

**IWSFG Template for reviewer comments and
IWSFG secretariat observation**

Document reviewed: **PAS 1**

Due date: 2018

1 Te=Technical, Ge=General, Ed=Editorial

Initial	Starting Line Number (e.g. 17)	Ending Line Number (e.g. 23)	Clause/ Subclause (e.g. 3.1)	Type of comment ¹	Comments	Proposed change	Observation of the secretariat
RL	71	78	Pas 2018	GE	Collection studies conducted by wastewater agencies in North America and Europe have demonstrated that Baby wipes and other non flushable products are the cause of clogging waste water systems. These studies have repeatedly demonstrated that GD3 compliant wipes are not causing clogs or harm to wastewater infrastructure. Code of Practice labeling and GD3 compliant wipes are the solution to the problem waste water is facing, not the problem.	Adopt Code of Practice labeling requirements and GD3 testing protocol and criteria	
RL	182	184	Pas 1:2018	TE	Rockline agrees with the addition of INDA's GD3 toilet drainline test (FG501), Column settling test (FG504) and Anaerobic biodegradation test (FG506) as they are supported and corroborated with multiple laboratory and field studies demonstrating wipes passing these and the other GD3 tests tests will not harm waste water infrastructure		
	242	249	7.5	TE	IWSFG-PAS 1:2018 does not include Aerobic Biodegradation testing as a criteria which is a critical function within Wastewater systems.	Include INDA/EDANA, FG 505 Testing	

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	197	249	7	TE	IWSFG-PAS 1:2018 does not include Municipal Pump Testing. Wastewater has clearly stated flushable wipe compatibility with lift pumps is a major issue within the wastewater system. Testing impact on a municipal pump is critical to ensuring protection of a key wastewater system	Include INDA/EDANA, FG 507 Testing protocol and pass fail limits	
RL	197	249		TE	IWSFG-PAS 1:2018 does not include Household Pump Testing. Ensuring wipes have sufficiently low wet strength to be compatible with household pumps is critical to protecting this important piece of infrastructure	Include INDA/EDANA, FG 503 Test methods	
RL	219	300	7.2	TE	IWSFG-PAS 3:2018 describes procedures for slosh angle calibration that are not feasible. Calibration implies adjustment is readily possible, but there is no readily available means to effectively adjust according to the procedures listed.	Follow Standardized GD3 procedures for calibration	

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RL	219	300		TE	IWSFG-PAS 3:2018 Slosh Box testing parameters (4L, 30 min, 16 RPM) and pass-fail criteria lack the scientific basis to prove its conditions are required to protect wastewater systems. Based on the results of field testing and forensics conducted by a range of stakeholders, all available evidence continues to reinforce the fact that flushable wipes tested according to current GD3 Slosh box testing are compatible with wastewater infrastructure.	Follow Standardized GD3 testing parameters. Please provide evidence that materials passing FG 502 and all other GD 3 tests are causing harm to waste water systems	
RL	219	300		TE	Previous versions of the slosh box protocol from IWSFG specified a 13 rpm sloshing rate and much smaller sieve hole size. No explanation has been provided as to why the rate was increased to 16 rpm or the sieve hole size was increased to 25 mm	Please provide laboratory and field study evidence supporting the new sloshbox criteria are required to protect the wastewater infrastructure	
	219	300			Many articles that Wastewater has cited don't cause harm to wastewater infrastructure, including premium toilet paper, and paper towels will not pass the slosh box test proposed by IWSFG	Follow Standardized GD3 testing parameters.	

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RL	219	300		TE	IWSFG-PAS3:2018 does not provide corroborating field study evidence demonstrating impact on wastewater infrastructure. The GD3 FG502 sloshbox test is supported with significant evidence from field studies that show compliant wipes will not harm wastewater infrastructure	Provide field study evidence demonstrating requirements for adopting IWSFG sloshbox protocol. Follow Standardized GD3 testing parameters.	
RI	219	300		TE	IWSFG-PAS 3:2018 Slosh Box Sieve contains several dead areas around the outside of the sieve which increase variability and reduce accuracy/reproducibility depending on the method of transfer between the slosh box and the sieve.	Follow Standardized GD3 testing parameters and pass-fail criteria.	
RL				TE	IWSFG-PAS 3:2018 does not contain pre-rinsing procedures that are readily available to all labs	Follow GD3 FG502 guideline for sample preparation	
	258		7	TE	IWSFG-PAS 1:2018 Restriction of fibers-- A wipes compatibility with the environment should be based on its ability to biodegrade in the aerobic and anaerobic conditions found in the waste water environment.	Adopt the aerobic and anaerobic biodegradation tests specified in GD3	
RL	258	265		TE			
					IWSFG has provided no evidence that the GD3 testing protocol and pass fail parameters are resulting in harm to wastewater infrastructure.	Please provide field study evidence that demonstrates harm to wastewater infrastructure from GD3 compliant	

