

Initials	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
SGS-IPS	134			Ge	Who has performed these methods and who is the point of contact for issues with these methods?		
SGS-IPS	184	6.3		Te	Third party validation and ISO accreditation will take months to a year or more to complete, since accreditation is based on performing the methods as written. Methods all need to be validated and need either a round robin or a certified standard to determine interlaboratory variabilities and precision.		
SGS-IPS	184	6.3		Ge	Has interlab variabilities with these methods been determined?		
SGS-IPS	198	6.4.1	2	Ed	We don't recommend this wording on behalf of the labs performing these methods. This type of certification, as well as name and logo use, will have legal and business implications. Therefore, the this should not be specified in these methods.	Remove from method.	
SGS-IPS				Ge	Why is there not a municipal pump test method?		
SGS-IPS				Ge	Why is the 6.3 mm sieve being used? While we have had little time to evaluate these methods, we have seen many bath tissues are unable to pass this criteria.	Insert 12.5mm sieve is methods.	

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

IWSFG Template for Reviewer comments and IWSFG secretariat observations<sup>1</sup>

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/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat

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**IWSFG Template for Reviewer comments and IWSFG secretariat observations<sup>1</sup>**

Document reviewed: IWSFG Standard 1:2017 – Environmental and Health Safety Requirements

Due Date: 2017-09-01

<b>Initials</b>	<b>Line number (e.g. 17)</b>	<b>Clause/ Subclause (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ (e.g. Table 1)</b>	<b>Type of comment<sup>2</sup></b>	<b>Comments</b>	<b>Proposed change</b>	<b>Observations of the secretariat</b>
SGS-IPS	124	7.2.3		Ed	Regenerated cellulose will biodisintegrate and any risk to the environment, in our opinion, has not been substantiated.	Remove restrictions on regenerated cellulose.	

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**Document reviewed: IWSFG Standard 1:2017 – Environmental and Health Safety Requirements**

**Due Date: 2017-09-01**

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SGS-IPS	100	5.1		Te	Please clarify unit size and define examples of dry tissues.		
SGS-IPS	138, 199	7, 8.4	A, 3	Te	Is this a minimum flush volume or an absolute? Other methods in this series mention a minimum flush volume of 4.5L. Not consistent throughout method series.	4.5L flush volume minimum, not to exceed 6.0L.	
SGS-IPS	153	8.1	1	Ge	Store pulls of actual samples is not always as straight forward as one would think.	Make an option by changing “shall” to “may”.	
SGS-IPS	211	9.1	3	Te	Why double-bag dry products? They are being flushed.	Strike requirement.	
SGS-IPS	221	9.1	5	Ge	Not necessary if lab is secured.	Strike paragraph. This is addressed within the ISO 17025 requirement.	
SGS-IPS	259	10.2	Note 3	Te	Is it 2 or 5 flushes for a failure? Inconsistent wording.		
SGS-IPS	286	10.4	A	Te	Is it 2, 3, or 5 flushes for a failure? Inconsistent wording.		
SGS-IPS	323	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	
SGS-IPS	353	Annex 1	2	Te	What are these “applicable national standards”?		

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**IWSFG Template for Reviewer comments and IWSFG secretariat observations<sup>1</sup>**

**Document reviewed: IWSFG PAS 2A:2017 – Toilet and Drain Line Clearance Test Methods – Toilet Clearance**

**Due Date: 2017-09-01**

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SGS-IPS					Why two methods (2A & 2B)? If properly set up to national standards, it shouldn't be a problem to combine both methods.	Combine methods into one.	
SGS-IPS	134	7	c,d	Te	Why are the pipe sections and the total length that specific?	Make the length of 20m a minimum.	
SGS-IPS	236	9.2	1	Te	Why condition samples through the toilet before going through the pipe? Should be a connected system.	Strike section.	
SGS-IPS	326	13	2	Te	Gradient of drain line should be 2%, not 1%.	Correct error.	
SGS-IPS	323	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	

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SGS-IPS	172	7	E	Te	What size screw? Length, diameter?	Define screw details	
SGS-IPS	380	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	
SGS-IPS	272	9.1	5	Ge	Laboratory is secure by ISO standards.	Strike paragraph.	
SGS-IPS	302	10.2	5	Te	How do you record a product that has split apart? ½ on the snag and ½ continues down the pipe?	Need more detail on how to record this event.	
SGS-IPS	314	10.2	Table 1.	Ed	Too many photos are required.	Strike requirement.	
SGS-IPS	314	10.2	Table 1, 5 <sup>th</sup> flush	Te	Are materials on snag removed between samples or allowed to remain until testing is complete?	Clarify.	
SGS-IPS	458	A.4.3.1	2	Te	Recommended that use a toilet with “at least” a 4.5L±0.4L flush volume. Other places in these methods don’t have an “at least” statement.	Make the requirement a “minimum of 4.5L flush volume”.	
SGS-IPS	169	7.	c.	Te	Make 20m a minimum. Are 90° bends permitted to meet space restrictions?		

