

## FULL IMPACT ASSESSMENTS

### A. CHILDREN'S RIGHTS IMPACT ASSESSMENT

All completed Children's Rights Impact Assessments must be sent to the [CRIA@gov.wales](mailto:CRIA@gov.wales) mailbox

#### 1. Policy objectives

A ban on the supply of wet wipes containing plastic in Wales is due to come into effect on 18 December 2026 and will align with bans being introduced in England, Scotland and Northern Ireland.

Our policy seeks to:

- Rapidly reduce the environmental harm caused by plastic and microplastic pollution, particularly in our rivers and seas, from the incorrect disposal of wet wipes containing plastics.
- Encourage a shift towards reusable or non-plastic alternatives.
- Support our wider strategic objective of tackling the throw-away culture by encouraging a change in behaviour in relation to the consumption of single-use products.

We will be using powers under [The Environmental Protection \(Single-use Plastic Products\) \(Wales\) Act 2023 \(the 2023 Act\)](#) to introduce our regulations. This makes it an offence for a person to supply or offer to supply, including for free, a single-use product specified in the Schedule of the 2023 Act.

#### 2. Gathering evidence and engaging with children and young People

To develop our Policy, we gathered evidence from existing scientific studies, public surveys, stakeholder engagement and public consultation. Our work has also considered, and mitigated against, any potential negative impacts from banning wet wipes containing plastic on individuals, groups, businesses and other organisations. This includes children and young people through engagement with representatives of the Youth Parliament and a local constituency community group in which children and young people were in attendance. We also sought the views of young people through Children in Wales, the umbrella organisation for those working with young people in Wales, who reached out to them on our behalf. See below for more details.

## **Overview of engagement and evidence gathered undertaken**

The policy proposals were developed prior to the COVID-19 pandemic and the initial consultation was undertaken during a period of national restrictions. We were therefore unable to hold face-to-face engagement sessions.

Overall, evidence gathering, engagement and consultation can be divided into three stages, set out below.

### ***Stage 1 – Public consultation (2020)***

A public [12-week consultation](#) was held between 30 July and 22 October 2020 relating to proposals to ban several commonly littered single use plastic products, this included a specific question on wet wipes:

***‘Question 11: Should wet wipes be included in future proposals for further bans or are there other measures which could be introduced to address them, for example Extended Producer Responsibility?’***

During this stage, due to the COVID restrictions, opportunities for engagement were restricted. Online meetings were held with different groups, this included representatives of the Youth Parliament and a local constituency community group in which children and young people were in attendance.

### **Summary of responses and evidence gathered**

A total of 3,581 [responses](#) were received to the main consultation and of these 2,373 responded to the specific question on wet wipes. Of this figure, 63% were in favour of further action, with the majority supporting a ban on these products. However, some respondents favoured a more nuanced approach which included the need for regulations to target products advertised as “flushable”, but which did not biodegrade or break down in the same way as toilet tissue. There were also calls to maintain access to wipes for hygiene purposes, with reference to their importance to some protected characteristic groups, for example disabled people and also those caring for infants or young children.

In our engagement with Youth Parliament members, some highlighted concerns for the potential risk of those who opposed the bans on health and/ or accessibility grounds being stigmatised as not caring about the environment when this was not the case. One Youth Parliament member noted there were often socio-economic barriers to young people “doing the right thing” when it came to buying alternative products. For example, those living in less affluent areas may not have plastic free shops or may find alternative products too expensive. It was felt more could be done

to improve the access and affordability of these products. In considering these views we have sought to highlight the potential price differences between plastic and non-plastic alternatives when developing our Regulatory Impact Assessment work.

Responding to the consultation, [The Children's Commissioner for Wales \(CCW\)](#) explained they, along with the Youth Advisory Panel of the CCW, “*support the proposals put forward by Welsh Government to ban the single use plastics items identified for general widespread use, however, clear and robustly considered exemptions must be put in place to ensure certain groups of people are not adversely impacted by this decision. The impact of this ban on individuals with disabilities and certain health concerns was identified as a key concern by my Panel*”. There were no specific comments provided on the question related to wet wipes.

