

REVIEW OF BABY WIPE COMPLIANCE WITH THE INDA/EDANA 2017 2ND EDITION LABELING CODE OF PRACTICE

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EXECUTIVE SUMMARY

This report is a follow-up to the research done for the 2019 Pennsylvania Water Environment Association Keystone Water Quality Manager article, “Bet You Didn’t Know Your Baby Wipes Are Plastic!”⁽¹⁾ and the 2019 Canadian “Defining ‘Flushability’ for Sewer Use”⁽⁸⁾ (as known as “The Ryerson Report”). This report expands on that article and looks at the issues of Do Not Flush (DNF) labeling compliance and the Single Use Plastic (e.g. plastic/synthetic fiber) construction of baby wipes in significantly greater detail.

An area of concern for both wastewater systems and the environment in general is the wipes manufacturers’ lack of transparency with the consumer. This includes the absence of clear and prominent DNF on-package labeling, as well as the totally absent information that almost all baby wipes are made of plastic or synthetic (regenerated cellulose) fibers. While other products, such as laundry detergent pods, have consistent warning labels across the brands, INDA (Association of the Nonwoven Fabrics Industry) and its members have fought against such commonality for their baby wipes. Regarding the fiber composition, clothing labels list the fiber types so that the consumer can make an informed purchasing decision. For baby wipes, this information is not available to the consumer on the packaging ingredients label and, at best, it takes considerable effort to get that information from the brand owner.

After examining 120 individual packages of wipes, it is clear that manufacturer’s compliance with the INDA/EDANA (The European Disposables and Nonwovens Association) 2017/2nd Edition Labeling Code of Practice (CoP)⁽²⁾ could easily be categorized as abysmal. More than 2½ years after the manufacturers agreed to the CoP, and close to a year after it was implemented, only 10% can be considered in compliance with the placement, size, and contrast requirements for the DNF Symbol, and almost 40% of the products still do not carry any DNF symbol at all, on either the top or front panel, as required by the CoP. Although the other 60% of the packages showed some sort of compliance with the CoP, typically having a DNF symbol on the top panel, very few also comply with the CoP requirements regarding DNF symbol size and contrast. And none carry the optional, detailed disposal language allowed by the CoP.

In response to the growing problem of plastics in the marine environment, the European Union (EU) issued a Single Use Plastics Directive in 2018 and confirmed it in 2019.⁽³⁾ In the directive, personal use disposable wipes, such as baby wipes and flushable wipes, were categorized as **single use plastics**. The adapted definition of plastics therefore covers polymer-based rubber items and bio-based and biodegradable plastics regardless of whether they are derived from biomass or are intended to biodegrade over time. Since this definition covers “plant-based” or regenerated cellulose fibers, it brings almost all “flushable”^(Note 1) wipes and baby wipes under its scope. “Flushable” wipes contain 20-30%

regenerated cellulose fibers like rayon, viscose, lyocell, Tencel, etc. and baby wipes are either plastic, regenerated cellulose or a combination of those fibers. As part of the EU recommendations, these products will be required to be labeled, starting in July 2020, that they contain plastics, and a consumer education program regarding their proper disposal will be initiated.

The lack of consumer understanding of the Do Not Flush (DNF) instruction stems from various issues with packaging requirements, including the lack of uniformity in the placement, size, and specifically the color of the DNF symbol, along with varying levels of compliance of the INDA/EDANA CoP for DNF labeling by individual manufacturers. Additionally, the inability of INDA/EDANA to force, or enforce, compliance from even its members, raises serious concerns about the ability of the wipes manufacturing industry to effectively regulate itself. Both the INDA website, www.inda.org, and the *Introduction to the CoP* contain wording that promises the help of the brand owners to properly and clearly label non-flushable products and provide consumer education:

The labeling Code of Practice (2017) includes guidelines on when and how to use the ‘Do Not Flush’ symbol. For products that have a high likelihood of being flushed, but that are not designed to be flushed, the “Do Not Flush” symbol should appear clearly on the packaging as outlined in the labeling Code of Practice.

