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Subject: IWSFG 2nd draft for flushability

Dear Cynthia,

LENZING would like to thank the members of IWSFG and you for the second draft of the IWSFG flushability guideline. We appreciate the comprehensive work of IWSFG to put all public comments into one document.

"Regenerated Cellulose" topic is a very important for LENZING as a wood-based cellulose fiber producer for nonwovens and textile industry.

LENZING™ wood-based cellulose fibers are a good alternative instead of synthetic and non-biodegradable fibers in different disposable applications such as wipes which contribute to reduce the microplastics in the environment. Our arguments are shown in the attachments 2 and 4.

We appreciate if IWSFG shares the scientific evidences on the non-biodegradability of regenerated cellulose in natural environment and it's impact on the environment with LENZING. We welcome discussion with IWSFG regarding this topic.

I am sending you in the attachments several documents regarding the second draft of the IWSFG flushability guideline as follows:

- Lenzing comments for PAS1
- Lenzing's statement for the references mentioned in PAS1 in section 7.1.3. "Regenerated Cellulose".
- Attachments 1 – 4: further references regarding regenerated cellulose which should be added in section 7.1.3. and into the bibliography of PAS1.
Note: I have already sent those references in my email for the first draft on August 25th 2017.
- Lenzing comments for PAS2
- Lenzing comments for PAS3

If you have any questions please do not hesitate to contact me.

My best regards,

Shayda
S. A. Shayda Rahbaran
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