A selected range of the feedback we received from those working with, caring for or representing children and young people is provided below. Responses from children and young people have been summarised in the paragraphs above.

*“These are essential for caring for children. However there are alternatives for cleaning other than cleaning wipes. Until there are suitable alternatives for child care I don't know if this can be changed. However these do have a profound impact on the environment and an alternative does need to be found”.* **Vale Youth Service**

*“Wet wipes are a waste of money and resources! Use water!”* **Teacher, Caerau Primary School**

*“The blanket description [sic] of 'wet wipes' is not helpful in this context. There needs to be push for single use biodegradable products (there are some already available). If any single use item (including a whole range of unnecessary [sic] packaging) are not readily recyclable or fully biodegradable then there should be a ban imposed on them”.* **Headteacher**

*“Wipes are useful and have been used a lot during Covid but their composition ought to be reviewed”.* **Playgroup staff member**

*“However replacement ideas would need to be explored first. Use could be allowed within certain settings and for young children - difficult to monitor but any reduction useful”.* **Anonymous**

*“If it was manufacturers that needed to make the changes and the costs of this were not passed on to consumers as this could lead to the suffering of low income families with children”.* **Anonymous**

*“For the consumer, having children is hard enough! introduce fines if found polluting etc. Many businesses including the NS use wipes for sanitising. A ban is tricky”...*

**Anonymous**

*“I have two children below the age of 10, I cannot see why anybody feels the need of these throwaway wipes. My parents didn't have them, I am healthy, my children are healthy! I have also had to unblock sewer pipes in rented properties that I manage. People continue to flush them down the toilet despite advice not to, as can be seen at any treatment works, or indeed on beaches”.* **Anonymous**

## **Stage 2 – Legislation development and targeted engagement (2022)**

Following the consultation's closure in October 2020, work was then undertaken to develop our policy proposals further and to identify the most effective intervention to address plastic pollution from this source. Early in 2022 Welsh Ministers took the decision to introduce the 2023 Act to tackle the environmental damage caused by commonly littered single-use plastic products. This included the potential expansion of the original proposals to cover plastic single-use carrier bags, polystyrene lids and food containers and wet wipes containing plastic.

To understand the potential impacts from any legislation, the Welsh Government undertook a targeted evidence-gathering exercise and facilitated several engagement sessions with a range of stakeholders prior to introducing the 2023 Act. This work was conducted between April 2022 and August 2022 and involved representatives from industry, the retailer sector, health and social care, those representing protected characteristic groups and the environment. Engagement with manufacturers highlighted that some wipes have been specially designed for specific purposes and in some cases have been tested and licenced for these specific tasks. These were identified as either for medical or specialised cleaning purposes.

Engagement with organisations such as Newborn Hearing and Newborn Bloodspot Screening Wales, Youth Wales Special Interest Group and the Professional Association for Childcare and Early Years Cymru (PACEY Cymru) didn't identify any additional concerns due to the existence on the market of plastic-free alternatives at similar price points. Engagement was also held with the Youth Wales Climate Change Special Interest Group (see below).

The Welsh Government also commissioned [WRAP Cymru](#), an environmental non-governmental organisation, to undertake an online survey of 1,003 adults between 4-17 July 2022 to understand the behaviours and views of consumers in relation to wet wipes. Questions focused on frequency of purchase and use, disposal, perception of wet wipes as a source of litter and reactions to different policy interventions. Whilst the survey did not target children and young people, it did provide evidence of why

people purchased wet wipes and how they used them, particularly in relation to their use with babies, children and young people.

An overview of WRAP and childcare surveys' outcomes, applicable to children and young people, are included in this Impact Assessment.

### Summary of responses and evidence gathered

#### Engagement with Youth Wales Climate Change Special Interest Group

Whilst no specific comments were raised during our engagement with this group, the children and young people in attendance expressed their broad support for a ban on wet wipes. While there was broad support for the ban, one reason given against the ban was that there are appropriate methods available in Wales to safely dispose of wipes without causing litter or flushing them (e.g. purple waste bags provided for curb side collection of clinical waste, continence products and nappies).