We believe educating consumers on the proper disposal method for our products is one of the most important things we can do to help ensure that only those products designed and marketed to be disposed of via the toilet are flushed. This is why we created the labeling Code of Practice and the “Do Not Flush” symbol which accompany the Guidelines.

... that directs brand owners to make it clear on the package to not flush non-flushable wipes that have the potential to be flushed

However, based on the study often cited by INDA, “Forensic Evaluation of Non-Dispersables New York City Law Department,”⁽⁶⁾ where baby wipes make up 63.5% of the wipes recovered, this talk is just that: talk but no action. Although this study does not look at the education portion of these promises, it certainly shows that the labeling portion based on the CoP is far from what is promised by INDA, and the results of that non-compliance are showing up as baby wipes in the sewer systems.

Even more egregiously, “flushable” wipes^(Note 1) (which are often made by the same manufacturers that produce baby wipes) contained plenty of flushing instructions, whereas the baby wipes that are not designed to be flushed contained minimal instruction, if any. On baby wipes packaging, the most common disposal instruction was “Do Not Flush” in, at best, 2mm high text. Most commonly this instruction was found on the bottom panel where it is not readily seen. Only nine packages had this instruction on the top panel. By comparison, flushable wipes universally had the instruction: “Only Flush One Wipe at a Time” on the packaging. In fact, many packages go way beyond that and have paragraphs or charts informing the consumer under what condition(s) these products should, or should not, be flushed (see Figure 1). This often includes not flushing them in basement or household pumps; which is curious because the Household Pump test is one of the seven tests a flushable-labeled product must pass according to the manufacturer’s own guidelines, INDA/EDANA Guidelines for Assessing the Flushability and Disposable Nonwoven Products 3rd Edition/GD3⁽⁴⁾ and 4th Edition/GD4⁽⁵⁾.

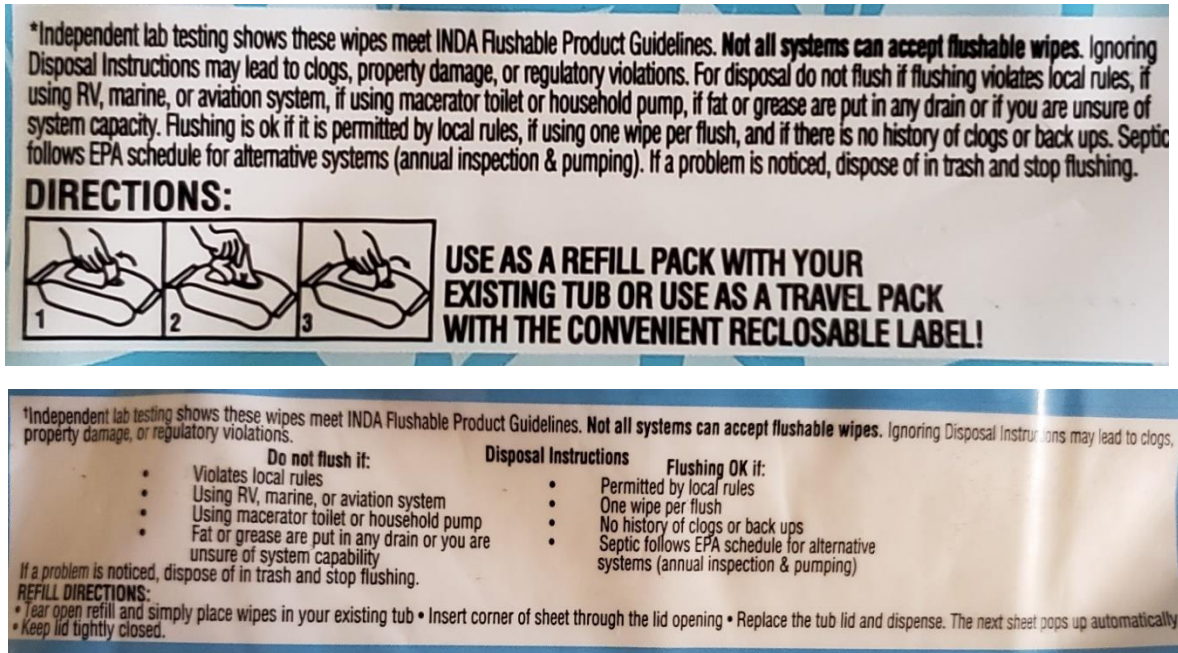


Figure 1. Examples of instructions on a package of “flushable” wipes.

