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Due date:2018/3/2

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CB	26	28	Foreword	Te	It is inappropriate to suggest that any company that chooses to not follow these voluntary guidelines is not acting in a socially responsible or sustainable manner. IWSFG has not standing to issue such judgments. A company may choose to conform to different criteria that those suggested in this document, and still be responsible and sustainable. This language is particularly problematic since every empirical study on the topic indicates that the primary problem lies with the user community improperly disposing of material never intended or labeled as flushable, ranging from baby wipes to cooking grease to clothes.	Delete lines 26 (after the first sentence) - 28.	

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CB	71	72	Introduction	Te	The first half of this sentence is incorrect or, at best, very misleading. This document should reflect the evidence recently collected and reported by studies of blockages conducted on behalf of the wastewater sector. These indicate that materials that are neither intended nor labelled as "flushable" are the primary cause of blockages. Recent studies have indicated a range of causes of blockages. For example, New York City's "State of the Sewers – 2016" report stated that confirmed sewer "backups" had decreased 50% since fiscal year 2012, and of the "backups" that did occur, 71% were attributable to grease, 16% to debris (defined as accumulated sand, silt and roadbed aggregate), and 5% were due to "other causes. The only comprehensive studies of blockages that have thus far been conducted indicate that almost all of the material collected from blockages are from products not intended to be disposed of through toilets. For example, an engineering forensic study commissioned by New York City of three of its major systems found that 95%-98% of the items recovered from screens were materials not intended for flushing. [Forensic Evaluation of Non-Dispersables, New York City Law Department (2016)]. For example, in one system just three materials, trash, baby wipes and paper towels	Delete lines 71-72 and replace with the following: "The physically adverse effects (e.g., clogging and plugging) of the introduction of materials not intended or labeled for flushing or disposal into wastewater systems (e.g., baby wipes, cooking grease) has been documented, reflecting a lack of awareness by users regarding the consequences of such disposal. [N.B. Insert reference notes for the UK and NYC studies]. However, the potential environmental effects of such disposal has not been systematically studies.	

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CB	131		Intro	Te	Nowhere does the Introduction discuss the issue of user or consumer awareness or communication, which every study has identified as a central challenge. Every study of blockages has demonstrated that the primary cause is the improper disposal of materials not intended or labeled as flushable, including baby wipes, clothes and cooking grease. The sole focus of the introduction on the design of products provides the incorrect impression that if only products could be properly designed and labeled, significant progress could be made. However, the evidence demonstrates that this is not the case.	Add the following new paragraph after line 131. Studies have demonstrated that the primary cause of blockages is the improper disposal of materials not intended or labeled for disposal in wastewater systems, from baby wipes to clothing to cooking grease. While not addressed in this specification, the public, including industrial and commercial entities, as well as private consumers and householders, should be aware of and avoid the disposal of inappropriate materials into wastewater systems (e.g., grease, textiles, objects, debris, toys, pharmaceuticals, packaging, etc.), or allowing for the entry of such materials into the system (e.g., by allowing debris or trash to collect near grates).	

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CB	184		6.2	Te	The TAPPI/ANSI Test Method T 401, Fiber Analysis of Paper and Paperboard, is a procedure for identifying the kinds of fiber present in a sample of paper or paperboard, with the aim of differentiating among fibers such as those from straw, flax, esparto, soft woods and various species of hardwoods. This is not a test for environmental and health protection, and contains no such criteria. Not being a test for environmental/health protection, it must be deleted from this section that claims it is such a test.	Delete reference to TAPPI/ANSI Test Method T 401	
CB	185	188	6.3	Te	It is ISO policy that ISO standards and technical reports not contain any references to or express any preference for a particular form of implementation, particularly conformity assessment through third party certification. While this may not be an ISO document, this IWSFG should honor this well-established policy and delete this section. At a minimum, it should delete any reference to ISO documents in this regard, since this section would not be allowed in any ISO standard or specification.	Delete lines 185-188.	

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CB	206		7.1.2	Te	This phrase implies that the presence of a single plastic fiber in a product would mean that it is not flushable. No doubt some "rule of reason" is intended regarding de minimis or unintentionally present levels of plastic fibers, but that is not what the text says.	Replace line 206 with: Plastic fibers should not be intentionally introduced into flushable products, or be present in more than de minimis concentrations.	
CB	208		7.1.3	Te	It is accurate to state that there are "strong concerns" about the impact of regenerated cellulose in the environment. However, it is equally accurate to state that there are strong beliefs that these fibers do not pose a threat. This sentence should be re-phrased to accurately reflect that there is a strong debate on this issue, and avoid the misleading implication that the views are all on one side.	revise line 208 to read as follows: "There is a debate about the impact of regenerated cellulose in the environment, with some expressing concern about potential impacts on the environment and studies reporting that cellulostic fibres are biodegradable in terresterial and marine/aquatic environments."	

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