

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

Document reviewed: **PAS 1**

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 ¹	Comments	Proposed change	Observation of the secretariat
NP	Various places throughout document			Ge	The word " specification" is not appropriate here. As specification means "a detailed description of the design and materials used to make something." These test methods should be presented as guidelines. Does IWSFG intend to provide design parameters for flushable products?	Recommend changing the "specification" to "guideline" throughout all relevant documents.	
NP	13	13	Copyright notice	Ge	Purpose of proposed IWSFG documents are presented as a ground to develop guidelines and standards. There should be involvement from other stakeholders like industry associations and other industry representatives along with waste water experts in order to create a multi-disciplinary approach to a guideline or a standard.	Proposing to change the sentence as: "Such purpose includes the development of guidelines and standards by multi-stakeholders such as industry associations and other experts in the subject matter."	
NP	16	24	Foreword	Ge	Who are the consensus members? And how are these test methods and pass/fail criteria are designed? What was the protocol that was followed to get global consensus on these documents?	Clarify the section by adding members of the consensus and basis for how the test methods and criteria for flushable product designed. Explain the protocol or program that was followed for global alignment of all wastewater services.	

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NP	25		Foreword	Ge	In the foreword 4th paragraph, it states that “the task of the group was to prepare standards reflecting the above purpose.” It does not state that this group accomplished that goal. Did they?	Please clarify.	
NP	26	28	Foreword	Ge	What is the authority of Wastewater services to expect the manufacturers and distributors of the products to act in a socially responsible and environmentally sustainable manner?	Please clarify.	
NP	71	73	1	Te	What are the studies conducted by IWSFG to understand the causes of clogs and blockages?	Please show references.	
NP	73	78	1	Te	Chemicals harmful to the environment is a very broad statement and is out of the scope of this document.	Remove this section.	
NP	79	87	1	Ge	As mentioned in the comments in Draft 1, general statements presented here on long term sustainability of wastewater systems with no references or rationale as to why existing flushable products are not found acceptable by wastewater. Given recent data including NYC 2016 study, Perry settlement and recent UK study, flushable wipes were not found to be contributing to blockages or increased operation costs.	Please reconcile or clarify rationale as to how this standard will improve long term sustainability.	

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NP	88	99	1	Te	Where is this information taken? Is there a study done to identify these problems?	Please provide references.	
NP	100	106	1	Ge	These general statements here only talks about the flushable products being complaint with the wastewater systems. How does wastewater intend to manage product catogeries that does not have code of practice for labeling, like paper towels?	Please clarify.	
NP	114	115	1	Te	Biodegradation is misused here as each material will take different times to biodegrade. What material is being mentioned here? Also biodegradation is not in the scope of the tests in the documents.	Change the explanation by removing the word "biodegraded".	
NP	126	131	1	Ge	This paragraph is out of the scope of the document. Industrial waste and chemicals should not be discussed in this document. How does this affect the determination of a flushable product?	Either remove this section or clarify the connection between the flushable products.	
NP	147	150	3	Te	Is toilet paper in scope or not in this document? The explanation in this paragraph is confusing.	Please clarify.	

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NP	153, 252		4	Ge	Regarding the ISO / IEC standard on packaging this doesn't really address the main need on packaging which is correct communication of Do not Flush labelling. The ISO / IEC standard is essentially a very basic guide on good packaging design development and use of fewer materials, recyclable, re-usable etc. At what point was this referenced used to create these documents?	Please clarify.	
NP	172	177	6.1	Te	What is the reasoning of removing household pump, municipal pump and aerobic biodegradation from the critical criteria?	Please explain.	
NP	183	184	6.2	Te	Are these criteria recommendations or mandatory requirements by IWSFG? And what authority does IWSFG have to mandate something?		
NP	184	Table li	6.2	Te	What is the relationship between the TAPPI/ANSI Test method T 401 and the Environmental and health protection?	Please clarify.	