The instructions on flushable wipes go far beyond that and essentially indemnify the manufacturer unless this is a brand-new home and you have never washed your dishes (fat or grease are washed from dishes into any drain). These type of instructions, or conditional flushability instructions, are noticeably absent from toilet paper, which is universally understood by the consumer to be flushable.

During the negotiations for the 2017 CoP, the manufacturers resisted a common DNF symbol citing “brand individuality” as the reason. However, existing commercial products already have the same, across brands, Do-Not-Do-Something labeling that could be used as a model for baby wipes packaging. In the Laundry Detergent Pod category, *all the manufacturers* have large symbols with bold red lines, and a written instruction that starts with the word “WARNING” (see Figure 2). This universal red circle



Figure 2. Examples of laundry detergent pad labeling.

with a slash symbol immediately catches the eye of the consumer and is reinforced by the word “WARNING.”

The manufacturers could have greatly improved how they convey that baby wipes are not flushable just by complying with the labeling CoP they agreed to in 2017. However, based on this study, they have not. In fact, it could be argued that many have gone to great lengths to hide that baby wipes are not to be flushed as a method of disposal. Manufacturers should instead convey to consumers that these products are not flushable by agreeing to adopt a warning design similar to the Laundry Detergent Pod category. In addition, manufacturers should adopt a truly transparent ingredient label, similar to the clothing manufacturers, that lists the fiber type(s) contained in the substrate, or expand the current European labeling on the Kimberly Clark Huggies wipes to include that it contains plastics in addition to the 65% cellulose/wood pulp already listed. Another option would be to adopt the European Union Single Use Plastic labeling requirement (proposed for 2020). However, if they do not make these changes, it appears that the only effective remedy will be through a regulatory/legislative process that modifies the INDA Labeling CoP and makes proper labeling mandatory.

Note 1: The international wastewater organizations do not consider the terms “flushable” or “sewer safe” as a valid confirmation that these products can be safely disposed of via the toilet since the test methodology (GD4) used by the manufacturers was created unilaterally by the manufacturers over the objections of the North American wastewater industry. In October 2019, the UK Advertising Standards Authority, in an action with Kimberly Clark, agreed with the wastewater industry that basing the word “flushable” solely on the manufacturer created GD4, when there were other accreditations such as the UK Water industry Standard (WIS) available, was misleading. The inclusion of this flushable wipe language is simply an example that manufacturers can and do put detailed instructions on their packaging when it is in their own best interest to do so.

BACKGROUND

INDA concludes from the study, “Forensic Evaluation of Non-Dispersables New York City Law Department”, that baby wipes have been identified as the primary source of complication in wastewater systems. In this study, baby wipes made up 63.5% of the total wipes recovered in the two sorted samples. In fact, over 96% of the wipes recovered should have carried Do Not Flush Instructions on the packaging. In defense of their flushable products, INDA routinely cites this study showing their non-flushable baby wipes as the main culprit in sewer system issues, often calling out the consumer for the improper disposal via the toilet.

