

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/
Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill
SUP_09
Ymateb gan / Evidence from GAMA Healthcare

The Environmental Protection (Single-use Plastics Products) (Wales) Bill Written evidence from GAMA Healthcare

About GAMA Healthcare

Founded in 2004 by two doctors, GAMA Healthcare is a dynamic, innovative company at the forefront of infection prevention technology. GAMA specialise in the manufacture and distribution of revolutionary Infection Prevention and Control (IPC) products and the provision of exceptional aftersales support. In addition, with the threat of antimicrobial resistance rising, continuous innovation is needed to deliver safe healthcare. The team at the state-of-the-art Fellows Research Centre explore areas ranging from microbiology to formulation and materials science, supporting every GAMA product with a robust package of scientific evidence.

GAMA Healthcare is also a member of the Safer Disinfectant Network (SDN), having led its establishment in 2019. The SDN is a network of companies, professional associations, and stakeholders, formed because of a shared concern about failings in the supply of infection prevention products in the UK. Our aim is to ensure that all disinfectants used in the UK are safe and effective.

We are the provider of Clinell – the primary brand of wet wipes used in the NHS for surface and equipment cleaning and disinfection (Clinell Universal) and hand sanitisation (Clinell Antimicrobial Hand Wipes).

Summary

GAMA Healthcare welcomes the introduction of the draft Bill by the Senedd. We are, however, pleased that professional wet wipe products have been excluded from its scope, as is the case within the European Union's single-use plastics directive.

We would note the importance of ensuring the legislation in draft and final form uses the same definitions as all devolved institutions in the UK, the Westminster government, and the European Union as Wales's strongest trading partners. This is essential for consistency and to support the purchasing of goods in Wales by the public and private sectors, and by consumers.

To that end, we would urge the Senedd to ensure the draft legislation adopts the definitions used by the European Union for 'plastic,' 'polymer,' 'main component of a product,' and 'not been chemically modified.' These are set out in Directive EU 2019/904 (see [Directive \(EU\)](#)

[2019/ of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment \(europa.eu\)](#)). and Commission Notice C216 (“Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment”). (see: [Commission notice — Commission guidelines on single-use plastic products in accordance with Directive \(EU\) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment \(europa.eu\)](#))

We recognise the environmental harm that is caused if products are improperly disposed of – i.e., inappropriately flushed so they enter waterways and potentially damage marine ecosystems. It is for this reason that GAMA Healthcare products are labelled in line with the EDANA code of practice on “Communicating Disposal Pathways for Single Use Nonwoven Wet Wipes to Protect Wastewater Systems.” This includes specific labelling to communicate the ‘Do Not Flush’ message appropriate for Gama Healthcare wet wiping products. It is also why our aftersales care for businesses, schools and the NHS includes training on the use and appropriate disposal of professional wet wipes made from synthetic/plastic fibres.

Professional wet wipes, including those containing clinical grade disinfectants and active agents, are used for cleaning and disinfection, playing a critical role in reducing the spread of highly transmissible viruses and pathogens such as Covid-19, influenza and norovirus. Had professional wet wipes been included in the draft legislation to prohibit such single-use plastic products, there would have been profound public health implications, while products made from cellulosic materials would be unable to meet exacting efficacy specifications set by the likes of the NHS (due to a higher rate of absorption of disinfectant agents by cellulose fibres compared to plastics).

A ban on the use of plastic in professional wet wipe products would also incur significant additional costs (potentially exceeding 40 percent) to end-users, including those in the public sector, due to the higher cost of raw materials.

GAMA Healthcare written evidence

- **Whether a Bill is needed to introduce a ban on commonly littered single-use plastic items.**

GAMA Healthcare recognises the need for action to address the environmental damage caused by single-use plastic items and products that are commonly littered and improperly disposed of.

However, we would note the importance of concerted and proactive public/consumer education to change current behaviours that are the cause of littering. We provide training to end-users, including customers in the NHS, as part of our aftersales care – this includes how to appropriately dispose of wet wipe products. We also support and have helped the development of the leading industry code of practice on wet wipe product labelling, which is

maintained by EDANA – and GAMA Healthcare products are clearly labelled to show that they should not be disposed of via flushing down the toilet.

The draft legislation excludes wet wipe products. We believe it is appropriate that professional wet wipes are outside the scope of the Bill, mirroring the distinction made in the EU's single-use plastics directive. As noted above, professional wet wipes are critical to effective infection prevention strategies.

