

International Water Services Flushability Group

To Whom it may concern

Please find attached summarized comments regarding the IWSFG recent release of guidelines (positioned as proposed standards). By way of some highlighted key comments on the process:

- Jacob Holm participating in the comment process does not represent an endorsement of the proposed standards.
- Jacob Holm does not accept that any wipe substrates produced by Jacob Holm have been responsible for wastewater treatment issues in the past or present.
- Jacob Holm does not believe that the use of the term Standard is warranted at this time as the test methods proposed have not been fully reviewed and vetted. Proposed Guidelines is a more appropriate term.

By way of some highlighted comments on the proposed tests themselves we would wish to highlight the following:

- We feel the criteria for recognition as a flushable product should align with the labelling Code of Practice that was jointly developed by INDA & Wastewater
- Jacob Holm does not believe that documentation or evidence has been provided to identify that regenerated cellulose represents an issue in such a wipe. In fact there are multiple studies showing the ready biodegradability of such fibers. Therefore we reject the need for regulation of content or reduction of content of such fibers.
- We have considerable concern that all three of the proposed disintegration tests proposed create a benchmark that MANY grades of commercially available toilet tissue will not satisfy. This cannot represent an acceptable test criteria. Additionally we see no evidence that would support the need to reduce the current sieve size from 12.5mm to 6.3mm

We have made multiple comments using the detailed forms provided and we hereby also provide permission that the comments made in this cover letter and in the forms can be made public.

Sincerely,

JHI America