



Policy recommendations to make menstrual products, nappies and wet wipes circular

Policy paper

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Drawing from the findings of two pioneer studies on the environmental and economic impacts of single-use menstrual products, baby nappies and wet wipes¹, and on the legal measures to address such impacts², Zero Waste Europe makes the case for the EU to regulate a product category that, as of today, is anything but circular and instead is based on disposable items which end up incinerated, landfilled or littered almost entirely.

EU policies are still piecemeal and fail to address some of the biggest barriers both for waste prevention and recycling processes, resulting in the EU market being flooded with short-lived products that cannot be reused or recycled, and that has great environmental and economic impacts for both consumers and public administrations.

ZWE supports the Circular Economy objective that by 2030 all products placed on the EU market should be safe, sustainable and circular. For menstrual products, nappies and wet wipes this means **moving away from disposability to changing the current consumption patterns and the single market towards sustainable and effective systems and products.**

Policy recommendations

In line with the circular economy and the European Green Deal, **the European Commission should adopt a strategy to increase the reusable market for menstrual products, nappies and wipes, while simultaneously ensuring that the single-use equivalents are collected separately and recycled effectively.**

This strategy should also include financial incentives to promote reuse products and systems and make them more competitive. Some key recommendations are:

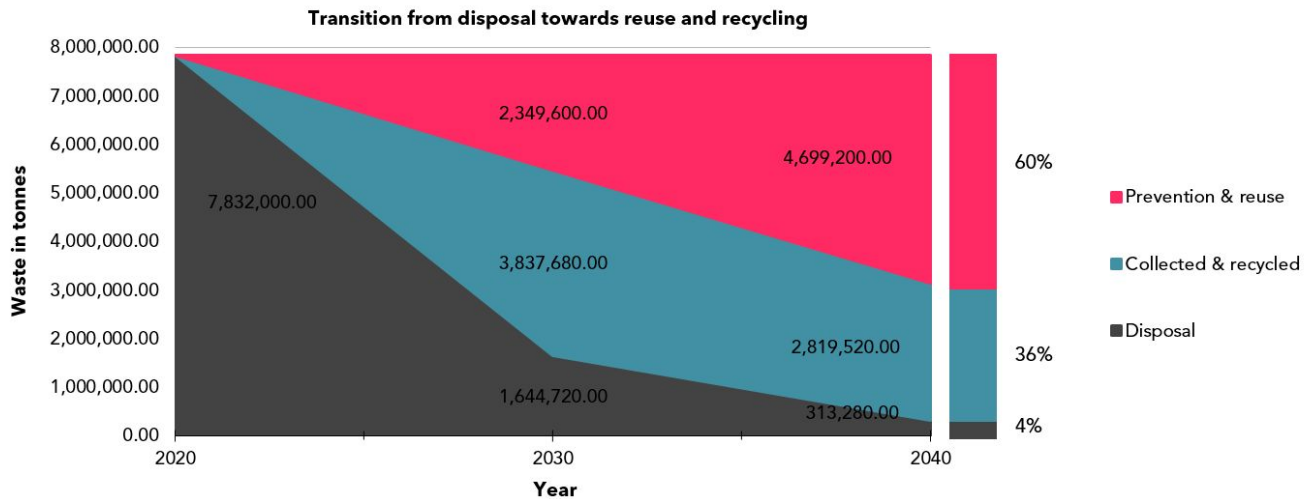
- Set a **reuse target of 30% by 2030**, to be increased to **60% by 2040** for menstrual products, nappies and wet wipes.
- Set a **separate collection target for recycling** remaining single-use menstrual items, wet wipes and nappies: **40% by 2025, 70% by 2030 and 90% by 2040.**
- **Expand the scope of EPR schemes to cover all of these items, coupled with eco-modulation of fees.** This should, at a minimum, cover the costs of awareness-raising measures, collection, transport and treatment, clean-up costs, data gathering and reporting. **Part of the fees should be dedicated to a special fund to finance** the transition from single-use to **reusable systems** (e.g. local washing systems for reusable nappies) **and, in the case of menstrual items, for organisations or programmes fighting menstrual poverty.**
- Set binding requirements for manufacturers to **phase-out hazardous chemicals** and **eliminate the use of toxins** in their products.

¹ www.breakfreefromplastic.org/wp-content/uploads/2019/12/bffp_single_use_menstrual_products_baby_nappies_and_wet_wipes-1.pdf

² <https://zerowasteurope.eu/library/existing-measures-policy-recommendations-to-minimise-the-impact-of-menstrual-products-nappies-wet-wipes>

By implementing these recommendations, the future scenario for menstrual products, baby nappies and wet wipes in the EU-28 would look very different. With the target of 60% prevention and reuse, waste generation would be reduced by 4,699,200 tonnes in 2040. Of the remaining 3,132,800 tonnes, 90% should be separately collected for recycling, and only 10% would need to be treated as residual waste. This means reducing residual waste in this sector from 7,832,00 tonnes to 313,280 by 2040, that is an overall reduction of residual waste of 96% in 20 years.

