

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

1) General

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
					In general, Watercare is in support of the development of the standards.		
					The standards are detailed and targeted to address issues associated with flushability.		
					The approach provides options in some cases to meet the flushability requirements.		
					The standards in their current form do seem to suffer from a lack of proof reading, with mistakes, inconsistencies, ambiguity and different writing styles that should be avoided in a standard document.		
					Some of the comments below relate to issues that are repeated in a number of documents these may not have been listed in each instance below due to time pressures.		
					Unfortunately, the above issues distracted or confused things enough to limit proper critique of the method at times.		

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	100	5.1			Title missing as per 5.3 and 5.4.		
	102	5.2			Title missing as per 5.3 and 5.4.: The paragraph starts "This unit" but does not state what this unit is referring to. Should clearly define that it is referring to toilet paper and use consistent wording e.g. unit size.		
	129	6			Principles: Five flushes seems a lot just to clear a toilet bowl. I would have thought three as a maximum.		
	161				Number of Test Pieces: The title is the only time test pieces is used and is not consistent with wording in body of text.		
					Sentence in paragraph starts with ten specimens then changes to 5 specimens. This is confusing.		
					The term Unit Size is defined in section 5 and yet the term specimen is then used in section 8.2 and other parts of the document. The term specimen has not been defined and adds confusion.		
	190	8.3.3			Other Products: Should the definition of unit include the words "or maximum loading per flush suggested by the manufacturer ..." as per 8.3.2 Moist Tissues clause above		
	229	10.1			Summary: The test specifies ten toilet flush sequences but in 8.2 you only have 5 specimens?		
	255	10.2			Test Procedure: Suggest expanding the use of a plunger to cover any mechanical assistance.		
	273		Table 1		Procedures to Follow after Each Flush Based on Observations of Toilet and Drain Line: The procedure in the table states 3 flushes to complete the test and yet the Test Procedure 10.2 states a maximum of 5 flushes and 8.2 mentions 10 specimens.		

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	83	2			Purpose: Restricts application to United Kingdom, should be removed.		
	136	7			Apparatus: Requirement d specifies a 90° horizontal bend in the drain line but this does not appear to be present in the photo line 355.		
	137	7			Apparatus: Reference in brackets does not match any wording with the photos.		
	156				Number of Test Pieces: The title is the only time text pieces is used and is not consistent with wording in body of text.		
					Sentence in paragraph starts with ten specimens but only divide the package into 5 sections and take 1 specimen from each section. This is confusing.		
					The term Unit Size is defined in section 5 and yet the term specimen is then used in section 8.2 and other parts of the document. The term specimen has not been defined and adds confusion.		
	242	10.1			Summary: With confusion over numbers in section 8.2 I think it would be helpful to define what a toilet flush "sequence" was up front for clarity.		
	261				Test Procedure: Repeat steps 2 to 4, a maximum of 5 times" could be taken literally to mean do steps 2 to 4 once then repeat a further 5 times i.e. 6 times. Wording needs to be clear.		
	273		1		Procedures to Follow after Each Flush ...		
					The table could be clarified by having titles in the left column i.e. 'Observation 1' on the left side and actions on the right. This will ensure the correct order of tasks as currently it is not clear i.e. 1 allow 3 minutes..., 2 Record distance ..., 3 If the specimen ...		
					It is unclear why second part of the first sentence in		

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	134	5.2			Unit Size – Toilet Paper: Add the words or as close as practical to the target mass size as per other documents.		
	171	7			Apparatus: Here the 90° bend is 5m from the head end in the drain line flow test it was 10m is this correct?		
					Photo has two 90° bends and they appear to be closer than 5m?		
	190				Number of Test Pieces: The title is the only time test pieces is used and is not consistent with wording in body of text.		
					Sentence in paragraph starts with ten specimens then refers to dividing into 5 equal sections and taking 1 specimen from each. This is confusing.		
					The term Unit Size is defined in section 5 and yet the term specimen is then used in section 8.2 and other parts of the document. The term specimen has not been defined and adds confusion.		
	202	8.3			Sample Preparation: Section heading missing.		
	211	8.3.2			Moist Tissues: Paragraph not aligned.		
	220	8.4			Apparatus: Bullet points change between a, b, c and 1, 2, 3 within document and between documents with no apparent consistency?		
	290	10.2			Test Procedure: Suggest specify funnel dimensions.		
	325-335	10.4			Test Results: This appears to be the first time sieving is mentioned and it does not form part of the test procedure?		
	346	10.4			Calculations: % disintegration does not appear to be the appropriate term for the percentage of mass		

