

## **Support and Funding for a Canadian Standard for Flushable Consumer Products**

All of us in the wastewater sector understand the harmful impact that so-called flushable products have on our municipal wastewater systems. From additional maintenance, to equipment damage, to clogs and system failures to contamination of sludge, this issue is costing Canadian municipalities over \$250 million each year. The inappropriate labeling of products and counter-education of our customer's needs to be addressed. Currently, there are no standards, regulations or official definitions for the use of the term 'flushable'. A solution is needed that supports jobs and free trade, but not at the expense of our wastewater systems. MESUG and CWWA have combined forces to address this situation for Canadian utilities, but we need your support.

MESUG, the Municipal Enforcement Sewer Use Group, is a non-incorporated group of municipal enforcement professionals working together to address common issues regarding sewer use in Canadian municipalities. MESUG spearheaded this effort to bring awareness and then invited CWWA to be a partner to assist with financial administration and national/international outreach. CWWA, the Canadian Water and Wastewater Association, is a registered not-for-profit corporation that serves as the national professional association for our municipal sector. Together, MESUG and CWWA have been working on this issue for a few years, and working at it from various angles.

An ISO (international standard) initiative was commenced in 2014 by Canada through ISO's Technical Committee (TC) 224. Considerable progress was made on the development of a Technical Specification regarding the quality and characteristics of products that might be considered "flushable" and how products, flushable and non-flushable, might be clearly labeled. This international committee consisted of both utility representatives as well as those in the wipes manufacturing industry. This work was nearing completion when it was halted by a challenge from the manufacturers concerning test methods.

Over the same timeframe, INDA, the US-based trade association for non-woven products, sought collaboration with the major North American wastewater associations (CWWA, NACWA, WEF and APWA), to review and improve their voluntary Code of Practice and their Guidance Document for Assessing Flushability (GD3) of their products. A task group of wipes industry and municipal utility representatives worked to develop a more stringent fourth edition of the INDA Guidance Document – GD4, but this work halted by the end of 2016 when the manufacturers failed to accept proposals for new tests and pass/fail criteria provided by the wastewater associations.

INDA and the utility associations did however come to agreement on a new voluntary Code of Practice with better guidelines for labeling of any product that could likely be flushed – although we did not agree that any products could be considered flushable yet. You can obtain the new Code of Practice at: <http://www.inda.org/code-of-practice-download/>.

So this leaves us with the original question of "what is flushable?" With the suspension of the ISO work and collaboration with INDA failing, the wastewater associations joined together to form the **International Water Services Flushability Group (IWSFG)**. This informal coalition put together a position statement on non-flushable and flushable labelled products which is now supported by wastewater services in 25 countries and by over 300 stakeholders. You can see the

position statement and the entire list at <http://bit.ly/MultiLangFlushabilityStatement>. The IWSFG is also developing a flushable product standard that would be acceptable to wastewater services.

#### How You Can Help:

Any developed standard (whether international or North American) would require adoption within Canada, as a Canadian Standard, to be enforceable. The ISO and continuing IWSFG work has paved the way, and saved much time, on the development of a Canadian national standard. However, funding is required to continue this work and move us forward toward the implementation of a standard into legislation.

We are requesting Canadian wastewater utilities to contribute to a common fund for the development, adoption and implementation of a Canadian Standard for 'Flushability'. Previous quotes from standards associations estimate a cost in the range of \$150,000 over 18 months to develop a Canadian standard. Additional funds would be required to support lobbying efforts and the process to have such a voluntary standard adopted as an enforceable regulation. Given that the annual cost to Canadian utilities for responding to inappropriately flushed products is assessed at \$250 million, the cost-benefit ratio of this investment is clearly evident.

- Suggested donation levels, donation instructions and project details are attached

CWWA, as a registered and audited corporation, will provide the financial administration for the collection of the funds, the issuance of invoices as required, and the provision of receipts. All funds accepted will be documented by CWWA and held as restricted funds to be used only for the purposes outlined in this request. These funds will be overseen by a project subcommittee consisting of William Fernandes, the CWWA Vice President, Neil Thomas and Mike Darbyshire, both past CWWA Presidents. CWWA will be prepared to commence accepting donations by June 5, 2017 in line with the Window on Ottawa event.

#### Conclusion:

Thus far, the manufacturers have, in their own interests, decided what is 'flushable' in our sewer systems without any agreement from our wastewater professionals. MESUG and CWWA have put in a lot of time and effort into getting this 'flushables' issue this far, but now we need the help and support of our fellow municipalities to develop an enforceable standard. Let's collectively put an end to the treatment of our sewer systems as garbage cans. If you believe that you are not being impacted by this issue, then please take a second glance. We are all impacted, as our systems are all fairly similar. (<https://www.youtube.com/watch?v=h0Eqfsc89-Q>)

If you have any questions or would like more information, please do not hesitate to call any one of us. This will be one of the best returns on investment that can be made, not only financially, but also environmentally, and something we will all be proud of.

Sincerely,

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## Canadian Standard for Flushability Campaign

Suggested donation levels are:

Utility members (Population served)	Suggested Donation level
> 1 million	\$10,000
> 500,000 to 1 million	\$5,000
> 100,000 to 500,000	\$1,000
up to 100,000	\$500
<b>Associate Members</b>	
Private sector	\$1,000

Show your leadership by adding your logo to the Canadian Wastewater Statement on Flushables. Please contact Kara Parisien at CWWA for support information:

Kara Parisien, CWWA Communications  
(613)747-0524 ext 4  
[kparisien@cwwa.ca](mailto:kparisien@cwwa.ca)

Payments are to be made to the Canadian Water and Wastewater Association with a note to direct funds to flushable standard campaign.

Canadian Water and Wastewater Association  
1010 Polytek Street Unit 11  
Ottawa, ON, K1J 9H9

Contact Account Receivable Clerk Louisa Spina for payment details, electronic banking, invoices and receipts.

Louisa Spina, CWWA Accounts Receivable  
(613)747-0524 ext 226  
[lspina@cwwa.ca](mailto:lspina@cwwa.ca)

Funding will be directed in a two-stage approach:

Immediate (Short Term) Expenses:

- 1.) Research and final development of ‘flushable’ test methods;
- 2.) Retention of formally qualified 3<sup>rd</sup> party laboratories to confirm reliability of the test methods and confirmation of the wastewater approved pass/fail criteria; and
- 3.) Retention of qualified Fibre Analysis testing laboratories to analyze the materials used in ‘flushable’ products that do not biodegrade and contribute to microfiber issues in the aquatic environment.

Long Term Expenses:

- 1.) Education and Outreach programs such as “Toilets Are Not Garbage Cans”; and
- 2.) The expense to move the adoption of the standard into enforceable regulation.