#### Targeted surveys

*Nurseries and childcare settings* - Of those working in nurseries, most commented that wet wipes were used daily for cleaning the faces and hands of the children in their care, changing nappies, cleaning the surface of desks, toys, or doors. It was noted the importance of using wet cloths had increased following the introduction of COVID-19 guidelines which required staff to use single-use PPE to meet the health and safety requirements in their locations / offices. Some commented there would be concerns about moving to plastic free alternatives, especially if they were more costly and queried whether they were still able to adhere to health and safety policies for infection control and other requirements.

However, some respondents reported parents had already asked for the nurseries to shift towards using flannels and that many had now done this for several years. Others mentioned there was now clear guidelines provided that encouraged re-usable products such as "reusable" nappies, and other disposable items although progress of change is slow. It was felt the COVID-19 pandemic had undermined these efforts as the disposable element of wipes was seen as a more robust method of helping to deal with infection control.

*Hospitals and pharmacies* - Views were obtained through direct discussions with the British Medical Association Cymru and via an email survey to all Health Boards in Wales. Whilst questions were not specifically aimed at the care of children and young people, it is anticipated the care of such individuals would have been considered in the responses.

Those working in this sector highlighted there were a broad range of uses and applications for wet wipes. These included the personal care of patients, for example they can be used for bed baths and for cleaning during continence care. It was noted these types of wipes often containing cleansing agents, moisturisers and skin

protectants all in one. Other uses included general cleaning and sterilising and infection control - for people, surfaces, and equipment. The plastic component of wet wipes was also highlighted as an important feature by some respondents. This due to the fact it helped provide material strength and delivered some advantages in terms of the fibres and effectivity.

However, evidence was also provided by some NHS Health Boards exploring “non-plastic” alternatives. For example, Cardiff and Vale Health Board had introduced “non-plastic” wipes in some of their Intensive Care Units (ICU), although it was noted suitable wipes had been difficult to source. The respondent also highlighted that such changes are often difficult to introduce and required engagement with staff to ensure acceptance of the new product.

#### *WRAP online survey*

This data helped inform our policy understanding of the type and frequency of use of wet wipes amongst the general population. The evidence gathered highlighted the use of wet wipes was widespread, with only 11% of respondents to the survey stating they had never purchased any and 30% of respondents stating they regularly or occasionally purchased 5 or more of the categories of wet wipe. The later response came predominantly from those in 18-34 age range and from those with children at home. Despite their common use within the home, the research found there was widespread support for policy interventions, with almost four in five (78%) of respondents being either strongly or somewhat in favour of banning wet wipes that contain plastic.

### ***Stage 3 – UK wide consultation (2023)***

The UK Government, Welsh Government, Scottish Government and the Department of Agriculture, Environment and Rural Affairs for Northern Ireland undertook a [six-week consultation](#) on its proposals. This ran from 14th October 2023 to 25th November 2023.

The consultation focused on wet wipes containing plastic and addressing their impact on the environment. The UK Government and Devolved Governments sought 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.

The consultation sought views on a range of areas which included the likely impact of the proposed ban for consumers, particularly for those with protected characteristics e.g. disabled people etc Views were also sought on whether any exemptions were needed for wet wipes containing plastic.

As this was a UK led consultation process there was no targeted engagement with children and young people, however the consultation was shared with a wide range of groups and organisations.

#### Responses and evidence gathered

Analysis of responses from across the UK identified similar concerns to those raised in previous Welsh Government consultations and engagement i.e. suitability of alternative products, the cost of those products and their use by those with children and young people or those responsible for caring for children and young people. A selection of responses, see below, to a consultation question on which groups, if any, would be negatively impacted by a ban.

