

IWSFG Template for Reviewer comments and IWSFG secretariat observations¹

Document reviewed: IWSFG-Standard-1-Criteria-for-recognition-as-a-flushable-product-2017-07-21

Due Date: 2017-09-01

Initials	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
KCC	All lines where it occurs			Ge	Amend the word standard to guideline throughout to stop any confusion on behalf of the reader that these documents are standards created under the multi stakeholder processes of the International Standards Organization (ISO)	Change the word standard to guideline throughout	
KCC		Forward		ED	Forward should be Foreword https://www.merriam-webster.com/dictionary/foreword	Correct	
KCC	117			Ed/TE	<p>“The goal of the IWSC is not to ban the production and/or use of these products...”</p> <p>This is a disingenuous statement knowing that a significant proportion of US Dry Toilet paper cannot pass the 3 disintegration tests in this ‘standard’</p> <p>A simple Interlab study of 5 toilet papers was carried out at the KC labs and 2 other labs (1 industry and 1 3rd Party lab)– all 3 labs confirmed that 3 of the 5 toilet papers tested, failed all 3 Disintegration Test using methods PAS3A and PAS 3B – see table below with all data from Interlab study</p>		

¹ Adapted from the ISO/IEC Commenting template. ² Te = Technical, Ge = General, Ed=Editorial

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KCC	119			ED	“Acceptable” must be grounded in data, and impact and not based on whim and personal favorites else we have an arbitrary ‘standard’ not grounded in science.		
KCC				Ed/TE	<p>If 3 disintegration test methods are offered, then all 3 tests must be capable of providing the same outcome when tested in one lab or multiple labs.</p> <p>Based on a the same quick Interlab study using 5 toilet Papers ,there is evidence that <u>within a single lab, all 3 tests do not provide the same outcome</u>—see Code G at KC lab and Code S at Industry Lab.</p> <p>See data table below showing data for Codes F,G,I</p>		