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Document reviewed: IWSFG PAS 2C:2017-Drain Line Snagging

Due Date: 2017-09-01

<b>Initials</b>	<b>Line number (e.g. 17)</b>	<b>Clause/ Subclause (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ (e.g. Table 1)</b>	<b>Type of comment<sup>2</sup></b>	<b>Comments</b>	<b>Proposed change</b>	<b>Observations of the secretariat</b>

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SGS-IPS					Missing the "S" on top page method title: (IWFG PAS 3A:2017)		
SGS-IPS	261	10.2	9	Ge	Cannot take photos of lower sieve before rinsing. Product slides off sieve. Must rinse first. Too many photos taken otherwise. Back off on number of photos.		
SGS-IPS	325	11	b	Te	Should be 120 seconds, not minutes. 2-minute agitation, not 120 minutes.	Correct wrong units.	
SGS-IPS	136	6.	2	Te	Why is the 6.3mm sieve being used? Sieve holds back material that is obviously dispersed.	Use 12.5mm sieve.	
SGS-IPS	348	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	

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SGS-IPS	398	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	
SGS-IPS	217	8.3.2	1	Te	Why cut test specimen if over your self-imposed limit? Products going down the sewer line are not cut to length in real-world. Limiting size in test 3A makes sense because of size of the beaker. The slosh box in 3B is much larger.	Delete this spec and leave in whole-product.	
SGS-IPS	221	8.3.2	2	Te	Lotion should be removed in bucket or drain line, as this would happen in real-world. Lotion will affect dispersion and the moisturizing chemicals can foam and cause other issues when trying to capture images.	Add reference to remove lotion prior to testing.	
SGS-IPS	247	10.1.1		Te	This section conflicts with 8.3.2.		
SGS-IPS	269	10.1.1	b-5	Te	Why hold specimen for 15 minutes before placing in slosh box? No bucket rinsing for lotion removal, just drain line?	Strike paragraph and add section to rinse lotion using bucket method.	
SGS-IPS	289	10.3	e	Ge	Taking pictures every 30 minutes unnecessary, judgement call as to 6mm X 6mm pieces.	Strike requirements.	
SGS-IPS	303	10.3	5	Ed	Too many pictures, lower sieve pics will spill top portion of sieve.	Strike requirements.	
SGS-IPS	311	10.3	8	Ed	1 minute rinse?	2-minute rinse.	
SGS-IPS	383	12	8	Ed	RPM and rock angle calibration data is overkill.	Strike requirement for report.	
SGS-IPS	401	13	2.	Te	Method specifies to measure rock angle to a half of a degree. Have you determined the true ability of these instruments to be calibrated and hold to that precision of calibration?		
SGS-IPS	616	A..5.4.2	Right photo	Te	12.5mm sieve shown in picture and is not a 6.3mm sieve.	Show photo of correct sieve.	
SGS-IPS	637	A.6.2.1	3.	Te	Please place specimens on a tarred aluminum	Strike the piece of foil reference.	

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					weighing dish.		

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SGS-IPS	134	7	1	Te	Why 1" orbit and not 2"? There is a lot of historical data regarding flushability conducted at a 2" throw. Most labs are equipped with this one.	Optional 2" orbital shaker at 75 rpm.	
SGS-IPS	136	7	3	Te	Should be 2.8L Fernbach flask, not two 8L.	Correct error – 2.8L flask.	
SGS-IPS	228	10.1	1	Ed	Too many photographs. Lower photos will disturb top specimen remnants.	Photograph sieves after rinsing.	
SGS-IPS	240	10.2	7	Ge	Taking pictures at 30 minute intervals until disintegrates too time consuming and unnecessary.	Strike from procedure.	
SGS-IPS	244	10.2	9	Te	Taking pictures of upper and lower sieve prior to rinsing causes problems on lower picture. Material can slide off sieve.	Change to take photos after rinsing.	
SGS-IPS	249	10.2	11	Ge	Why rinse for only 1 minute?	Change to rinse for 2 minutes to match INDA FG502 method.	
SGS-IPS	319	11	B	Te	Is test criteria >95%, or ≥95%? Is 95.0% a fail?	Clarify acceptance criteria.	
SGS-IPS	138	7	5.	Te	Why is the 6.3mm sieve being used? Sieve holds back material that is obviously dispersed.	Use 12.5mm sieve.	
SGS-IPS	394	Annex-1		Te	Recommend use of side baffled flask instead of bottom-baffled flasks.		
SGS-IPS	342	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	

