



Our Response to the Latest Government Announcement of their Views of “Disposable” Nappies

We were again hugely disappointed that Mr. Ben Bradshaw (formerly the minister responsible at the Department for Environment, Food and Rural Affairs) reiterated in parliament this week the now discredited results of the Environment Agency's report “Life Cycle Assessment of Disposable and Reusable Nappies in the UK”. Once again our disappointment turned to anger for the same reasons as before. Broadly speaking, the report has been shown to be critically flawed in various areas (e.g. unbelievably small sample sizes, dubious survey results, the disregarding of certain major environmental considerations).

Probably the most glaring omission is that the report ignores the logistics of disposing of 3 billion “disposable” nappies a year.

We were also disappointed that the report purports to relate to the whole of the U.K. as opposed to just England and Wales - a strange remit for the Environment Agency to undertake without the collaboration of SEPA (Scottish Environment Protection Agency). As the largest nappy service in Scotland, we would like to have been involved in the studies which the Environment Agency undertook in 2004.

Even assuming that the report is a fair reflection of the situation in the U.K. in 2002, we operate to higher environmental standards than the model laundry from the report, meaning that we can justifiably state that using our nappies is better for the environment than using “disposables”.

Below is a more detailed breakdown of our points of contention with the report – and Mr Bradshaw.

Items of Contention with Assessment

1. ERM (authors of the document) base all of their data regarding the manufacture of prefold nappies on "only one complete response" (p. 37, para. 7) from a manufacturer. It is astounding that such a significant part of the environmental impact of laundry services should be founded on a survey sample size of one! It is even more concerning when the sensitivity analysis of this shows it to be a highly significant factor. Figure 9.8 (p. 116) details the results of the sensitivity analysis where data for the production of terry nappies (used for home-laundering) replaces corresponding data for the production of prefolds. It is obvious from this that reliable data should have been secured. ERM only see fit to state "Figure 9.8 shows that the system is sensitive to the prefold manufacturing data and suggests that the study would benefit to further work in this area." (p. 115, para. 6).

2. In a similar vein, only four laundries supplied "usable data" (p. 38, para. 1) and of those, only three "questionnaires were fully completed" (p. 70, para. 2). We supplied data to ERM in 2002 and assume that we are one of the three mentioned. Also, only eight customers of laundry services were interviewed (p. 52, para. 6) – a ridiculously small sample size.

3. The average daily use of disposables is calculated by ERM to be 4.16 nappies per day (p. 42, para. 3). This figure was derived from UK sales figures for 2001-2002 and market penetration in 2004. Using two data sources originating three years apart to extrapolate a result seems strange considering that the Environment Agency surveys in 2004 yielded a different (higher) result. Furthermore, it is hard to understand how sales figures would indicate the age of baby for which the nappies were purchased. As the Assessment considers only nappies used in the first 2.5 years of a baby's life, it would be interesting to know how this proportion of the total UK sales figures was arrived at – if indeed it was accounted for at all. This is another critical factor, as the number of nappies used per day will obviously dramatically affect the overall results.

4. Data for cotton growing and ginning is based on figures from the USA (p. 72, para. 4) despite the assertion that "the majority of prefold nappies are thought to be produced in the Far East, India and Pakistan." (p. 72, para. 6). Indeed almost all of our nappies are produced in Pakistan.

5. The Environment Agency conducted surveys in 2004 (presumably because it had belatedly become apparent that there was a critical lack of data for many aspects of the Assessment). However, despite being the largest service in Scotland, we were not contacted as part of these surveys. This is especially surprising as we had previously spent some considerable effort in supplying ERM with accurate data in 2002.

6. There are two tables providing information on the average composition and weight of a disposable (Table 3.2 (p. 28) and Table 3.3 (p. 29)). The first table is the source from which data is taken to define the "average disposable" for the rest of the Assessment. However the source of the data for this table is not made clear. It also yields a lower figure for average weight of a disposable than does the other source.

7. ERM were able to ascertain the average weight of a prefold cotton nappy (the type used by laundry services) by doing analysis on samples themselves (p. 37, para. 6). It would seem to have been prudent for them to have done likewise for disposables rather than taking data from manufacturers of disposables at face value.

8. The figures taken for the composition of an average disposable (Table 3.2 (p. 28)) do not agree with the corresponding figures from the alternative source (Table 3.3 (p. 29)). They also do not appear to tally up with the input / output manufacturing data for disposables.

Aspects in which the Scottish Nappy Company is better than the Assessment Model

1. The Scottish Nappy Company (SNC) uses only (and has always used) LPG delivery vehicles. This is acknowledged to be better for the environment than petrol- or diesel-powered vehicles.
2. The second (and most recent) set of laundry equipment purchased by SNC is very environmentally-friendly. The washer uses a water re-use tank whereby water from the last rinse is used in the subsequent initial prewash. The energy-efficient dryer uses a heat exchanger to reduce gas consumption by around a third.
3. SNC asks customers to return plastic bags (in which their nappies are delivered) to us so that we can recycle these. They are taken for recycling every few months as part of our normal delivery round – no special journey is made.
4. SNC provides biodegradable, flushable liners as part of the service and almost all customers use these. This means that almost all excreta goes into the sewerage system as intended for proper treatment. This is at odds with the report's estimate of 43% of excreta being landfilled or incinerated.

Broader Important Issues

1. This Life Cycle Assessment has as its aim "to assess the life cycle environmental impacts associated with" the various nappy systems in the UK (p. 4, para. 5). It ignores the most obvious environmental impact of disposables in that there simply is not enough landfill to sustain current rates of usage.
2. The Assessment assumes that a large proportion of excreta goes to landfill / incineration for the laundry service scenario, and that all excreta goes to landfill / incineration for the disposables scenario. By not highlighting this as a negative environmental factor, the Assessment almost appears to condone this as acceptable. It perhaps has little impact under the environmental criteria set out by the Assessment, but it most certainly should be an environmental consideration. If this were not the case, it would surely be more cost-effective for councils to uplift all human excreta from households along with the rest of the rubbish rather than supply and maintain a sewerage system.
3. Sir John Harman, Chairman of the Environment Agency states, "We are the leading public body for protecting and improving the environment in England and Wales." It would be interesting to see the reaction of the Environment Agency had its Scottish counterpart (Scottish Environment Protection Agency) taken it upon itself to publish a report detailing environmental conditions in England and Wales.

Finally

This award-winning, family run business will continue to provide a bulwark to short sighted profiteering at the expense of the environmental impact espoused by large, multi-national conglomerates with vested interests – and ill-informed Government Ministers.