The labeling CoP promulgated by INDA is an important component to informing the consumer that baby wipes are not designed to be flushed. Since 2009, the INDA/EDANA Flushability Guidelines (GD2, GD3, and GD4) have a labeling CoP incorporated as an integral part. The 2009 GD2 has a CoP⁽⁷⁾ that calls for clear and prominent labeling of all non-flushable products. However, there was little to no compliance with this requirement through 2013. In 2013, INDA released their Flushability Guidance Document; 3rd Edition (GD3). This contained an updated version of the CoP which required a standardized ½-inch DNF symbol next to the UPC barcode on the bottom of the package. The wastewater industry criticized this as ineffective and not meeting INDA’s own clear and prominent criteria, since consumers are unlikely to see the DNF on the bottom of the package. Although there was more compliance with the 2013 CoP than the 2009 version, many packages were still left unlabeled, or did not comply with the CoP requirements well after the January 2015 implementation date, and the problem with baby wipes being flushed continued to grow. In April of 2017, after 18 months of negotiations, INDA agreed to a new CoP with the American and Canadian wastewater associations. The new CoP took effect on November 1, 2018, and was also incorporated into the release of the INDA/EDANA Flushability Guidance Document, 4th Edition (GD4). The 2017 CoP contained specific *On-Pack Consumer Information* requirements for the location, color, size of the DNF symbol and *Wording* requirements for the disposal instruction text (see Appendix C).

The 2019 Canadian report, “Defining ‘Flushability’ for Sewer Use.”⁽⁸⁾ discusses the CoP decision tree which:

“...indicates that for a product to be ‘flushable’, it must pass an appropriate flushability assessment.” It points out that appropriate flushability refers to the current guidance document (GD4) testing criteria, which has not been accepted by wastewater professionals in North America and may not be as robust as other wastewater industry specifications (e.g. UKWIS and IWSFG). Products not meeting the GD4 criteria – and it is universally agreed that that baby wipes do not meet the flushability criteria – must be clearly and prominently labeled Do-Not-Flush according to the 2017 CoP. Additionally, the CoP provides on-pack consumer criteria for manufacturers, which includes the location, color, size, wording, and CoP implementation timing of the DNF symbol. The symbol to be used to indicate that the product should not be flushed is the INDA/EDANA DNF symbol [see Figure 3].”



Figure 3. INDA/EDANA “Do Not Flush” symbol.

SCOPE OF WORK

The purpose of this report is to assess the compliance of baby wipes and other wipe products found in the baby wipe section with the *On-Pack Consumer Information* section of the labeling CoP. In addition to the CoP criteria, each product was assessed for on-package information regarding substrate composition (the cloth-like portion) and biodegradability claims. This was assessed because almost all products in this product class are made with plastic resins like polyester, polyethylene, and polypropylene, or regenerated/modified cellulose like rayon, viscose, or lyocell. This parameter was looked at because the forensic survey data cited by INDA/EDANA clearly indicates that these single use plastic products are being disposed of into sewer systems which can lead to negative impacts on the utilities and the fresh and salt water marine environments.

PROCESS

For this report, 120 products were examined and compared with the *On-Pack Consumer Information* section of the 2017 CoP (pages 5 and 6). Most of the products contained in this report were either purchased or photographed in New Jersey during spring and summer of 2019 to obtain a broad representation of current products. This product examination comes 9-12 months after the official launch of the new CoP in November of 2018 and a full 2.5 years after the manufacturers agreed to the CoP. Specifically, each package was examined for location of the DNF symbol, to see whether the symbol was the correct size, of a high contrast color, or obscured by the package artwork. Additionally, packages were examined to see if the optional DNF text was used. These results were tabulated in a chart (see Appendix A). For comparison, other products with warning symbols and/or text were examined – specifically, laundry detergent pods.

The packages were also examined for information about what the composition of the substrate (cloth-like portion of the wipe). When substrate information was not available on the wipes packaging, attempts were made to obtain this information from the company’s website, or the company was contacted via phone or email. This information gathering process was time consuming, since only two brands had the substrate information available via their website. In most cases, the customer service number had to be called to attempt to find out his information, and on many products this number was not included, requiring additional research. In almost all cases, this information was not readily available to those representatives and necessitated that the manufacturer be contacted, and either reply directly or through customer service. This process was successful less than 50% of the time, despite repeated phone calls. Even the “Transparency” Scan sticker⁽⁹⁾ (see Figure 4) on the Amazon Elements Baby Wipes, which claims to provide the origin and materials of the product, failed to provide any information on the substrate material.

