March 2, 2018

International Water Services Flushability Group
Transmitted by E-mail to staff@iwsfg.org & info@iwsfg.org

RE: General Comment to International Water Services Flushability Group (IWSFG)
Second Drafts:
   - IWSFG PAS 1: 2018 - Criteria for recognition as a flushable product
   - IWSFG PAS 2: 2018 Terms and Definitions for Determination of Flushability
   - IWSFG PAS 3: 2018 – Disintegration Test Methods – Slosh Box

To Whom It May Concern:

Food & Consumer Products of Canada (FCPC) and the member companies we represent wish to thank you for this opportunity to comment on the International Water Services Flushability Group’s (IWSFG) Draft Guideline for Flushability

FCPC is the largest national industry association in Canada representing companies that manufacture and distribute food and consumer products. As the country’s largest employer in the manufacturing sector, our industry employs approximately 300,000 Canadians in 6,000 manufacturing facilities located in both urban and rural areas across the country. Please find enclosed a list of our members and our current Board of Directors.

On behalf of our members, FCPC is pleased to note that there have been a number of significant and helpful changes to the previous draft proposal. In particular, we are pleased to see that three of five critical criteria that are consistent with industry guidelines, and that toilet paper is considered outside of the scope of these documents. We believe it is inappropriate to include any reference to regenerated plant-based fibres because it has been clearly established in the literature that these fibres can be biologically degraded.

One minor correction to note; INDA/EDANA guidelines only describe labelling for non-flushable products. They do not describe labelling for flushables.

Within the PAS 1- Criteria for recognition as a flushable product there are some references to activities that are beyond the scope of the document, such as the references to environmental impacts. Because this is intended to be a reference document on flushability, environmental impacts such as those mentioned lie outside the scope of the document and should be dealt with in another venue.

New features in the PAS-3 Disintegration Test Methods, are welcome and positive changes, including the grid angle at the bottom of the slosh box, measuring the rock angle for reduced variability, and also using photography to assist with the assessment of disintegration. We do have some questions regarding changes to some test parameters from the original test methods such as changes to:

   - Sieve size from 6mm to 25mm
   - Test time from 120 minutes to 30 minutes
It is unclear why these changes were made, and it would be helpful to understand the rationale for these proposed changes.

It is important to note that the majority of problematic materials in municipal sewers are non-flushables, and that continuing consumer education is the most critical factor in mitigating this issue.

We look forward to discussing this with you in the near future.

Sincerely,

[Signature]

Regards,

Susan Abel
Vice President Safety and Compliance, FCPC

Cc. Michi Furuya Chang, Senior Vice President, Public Policy & Regulatory Affairs, FCPC
    Michelle Saunders, Vice President, Provincial Affairs and Sustainability, FCPC
    Carla Ventin, Senior Vice President, Government Relations, FCPC
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