The definition of professional products would include hospital grade disinfectant wet wipes (whether used in hospitals or community settings) that are subject to biocidal and medical device regulations); detergent wipes used for cleaning prior to disinfection; and patient care wipes that are used for hygiene purposes and may contain antiseptics along with cleaning formulas.

Professional wet wipe products must routinely meet high specifications set by the customer, e.g. the NHS. These include the ability to eradicate specific viruses and pathogens within a set time. Products made entirely of cellulose fibres would be unable to meet these specifications due to a higher rate of absorption (compared to plastic) of the disinfectant, agent within the cellulose-based wiping material. This would have significant consequences for infection prevention.

We would note that GAMA Healthcare has launched a plastic-free surface disinfectant wet wipe as part of our efforts to reduce plastic usage and to protect the environment. However, this product is for public (non-professional) use and does not have the same microbiological efficacy or target organisms as a clinical-grade wet wipe.

- **The advantages and disadvantages of using a Bill rather than secondary legislation to introduce a ban.**

We recognise the opportunities to promote responsible public behaviour by acting via primary rather than secondary legislation.

Whilst there are advantages to banning plastic from commonly littered products, the impact of any legislation is conditional on public education and behaviour change to ensure all products are disposed of in an appropriate way.

- **Whether the provisions of the draft Bill will deliver the policy intention.**

We hope that Bill will deliver on the policy intention, which we understand to be reducing the environmental damage caused by commonly littered products made of single-use plastics. We would, as noted above, caution that any ban will only be successful if accompanied by concerted efforts at public education to drive behaviour change and ensure products are appropriately disposed of.

We believe it is appropriate that professional wet wipe products are excluded from the scope of the Bill, as they are similarly excluded from the scope of the EU single-use plastics directive. This reflects the crucial role they play in infection prevention strategies. We would note that

such products are routinely disposed of as clinical or industrial waste and thus should not be a source of environmental damage. We would further note that responsible product suppliers such as GAMA Healthcare clearly label products to show how they should and should not be disposed of (following the EDANA code of best practice) and provide training to end users that includes product disposal as part of extensive aftersales care.

- **Whether there are any potential barriers to the implementation of the draft Bill's provisions (including the United Kingdom Internal Market Act 2020).**

It is the view of GAMA Healthcare that the “**Key concepts**” section of the draft Bill requires elaboration and or that a separate “guidelines” document should be drafted to introduce **clarity** and ideally to harmonise with definitions that already exist within some of Wales’s strongest trading partner, the European Union. The definitions need to be consistent to avoid barriers to future product innovation and trade.

GAMA Healthcare urges the Senedd to harmonise its approach to addressing the issue of single use plastic products with the other UK devolved administrations to ensure that a unified approach is undertaken to ensure the “mutual recognition principle for goods”

- **Whether the powers in the draft Bill for Welsh Ministers to make subordinate legislation are appropriate.**

GAMA Healthcare believes the powers set out are appropriate – we would reiterate the importance of continued alignment with the EU single use plastics directive in any subordinate legislation – i.e. that professional wet wipes should remain outside the scope of any ban on single-use plastics to reflect their role in effective infection prevention strategies and in protecting public health.

- **Whether there are any unintended consequences arising from the draft Bill.**

As outlined above, definitions of “key concepts” need to be harmonised both with other legislators within the United Kingdom and with our strongest trading partners within the European Union. A lack of harmonisation could have a negative impact and create barriers to product innovation and free trade.

We would however caution that the success of the legislation – i.e. its effectiveness in reducing pollution and environmental damage – is conditional on changes to public behaviour and ensuring products, with or without single-use plastics, are disposed of appropriately.

- **The financial implications of the draft Bill (including for businesses and consumers).**

We do not anticipate any substantive financial implications. As noted above, a ban on plastic in professional wet wipes would have resulted in a significant increase in product cost to end-users, including the NHS, due to the higher costs of raw materials, i.e. organic fibres.

References:

- **Commission Notice 2021/C216/01.** Commission guidelines on single use plastic products in accordance with Directive (EU) 2019/906 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the Environment. OJ. C216(64). p1-52. Available from: <https://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=OJ:C:2021:216:FULL> (Accessed: August,2022).
- **Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment.** OJ. L155. pp.1-19. Available from: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0904&from=EN> (Accessed: August, 2022).