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**IWSFG Template for Reviewer comments and IWSFG secretariat observations<sup>1</sup>**

Document reviewed: IWSFG PAS 3C:2017-Flask and Shaker Table

Due Date: 2017-09-01

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SGS-IPS					Method header on top right of document has the wrong year of 2016.	Correct error	
SGS-IPS	128	5.7	1	Te	There is no indication of cutting down moist tissues to a 4"X4" square, so product does not contact sides of column during testing, which would interfere with the settling time and velocity.	Use the 4"X4" size recommendation from INDA GD3 FG504 test method.	
SGS-IPS	154	7	1.4	Te	Timing graduation marks 1200mm apart not consistent with existing FG504 method, which is 1150mm. Labs already have this set up and verified.	Use the 1150mm maximum length from FG504.	
SGS-IPS	213	8.3.2	1	Te	Using the maximum loading per flush suggested by the manufacturer doesn't make sense. Only 1 product should be timed and it needs to be a maximum unit size of 4"X4", so as not to cause interferences with the column sides.	Change to only use one 4"X4" item per introduction into column for timing.	
SGS-IPS	230	8.4	4	Te	Waiting only 6 hours for the tap water to degas is not enough time, especially in the winter in northern climates. You need to wait longer, otherwise gas bubbles will affect the settling time and possibly make samples buoyant. There is no mention of scraping sides of column to eliminate gas bubbles adhering to the inner surface of the settling column.	Wait 24-48 hours for water to degas, making sure to scrape the inner walls of the settling column with the collection basket to remove the gas bubbles. Cold tap water may require 72 hours in northern climates. <b>The column water needs to equilibrate to room temperature prior to testing.</b>	
SGS-IPS	358	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	
SGS-IPS	317	11	b	Te	Products should not rise more than 300mm from the bottom of the column, rather from the Stop Mark. This is an incorrect statement.	Change wording.	
SGS-IPS	253	5	5.	Te	Laboratory is secure by ISO standards.	Strike paragraph.	

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Document reviewed: IWSFG PAS 4:2017 - Settlement

Due Date: 2017-09-01

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SGS-IPS	138	7	a	Te	Why 1" orbit and not 2" to match historical database from INDA FG505A method?	Change to 1" at 100 rpm or 2" at 75 rpm.	
SGS-IPS	146	7	i	Te	Need to allow gravimetric method for solids determination, Standard Methods, 2540 D.	Allow gravimetric method for solids determination.	
SGS-IPS	194	8.3.4	1	Te	Why narrow solids range to 4000 mg/L? Follow range from INDA FG505A, solids 2000 – 4500 mg/L.	Allow larger range to 4500 mg/L	
SGS-IPS	196	8.3.4	3	Te	600 micron sieve too small, eliminates too many solids. We have also had issues with worms growing in the flasks. These worms get retained on the 600-micron sieve, but freely pass through the 1mm sieve.	Use 1mm sieve as per FG505A to avoid this bias with the worms being retained.	
SGS-IPS	197	8.3.4	4	Te	Labs cannot control temperature of aerobic sludge. At the mercy of sewage treatment plant.	Strike from method	
SGS-IPS	237	10.2	1	Te	Why 750mL of sludge? Keep consistent with existing databases.	Change to 1000 mL of aerobic sludge.	
SGS-IPS	238	10.2	2	Te	Why only for 1 minute?		
SGS-IPS	240	10.2	3	Te	Confusing? Of course, you need to place on shaker table, but there's no direction to start the table at desired speed.	Needs clarification.	
SGS-IPS	243	10.2	5	Te	Temperature window too tight. HVAC systems cannot maintain this tight tolerance.	Allow 22°C±4°C.	
SGS-IPS	244	10.2	6	Ed	If you have active, healthy sludge, this step is overkill. That's why you use cotton controls to monitor sludge health activity.	Strike from method.	
SGS-IPS	256	10.2	12	Ge	Too many photos, overkill.	Strike from method. Only photograph remaining fibers from sieve after rinsing.	
SGS-IPS	257	10.2	13	Te	1 minute rinse not enough to rinse bio-solids from sieve.	Change to 2 minutes	
SGS-IPS	259	10.2	14	Te	Too many photos, especially underside of sieve.	Strike from method.	