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					that did not snag.		
	376	12			Test Report: Is it 5 tests or 10 tests?		
	386	13			Precision: Why not say extend 12mm from the surface rather than 'protuberance' to keep it in plain English.		
	410				Photographs: Caption on Photo A.4 should say "Test product left on a snag point" not a "snag left...".		
	420				Annex 4: This procedure should be mentioned or referred to clearly in the method up front.		
	446	A.4.2			Test Product Selection: Selection method should be same wording as the test product selection method for consistency.		
	471	A4.3.2			Procedure: This should be consistent with 5.3 Unit – Size which mentions manufacturer's maximum recommendation		
	490	A.4.4.2			Procedure: This should be consistent with 5.3 Unit – Size which mentions manufacturer's maximum recommendation Procedure:		
	499	A.5.1			Introduction: Should clarify if this refers to product caught on snag or product not caught on the snag for clarity.		
	527	A.5.3			Procedure: The reference should be to the drain line snagging test not disintegration test.		
	563	A.6.2			Procedure: In other documents the time is defined as 4 – 8 hours times should be more specific that several hours and consistent between methods.		
	568	A.6.2			Procedure: Constant weight should be defined e.g. within +/- 0.01g.		
	581	A.6.3.1			Initial Dry mass Calculation Procedure: In other documents the time is defined as 4 – 8 hours times		



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	127	5			Terms and Definitions: Unit sizes appear to be missing in this document I would have thought it would have applied here also?		
	145	7			Apparatus: Should a sieve also be listed under apparatus?		
	252	10.2			Test Procedure: Suggest using simple English rather than use of the word "perturbation".		
	292	10.4			Test Results: Suggest changing the word repeated to carried out or undertaken as repeats are technically in addition to the first instance and would equate to 6 specimens being used.		
	329	12			Test Report: Report should list the name of the person(s) carrying out the test.		
	378		Figure 1		Screw propeller: The propeller in the top view of figure 1 is not centered as described in line 369.		
	426				Annex 3: Section A.3.3 is missing or numbering is incorrect.		
	447	A.3.4.2			Procedure: This should be consistent with 5.3 Unit – Size which mentions manufacturer's maximum recommendation		
	543	A.5.2.1			Loss of Mass Calculation Procedure: In other documents the time is defined as 4 – 8 hours times should be more specific that several hours and consistent between methods.		
	552	A.5.3.2			Initial Dry Mass Calculation Procedure: Numbering should be A.5.2.2		
	553	A.5.3.2			Initial Dry Mass Calculation Procedure: Refers to section A.3.3 it should be A.3.2.		
	574	A.5.4			Example of a Loss of Mass Calculation Worksheet: Should the numbering be A.5.3?		

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	118-120	2			Purpose: I would expect consistency between this test and that of 3C but they differ slightly.		
	142	5			Terms and Definitions: Would have expected Unit Sizes to be presented here similar to other PAS's for consistency.		
	246	10			Procedures: Formatting error Title needs to be on a new line.		
	246	10			Procedures: No summary as in other PAS's outlining the procedure which is helpful.		
	269	10.1.1			Toilet and Drain Line Method: Need to explain how and why you need to hold the specimen i.e. do you allow it to drain of water or not etc.		
	291-294	10.3			Test Procedures: It is uncertain why the size of disintegrated pieces is defined here and not in other similar methods?		
	489	A.4.3			Annex 4: Section A.4.3 is missing or numbering is incorrect.		
	562				Annex 5: Missing "or:" to join text as in other versions of this Annex.		
	641	A.6.2.1			Loss of Mass Calculation Procedure: In other documents the time is defined as 4 – 8 hours times should be more specific that several hours and consistent between methods.		
	651	A.6.3.1			Initial Dry Mass Calculation Procedure: Should the number of initial mass measurements be the same as the number of tests i.e. 5?		

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	15				Forward: One paragraph of text has been cut off and not showing.		
	25-28				Book mark errors.		
	76	1			Introduction: Typo "discharges1".		
	122	5			Terms and Definitions: Would have expected Unit Sizes to be presented here similar to other PAS's for consistency.		
	265	10.2			Test Procedure: Suggest putting in additional instruction to repeat procedure for each of the specimens or similar.		
	329	12			Test Report: Suggest adding requirement to record initial dimensions and weight of the specimen.		
	340	12			Test Report: Suggest taking photographs of upper and lower surface of sieve as in other PAS's.		
	550				Annex 4: Reference to Annex 6 should be Annex 5.		
	585				Annex 5: Reference to section A.3.3 should be section A.3.2.		
	599				Annex 5: Constant weight should be defined e.g. within +/- 0.01g.		

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	31				Contents: Typo - Sizee should be Size		
	62	1			Introduction: Typo "discharges1".		
	140	6			Principles: The sentence in Note 1: Does not read well and is confusing.		
	190-198	8.2			Number of Test Pieces: Title refers to pieces and text refers to specimens suggest consistency.		
					Text talks of 10 specimens but requires selection of 1 specimen from each of 5 equal sections resulting in 5 specimens too little. This is confusing.		
	213	8.3.2			Moist Tissues: Should the maximum loading be per flush or per test?		
	229	8.4			Apparatus: Should step 3 come after step 4 as have not filled the column with tap water yet and has not equilibrated.		
	275-284	10.2			Test Procedure: The sentence specifies the specimen sinking to the Fill Mark but the water is only filled to the Fill Mark so the specimen will be at the fill mark as soon as it is placed?		
					May pay to specify what part to the specimen to start and stop recording i.e. first, middle or last part of specimen.		
					Suggest photos should be taken.		
	302	10.4			Calculations: What are conditions 10a? and 10b.?		
	315	11			Acceptance Criteria: Suggest clarification of how many pieces of the specimen shall not become buoyant i.e. none, no more than 5% etc.		

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