*“It will be harder for parents of young children, for example. But as a parent, I think it will not be impossible, and the good outweighs the bad in this case”.* **Anonymous, England.**

*“I think these groups of people will be impacted negatively, because plastic free wipes are not as strong as the one with plastic:*

*- parents of children in nappies”.* **Anonymous, England**

*“Parents of babies and young children will have to use poorer quality more expensive baby wipes if the proposed ban is implemented”.* **Anonymous, Wales**

*Yes, mums of children who need access to a wipe when necessary, the ones with some plastic in are the only ones to easily be pulled from the packet.* **Anonymous, Wales**

#### **Stage 4 – Engagement to support Impact Assessments (2024)**

With Ministerial agreement for a UK wide ban on the supply of wet wipes containing plastic, Welsh Government officials engaged with children and young people to help develop the required Regulatory Impact Assessment and Integrated Impact Assessment. This included the use of surveys completed by children and young people and engagement with specific groups.

On the 13 July, at a Children in Wales (CiW) Social Justice and Climate Change session, children and young people engaged in discussions about the Welsh Government’s proposal to ban problematic single use plastic products, including wet wipes containing plastic, and the impacts they had on children and young people. Through interactive activities and resources, the session encouraged open dialogue, fostering critical thinking and an opportunity for young people to express their

opinions, and respond to a Welsh Government consultation exploring impacts on children and young people. CiW also created a survey for young people to participate in at their summer residential week. The consultation questions given to CiW for inclusion in the online survey are at **Annex 1**.

The Welsh Government also produced an online survey regarding the proposed ban on problematic single use plastic products, including wet wipes containing plastic. An online survey was shared with [Eco Schools](#) for children and young people to complete via social media, aimed at High School students. The policy background and questionnaire were also shared, in hard copy format, with 14–18-year-old children and young people at the '[Our Earth, Our Future](#)' conference in July.

### Responses and evidence gathered

In relation to the views shared by those responding to the Eco-schools survey and Children in Wales engagement session, no significant feedback resulted. In relation to the Eco-schools survey only one respondent highlighted potential concerns of still being able to use wet wipes for cleaning purposes after a ban. Responses to our Children in Wales survey indicated those responding felt banning wet wipes containing plastic would not cause them any problems, however awareness of non-plastic alternatives amongst those questioned was low (they were asked had they seen non-plastic wipes in shops). The cost of living was cited as a reason why people would choose cheaper options containing plastic.

## **3. Analysing the evidence and assessing the impact**

- Using the evidence you have gathered, what impact is your policy likely to have on children and young people? What steps will you take to mitigate and/or reduce any negative effects?

The evidence and views we have documented during the policy development process has highlighted a high level of support to address the environmental impacts from wet wipes containing plastic. Whilst some concerns were raised over the potential increased cost of non-plastic alternatives (which could affect those with caring responsibilities or those in low-income families), we believe there are now a sufficient range of products available that will ensure wet wipes will still be accessible to all those who need them.



## Exemptions to mitigate impacts

We acknowledge that for some uses, plastic free alternatives are either unsuitable or unavailable.

Following the four-nation consultation in 2023, a need was identified to continue to allow wipes to be available for industrial and other business purposes, such as hospitals or food production sites. This would allow other businesses, such as wholesalers, to obtain wet wipes containing plastic from them or directly from the manufacturer.

To account for those who receive or require medical care in their own home, it was proposed an exemption would allow for supply and sale by registered pharmacies. Wet wipes containing plastic will not be permitted for sale on the shelves, and customers who require these products for medical purposes will need to specifically ask the pharmacist for these. This proposal was based on the model for the restrictions on the supply of single-use plastic straws under the 2023 Act.

Following further discussions, we have agreed an exemption to allow the continuing supply, or offer to supply, of a wet wipe designed or manufactured for use in connection with medical care or treatment. This will benefit those children and young people who receive or give medical care in their own home and in health or care settings.

The full details of these exemptions will be included in regulations and set out in more detail in guidance. We will continue to engage with the relevant organisations to ensure that they are implemented effectively.