The substrate information is in the Comments column of Appendix A when it was obtained. When a company refused to answer, or did not provide the substrate information, the Materials Columns were marked “U” for unknown. In the Column that calculates whether a product does not contain plastic or regenerated cellulose fibers, the “U” is counted as a “Y” (Yes). We believe this process is fair, and produces an accurate result, since (1) nearly all products in the baby wipes category contain plastic or regenerated fibers; (2) the manufacturers had a chance to provide this information; and (3) if this information is provided in the future, we will update the chart.



Figure 4. Amazon transparency sticker on Amazon Elements Baby Wipes.

FINDINGS

Based on the review of 120 individual packages of wipes, a list of findings was developed. These are broken down into two subgroups, Labeling and Wipe Composition/Plastic and Synthetic Fibers. A brief explanation of each finding is presented in italics.

Labeling

- 1) In stores both the top and front panel are displayed towards the consumer (see Figure 5).

The fact that stores use either display method often leaves no visible DNF symbol facing out at the consumer.

- 2) There are four general package sizes: the individual package, the small individual package, the 3-pack, and the 10-pack box.

The INDA CoP by package area criteria for what size DNF symbol should be used is overly complicated and hard to measure due to the way the packaging is constructed. This could lead to differing opinions as to what a specific panel measures.

- 3) All Flushable Wipes have Flushing/Do-Not-Flush instructions on the package, while baby wipes – which are not designed to be flushed – do not.

Almost universally, flushable wipes carry a ‘Flush Only One Wipe at a Time’ cautionary statement. Many Flushable wipe packages have more text, some quite extensive, describing the proper disposal, specifically when not to flush it. These warnings require a consumer to know if their home sewer lines are well maintained or contain any defects. This is a requirement that few if any homeowners would have knowledge of or could comply with. The labels also instruct



Top Panel Display



Front Panel Display

Figure 5. Comparison of display methods used in stores.

not to flush the wipes if you have a household/basement pump. The INDA/EDANA Flushability Guidelines require a wipe to pass the Household Pump Test (FG503), so it is strange that the companies are indemnifying themselves against one of the seven tests they must pass. The warnings also tell you not to flush a flushable wipe if “any of the drainlines in the home have been used for grease or oil disposal.” This requirement effectively indemnifies the manufacturers after the first time that dishes are washed in a home. By contrast, non-flushable products, like baby wipes, carry minimal instructions for disposal. At best they have a DNF symbol and possibly some text saying Do Not Flush. This text is almost always on the bottom panel, with just a few products including it with the visible DNF symbols on the top or front panel.

4) The compliance by the manufacturers with the agreed upon 2017 Labeling Code of Practice is extremely poor. Of the packages studied:

- a. *39% of the packages did not have a DNF Symbol on either the top or front panel as required.*
- b. *55% had a DNF symbol on the top panel, but only 9% had it in the right size and high contrast color.*
- c. *19% had a DNF symbol on the front panel, but only 1% had it in the right size and high contrast color.*
- d. *Only 8% had a DNF symbol on both the top and front panels.*
- e. *0% utilized the optional text instruction that allowed a detailed instruction/warning not to flush these products on either the top or front panel. While a few (9) products included small Do Not Flush text under the DNF symbol on the top panel, most times this text was relegated to the bottom panel where it was not readily visible.*
- f. *0% had both the correct size and contrast DNF symbol on the top and front panels and the DNF text on top panel.*
- g. *DNF symbols and instructions on the hard case (injection molded plastic) tops are non-existent and need to be addressed.*

5) The lack of consistent colors, placement, and design of the DNF symbol by the individual manufacturers causes consumer confusion regarding DNF instructions.

Each manufacturer has interpreted the CoP requirements differently. This resulted in a rainbow of colors for the DNF symbol. The lack of a uniform color for the warning dilutes the message, since the consumer is conditioned to look for the universal red circle with a slash as an indicator that they should not do something. Consumers therefore may not realize, or have a hard time understanding, that a pink, green, or light blue DNF symbol is supposed to mean “don’t flush this product.”

The major violations among wipe manufacturers include not meeting the requirement that the DNF symbol “should not be obscured by packaging seals or folds or obscured by other package design elements” and that “symbol artwork should have a sufficiently high contrast with the background to be highly readable (i.e. dark on a light background),” and size.

