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# CIWM Scotland Centre Consultation Response

May 2018

Scottish Government Consultation on the Proposal to ban the manufacture and sale of plastic-stemmed cotton buds in Scotland.

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 5,000 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management sector and has various grades of membership determined by education, qualification and experience.

The Scottish Centre Council of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to the Scottish Government consultation on the Proposal to ban the manufacture and sale of plastic-stemmed cotton buds in Scotland.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste and resources sector. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the management of all wastes and resources.

CIWM Scotland offers these comments based on the extensive experience of a number of our senior members.

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**Question 1: Do you support the proposal to introduce a ban on the manufacture and sale of plastic-stemmed cotton buds in Scotland?** Yes No**Please give reasons:**

As per those discussed in the consultation document regarding plastic fragments causing harm to sea life, and potentially acting as a vector for contaminants. To date, voluntary measures and education/awareness campaigns have not prevented members of the public and relevant businesses from correctly disposing of these, or many other items.

At the very least, a logo featuring a crossed-out toilet should be added to items to indicate that wipes, buds, etc that are used in the bathroom/bedroom should not be disposed of via toilets (similar to that on batteries showing a crossed-out bin).

By removing the issue of plastic stems at source, a specific material creating environmental issues is avoided. There are alternatives and these were used before the plastic stemmed version was produced. They are also in use by some manufactures – Johnson and Johnson swapping to paper in [Feb 2017](#).

**Further considerations:**

As per the actions identified in the Marine Litter Strategy for Scotland 2014, this ban should ideally be accompanied by further awareness raising measures around:

- the impacts of incorrect disposal of non-biodegradable waste on/in the water network;
- littering on land, regardless of the material type.

With plastic stemmed cotton buds being a commonly found form of marine debris in European seas there is due cause to act in favour of a ban where voluntary actions have not produced significant change. Careful consideration should also be given to the ways in which public messages are sensitively disseminated around the favourability of non-plastic options.

Although the removal of plastic-stemmed cotton buds is desirable, there is currently confusion and misinformation in the public and retail domain, propelling some to rush to convert to biodegradable/compostable options for all single-use disposable materials. For all disposables full life cycle costing and environmental impacts of other reusable/biodegradable options - which would predominately make their way to landfill or energy recovery and not into the marine environment - should be encouraged at a product level.

CIWM Scotland see a Scottish government, and country, that is at the forefront of resource management and circular economy and support this proposed ban if it is to be used as an

exemplar – were the results will then be applied to other disposables and wider products. Rushing and potentially missing an opportunity to provide a wider positive impact would be disappointing.

The link to wider application also indicates reviews of other areas, like the litter strategy, extended producer responsibility and eco-design.

**Question 2: If you are responding as a business, can you provide supporting evidence of any expected additional costs from this proposed ban?**

N/A

**Question 3: Are you content for the Scottish Government to contact you for further clarification of the financial effects that you have estimated?**

- Yes
- No