

**IWSFG Template for reviewer comments and IWSFG secretariat observation**

Document reviewed: **PAS 2**

Due date:2017//

1 Te=Technical, Ge=General, Ed=Editorial

Initial	Starting Line Number (e.g. 17)	Ending Line Number (e.g. 23)	Clause/ Subclause (e.g. 3.1)	Type of comment <sup>1</sup>	Comments	Proposed change	Observation of the secretariat
INDA	16	24		Ge	<p>The statement made in this paragraph is misleading. The IWSFG takes unacceptable liberties in describing who actually has developed the criteria in this draft specification.</p> <p>First and foremost, the criteria discussed in this draft have been collected by a relatively small group of global wastewater “experts”, including only six voting members none of whom are from the UK and only one from Europe. With no line of sight to individual members participating from each country along with background and credentials, there is no validation of “expertise”. Use of terms like “worldwide coalition” and “global consensus” should be struck.</p> <p>In addition, three of the five “critical characteristics” described in section 6.2 are pulled verbatim (with one minor alteration) from INDA and EDANA’s 3<sup>rd</sup> ed. Guidelines for Assessing Flushability of Disposable Nonwoven Products (as referenced within this draft). In addition, the test method used in PAS 3 is sourced from GD3 (with parameter and pass/fail changes). In essence, adoption of this methodology points to the fact that INDA and EDANA members (along with wastewater representatives who have been involved over the years with these guidelines) are the true “experts” in developing guidelines such</p>	<p>The proposed change is to rewrite the foreward using the following messaging:</p> <p>1) The current makeup of the IWSFG members who worked on this document, including the background credentials of each and the process used to gain a “global consensus”.</p> <p>2) Acknowledgement that the majority of this document is due to the long-standing work of industry experts working with wastewater representatives over the years,</p>	

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INDA	25	27		Ge	<p>As discussed in the Main Document from Draft 1, this language is unacceptable. Although the comment was “Not accepted” in the first draft, there was no reasoning behind the decision. In light of lack of an explanation, it needs to be brought up again.</p> <p>This statement is presumptuous. The IWSFG implies that not adhering to this standard precludes the possibility of being socially responsible or environmentally sustainable. The IWSFG has neither the expertise nor the authority to define what is meant by “socially responsible” and “environmentally sustainable”. At best, this can be stated as an opinion of the IWSFG.</p>	Remove statement or reword to reflect this is an opinion of the IWSFG.	
INDA	30	30		Ed	<p>Contents – in general. Missing numerous entries – numbering is not continuous.</p>	Renumber.	
INDA	79	81		Ge	<p>Reference to a PAS – Publicly Available Specification – was made in the Main Document of Draft 1. Comments made referencing this terminology were ignored by the IWSFG as being not specific to the PAS.</p>	Revisit the comments made in Draft 1 and provide some sense of transparency in this draft as to the purpose of adopting the PAS nomenclature.	

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INDA	192	194		Te	Excreta is human waste, typically due to digestion.  Vomit, blood, and mucous (already mentioned in Draft 1) are not human waste products. Sweat is excreted, but not due to digestion.	Modify the definition of excreta to only include feces and urine.	
INDA	201	202		Te	Unclear as to what the note is trying to say.  <b>... provide protocols and tests to clarify these suitable conditions.</b>  The tests are performance criteria that a material must pass to be considered flushable based on your explanations. What "conditions" are being clarified ?	The IWSFG is proposing performance criteria for determination if a product is flushable.  Reword to clarify.	