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G	Industry Lab	100.00%	100.00%	100.00%	Code G	Industry Lab	100.00%	100.00%	100.00%	Code G	Industry Lab	100.00%			Code G	Industry Lab	100.00%			Code I	3rd Party Lab	100.00%	100.00%		Code I	3rd Party Lab	100.00%	100.00%		Code I	3rd Party Lab	100.00%	100.00%		Code I	3rd Party Lab	100.00%	100.00%		Code I	3rd Party Lab	100.00%	100.00%		Code I	KC	100.00%	100.00%	100.00%	Code I	KC	100.00%	100.00%	100.00%	Code I	KC	100.00%	100.00%	100.00%	Code I	KC	100.00%			Code I	KC	100.00%			Code I	Industry Lab	100.00%	100.00%	100.00%	Code I	Industry Lab	100.00%	100.00%	100.00%	Code I	Industry Lab	100.00%	100.00%	100.00%	Code I	Industry Lab	100.00%			Code I	Industry Lab	100.00%				
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					<table border="1"> <thead> <tr> <th>Code</th> <th>Lab</th> <th>PAS 3A % passing 6mm</th> <th>PAS 3B % Passing 6mm</th> <th>PAS 3C % Passing 6mm</th> </tr> </thead> <tbody> <tr><td>Code S</td><td>3rd Party Lab</td><td>71.40%</td><td>87.62%</td><td></td></tr> <tr><td>Code S</td><td>3rd Party Lab</td><td>77.58%</td><td>90.21%</td><td></td></tr> <tr><td>Code S</td><td>3rd Party Lab</td><td>70.28%</td><td>91.11%</td><td></td></tr> <tr><td>Code S</td><td>3rd Party Lab</td><td>61.80%</td><td>81.92%</td><td></td></tr> <tr><td>Code S</td><td>3rd Party Lab</td><td>59.36%</td><td>86.29%</td><td></td></tr> <tr><td>Code S</td><td>KC</td><td>89.26%</td><td>63.72%</td><td>87.48%</td></tr> <tr><td>Code S</td><td>KC</td><td>90.30%</td><td>63.89%</td><td>85.89%</td></tr> <tr><td>Code S</td><td>KC</td><td>88.91%</td><td>69.81%</td><td>88.06%</td></tr> <tr><td>Code S</td><td>KC</td><td>88.88%</td><td></td><td></td></tr> <tr><td>Code S</td><td>KC</td><td>84.30%</td><td></td><td></td></tr> <tr><td>Code S</td><td>Industry Lab</td><td>92.75%</td><td>82.40%</td><td>95.37%</td></tr> <tr><td>Code S</td><td>Industry Lab</td><td>94.30%</td><td>89.07%</td><td>97.39%</td></tr> <tr><td>Code S</td><td>Industry Lab</td><td>96.60%</td><td>84.89%</td><td>98.46%</td></tr> <tr><td>Code S</td><td>Industry Lab</td><td>88.71%</td><td></td><td></td></tr> <tr><td>Code S</td><td>Industry Lab</td><td>89.58%</td><td></td><td></td></tr> <tr><td>Code W</td><td>3rd Party Lab</td><td>76.44%</td><td>78.63%</td><td></td></tr> <tr><td>Code W</td><td>3rd Party Lab</td><td>71.02%</td><td>77.54%</td><td></td></tr> <tr><td>Code W</td><td>3rd Party Lab</td><td>69.34%</td><td>76.28%</td><td></td></tr> <tr><td>Code W</td><td>3rd Party Lab</td><td>78.26%</td><td>66.78%</td><td></td></tr> <tr><td>Code W</td><td>3rd Party Lab</td><td>63.47%</td><td>77.58%</td><td></td></tr> <tr><td>Code W</td><td>KC</td><td>86.09%</td><td>53.99%</td><td>64.97%</td></tr> <tr><td>Code W</td><td>KC</td><td>84.71%</td><td>50.89%</td><td>66.15%</td></tr> <tr><td>Code W</td><td>KC</td><td>87.95%</td><td>56.41%</td><td>63.47%</td></tr> <tr><td>Code W</td><td>KC</td><td>85.81%</td><td></td><td></td></tr> <tr><td>Code W</td><td>KC</td><td>85.07%</td><td></td><td></td></tr> <tr><td>Code W</td><td>Industry Lab</td><td>91.68%</td><td>78.53%</td><td>90.43%</td></tr> <tr><td>Code W</td><td>Industry Lab</td><td>96.91%</td><td>77.85%</td><td>77.89%</td></tr> <tr><td>Code W</td><td>Industry Lab</td><td>91.10%</td><td>74.47%</td><td>80.01%</td></tr> <tr><td>Code W</td><td>Industry Lab</td><td>91.21%</td><td></td><td></td></tr> <tr><td>Code W</td><td>Industry Lab</td><td>89.39%</td><td></td><td></td></tr> </tbody> </table> <p>Furthermore, across labs, Method PAS3C has generated a pass and fail outcome for Code S when looking at KC and the Industry lab. See data table below</p>	Code	Lab	PAS 3A % passing 6mm	PAS 3B % Passing 6mm	PAS 3C % Passing 6mm	Code S	3rd Party Lab	71.40%	87.62%		Code S	3rd Party Lab	77.58%	90.21%		Code S	3rd Party Lab	70.28%	91.11%		Code S	3rd Party Lab	61.80%	81.92%		Code S	3rd Party Lab	59.36%	86.29%		Code S	KC	89.26%	63.72%	87.48%	Code S	KC	90.30%	63.89%	85.89%	Code S	KC	88.91%	69.81%	88.06%	Code S	KC	88.88%			Code S	KC	84.30%			Code S	Industry Lab	92.75%	82.40%	95.37%	Code S	Industry Lab	94.30%	89.07%	97.39%	Code S	Industry Lab	96.60%	84.89%	98.46%	Code S	Industry Lab	88.71%			Code S	Industry Lab	89.58%			Code W	3rd Party Lab	76.44%	78.63%		Code W	3rd Party Lab	71.02%	77.54%		Code W	3rd Party Lab	69.34%	76.28%		Code W	3rd Party Lab	78.26%	66.78%		Code W	3rd Party Lab	63.47%	77.58%		Code W	KC	86.09%	53.99%	64.97%	Code W	KC	84.71%	50.89%	66.15%	Code W	KC	87.95%	56.41%	63.47%	Code W	KC	85.81%			Code W	KC	85.07%			Code W	Industry Lab	91.68%	78.53%	90.43%	Code W	Industry Lab	96.91%	77.85%	77.89%	Code W	Industry Lab	91.10%	74.47%	80.01%	Code W	Industry Lab	91.21%			Code W	Industry Lab	89.39%				
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KCC	179-182		Critical Characteristic	Te,Ge	<p>Throughout all the IWSFG documents, toilet paper is consistently put forward as exemplar material. There is no mention that any toilet paper is a problem, and that it is the more recent advent of 'wipes' in particular which have created problems.</p> <p>Given that Toilet Paper is in scope it would be</p>	All 3 disintegration tests need to be reconsidered and pass / fail criteria reset in order that any current toilet paper on US market today can pass with appropriate safety factor. See separate comment sheets																																																																																																																																																												