This transition is represented in the graphic below:



Graphic 1: transition from disposal towards reuse and recycling

Beyond the EU level, **national initiatives** are critical and we believe **the SUP Directive transposition phase** is a good opportunity for Member States to go further with the inclusion of waste prevention measures and facilitate the development of reuse models by:

- Extending the **SUP Directive to include nappies**.
- **Enlarging the current cost coverage of EPR for wet wipes** to cover their collection, transport and treatment.³
- **Extending the scope of EPR to menstrual products and nappies**, covering at least the costs of awareness-raising measures, their collection, clean-up, transport and treatment, as well as data gathering and reporting.
- Establishing a **dedicated fund** where at least 5% of the **EPR fees** collected are invested in **subsidies for prevention and reuse systems** (e.g. local washing systems for reusable nappies) and **for organisations fighting menstrual poverty** (see Box 1 below).

³ EPR schemes for wet wipes in the SUP Directive include only the costs of awareness-raising measures, cleaning up litter, transport and treatment, data gathering and reporting.

- Setting legally **binding consumption reduction targets** for single-use menstrual products, nappies and wet wipes, together with **reuse targets**, such as **30% by 2030, and 60% by 2040**.
- Making **mandatory the separate collection** of this product category.
- Setting **separate collection targets for recycling** single-use menstrual items, wet wipes and nappies of **40% by 2025, 70% by 2030 and 90% by 2040**.
- **Reducing or eliminating taxes on reusable** menstrual **products**, nappies and wipes.
- Introducing **economic incentives for reusable products and reuse systems to overcome barriers to entry**, such as capital investment in nappy-washing facilities.
- Making the **availability of reusable products mandatory**, to at least the same extent as single-use products (50/50) **in all national retail outlets**.
- Ensuring **clear and legible marking/labelling requirements for all products** covered under this study, **on each sales unit** and on their packaging, including information on the presence of plastics and chemicals, and appropriate waste management options/waste disposal means to be avoided.

Background: the impact of these single-use items across Europe

Single-use menstrual products, nappies and wet wipes create serious environmental, economic and social impacts throughout their lifecycle, from the production phase to the end-of-life. Compared to reusable products, these single-use items still dominate the market and their production in Europe has actually increased in recent years.

Waste generation: In the 28 EU Member States, by 2017 (reference year), research has shown that:

- more than 49 billion units of **menstrual products** were consumed, meaning an annual generation of about **590,000 tonnes** of waste,
- around 33 billion **single-use baby nappies** were consumed, resulting in **6,731,000 tonnes** of waste per year, and
- around 68 billion individual **wet wipes** were consumed, which equates to **511,000 tonnes** of waste per year.



The waste generation of single-use menstrual products, baby nappies and wet wipes accounts for approximately **7,832,000 tonnes** of waste annually (equivalent to 15.3kg per inhabitant per year) within the EU-28. **This amount of waste accounts for 3% of total municipal solid waste and 4% of the total residual municipal waste stream.** This percentage increases in regions presenting higher separate collection rates for other waste streams (**it can represent up to 30-40% of the residual fraction in zero waste municipalities**).

Single-use menstrual products, nappies and wet wipes are currently included in the scope of municipal waste, which is not required to be separately collected and therefore ends-up in the mixed municipal waste bin, causing the contamination of the waste bin and hampering the recycling process.



In Europe these products typically end up in landfills (87%) or are incinerated (13%), wasting resources and invoking negative environmental impacts (high land occupation rates, groundwater and soil contamination, greenhouse gases emissions, etc.).

Marine litter and costs for municipalities: Single-use menstrual products and wet wipes are usually flushed down the toilet after use and thus, they can enter the marine environment through the waste water release system, resulting in significant environmental and economic impacts.



Waste management costs (collection and final treatment) of these products can range from €3 to more than €10 per inhabitant per year, depending on the country:

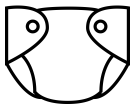
- For the maintenance and unblocking of sewer facilities, it is estimated that the cost of waste disposal for **sewage debris removed from wastewater treatment plants, equates to between €500 - €1,000 million per year for the European Union.**
- For **removing these products from beaches**, coastal municipalities assume high costs: about **€1.1 million annually** in the **United Kingdom** and approximately **€50,000** to the Government of the **Balearic Islands** each year.

Showcasing the benefits of reusable products

Waste prevention: Among the environmental advantages of reusable products (compared to single-use ones), waste prevention is one of the clearest benefits.



It has been estimated that the use of a menstrual cup results in a reduction of 99% of the waste that would be generated using single-use products. Therefore, **if only 20% of menstruators would opt for the menstrual cup instead of single-use menstrual items, the amount of waste could be reduced by nearly 100,000 tonnes per year in EU-28.**



Similarly, a family that chooses reusable baby nappies can also save about 99% of the waste that would be generated by using single-use ones. **If only 20% of babies using nappies switched to reusables, the amount of waste that could be prevented in the EU-28 would be more than 1 million tonnes each year.**

Economic savings: The waste reduction potential can be translated into high economic savings for the municipality, due to lower management and treatment costs, as well as a reduction in the costs coming from removing waste from beaches and seas, as litter and sewage related debris would be reduced.



Also regarding the saving for consumers, **using a menstrual cup instead of tampons or pads, would result in annual savings of €18 to €119 per person while lifetime savings could exceed €4,400.** Similarly, the use of **reusable nappies results in savings between €200 to €2,000 per family compared to single-use ones.** The saving increases if you take into account the fact that reusable baby nappies can be used by different siblings or bought second-hand.

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Zero Waste Europe is the European network of communities, local leaders, businesses, experts, and change agents working towards the same vision: phasing out waste from our society. We empower communities to redesign their relationship with resources, to adopt smarter lifestyles and sustainable consumption patterns, and to think circular. zerowasteurope.eu



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