A common violation was the use of same or similar colors to the package text or art work. White on a light-colored background, or a similar color but several shades darker were commonly found during this review. A black DNF symbol was also used frequently and while it may meet the high contrast color requirement in most cases, it suffers from not being universally understood as a symbol not to do something. Additionally, many manufacturers hid or camouflaged the DNF symbol within the package artwork in clear violation of the CoP requirement. Kimberly Clark and Procter & Gamble were the primary violators of this requirement, often putting light colored DNF symbols on busy backgrounds that partially to almost totally obscured them. This spans across their entire product lines.

- 6) Other Consumer products have a uniform warning and text that spans across manufacturers.

In comparison to baby wipes, the laundry detergent pods have a standardized symbol with a large, bold red circle and slash that is placed on the front panel of the packaging and used by all the manufacturers. All the manufacturers also put "Warning" text that covers approximately 40 cm² (see Chart 2).

- 7) The report "Defining 'Flushability' for Sewer Use" had similar findings to the ones tabulated in Appendix A regarding the DNF symbol.

"Defining 'Flushability' for Sewer Use" created a Table (see Appendix B) that "shows the percentages of each category where a DNF symbol was required versus the percentages of those products which met the specified criteria." As shown in that table, "specific categories like baby wipes, cleansing wipes, and diaper liners required that all their products display a DNF symbol. However, none of the products tested adhered to the criteria for package labelling in the Code of Practice, including those which were required to display the symbol."

Wipe Composition/ Plastic and Synthetic Fibers

- 1) The problem of single use plastics and plastic in the environment is a growing concern. The European Union (EU) issued a Single Use Plastics Directive that ***includes both Baby Wipes and Flushable wipes as Single Use Plastic products.***
- 2) The manufacturers go to great lengths to keep the consumer from knowing that baby wipes are made of plastic or synthetic fibers like rayon/lyocell/viscose/Tencel.
 - a. *No product listed the substrate composition on the package ingredient list.*
 - b. *Of the 120 products reviewed, there was only one product that did not contain plastic resin or synthetic fibers. This one product was a 100% cotton wipe (based on the text on the product packaging). The claim was made on the package, but the substrate composition was not listed in the "ingredient list."*
 - c. *Only one of the other 119 products had any information on the package regarding what the substrate was made of. That product was the Kirkland wipe that was made from Tencel fibers (100% synthetic fibers).*

- d. Attempts at obtaining the information from the company website were limited to Kimberly Clark and Procter & Gamble products. For all other products, calls or emails to the customer service department were required. Most often this required follow up due to the brand owner having to call the manufacturer for this information. In many cases, this information was not received, even after numerous attempts.
- 3) The clothing manufacturers clearly and transparently label each garment with the fiber(s) that they are made from (see Figure 6).

The consumer can make an informed choice regarding the product based on the label.

- 4) Several products exhibited “Greenwashing,” or disingenuous claims of being natural.

Greenwashing is defined as “the practice of making an unsubstantiated or misleading claim about the environmental benefits of a product, service, technology or company practice. Greenwashing can make a company appear to be more environmentally friendly than they really are.” This included claims of biodegradability and the deceptively used “plant based” or bio-based fibers on the package itself. Additional research showed that all of these products are made out of regenerated/modified cellulose, or, a combination of regenerated cellulose and plastic fibers. In either case they would be labeled as Single Use Plastics under the EU Directive.

- a. *The Biodegradability claims are based on the use of a commercial compost facility for biodegradability to occur. This important qualifying text was sometimes, but not always, included, citing that the wipe is biodegradable and compostable in municipal/industrial facilities according to ASTM D5338 and OECD 311 standards. However, when present on the package, it was always buried on the back of the package. The average, or even well informed, consumer would have no idea that these tests required high heat, high micro-organism populations and extended time for this to occur, and therefore are likely to think this product is a greener alternative based on the plant-based label or biodegradability claim.*



Figure 6. Example of a clothing fiber composition label.