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					<p>normal and appropriate that any toilet paper should pass this test with a safety factor of 2 or 3, to allow for variability.</p> <p>Simple screening of toilet papers from the USA shows a significant number which will not only fail all 3 disintegration tests, but will fail by a significant margin. A 'standard' which uses Toilet Paper as a benchmark and fails to encompass toilet paper has missed its mark and needs to be reconsidered.</p>		
KCC				Ge	<p>Throughout all the IWSFG documents, toilet paper is consistently put forward as exemplar material. There is no mention that any toilet paper is a problem, and that it is the more recent advent of 'wipes' in particular which have created problems.</p> <p>Given that Toilet Paper is in scope it would be normal and appropriate that any toilet paper should pass this test with a safety factor of 2 or 3, to allow for variability.</p> <p>Simple screening of toilet papers from the USA shows a significant number which will not only fail all 3 disintegration tests, but will fail by a significant margin. This is absurd.</p>	Please provide evidence by way of reports, studies which confirm that US toilet paper is causing any issues in wastewater treatment.	
KCC	127-135	3. Scope		GE/ED	<p>Very broad scope.</p> <p>Toilet paper is very clearly in scope and is cited as exemplar material throughout, it makes no sense to have Toilet Paper Manufacturers labelling packs of toilet paper as Flushable and some non flushable – this will cause even greater confusion for consumers.</p>	Remove Toilet paper from scope	

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KCC	127-135	3. Scope		ED	Note: A product is considered to be flushable only if it has been tested to and certified by a third-party certifier as meeting the criteria set down in this standard.	Please provide a full list of all accredited third – party certifiers who have been trained and validated to run the IWSFG test methods. Please provide any interlab studies carried out to validate the different labs.	
KCC	107-110			TE/ED	Stipulation for only natural cellulose is at odds with Toilet Paper which uses natural cellulose and will impact wastewater treatment through the BOD loading of the pulp. This paragraph needs clarification.	Rewrite and provide any references.	
KCC	198-199			ED	Has IWSFG checked with all third party that they are prepared to accept liability for the claims?	Please provide a full list of all accredited third – party certifiers who have been trained and validated to run the IWSFG test methods.	
KCC	200-201			GE	This note adds nothing to the document.	Delete	
KCC	89-92			GE	This does not provide any context to the scale of the problem which the non-conforming product may represent. To go to the length of producing a ‘standard’ then there needs to be an intelligible problem statement which is relevant to impact. Many numbers have been used historically in WG10 intro and MD280 Testimony	Replace with a problem statement which can be substantiated and is based on impact.	
KCC		6.4 Section		ED	Creating alternate Do not flush logo requirements when there is already in existence a jointly agreed by NACWA, WEF, CWWA, APWA, INDA and EDANA is wasteful.	Suggest IWSFG adopt the INDA/EDANA Code of Practice Edition 2.	
KCC	226-231			Te/Ge	This may be superfluous as written Manufacturers are bound by the regulations in the	Consider It is the responsibility of manufacturers to comply	

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					countries in which they sell and have responsibilities for the human and environmental safety of their products. Any product which fails to meet the current regulatory requirements would not be sold.	with all relevant and current legislation for environmental and human health for the countries where they sell.	
KCC	232-235	7.1.2		TE	The term plastic is generic and used in this context is not correct. IUPAC (International Union of Pure and Applied Chemistry), provides more clarification around the term plastic and polymer. However since cellulose is also a polymeric material, an alternative word or phrase should be used. The definition that was developed in ISO TC224 WG10 could serve.	An alternative word or phrase should be used.	
KCC		7.1.3		Te/Ge	20% is an arbitrary number. Why not 35%? Why is a 5% reduction every 2 years necessary?	Please provide technical basis upon which IWSFG determined that an arbitrary level of 20% inclusion of regenerated cellulose was appropriate or technically possible for the manufacture of a viable flushable product for consumers that would meet the 'standard' as drafted?	
KCC		7.1.3			IWSFG deciding to have a moratorium on Regenerated Cellulose is premature and without any sound scientific basis which is shown in the reference [2] provided. Regenerated cellulose fibers readily degrade in both aerobic and anaerobic wastewater, often at a faster rate than wood pulp fibers due to low crystallinity. Flushable wipes produced with regenerated cellulose are designed to sink and upon entering wastewater should be consumed in the treatment process. It is unlikely that free regenerated cellulose fibers will be release in effluent. If any regenerated cellulose fibers did leave in effluent we need to consider if they are toxic and	Delete section 7.1.3	

