

Initials	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
JRM	117-122			Te	What is acceptable to wastewater services, as evidenced by the proposed tests, is significantly more stringent than what causes damage to conveyance pumps or screen clogs. Forensic analysis of pumps and screens indicate that nonwoven material that conforms to the current INDA Code of Practice (GD3) does not cause clogs in pumps and screens. IWSFG has not provided a compelling reason why these more stringent tests are necessary.	Thresholds in this Guideline should be revised to reflect levels where material causes damage to water treatments facilities.	
JRM	131-135			Te	The scope of this guideline would include toilet paper and would be considered to be flushable only if it has been tested to and certified by a third party. Toilet paper has been in common use in the United States for over 100 years without any evidence that it is causing clogs in water treatment systems. Toilet paper should be specifically excluded from these guidelines. Disintegration tests 3A, 3B, and 3C are so stringent that existing brands of toilet paper are at risk of not passing.	Toilet paper should be specifically excluded from this Guideline.	
JRM	203-218			Ed	For products that are used in commercial environments (such as office buildings, schools, and restaurants), the user of the product will likely not have access to the sales packaging. Given that manufacturers no longer have custody of the product, it is not		

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**IWSFG Template for Reviewer comments and IWSFG secretariat observations<sup>1</sup>**

**Document reviewed: Standard 1 - Criteria for Recognition as a Flushable Product**

**Due Date: 2017-09-01**

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					clear how consumers will be notified. Note that the goal of these guidelines, as stated in lines 117 - 126, is not to prohibit use of these products but rather to identify those that don't pass the tests.		

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**Document reviewed: PAS 0 – Terms and Definitions for Determination of Flushability**

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JRM	142			Ed	Refers to IWSFG PAS 2B (UK) which doesn't exist on the website	Remove or fix reference.	

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JRM	48-50			Ed	These guidelines should be limited to factors that impact the cost and operation of water treatment facilities. Environmental harm should be determined by an appropriate regulatory body (e.g. EPA or State EPD), not by IWSFG. Legislation based on environmental harm should be enacted consistent with applicable law.	Guideline should be revised so that it is limited to issues that impact the cost and operation of water treatment facilities.	
JRM	106-113			Ed	IWSFG does not establish that the presence of regenerated cellulose or plastic fibers negatively impacts the cost and operation of water treatment facilities. Environmental harm should be determined by an appropriate regulatory body (e.g. EPA or State EPD), not by IWSFG. Legislation based on environmental harm should be enacted consistent with applicable law.	Guideline should be revised so that it is limited to issues that impact the cost and operation of water treatment facilities.	
JRM	124-126			Te	How will the testing organization determine if a "synthetic" fiber was intentionally introduced or introduced as a part of using recovered paper or another non-intentional manner?	Guideline should be revised so that it is limited to issues that impact the cost and operation of water treatment facilities.	
JRM	129-130			Ed	IWSFG does not establish that the presence of geological materials negatively impacts the cost and operation of water treatment facilities. Environmental harm should be determined by an appropriate regulatory body (e.g. EPA or State EPD), not by IWSFG.	Guideline should be revised so that it is limited to issues that impact the cost and operation of water treatment facilities.	

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					Legislation based on environmental harm should be enacted consistent with applicable law.		
JRM	137-167			Ed	Section 7.5 is irrelevant to the issue of flushability and is already covered by existing legislation and rules. This section should be deleted.	Delete section.	

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JRM	102-108			Te	The unit size is 6 sheets of toilet paper. The actual amount of toilet paper used by consumers is impacted by certain product features, including sheet length, basis weight, strength, and caliper. A testing methodology should account for this difference.	The unit size should be variable, based on basis weight and caliper.	
JRM	138			Te	The performance of different toilets can vary widely. A specific model(s) should be specified so that labs obtain reproducible results	Establish a specific model as a standard.	
JRM	263, 273, 291, 312, 318			Te	These sections are inconsistent. Some refer to 3 flushes and others to 2 flushes.	Establish a standard number of flushes.	
JRM	170, 327			Te	These sections are inconsistent in stating the slope of the drainline.	Establish a standard drainline slope.	

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JRM	102-108			Te	The unit size is 6 sheets of toilet paper. The actual amount of toilet paper used by consumers is impacted by certain product features, including sheet length, basis weight, strength, and caliper. A testing methodology should account for this difference.	The unit size should be variable, based on basis weight and caliper.	

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JRM	132-137			Te	The unit size is 6 sheets of toilet paper. The actual amount of toilet paper used by consumers is impacted by certain product features, including sheet length, basis weight, strength, and caliper. A testing methodology should account for this difference.	The unit size should be variable, based on basis weight and caliper.	
JRM	300, 314			Te	These sections are inconsistent in stating the time between flushes. It should also be consistent with PAS 2A.	Establish a consistent time interval.	
JRM	323-332			Te	This section refers to catching the products on a sieve which isn't described in the Test Procedure (285 – 310). It is unclear whether just the material that is caught on the snags is collected and rinsed (Appendix 5) or if all the material is captured on the Sieve (Photo A.3 410).	Clarify the test methodology.	
JRM				Te	The time given for breakup of a material on a snag is very short. It is 12 minutes (5 flushes that are 3 minutes apart). Many articles that will disintegrate do not do it in this short of time. This test seems unnecessary, since the disintegration tests will establish whether a product will adequately disintegrate.	Eliminate this test.	

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JRM				Te	This test delivers significantly less energy to break up the sample than test 3B. For the tests to give similar results on similar products either the time or the propeller rpm needs to be increased.	Adjust the methodology to increase the energy.	
JRM	233-235			Te	Why does this test and test 3C not condition the samples and 3B does? If they are supposed to equivalently test the product the conditioning should be the same.	Revise the methodology to include conditioning.	
JRM				Te	The size of this sieve is very small. A sieve of 12.5 mm is more representative of the size of screens used in treatment plants.	Increase the size of the sieve to 12.5mm.	
JRM				Ed	What work supports that the 3 disintegration tests give equivalent results on similar products? The amount of energy in each of these tests varies significantly.	Provide support that all three tests yield similar results or consolidate to a single test.	

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JRM				Te	This test delivers significantly more energy to break up the sample than test 3A.	Revise test 3A to increase its energy.	
JRM	181, 297, 335, 337, 340, 364, 370, 371, 391, 606, 712			Te	The sieve size mentioned is not consistent.	Establish a consistent sieve size at 12.5mm.	
JRM				Te	The size of this sieve is very small. A sieve of 12.5 mm is more representative of the size of screens used in treatment plants.	Establish a consistent sieve size at 12.5mm.	
JRM	233-235			Te	Why does this test condition the samples and 3A and 3C doesn't? If they are supposed to equivalently test the product the conditioning should be the same.	Include conditioning in the test methodology.	
JRM				Te	What work supports that the 3 disintegration tests give equivalent results on similar products? The amount of energy in each of these tests varies significantly.	Provide support that all three tests yield similar results or consolidate to a single test.	

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JRM	218-220			Te	Why does this test and test 3A not condition the samples and 3B does? If they are supposed to equivalently test the product the conditioning should be the same.	Include conditioning in the test methodology.	
JRM				Te	What work supports that the 3 disintegration tests give equivalent results on similar products? The amount of energy in each of these tests varies significantly.	Provide support that all three tests yield similar results or consolidate to a single test.	

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