daily.

3.3 Disposable nappies constitute 30% of all non-biodegradable waste and are the third biggest product category in landfill. They are also one of the worst sources of contamination in recycled waste streams. One disposable nappy can take over 300 years to break down, disintegrating into microplastics which poison our waterways, pollute the environment, and harm animals and eco-systems. If they do breakdown in landfill, disposable nappies produce methane gas, further contributing to the climate emergency. A report by Zero Waste Europe from November 2019 found that using disposable nappies over the two and a half years it takes on average for a child to potty train would result in a global warming impact of approximately 550kg of CO₂ equivalents or 3.3Mt of CO₂ equivalents per year based on a population of 15 million babies across the EU.¹

¹ Zero Waste Europe, (2019) "The environmental & economic costs of single-use menstrual products, baby nappies & wet wipes: investigating the impact of these single-use items across Europe", [online], available at: https://zerowasteurope.eu/wpcontent/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes.pdf

- **4.1 Introducing environmental standards for nappies**

4.2 A small number of disposable nappies are marketed as “biodegradable”, “eco-friendly”, “environmentally friendly” and other labels. However, these products cannot breakdown in a domestic composting environment and will take many years to decompose in landfill.² Furthermore, the composition of these products (made of mixed material types) and the presence of organic material after use, makes recycling technically difficult and economically expensive.³ The various composite materials also require different environmental conditions in order to decompose.⁴ These products cannot decompose in landfill or incinerators, and the UK does not have the infrastructure or facilities to process, recycle and reproduce these products. This means that the vast majority end up in regular waste streams or cause serious contamination issues in recycled waste streams, resulting in potential recyclate ending up in landfill instead.⁵

4.3 A nappy recycling plant has been developed in Italy but is only equipped to manage 2% of the waste generated from Italy’s disposable nappy consumption.⁶ Collecting, cleaning and breaking nappies into their component parts is likely remain complex and expensive. The success of nappy recycling plants is unproven on a large scale and the likelihood of the UK being able to rely solely on nappy recycling technologies to reduce the amount of single-use plastic waste generated by disposable nappies is slim. Accurate data on the amount of energy used per tonne of recyclate produced should also be assessed before recycling nappies is considered a viable option.

4.4 Whilst there are now compostable plastics (plant-based) on the market, these products can only be composted in an industrial composter, which involves heating the compostable plastics to extreme temperatures and to date the UK has no such facilities in place.⁷

4.5 Parents and carers are often confused about whether they can recycle disposable nappies, meaning that disposable nappies are regularly the number one source of contamination in recycled waste. When asked which bin dirty nappies should go in, 22% of respondents in a survey by the North London Waste Authority said a bin other than the residual bin, whilst 11% specifically said the recycling bin.⁸ 13% of those putting dirty nappies in the wrong bin took their information from on-package labelling, which demonstrates how the information included in the labelling by many disposable nappy manufacturing companies is leading to confusion.

4.6 This amendment would therefore prohibit manufacturers of nappies from trading, advertising or promoting their products as “biodegradable”, “eco-friendly”, “environmentally friendly” and other labels if the products cannot be reasonably dealt with in the correct way in local waste streams.

- **5.1 Promoting nappies that meet environmental standards**

5.2 Using just one reusable nappy in place of a disposable every day can save 730 nappies from landfill during early childhood. A family that chooses reusable nappies for their children can also save about 99% of the waste that would be generated by using single-use ones.⁹ In Europe, if only 20% of families using disposable nappies for their children switched to reusables, the amount of waste that could be prevented would be more than 1 million tonnes each year.¹⁰

5.3 Reusable nappies also deliver significant savings to new parents. By the time a child is potty trained, their disposable nappy consumption can cost up to €2,672, according to Zero Waste Europe, whereas reusable nappies can result in savings between €200 and €2,000 per family.¹¹ These savings increase if the reusable nappies are used on multiple children or if they are bought or sold on the thriving second-hand market.

