

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

Document reviewed: **PAS 3**

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	15	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</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”. <del>At best, this can be stated</del></p>	Remove statement or reword to reflect this is an opinion of the IWSFG.	
INDA	104	105		Te	<p>The first sentence of the introduction implies that disintegration is, in and of itself, all that is necessary for a material to be compatible with a wastewater transport system. This is entirely untrue, or why would there be other tests within this specification.</p> <p>In addition, the concept of rapid disintegration being “necessary” to insure compatibility is not borne out in testing – either in field studies or in laboratory studies.</p>	<p><b><i>This document provides a description of the test method and threshold criteria for determining if a product will disintegrate sufficiently to be compatible with wastewater transport systems.</i></b></p>	

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INDA	109	112		Te	The forces found in a system immediately after flushing can in no way be represented by a Reynolds Number of 20,000. Immediately after flushing, a product can be subjected to the strong mechanical agitation of a household pump, or it may sit in the drain-line for hours until other water flow moves it.	Remove the phrase "immediately after a product is flushed".	
INDA	111	112		Te	There were numerous comments reflected in the first draft around choice of a Reynolds Number of 20,000 and use of that to define a conveyance system. In addition, there were comments questioning how the parameters of the Slosh Box Test were equated to a Reynolds Number of 20,000.	Draft 1 response to comment suggested this issue would be addressed in the second draft.	
INDA	114	114		Te	To the best of our knowledge, distributors of retail products do not make the determination of whether or not a product is considered flushable. Retailers, brand owners, private label owners – these are groups responsible for requesting from a brand manufacturer or private label manufacturer a product that is acceptable for being marketed as "flushable".	<b><i>... a manufacturer <del>or distributor</del> may wish to identify as being flushable ...</i></b>	

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INDA	114	117		Te	<p>Broadly defining the scope of this document when it was originally designed for sheet or sheet-like materials is problematic. This test cannot predict the nature of future products that may be considered flushable.</p> <p>Examples of potentially problematic products include disposable ostomy bags or toilet seat liners.</p>	Narrow the scope, or include language that details the potential issues of using materials not intended for this test.	
INDA	186	186		Ge	Is dry tissue in or out of scope for this method ?	Clarify if dry tissue is or is not toilet paper.	
INDA	193	194		Te	The prior paragraph says one or two. This paragraph says one.	Clarify , one or two.	
INDA	198	198		Te	This assumes you know what the product is.	Language needs to be included in this document that gives guidance to a tester who might need to test a product in some other form. If the scope is left broad, the IWSFG must anticipate how the test might be adapted.	

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INDA	207	214		Te	In light of the need to produce random samples from multiple packages (which includes pulling samples from the middle of packages), it may be prudent to suggest for each new test a new set of packages should be chosen. Once a package is open, there is no control over how the product will react.  Comments similar to this were made in the first draft of these specifications.	Recommend storing samples in this way for archival purposes, but recommend using fresh samples for each new test.	
INDA	219	219		Ge	For completeness sake and clarity, the IWSFG should reference the conditioning step in the summary.	Reference the conditioning step in the summary.	
INDA	223	226		Te	pass/fail criteria have changed dramatically since the first draft. There were no indications in the IWSFG responses to comments in the first draft that these specific changes were to be made.  13 rpm – 16 rpm 120 minutes – 30 minutes 6 mm sieve – 25 mm sieve	Can the IWSFG please provide the rationale behind these significant changes to the testing parameters and pass/fail criteria ?	
INDA	261	261		Ed	Unsure as to the meaning of this statement. Specifically, <b>Record on left and right angles ...</b>	Clarify.	

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INDA	284	288		Te	A 25 mm circular orifice is a large area to rinse flimsy materials through. Has the IWSFG confirmed that the rinsing variability from tester to tester and lab to lab is acceptable ? I would recommend conducting a round-robin using a material, such as a baby wipe, that has pre-cut sizes and shapes ranging from 25 mm to 55 mm in 10 mm increments.	It is necessary to validate the ability to differentiate identical sizes of materials through the rinsing and sieving process. The accuracy and precision of this sieving method is in question.	
INDA	300	300		Te	Is a "round of testing" equivalent to an "agitation sequence" ?	Please clarify the terminology .	
INDA	303	307		Te	Line 303 states "each article's mass", but the equation and subsequent description states all five samples.	Please clarify .	
INDA	312	315		Te	It is critical to insure the acceptance criteria is spelled out very clearly. The current interpretation is that the average of all five tested samples is used together, not individually. This becomes important since combination of the weights of all five samples allows for individual samples to be <95% and the product still passes (e.g., four can test to 100%. and one can test to 81% and the	Insure the criteria are not open to interpretation - be very perscriptive and clear in this requirement.  Even in your examples in A.7 you show the calculations both ways.	
INDA	330	332		Te	In light of the discussion from Line 312, 11 a) adds confusion. This implies each individual article must be analyzed and calculated separately ?	Please clarify .	

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INDA	342	343		Te	Having a check for angle based on time (30 days) is problematic. A machine that is used daily will have more need to be checked than a machine that is used monthly.	Suggest checking the angle before each test, just like rpm.	
INDA	399	399		Te	Figure 3. Confusing. Remove and hold ... . Based on the text in the document, the requirement is either to hold the wipe IN THE DRAIN-LINE or place the wipe in a dry container.	Please clarify.	
INDA	432	432		Ed	Missing 4.3	Renumber.	
INDA	574	574		Ed	Fail, not pass according to the criteria.  Additionally, the line <b>The percentage of product remaining on sieve</b> is in error. The percentage that is remaining should be 15.10 %. 84.90% is the percentage that passes through the sieve.	Edit line.	

