

September 1, 2017

International Water Services Flushability Group  
Transmitted by E-mail to [staff@iwsfg.org](mailto:staff@iwsfg.org) & [info@iwsfg.org](mailto:info@iwsfg.org)

**RE: General Comment to International Water Services Flushability Group (IWSFG) Draft Guideline for Flushability**

To Whom It May Concern:

Food & Consumer Products of Canada (FCPC) and the member companies we represent wish to thank you for this opportunity to comment on the International Water Services Flushability Group's (IWSFG) *Draft Guideline for Flushability*

FCPC is the largest national industry association in Canada representing companies that manufacture and distribute food and consumer products. As the country's largest employer in the manufacturing sector, our industry employs approximately 300,000 Canadians in 6,000 manufacturing facilities located in both urban and rural areas across the country. Please find attached a list of our members and our current Board of Directors.

Since our individual member companies who currently sell flushable products are submitting comments of their own relating to the technical aspects of the draft and their implications, FCPC comment will be more general in nature.

While some preliminary evaluation has been done on the problem statement behind this *Draft guideline*<sup>1</sup>, we believe that the work was too narrow in scope to reach the broad conclusions that have informed this *Draft*:

- The cited dye-and-drop tests conducted in the U.S. are a poor surrogate for comprehensive studies of "real world" conditions: materials flushed into the sewer system by consumers.
  - Sewer system studies such as those conducted in U.S. municipalities, New York<sup>2</sup> and Maine<sup>3</sup> for example, provide a more accurate assessment of whether specific categories of products flushed by consumers are a source of negative impacts on those systems.
- We are also concerned about the *Draft guideline/standard* for the definition of flushable; the test limits proposed here would see some dry toilet paper currently on the market fail to meet the requirements.
  - It is essential that any test methods or limits must be reasonably achievable and set, with a reasonable margin of error, to ensure their stringency depends on what's necessary to not harm municipal sewage systems. Studies to determine this, in the Canadian context, must be conducted before any specific test methods or their limits, are proposed.
- Typically when a "standard" is developed, it undergoes a rigorous transparent process, such as those developed by Codex, ISO or, in Canada, the Canadian Standards Association.

- We would caution against the use of the term “standard” in this *Draft* as none of those essential activities have taken place.
- FCPC urges greater transparency by IWSFG so that the draft document and any tests referenced undergo an established, formalized standard development process that has rigor and accountability.
- Despite efforts by municipalities like Vancouver, WA and London, England, who regularly remind their customers to flush nothing but human waste and toilet paper<sup>1</sup>, problems do persist with non-flushable products.
  - A collaborative approach between municipalities and brand owners may be a more effective approach to modifying consumer behaviour.

We look forward to discussing this with you in the near future.

Sincerely,

Regards,



Susan Abel  
Vice President Safety and Compliance

cc Joslyn Higginson, Vice President, Public & Regulatory Affairs, FCPC  
Michelle Saunders, Vice President Provincial Affairs, FCPC  
Carla Ventin, Vice President, Federal Government Affairs, FCPC

References:

1. <http://www.wefnet.org/webcast/flushableornot/> *Flushable or Not? Dispersing the Non-Dispersible Problem*; 2013
2. Fuss & O’Neil, *Forensic Evaluation of Non-Dispersables*, New York City Law Department; August 15, 2016
1. INDA-MEWEA, “Don’t Flush Baby Wipes” *Pilot Public Education Campaign, Final Report*; May 2015