## Impacts on Children and Young People

We need children and young people to play a prominent role in meeting global commitments to reduce plastic pollution. We are aware, through correspondence received to the Welsh Government from schools and school children, that this is an area of significant concern and they demand immediate action to prevent it from occurring in the first place. The most challenging test for our plans is to meet the expectations of children and young people who will bear a far greater burden of the costs and impact of plastic pollution than anyone in a position of power today. The young people of Wales will face the ongoing and increasing impacts from plastic pollution if levels entering the environment are not addressed. This can bring stress, anxiety, and negative effects on mental well-being.

Initiatives across Wales support young people to take action to respond to such environmental concerns, and the Office of the Future Generations Commissioner for Wales is providing platforms to ensure young people are supported and their voices heard across Wales. The [Eco-Schools programme](#) is the main platform by which the Welsh Government engages directly with children and young people to help them develop sustainable behaviours within their schools and communities, while building on their skills, including numeracy and literacy, also encompassing education for sustainable development and global citizenship..

### Positive impacts

Through engagement with children and young people it is clear they understand the positive impact their actions and decisions have on plastic pollution. They show enthusiasm at the ability to become more sustainable and ethical and they demonstrate an understanding of the impact their choices and values have on their environment and communities, by choosing to use readily available alternatives to plastics or reusable products. Engaging on these issues is empowering for children and young people and helps them to also understand how these proposals will impact other groups such as young and older people or disabled people. Such engagement also suggests constructive ways in which to engage further with them on this issue through social media etc.

Tackling our over-use of single-use plastics is an issue which has been championed by many young people. There are many children and young people led campaigns to fight plastic waste. They have organised several campaigns, including the [Welsh Youth Parliament's report](#) on littering and plastic waste. Our proposals aim to build on this. We want to change consumer behaviour towards using fewer single-use plastic products, such as wet wipes containing plastic.

Also, these proposals will meet the requirement [in The United Nations Convention on the Rights of the Child](#), specifically Article 31 and Article 24, by reducing plastic pollution and providing cleaner green and natural spaces like beaches, forests, parks and the countryside for walking, learning, running, cycling and playing.

### Negative Impacts

Our consultation and engagement processes identified potential impacts on those children and young people who may be reliant on plastic wet wipes for medical purposes. As noted above we have sought to address this issue through the provision of exemptions. Concerns were also raised about the continued availability of wipes for use by children, young people and those responsible for their care, however we believe there are sufficient alternative non plastic, single-use and reusable products available on the market to limit any potential negative impact.

We recognise the cost and quality of those alternatives may prove to be barriers for some. Cost considerations for alternative products have been explored as part of the policy development and whilst these non-plastic materials can potentially be more expensive than plastic ones, we anticipate the continued shift in production to alternative materials will help reduce these costs over time.

UNCRC Articles or Optional Protocol	Enhancements (X)	Challenges (X)	Explanation
<b>Article 1:</b> Everyone under 18 years of age has all the rights in this Convention	x		During our policy making process we have sought to engage with children and young people to understand their views and assess any potential negative/ positive impacts.
<b>Article 2</b> The Convention applies to everyone whatever their race, religion, abilities, whatever they think or say and whatever type of family they come from	x		We have sought to engage with a wide range of Children and Young People's groups and have received views highlighting concerns around costs and accessibility of non-plastic wipes. These views have been taken into consideration when developing our policies.
<b>Article 12</b> Children have the right to say what they think should happen, when adults are making decisions that affect them, and to have their opinions taken into account.	x		The policy respects the right of children and young people to express their views and be heard on matters that affect them, by involving them in the consultation and decision-making process. The Welsh Government has sought the opinions and experiences of young people on our proposals to ban wet wipes containing and has taken them into account in developing the policy. The evidence shows that young

