

Brussels, 6<sup>th</sup> September 2017

Re: IWSFG “standard 1:2017”,

Dear IWSFG group,

EDANA, the International Association serving the nonwovens and related industries, would like to submit comments concerning the “IWSFG standard 1:2017”, which is available for comments on your website.

#### Executive summary

- EDANA and its members take the issues faced by waste water services due to items never designed to be flushed very seriously.  
We therefore regret the sole focus of the IWSFG on further specifying how wipes intended to be flushed should be designed, rather than looking for comprehensive solutions with all stakeholders, including consumer education to address the inappropriate disposal of products through the toilet.
- EDANA and its members believe that the use of the word “standard” to qualify the IWSFG document is misleading in that it conveys the wrong impression that this is the outcome of a broad, cooperative and transparent drafting and consultation process involving all stakeholder and resulting in a high degree of consensus
- EDANA and its members object to IWSSFG copyright claims on a document that partly replicates some of our own copyrighted material
- EDANA and its members note with concern that the IWSFG document unnecessarily contains new labelling practice recommendations which are distinct or additional to the widely accepted INDA-EDANA CoP, a situation which is only likely to cause market confusion and uncertainty
- EDANA and its members are in fundamental disagreement with the principle and purpose of this IWSFG document and the present comments should therefore not be misinterpreted as an attempt from our side to reach a compromise on an amended version.

The issues waste water services are facing with regards to wipes in general are a serious concern to us and we are committed to contribute to resolving them. Our long-lasting efforts (together with INDA) in creating the ‘Guidelines for Assessing the Flushability of Disposable Nonwoven Products’ (in short ‘GD’) are a proof of that, together with our engagement in the ISO TS/TR 24524 process and our on-going cooperation and dialogue with various waste water organisations throughout Europe.

As a trade association, we've discussed your proposal for the IWSFG standard with our members and agreed that each would submit comments on their own behalf. Most of these individual company comments will provide detailed feedback on the proposed standard and the related test methods. The comments below are more general.

- We noticed there are 11 documents referenced as PAS, publicly available standard. This raises the following concerns.  
Firstly a 'standard' as we know it (through ISO, CEN and national standardisation bodies) has to be the result of an open cooperation process between experts from interested parties, in order to incorporate the knowledge and views of the stakeholders involved.  
Secondly, such standards are reviewed through a transparent process, allowing sufficient time for a proper review. None of those conditions are met in this case. Using the word 'standard' will be misleading to the outside world, as readers might assume your documents have been drafted, reviewed and approved through a process as described.

In this respect, it is worth mentioning that the GD's have always been presented as guidelines and not as standards. Also, worth mentioning is that there has been a good cooperation in the past between the industry and waste water on this topic. We are pleased to notice the appetite to cooperate is increasing in Europe, and we deeply regret that the IWSFG seems to be ignoring such a wish to resolve the issues in good cooperation.

- The IWSFG claims the relevant documents are protected by copyright. We find this rather strange, since significant parts of the PAS documents show a clear resemblance with the FG test series that are part of the aforementioned and copyright protected 'Guidelines for Assessing the Flushability of Disposable Nonwoven Products'. To our knowledge neither EDANA nor INDA has given the permission to use the information.
- Although there are clear similarities between most PAS methods and the FG tests in GD3, they differ strongly in terms of pass/fail criteria. We would appreciate understanding the rationale for that. We kindly request the IWSFG to share actual test results and their correlation with real life blockages, to justify the proposed changes. It is too easy we believe to simply increase pass fail criteria without providing the experimental evidence supporting the need for this. The sheer fact that blockages still occur isn't proof that the GD criteria are inadequate.  
A recent blockage assessment in the UK has shown that products never designed to be flushed are the main cause of blockages (as far as wipes and personal care products are concerned).
- The IWSFG documents contain a labelling requirement which differs from the improved Code of Practice for "Communicating appropriate Disposal Pathways for Disposable Nonwoven Products to Protect Wastewater Systems", that was released by EDANA and INDA in April this year. We wonder why the IWSFG doesn't refer to this Code of Practice, taking the fact into account that several waste water organisations participated in its elaboration. Conveying

divergent information about what's flushable or not won't help consumers making the right choices.

- Although not commented in detail in this letter, we need to mention the fact that despite the resemblance between the IWSFG documents and the FG tests, the IWSFG documents contain numerous unclarities and inconsistencies. Unclarities in the way that it isn't always clear how the test is supposed to be executed and inconsistencies both in the methods themselves as well as in the pass/fail criteria.

Finally, these comments don't imply an endorsement of the PAS documents of any kind. EDANA is of the opinion that we need mutually agreed standards for flushable wipes, in combination with a serious effort to prevent consumers from flushing non-flushable products. Realising that about 10% of all wipes sold are marketed as 'flushable' and 90% as 'non-flushable', we need to align efforts assuring consumers dispose the 90% in a proper way, instead of continuing our disagreement about stretching the requirements for the 10% to unrealistic levels.

In case of any unclarities or questions about the above, please don't hesitate to contact me.

A handwritten signature in black ink, appearing to read "Marines Lagemaat".

Marines Lagemaat  
Scientific & Technical Affairs Director