- b. *Biodegradability of fibers in a marine environment is of concern. Microplastics/microfibers are a source of contamination as they are carriers of chemical pollution (plasticizers and additives) also known as Persistent Organic Pollutants (POP) that are adsorbed onto their surfaces.*⁽¹¹⁾

The 2019 'Effects of flushable products on wastewater infrastructure and natural aquatic environments,'⁽¹¹⁾ written by Barry Orr & Fatih Karadagli states: "Fiber composition of wipes include synthetic fibers that will increase microplastic pollution in natural aquatic environments.", and unlike INDA's flushability guidelines, "IWSFG's proposed test methods and their pass/fail criteria are stringent to protect public health and wastewater infrastructure." The IWSFG also requires a fiber analysis test to be submitted. This test will identify wood pulp, and synthetic fibers (regenerated cellulose and plastic fibers) and provide the transparency that is currently missing.

- c. *The EU recognizes that "there is currently insufficient evidence to provide assurance that oxo-degradable plastic will biodegrade in the marine environment within a reasonable time" and that "Few tests have been conducted, and currently no recognized standards exist that could serve as benchmarks."*⁽¹²⁾
- d. The 'Hello Bello' wipe stated that it was biodegradable on the front panel. However, after extensive examination, the statement that it was 100% Viscose was found underneath the flap on the bottom of the package.
- e. One product, Water Wipes, bragged about its biodegradability, but further investigation of their website found that they are "made using a blend of 80% Polyester and 20% Viscose. Viscose comes from wood so it's 100% natural and biodegradable, which makes 20% of our wipe material biodegradable." *It was also disingenuously green labeled with an unknown plant-based symbol.*
- f. Several other products that claimed to be plant based, after calls to the customer service number, also were found to contain plastic fibers like polyester. This was in addition to the claim that they contained "cellulosic fibers," which is a broad definition that includes both wood pulp/cellulose, as well as regenerated cellulose. Attempts to get a clarification as to which fibers were actually present were all met with no answer or the claim that it was proprietary information.

CONCLUSIONS

1. Compliance with the 2017 CoP is extremely poor. Manufacturers and brand owners have all interpreted the CoP differently, and in some cases have gone to great lengths to make the DNF symbol and text difficult to see. Other wipes products such as hard surface cleaning wipes, feminine hygiene wipes and other personal care wipes that also fall under the CoP labeling requirement were looked at and had less compliance than the baby wipes.
2. The current INDA/EDANA CoP is not adequate to convey a consistent DNF message to consumers. The variance among brands and manufacturers in size, color, and placement of the DNF symbol makes it almost impossible for a consumer to immediately identify these as disposal instructions, and the products as non-flushable.
3. INDA and EDANA as trade organizations are unable to compel their members to comply with a voluntary CoP and have little influence on non-member organizations.
4. With other consumer products, such as Laundry Detergent Pods, all the manufacturers and brand owners utilize a standardized symbol of at least 19mm in diameter with a 2.5mm bold solid red circle slash, as well safety warnings in large text that cover approximately 40 cm².
5. The option to choose whether the DNF symbol is displayed on either the top or front panel should be eliminated. Stores display products with either the top panel or front panel showing, often unintentionally hiding the DNF symbol from consumers.
6. The material/fiber that the wipe substrate is made of is not listed on the packaging and is not readily available from company sources. This lack of transparency in the ingredients list is troublesome since these products often contain plastic or synthetic fibers. Knowledge that these products contain plastics could help the consumer understand that there is a bigger environmental impact than just what happens in the home and municipal sewer systems.

