

**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
NP	16	23	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.	
NP	24		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	25	28	Foreword	Ge	What is 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	64	67	1	Ge	This list is not inclusive of all products found in various forensic collection studies including paper towels, baby wipes, etc. This comment was made on Draft 1 as well and was not given reasoning for not being accepted.	Recommend reviewing various forensic collections studies including NYC 2016, Portland and other global reports like recent UK Water Study for a comprehensive list.	

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NP	78	82	1	Ge	This document states that "standardization requires the establishment of a language common to the various stakeholders in order to policy understanding and conformity." It would appear that only various wastewater stakeholders were included in the development of these PAS documents. Clearly manufacturers and users of marketed flushable products were not included nor does it appear that toilet manufacturers or plumbers as key stakeholders.	Please justify limiting stakeholder to only select wastewater groups.	
NP	89	91	3	Ge	As mentioned in Draft 1 comments, the scope includes defining common terminology in the sale and manufacture of hygiene products. With no such stakeholders involved in this process, it is unclear with no reference as to how such definitions were derived.	Please provide reference or background for expertise in defining common terminology in the manufacture and sales of hygiene products.	
NP	96		3	Ge	See comment above for 89-91.		

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NP	99	103	4	Ge	As mentioned in Draft 1 comments, why are there no references for common terminology in the manufacture and sales of hygiene products? Why are current or previous versions of INDA/EDANA Guidelines for Assessing Flushability not a reference document?	Please clarify.	
NP	165	169	5.2.3	Ge	Improper definition.	Change to "A dimensionless quantity used in fluid mechanics to help predict flow patterns in different fluid flow situations, such as transitions from laminar to turbulent flow in pipes."	
NP	196	199	5.3.4	Te	From Draft 1 comment; Definition is circular using draft standard in the very definition. In addition, there is evidence that currently marketed flushable products do not materially adversely impact those systems. Reference NYC 2016 study and Perry settlement.	Please clarify definition. Please reconcile evidence that clearly shows compatibility with various systems yet statements that no current flushable wipe would meet this standard.	
NP	201	202		Te	This sentence is misleading and sounds like IWSFG is going to provide the design parameters of a flushable product. PAS documents are intended to test the performance of the products not providing design parameters for those products.	Please reword to clarify.	

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NP	224	225	5.3.12	Te	This language is not common terminology.	Please include stakeholders with knowledge/expertise in this area to provide commonly accepted terms and definitions.	
NP	227	230	5.3.13	Te	This language is not common terminology.	Please include stakeholders with knowledge/expertise in this area to provide commonly accepted terms and definitions.	
NP	258	265	5.4.7 Plastics	Te	Is there any tests done to confirm TAPPI T 401 is an appropriate test to identify plastic fibers in a product? What is the confidence level of this test method? TAPPI T 401 is a method to identify natural fibers in paper and paperboard. Was it confirmed that it can be used for all types of products? Also are all TAPPI, ISO and ASTM methods listed here resulting to the same values when performed on the same material?	Please show data or references to clarify.	

