IWSFG Template for Reviewer comments and IWSFG secretariat observations[1]

Document reviewed: IWSFG Standard 1: Criteria for recognition as a flushable product	**Due Date:** 2017-09-01

Initials	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment[2]	Comments	Proposed change	Observations of the secretariat
AF&PA				Ge	AF&PA is concerned that no representatives of the pulp and paper industry (or its tissue segment) have been included in the deliberations. Therefore, this standard is not being developed consistent with the International Organization for Standardization (ISO)'s Guide 59 Code of Good Practice for Standardization. Part 6 of the Guide states: 6.1 Participation in standardization processes at all levels shall be accessible to materially and directly interested persons and organizations within a coherent process as described in this clause. (underline added)	Remove applicability to tissue, toilet paper and regenerated cellulose from the standard.	
AF&PA				Ge	Guide 59 also requires that the organization developing the standard develop written procedures which "contain an identifiable, realistic and readily available appeals mechanism for the impartial handling of any substantive and procedural complaints." A true consensus process also has procedures to ensure balance, consideration of dissenting views, and appeals procedures. No such document appears to be available on the IWSFG website.	Develop and publish written procedures to handle appeals for any substantive and procedural issues.	
AF&PA				Ge	We understand that the intent of the IWSFG is to create guidelines on flushability testing and labeling. The document, however, establishes both an overarching standard as well as additional standards (called PAS's) articulating test methodologies.	The document should be revised to be clear that that this set of documents are intended to serve as guidelines	
AF&PA				Ge	The methodology documents are called "Publicly Available Standards (PAS)." However, this term can be easily confused with the "Publicly Available Specifications (also PAS)" used by both BSI and ISO.	This terminology should be changed to avoid misleading the public.	
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AF&PA	129	3		Ge	As currently written, the scope of the standard applies to “all products”, which would include tissue products. If the scope of previous efforts to establish flushable standards was intended to apply to wipes and non-woven products, and the intent of this standard development is to maintain that original scope, and not be applicable to tissue products, references to tissue products should be deleted to avoid confusion.	Eliminate tissue products from the scope of the standard	
AF&PA	93-102			Ge	Tissues, like toilet papers, have been in the market for years, and should not be characterized or included as “other products” or “additional “flushed” products”.	Tissues should be deleted from line 102	
AF&PA	107			Te	The document does not clarify what constitutes “natural cellulose products”	Delete from the document, or define and include references to “natural cellulose products”	
AF&PA	118-121			Ge	If the goal of the standards is to “establish for manufacturers the limits of what is acceptable to wastewater services for discharge via toilets”, how can a single set of test criteria and limits be applicable to all wastewater infrastructures without recognition that infrastructures vary from municipality to municipality and region to region or country to country? The limits or criteria may be appropriate and applicable to one infrastructure, but overly restrictive to a wastewater transport and treatment infrastructure that has a different configuration.	Adjust test limits and criteria to geographical infrastructure	
AF&PA	235-253	7.1.3		Ge	It is inappropriate for a standard to arbitrarily determine that a product with a given content of regenerated cellulose fiber is NOT FLUSHABLE, or to mandate the use of these fibers in products must decrease by a predetermined amount over a specific timeframe. The standards should be limited to product performance, not product content. Regenerated cellulose is primarily used, as is referenced in the entry note, in textiles which are	Section 7.1.3 should be deleted from the document.	

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					not designed to be flushed, but are washed as part of household laundry. Clothes washing is not within the scope or intent of the standards. This section should be removed.		
AF&PA				Ge	The Purpose IWSFG Standard 1 states that it is to establish "criteria for the quality and characteristics of products that may be disposed via the toilet." The issue of Environmental Health and Safety requirements is in outside the scope of these standards and guidelines. Such issues should be under the purview of appropriate regulatory bodies (e.g. EPA or State EPD), not by IWSFG. Legislation based on environmental harm should be enacted consistent with applicable law.	Remove references to Environmental Health and Safety throughout this document.	

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Document reviewed: PAS 0- Terms and Definitions	**Due Date:** 2017-09-01

Initials	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment[2]	Comments	Proposed change	Observations of the secretariat
AF&PA	235, 259, 298	5.3.2, 5.3.5, 5.3.12		Te	It is our understanding that this draft standard is under development to address nonwoven wipes. Tissue, Moist Tissue, and Dry Tissue should be removed from the standard as out of scope.	Remove the definition and all of the references in the standard and the draft standard to tissue, moist tissue and dry tissue.	
AF&PA	305	5.3.13		Te	Toilet paper is outside the scope of this standard	Remove the definition of toilet paper and any references to it in the standard and the PAS's.	
AF&PA	339	5.4.6		Te	Regenerated cellulose is outside the scope of this standard, particularly given that the UNEP has not included them in their report on marine plastics (which was the stated basis for including it in this standard). There is no scientifically based support for including regenerated cellulose within this standard	Remove the definition of regenerated cellulose and any references to it in the standard or PAS's.	

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Document reviewed: PAS 1- Environmental Health and Safety Requirements	**Due Date:** 2017-09-01

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AF&PA	78-81.	4.1	Normative References	Te	TAPPI/ANSI Test method T 401 om-15, Fiber Analysis of Paper and Paperboard, as amended, is for paper and paperboard and is not for fibers or any nonwovens fabrics such as moist toilet tissues and wipes and other nonwoven materials.	Replace it by use the following test methods which are widely used in the fiber and textile industries P.-A. Koch – microscopy of fibers materials Fr. Stratmann – to detect and identify the fibers Materials Microscopy in theory and practice, part 5 – Swiss textile apparel and fashion school	
AF&PA				Ge	The Purpose of this and the IWSFG Standard 1 states that it is to establish "criteria for the quality and characteristics of products that may be disposed via the toilet." The issue of Environmental Health and Safety requirements is in outside the scope of these standards and guidelines. Such issues should be under the purview of appropriate regulatory bodies (e.g. EPA or State EPD), not by IWSFG. Legislation based on environmental harm should be enacted consistent with applicable law	Rescind IWSFG PAS 1	

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