

Brussels, March 2, 2018

Re: IWSFG PAS 1,2,3: 2018

Dear IWSFG group,

EDANA, the International Association serving the nonwovens and related industries, would like to submit comments concerning the “IWSFG PAS 1,2 and 3”, which are available for comments on your website.

EDANA is aware that some of its members, as well as INDA, are submitting detailed feedback. This feedback is well thought-through, of high quality and brought to you in a constructive way. It would be redundant to repeat these comments, but I definitively would like to use this letter to explicitly endorse those comments.

Furthermore, I'd like to make the following notes:

EDANA and its members take the issues faced by waste water services due to items never designed to be flushed very seriously. As commented already on the first draft, we therefore regret the sole focus of the IWSFG on further specifying how wipes intended to be flushed should be designed, rather than looking for comprehensive solutions with all stakeholders, including consumer education to address the inappropriate disposal of products through the toilet.

We noticed that the IWSFG has taken many of the industries comments on the first draft into account, which we appreciate. The fact that you accepted significant parts of the requirements as were defined by industry, together with the clear outcome of the Water UK “wipes in the sewer audit” strengthens us that your organisation and the industry are getting closer to a common position.

However, we are in fundamental disagreement with the principle and purpose of these IWSFG documents, we know for a fact the industry guidelines are from a technical perspective adequate as they are (there is substantial data to proof this) and that there is no need for a parallel guidance document. That would in fact be counterproductive. We're open for future cooperation on streamlining the industry guidelines and the fact you've embraced significant parts of them is in our view a good step in that direction.

The technical requirements may be adequate as they are, we understand this by itself isn't enough to structurally mitigate the problems in the sewer system. These are caused by consumers that lack awareness of the difference between flushable and non-flushable wipes. We are committed to make a serious effort to prevent consumers from flushing non-flushable products. Realising that about 10% of all wipes sold are marketed as 'flushable' and 90% as 'non-flushable', we are convinced that aligning

efforts to encourage consumers to 'bin' the 90% of the wipes that are not designed to be flushed, will have much more impact than debating the technical requirements.

We would rather welcome the IWSFG in joining our efforts to raise consumer awareness instead of supporting a second set of flushability guidelines that are more likely to confuse stakeholders than to contribute to a measurable reduction in the number of blockages.

In case of any unclarities or questions about the above, we remain at your disposal, please don't hesitate to contact me.

A handwritten signature in black ink, appearing to read "Marines Lagemaat".

Marines Lagemaat

Scientific & Technical Affairs Director