² Gibbins, S. (2018), “What you need to know about plant-based plastics”, [online], Washington D.C: National Geographic, available at: <https://www.nationalgeographic.com/environment/2018/11/are-bioplastics-made-from-plants-better-for-environment-ocean-plastic/>

³ ZWE, (2019)

⁴ UNEP, (2015), “Biodegradable Plastics and Marine Litter. Misconceptions, concerns and impacts on marine environments”, Nairobi: United Nations Environment Programme

⁵ Gross, V. (2018), “Debunking the compostable myth”, [online] London: Carbon Smart, available at: <https://www.carbonsmart.co.uk/compostableplastics/>

⁶ ZWE, (2019)

⁷ UNEP (2015)

⁸ North London Waste Authority, (2019), “1 in 10 Parents Admit Throwing Dirty Nappies in the Recycling” [online], London: NWLA, available at: <http://nlwa.gov.uk/news/1-in-10-parents-admit-throwing-dirty-nappies-in-the-recycling/>

⁹ ZWE, (2019)

¹⁰ Ibid.

¹¹ Ibid.

5.4 Reusable nappies can also help children toilet train quicker, whereas the absorbency of disposable nappies can delay the process.¹² According to research by ERIC, The Children’s Bladder and Bowel Charity, 68% of early years staff across the UK said they felt children were being potty trained at a later age, with Purnima Tanuku OBE, Chief Executive of the National Day Nurseries Association citing disposable nappies as a cause.¹³

5.5 Reusable products are not as widely available or known about in the UK as their disposable counterparts. A scheme that promotes reusable nappies addresses Schedule 4 Part 1.2 (a) of the Environment Bill in particular, insofar as it would help in the “promoting or securing an increase in the reuse, redistribution, recovery or recycling of products or materials”. A successful scheme that promotes reusable nappies could also serve as a precursor to establishing legally binding re-use targets and ensuring adequate availability of reusable products in national retail outlets.

- **6.1 Promoting local authority reusable nappy schemes**

6.2 Reusable nappy schemes are being rolled out across the country and are helping local authorities meet their environment and waste targets as well as delivering significant financial savings through reduced landfill tax and disposable costs. However, current provision of reusable schemes is patchy and there is a greater need to promote standardisation and shared learning across local authorities.

6.3 Reusable nappy schemes can involve reusable nappy providers working in partnership with local authorities to offer parents reusable nappy schemes. The local authority and the waste authority pay an upfront cost for each voucher, varying between £40 and £54.

6.4 Successful reusable nappy schemes include the [Real Nappies for London](#) (RNFL) scheme. Parents with a baby under 18 months old are eligible to apply for a voucher to help with the cost of buying their first set of reusable nappies. Such schemes help local authorities to meet their environment and avoidable waste targets whilst also delivering significant financial savings. A report produced by the Institute of Civil Engineers showed that between July 2012 and July 2016, 3,188 vouchers were redeemed by parents across nine London councils. According to the study this delivered savings of £320,791.¹⁴ Hackney Council in London say that their reusable nappy scheme helped to cut costs by £10,360 in 2018/19 by avoiding gate fees for residual waste.

6.5 Local authorities that have used the scheme have reported on greater community cohesion and an increased awareness amongst residents of the need for behavioural changes that supports the environment.

6.6 Steps are being made elsewhere in the UK to help parents make the switch to reusable nappies. In Scotland, all new parents are provided with a box of essential items upon the birth of their child as part of the Scottish Government’s [Baby Box](#) initiative. These boxes include baby clothes, a digital ear thermometer, a bath towel, a changing mat, books and, since April 2019, a voucher for a reusable nappy kit. With the inclusion of a reusable nappy voucher in each baby box, the Scottish Government is providing information, promoting greater consumer choice for new parents and encouraging a reusable mentality. Similarly, in Wales, the Welsh Government are currently exploring the baby box idea as part of its [Beyond Recycling](#) strategy.

*The Nappy Alliance
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¹² ERIC, The Children’s Bladder and Bowel Charity, (2019), “More children toilet training later – how early years can help parents”, [online], available at: <https://www.eric.org.uk/news/more-children-toilet-training-later-how-early-years-can-help-parents>

¹³ ibid

¹⁴ Hill, K., Vick, H., Walker, A. and Warner, C. (2017), “Contribution of ‘Real Nappies for London’ to local authority waste prevention – 2012–2016”, [online], Northampton: The Institute of Civil Engineers and The University of Northampton, available at: <https://www.icevirtualibrary.com/doi/pdf/10.1680/jwam.17.00028>