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# IWSFG Template for Reviewer comments and IWSFG secretariat observations<sup>1</sup>

Document reviewed: IWSFG PAS 5A – Aerobic Biodisintegration Test

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 <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
					Can't see anything.		
SGS-IPS	300	11	2	Te	There are no acceptance criteria mentioned for a blank and two cotton controls.	Add a blank and two cotton controls to method and must pass 95% or greater acceptance criteria.	
SGS-IPS	244	10.2	7	Te	Remove the DO measurement. Rely on controls to measure activity. Foam stopper needs to stay in place, not only to stop evaporation, but to eliminate aerosols, which is a health hazard.		
SGS-IPS	325	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	

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Document reviewed: IWSFG PAS 5A – Aerobic Biodisintegration Test

Due Date: 2017-09-01

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SGS-IPS	144	7	c.	Te	Why baffled flasks for anaerobic biodisintegration that will be incubated?	Remove error from method.	
SGS-IPS	145	7	d.	Te	Why flask clamps? Are you shaking samples with shaker table in an incubator?	Remove error from method.	
SGS-IPS	149	7	h.	Te	Add fermentation air locks, filled with water, and insert into one-hole stopper.	Add to method.	
SGS-IPS	192	8.3.4	1	Te	What if solids are beyond 0.8%-1.0%? How do you get to that level? You are missing diluting sludge with raw, filtered, wastewater. How do you test the solids content?	Add diluting anaerobic sludge with raw, filtered (2mm sieve) wastewater, pH 6-9. See INDA FG506A method for reference. Add reference to gravimetric Total Solids determination from Standard Methods 2540B.	
SGS-IPS	193	8.3.4	2	Te	This is the aerobic sludge range.	Remove error from method.	
SGS-IPS	230	10.1	1	Te	Why 21 days? Be consistent with INDA method FG506A for 28 days, where there is a large database.	Change to 28-day incubation period.	
SGS-IPS	237	10.2	1	Te	What purity of cotton controls do you use?	Add cotton control specifications.	
SGS-IPS	239	10.2	2	Te	Why 2 grams of cotton controls? This is double of the FG506A method and you have shortened the incubation by 7 days.	Change to 1 gram for cotton controls.	
SGS-IPS	245	10.2	6.	Te	You need to add a fermentation airlock, otherwise the pressure will build and explode in the incubator.	Add airlock to rubber stopper.	
SGS-IPS	258	10.2	10.	Te	Shaker table?	Change to remove flasks from incubator.	
SGS-IPS	263	10.2	13.	Te	Rinsing for 1 minute is not sufficient time to rinse all the solids from the sieve. 600-micron sieve is too small to filter solids from this sludge. You are filtering way too many solids.	Change to 1mm sieve and rinsing to 2 minutes.	
SGS-IPS	274	10.2	15.	Te	Taking photos of sieves won't show you anything.	Take photos of sieve fiber remnants in the drying dish before drying in oven.	
SGS-IPS	336	13	2 <sup>nd</sup>	Te	You cannot monitor gas generation without affecting temperature of incubator. Waste of time. Use	Strike from method.	

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					cotton controls to monitor sludge activity.		
SGS-IPS	343	Bibliography	1.	Te	Wrong method reference.	Change to FG506A Anaerobic Biodisintegration Test.	
SGS-IPS	302	11	a.	Te	You do not mention acceptance criteria of blank and the cotton controls. You need to add this. Also, add that after 14 days, take one cotton control and pass through the sieve and make sure it passes at 95% or greater. Otherwise, stop the testing and reset the samples and controls with new sludge, since there is a problem with biological activity.	Add section based on comments. See FG506A test method for QC requirements.	
SGS-IPS				Ge	You make no reference to incubator specifications or vendor options.		
SGS-IPS	334	13	1	Te	The precision statement should address the precision of the method and not the variability of the product.	Indicate precision of the method.	

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Document reviewed: IWSFG PAS 5B Anaerobic Biodisintegration

Due Date: 2017-09-01

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