



March 2, 2018

To whom it may concern:

Thank you for providing the opportunity to provide comments on the proposed IWSFG flushability guideline documents. This response is being submitted on behalf of Nice-Pak Products, Inc., Nice-Pak International, Ltd. and Professional Disposables International, Inc. ("PDI"). The comments that Nice-Pak/PDI are providing are in no way exhaustive, nor should they be considered an endorsement of the proposed guidelines or participation by Nice-Pak/PDI in the creation of the IWSFG guidelines.

In addition to the responses provided to each individual proposed guideline, Nice-Pak/PDI has the following general comments:

1. The new slosh box criteria is "toilet paper standard", yet some toilet papers in the market may not be able to meet this test criteria. Does IWSFG intend to require all toilet paper products that cannot pass the guidelines to include "Do Not Flush" instructions on the packaging?
2. Nice -Pak/PDI's comments focused on the technical issues and do not include feedback on typographical or grammatical errors or formatting issues in the documents.
3. The guidelines should make clear that these are only recommendations on flushability testing provided by IWSFG, without collaboration from product manufacturers or industry groups.
4. The language in the methods should avoid any mandatory language like must or shall. If IWSFG have developed these documents as standards, please provide the validation, verification, repeatability and reproducibility data relied upon for each method, similar to what would be produced by any standards organization, such as ASTM, ISO, ANSI or BSI.
5. The guideline documents do not address the fact that many of the items found in collection studies impacting wastewater systems are not, in fact, products that are labeled as flushable wipes. Many of the flushable products on the market today, however, would not pass the proposed methods. Eliminating the currently available flushable products will only create a bigger problem for wastewater as consumers will substitute a non-flushable product for the same purpose.
6. There are no references in the methods to any studies that are designed to assess the impact of flushable or non-flushable products on wastewater systems. Any information that can clarify the impact on wastewater systems would be helpful.

We look forward to reviewing further development of these guidelines.

Sincerely,

Nilgun Auriemma  
Associate Director of Nonwovens  
Nice-Pak Products, Inc.