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

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

Initials	**Line number** (e.g. 17)	**Clause/ Sub clause** (e.g. 3.1)	**Paragraph/ Figure/ Table/** (e.g. Table 1)	**Type of comment**[2]	**Comments**	**Proposed change**	**Observations of the secretariat**
Gama Health Care(GHC	107–110	Introduction		TE	Please **clarify** this paragraph Toilet paper for instance which contains natural cellulose can impact collecting and treatment systems. Toilet paper can interfere with the free flow of a sewer or drain- it can cause blockages.	Please cite appropriate references for “all such materials”	
GHC	114	Purpose		TE	The use of the word “standard” should be questioned- it is not appropriate. It would better be considered a “guideline”. This guideline is not sanctioned by any International or national standards organization. Systems to develop Publicly Available Specifications PAS do exist e.g. Within BSI and ISO	Replace standard with guideline throughout the document set	
GHC	123-124	Purpose		TE	This paragraph needs clarification -As far as I am aware no regulations exist for labelling products as flushable. Manufacturers have cooperated in labelling non-flushable wipes as no flushable. In some jurisdictions regulation does exist to label non-flushable products as non-flushable.		
GHC	127	Section 3		GE	Please clarify the scope of these guidelines. As is it is written it is far too broad Please think about the types of products that may be in a suitable form to submit to the documented test protocols	Edit the scope taking into account the types of test that are actually being proposed	
GHC	181	Section 6.2 Critical Criteria to be met		TE	Three distinct disintegration tests have been identified and any one of the three is mandatory. Are there any correlations between the three identified test methods? Has any comparative testing been undertaken?	Chose a single test method that has worldwide applicability.	
GHC	183-219	Sections 6.3 to 6.4.		GE	Please clarify what you mean by conformity assessment This section is ambiguous.		
GHC	203	Section 6.4.2		GE	The use of the word “shall” is generally associated with an approved “standard”. This document claims to provide “criteria for recognition as a flushable product”. The identification of Non-flushable	Perhaps the IWSFG should follow the lead of the INDA/EDANA Code of Practice Edition 2 for labeling non-flushable products. This is a harmonized guideline in both Europe and the USA. There is incidentally only 1 harmonized	

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					products is not relevant to this document.	symbol	
GHC	218	Section 6.4.2		GE	If you do include non-flushable symbology within this guideline adopt the INDA EDANA DNF logo – it is already in use in the USA and the EMEA region.	Only show the INDA/EDANA DNF symbol and tidy man- other symbols will confuse a message. The tidy man is a positive reinforcement to dispose of non-flushable materials appropriately within the municipal waste stream.	
GHC	235-254	Section 7.13		ED	This section should be removed – there is no rationale to ban regenerated cellulose fibres-Natural cellulose fibres and regenerated cellulose fibres are chemically identical. There is a difference in crystal structure between natural cellulose (Cellulose I) and regenerated cellulose (Cellulose II)- however both crystal structures are biodegradable in all natural and manmade environments suitable for biodegradation – see **Betchtold, T. Schimpe, Cr.** (2010) Advances in Textile Biotechnology pp.312. Also, **Park, C.H, Kang, Y.K**(2004) Applied Polym Sci 94 pp.248-253	Delete section 7.13	
GHC	255-419	Section 7.14-7.52			I will review the individual sections of the “standard” rather than this “summary”		

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

Initials	**Line number** (e.g. 17)	**Clause/ Sub clause** (e.g. 3.1)	**Paragraph/ Figure/ Table/** (e.g. Table 1)	**Type of comment**[2]	**Comments**	**Proposed change**	**Observations of the secretariat**
Gama Health care(GHC)	175	5.17	Wastewater collection system	ed	Remove “Human waste”- the definition of wastewater already includes sanitary waste	Delete “Human waste”	
GHC	204–210	5.2.2	Disintegration	ED	Change text as described. opposite	Edit text to read: --“a process in which a product weakens, loses integrity, and breaks into smaller parts because of exposure to physical forces and or biological activity.”	
GHC	212-214	5.2.3	Reynolds number	TE	Change definition	Edit to read to Reynolds Number (Re) “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.”	
GHC	235-238	5.3.2	Dry tissue	TE	Clarify your definition and the context of the source	redefine	
GHC	240-242	5.3.3	Excreta	TE	Faeces, urine, and sweat are examples of excreta. Semen and mucus not excreta!”.	Remove semen and mucus from the definition.	
GHC	244-257	5.3.4	Flushable product	GE	The definition needs a total re-write. It is contradictory. E.g. because it will not (b) be unrecognizable in effluent	Remove this definition. Redefine more appropriately this is such a key concept.	
GHC	260-261	5.3.5	Moist Tissue	TE	This definition is confusing.	Please redefine	
GHC	318-320	5.4.2	Ambient laboratory conditions	GE	These can vary depending upon what is specified in individual test protocols	Remove 5.4.2	
GHC	340-341	5.4.6	Regenerated Cellulose	TE	The Viscose process and the Lyocell process are means of manufacture of regenerated cellulose fibres.	Clarify definition	
GHC	348-354	4.4.8	UNIT SIZE	ED	This is not a definition- it is an instruction where to	Delete.	

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					find?		