			<p>people are supportive of taking action to prevent plastic pollution, although have highlighted the need to ensure there is access to suitable alternatives for those who may require them for health or hygiene purposes. We have sought to address these concerns by allowing certain wipes to still be made available from pharmacists.</p>
<p><b>Article 13</b> Children have the right to get and to share information as long as the information is not damaging to them or to others.</p>	x		<p>Our existing Statutory Guidance is already available in <a href="#">Easy Read</a> format and will be updated following approval of the proposals in the Senedd.</p> <p>As part of our ongoing work to address plastic pollution we will continue to engage with children and young people to inform them of our progress.</p>
<p><b>Article 23</b> Children who have any kind of disability should have special care and support so that they can lead full and independent lives.</p>	x		<p>Our proposals will include exemptions for wet wipes to ensure they remain available to those who require them for medical or health related conditions.</p>
<p><b>Article 24</b> Children have the right to good quality health care and to clean water, nutritious food and a clean environment so that they will stay healthy. Rich countries should help poorer countries achieve this.</p>	x		<p>Climate change is a pressing public health issue which will increasingly dominate our lives as it adversely affects the most basic health requirements: clean air, safe water, sufficient food, and adequate shelter. It affects the environment around us – the places where we live, work, learn and play – can have a profound impact on our health and well-being.</p>

			Implementing these proposals will have a direct positive impact on protecting our environment, health and well-being in the short term and for future generations.
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We can foresee no potential impacts on EU Citizens Rights (as referenced in the Equality Impact Assessment) relating to young people up to the age of 18, from the proposed legislation.

#### **4. Ministerial advice and decision**

The policy proposal is based on robust evidence and research on the environmental impacts of wet wipes containing plastic, as well as the views of various stakeholders, including children and young people.

Based on this evidence, the Welsh Government advises the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to approve the policy of banning the supply of wet wipes containing plastic in Wales, as part of the wider strategy to tackle plastic pollution and its impact on our environment, economy and health. Our goal is to maximise resource efficiency and minimise 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.

The policy is expected to have positive impacts on the rights and well-being of children and young people in Wales, by protecting their environment and best interests. Whilst evidence on potential health impacts associated with microplastics is still under review, our proposals have adopted a precautionary approach should it emerge microplastics or plastic pollution may have a negative impact.

The policy has the potential to have a negative impact on those children and young people (or families with children and young people), who currently use plastic containing wet wipes on the basis of price. However, with many manufacturers and retailers already shifting to alternative materials it is anticipated any short-term increase in costs will reduce once more products are placed on the market.

Subsequently, the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs agrees with the advice and approves the policy of banning the

supply of wet wipes containing plastic in Wales, subject to the approval of the Senedd.

## **5. Publication of the CRIA**

Once our CRIA is finalised and our draft regulations agreed, this document will be published on the Welsh Government website along with Section 1 of the IIA and other relevant IAs.

## **6. Communicating with Children and Young People**

We will continue to work with children and young people to communicate the progress of this policy but also to engage with them regarding the Welsh Government's wider agenda to reduce single-use products littered in our streets and green spaces, reduce pollution and tackle the Climate Change emergency.

## **7. Monitoring and Review**

There is Ministerial commitment to review the implementation of the 2023 Act, the primary legislation being used to introduce these regulations. Whilst the scope and nature of this review has yet to be agreed, it is anticipated consideration the impacts/benefits identified in 2023 Act's CRIA and this CRIA will be considered as part of this review process.

If any information or evidence is identified through this process which affect children and young people's rights, both documents will be reviewed and amended where appropriate.

Evidence gathered during the targeted engagement supports the information received during the various consultation stages of this policy development. We have decided to allow the continuing supply, or offer to supply, of a wet wipe designed or manufactured for use in connection with medical care or treatment. **Therefore, the proposed exemption to be included in the regulations remain the same as set out above.**

## **ANNEX 1**

Children in Wales online questionnaire in relation to the Welsh Government proposal to ban wet wipes with plastic content.

1. Sometimes wet wipes with plastic can be found in our rivers and seas. To help stop this we want to ban wet wipes with plastics. Do you think this is a good idea or bad idea?
2. Have you seen plastic free wet wipes in the shops you go to?
3. If we ban wet wipes containing plastic, do you think this will cause problems for you or other people you know? If yes, then how do you think this might happen?