

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
JRM	117-122			Te	What is acceptable to wastewater services, as evidenced by the proposed tests, is significantly more stringent than what causes damage to conveyance pumps or screen clogs. Forensic analysis of pumps and screens indicate that nonwoven material that conforms to the current INDA Code of Practice (GD3) does not cause clogs in pumps and screens. IWSFG has not provided a compelling reason why these more stringent tests are necessary.	Thresholds in this Guideline should be revised to reflect levels where material causes damage to water treatments facilities.	
JRM	131-135			Te	The scope of this guideline would include toilet paper and would be considered to be flushable only if it has been tested to and certified by a third party. Toilet paper has been in common use in the United States for over 100 years without any evidence that it is causing clogs in water treatment systems. Toilet paper should be specifically excluded from these guidelines. Disintegration tests 3A, 3B, and 3C are so stringent that existing brands of toilet paper are at risk of not passing.	Toilet paper should be specifically excluded from this Guideline.	
JRM	203-218			Ed	For products that are used in commercial environments (such as office buildings, schools, and restaurants), the user of the product will likely not have access to the sales packaging. Given that manufacturers no longer have custody of the product, it is not		

¹ Adapted from the ISO/IEC Commenting template. ² Te = Technical, Ge = General, Ed=Editorial

IWSFG Template for Reviewer comments and IWSFG secretariat observations¹

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					clear how consumers will be notified. Note that the goal of these guidelines, as stated in lines 117 - 126, is not to prohibit use of these products but rather to identify those that don't pass the tests.		

1 Adapted from the ISO/IEC Commenting template. 2 Te = Technical, Ge = General, Ed=Editorial