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

Initials	**Line number** (e.g. 17)	**Clause/ Sub clause** (e.g. 3.1)	**Paragraph/ Figure/ Table/** (e.g. Table 1)	**Type of comment**[2]	**Comments**	**Proposed change**	**Observations of the secretariat**
Gama Health care(GHC)	64-67	2		GE	The author of this section should contemplate that the parent document is entitled "**Criteria for recognition as a flushable product"** It is not about delineating "product characteristics that are harmful to the environment and public health"		
GHC	68-72	3	Scope		Should there not be a **unified statement of scope** for all the separate sections of the PAS- there is a different phraseology used here from that used in document reference IWSFG STANDARD 1?	The scope should be rationalized / harmonized through all sections of the PAS.	
GHC	92-96	7.1	Applied substances	GE	Manufacturers of nonwovens and specifically of wet wipe products are strictly regulated within all regions where products are marketed. This regulation cover Safety, Health and environmental concerns This section of this PAS is not relevant	Section 7.1 should be deleted	
GHC	97-98	7.1		TE	A list of prohibited substances would be exceptionally **voluminous** depending on product type, country, regulatory agency	Delete section	
GHC	101-102	7.2.1		TE	Consider what you mean by the term "plastic". A good definition of plastic was developed during the ISO TC 224 WG 10 meeting at Grenoble	Define "plastic", consider using the definition from the WG10 meeting in Grenoble in 2016.?	
GHC	103-105	7.2.2		TE	Regenerated cellulose (manmade cellulose) vs natural cellulose: This section should be removed – there is no rationale to ban regenerated cellulose fibres-Natural cellulose fibres and regenerated cellulose fibres are chemically identical. There is a difference in crystal structure between natural cellulose (Cellulose I) and regenerated cellulose (Cellulose II)- however both crystal structures are biodegradable in all natural and manmade environments suitable for	Delete section	

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					biodegradation – see **Betchtold, T. Schimpe, Cr.** (2010) Advances in Textile Biotechnology pp.312. Also, **Park, C.H, Kang, Y.K**(2004) J. Applied Polym Sci 94 pp.248-253		
GHC	103-105	7.2.3		TE	TAPPI/ANSI 401 om-15 method is an ***estimation*** rather than a true quantification. A less ambiguous test method needs to be suggested.		
GHC	124-125	7.2.3		TE	If "A" fibre type is found. Does this imply a single synthetic fibre is found? Cross contamination during fibre analysis could easily occur- this is ridiculous. Recall the discussions at the WG 10 meetings in Grenoble	Re-think.	
	137-165	7.5			This section is surely irrelevant to a "standard" or PAS that is looking to set criteria for recognition as a flushable product	Delete Section 7.5.- it serves no purpose.	

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Document reviewed: PAS 2A – Toilet Clearance	**Due Date:** 2017-09-01

Initials	**Line number** (e.g. 17)	**Clause/ Sub clause** (e.g. 3.1)	**Paragraph/ Figure/ Table/** (e.g. Table 1)	**Type of comment**[2]	**Comments**	**Proposed change**	**Observations of the secretariat**
Gama Health care(GHC)	100-101	5.1	Terms and definitions- unit size	ED	There is a lack of consistency between section 5.1 and 5.4	Clarify to remove inconsistency	
GHC	102	5.2	The unit	ED	Confirm that this is for toilet paper / bath tissue	Clarify within text	
GHC	152-159	8.1	Sample acquisition	GE	Surely it is up to the organization placing the test to source the test samples? Maybe more appropriate to have some form of sample identification?	Delete existing section 8.1.	
GHC	170-171			GE	Removing samples, placing them into five stacks, and then pulling individuals from all five stacks precludes materials from being tested “immediately”.	Reword to provide consistency within Section 8 Preparation.	
GHC	180-183	8.3.2	Moist tissue	ED	The unit size is already specified in section 5.3.	Delete 180-183,	
GHC	200-202	8.4	Apparatus	ED	Ambiguity in test protocol	Please define periodically.	
GHC	223	9.2	conditioning	GE	Inconsistency between sections 9.1 and 8.2	clarify	
GHC	237-284	10.2	Test procedure	ED	The use of a test methodology and a set of 6 notes and a tabulation is confusing for a prescriptive test method	Redraft.	
GHC	280-282	10.3	Test termination	TE	?	Delete text	
GHC	284-287	10.4	Calculation	GE	By this test methodology 1 fail is a test fail	Redundant- delete	
GHC	309	12	Test report	GE	where is it stated there is a requirement to take photographs within the test methodology?	Clarify	
GHC	323	13	Precision	TE	Need to be precise about what is meant by periodically.	Clarify	

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Document reviewed: PAS 2B – Drain Line Settling Test	**Due Date:** 2017-09-01

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Gama Health care(GHC)	83	note		GE	This test is only applicable in the UK? Is this correct for an International "Standard"?	Clarify	
GHC	100-101	5.1	Unit size	ED	As with PAS "A This section is confused and inconsistent	Clarify & redraft	
GHC	137	Photo A1		ED	Missing	Add photo	
GHC	147-154	8.1	Sample acquisition	GE	As per comments for PAS 2A. The onus for obtaining samples is on the organization or individual commissioning the testing.	Delete section	
GHC	177-180	8.3.2	Moist tissue	ED	Unit size is already specified in section 5.3.	Delete	
GHC	205-207	8.4	Apparatus	ED	Where is Photo A.4? . There is no snagging equipment to be used for this test.	clarify	
GHC	213	8.4	Apparatus	GE	This needs precision "From time to time"?	Specify frequency for confirmatory inspection.	
GHC	280-282	10.3	Test termination	ED	This is totally confused	This is the wrong methodology?	
GHC	323-329			TE	This needs greater precision – define "Periodically".	Define periodically.	
GHC	328-329	13	Precision	ED	Section 6.1. is not present in the draft?	Clarify	

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