

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 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	

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

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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) <i>Advances in Textile Biotechnology</i> pp.312. Also, Park, C.H, Kang, Y.K (2004) <i>Applied Polym Sci</i> 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”		

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

IWSFG Template for Reviewer comments and IWSFG secretariat observations¹

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