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					<p>persistent which is dealt with by reference [2] provided.</p> <p>In respect of the concern for “potential take up in the food chain” and Reference: [2] When Microplastic is Not Plastic: The Ingestion of Artificial Cellulose Fibres by Macrofauna Living in Seagrass Macrophytodebris, Environmental Science and Technology, 2015, 49, 11158-11166, American Chemical Society.</p> <p>This paper observes that the regenerated cellulose fibers do not accumulate in the guts of the invertebrates.</p> <p>It also notes that “The observed viscose fibers thus do not seem to be transmitted from lower to higher trophic levels via predation.”</p> <p>And finally, the report states: “cellulose, even of artificial origin like viscose, is more digestible and degradable⁵² than plastic. Some marine invertebrates are known to be able to digest cellulose, and this could explain both the faster digestive transit of the fibers⁴⁵⁻⁴⁷ and the absence of accumulation. The small average amount of AFs found in the invertebrates’ gut contents also seems to favor this non accumulation or transmission.”</p> <p>Clearly, this study supports both the biodegradation and lack of bioaccumulation of regenerated cellulose</p>		
KCC	235-253				<p>This document is not a regulatory document, and this section extends beyond the scope of a guideline document.</p> <p>There is not a body of science available to support why IWSFG should need to consider any need to control and over time ban the use of a degradable fiber. As such, making an arbitrary, and</p>	This section 7.1.3 needs to be struck.	

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					<p>unscientifically founded distinction is discriminatory and inconsistent.</p> <p>Test results of cellulose and regenerated cellulose have demonstrated that their rates of disintegration in wastewater and receiving environments are equivalent.</p> <p>Washing machines and fabric laundering are a significant source of both synthetic and natural fibers to the sewer and wastewater treatment plants (Hartline, et al.; ES&T; 2016; Mahon, et al.; ES&T; 2016; Habib, et al.; Water, Air, and Soil Pollution; 1998; Carr, S; Integrated Environmental Assessment and Management; 2017).</p> <p>No studies have been provided to confirm if any pass through of Regenerated Cellulose fibers originating from wipes even occurs. If IWSFG has them please share.</p>		
KCC		256-257		Te/Ge	<p>All examples given are inert minerals.</p> <p>Why would inclusion of an inert material into a product be a reason for the product to be NOT FLUSHABLE</p> <p>If the real intent of this section is to control the sale of a 'flushable' pet litter then additional verbiage could then make the section make sense</p>	Delete section 7.1.4 or provide clear example	
KCC		7.2.1			See comments on regarding criteria sheet for PAS 2A		
KCC		7.2.3		Te/Ge	Please explain how IWSFG has determined that 5% of dry mass left on a self-tapping screw at the end of this test is the difference between pass and fail	Provide field studies which substantiate this method and the criteria in the real world	
KCC		7.3		Te/Ge	These criteria cannot be achieved with many US Dry Toilet Papers, the criteria and endpoint is not appropriate for scope and purpose of standard		

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					which uses toilet paper as the benchmark		
KCC		7.3.1		Te/Ge	Criteria 1 is redundant	Delete 1, keep 2	
KCC		7.3.2		Te/Ge	Criteria 1 is redundant	Delete 1, keep 2	
KCC		7.3.3		Te/Ge	Criteria 1 is redundant	Delete 1, keep 2	
KCC	375-376	7.4		Te/Ge	Superfluous, covered in criteria 1 and 2	Delete	
KCC	382-385			Te/Ge	Definition of biodegradation not relevant or useful	Delete lines 382-385	
KCC		7.5.1		Te/Ge	Criteria 1 is redundant	Delete 1, keep 2	
KCC		7.5.2		Te/Ge	Criteria 1 is redundant	Delete 1, keep 2	
KCC	432			ED	[5] not in body text. Superfluous	Delete [5]	

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