RECOMMENDATIONS

1. Develop a template for product labeling that could be used in regulatory or legislative efforts. The INDA/EDANA CoP labeling guidelines are inadequate in their current form and not followed. A uniform labeling requirement for Do-Not Flush and whether a product contains synthetic fibers will keep individual jurisdictions from creating their own requirements, thereby diluting the message to consumers.
2. Use the Laundry Detergent Pods Safety Warning as guidance to revise the On-Pack Consumer Information section of the CoP as follows:
 - a. Remove the option for either the top or front panel to carry the DNF symbol and make the DNF symbol mandatory on both panels.
 - b. Replace the “Color Section” with the following text: “Symbol artwork should contain a bold red circle and slash with a black toilet on a white background. The white background should extend a minimum of 1mm beyond the red circle and slash. The circle and slash shall be a minimum of 2.5mm solid red lines.”
 - c. Size section to be modified as follows:
 - i. Standard individual packages, whether sold individually or in multiple packages, should have the following:
 1. Top panel - 25mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 5mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT” May Cause Blockages in the Sewer Systems.
 2. Front Panel - 19mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 3mm font the text “WARNING: DO NOT FLUSH”.
 - ii. For 3-Packs:
 1. Front Panel - 35mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 8mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT. May Cause Blockages in Sewer Systems.”
 2. Top panel - 25mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 5mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT. May Cause Blockages in Sewer Systems.”
 - iii. For 10-Pack Boxes:
 1. Top Panel - 35mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 8mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT. May Cause Blockages in Sewer Systems.”
 2. Front Panel - 35mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 8mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT/ May Cause Blockages in Sewer Systems.”
 3. End Panel - 35mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 8mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT. May Cause Blockages in Sewer Systems.”

- iv. For small individual packages of less than 150 cm²:
 - 1. Top Panel - 15mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 3mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT. May Cause Blockages in Sewer Systems.”
 - 2. Front panel - 15mm DNF Symbol compliant with the “Color” section requirements. Additionally, in a minimum size 3mm font the text “WARNING: DO NOT FLUSH THIS PRODUCT. May Cause Blockages in Sewer Systems.”

- 3. Increase the transparency that baby wipes contain plastic and synthetic fibers.
 - a. Use the Clothing industry example for fiber labeling as guidance.
 - b. Follow the lead of the EU with their labeling requirements from the single use plastics directive. Note: All personal use wet wipes are included in Part D.

ARTICLE 7 - Marking requirements

1. Member States shall ensure that each single-use plastic product listed in Part D of the Annex placed on the market bears a conspicuous, clearly legible and indelible marking on its packaging or on the product itself informing consumers of the following:

- (a) appropriate waste management options for the product or waste disposal means to be avoided for that product, in line with the waste hierarchy; and
 - (b) the presence of plastics in the product and the resulting negative impact of littering or other inappropriate means of waste disposal of the product on the environment.
- The harmonised marking specifications shall be established by the Commission in accordance with paragraph 2.

2. By 3 July 2020, the Commission shall adopt an implementing act establishing harmonised specifications for the marking referred to in paragraph 1 that:

- (a) provide that the marking of single-use plastic products listed in points (1), (2) and (3) of Part D of the Annex shall be placed on the sales and grouped packaging of those products. Where multiple sales units are grouped at the point of purchase, each sales unit shall bear a marking on its packaging. The marking shall not be required for packaging with a surface area of less than 10 cm²;
- (b) provide that the marking of single-use plastic products listed in point (4) of Part D of the Annex shall be placed on the product itself; and
- (c) consider existing sectoral voluntary approaches and pay particular attention to the need to avoid information that misleads consumers.

- 4. Use the universally understood red circle with a slash Do Not Flush symbol in place of the current INDA/EDANA DNF Symbol.



Do Not Flush logo

REFERENCES

- 1) 2019 Pennsylvania Water Environment Association Keystone Water Quality Manager, article titled "[Bet You Didn't Know Your Baby Wipes Are Plastic!](#)"
- 2) Association of the Nonwoven Fabrics Industry (INDA) and The European Disposables and Nonwovens Association (EDANA). (2017). CODE OF PRACTICE: Communicating Appropriate Disposal Pathways for Nonwoven Wipes to Protect Wastewater Systems, Second Edition 2017. <http://www.inda.org/wp-content/uploads/2019/04/Code-of-Practice-Final-2nd-Edition-2017.pdf>
- 3) European Union (EU) Single Use Plastics Directive <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0904&from=EN>
- 4) Association of the Nonwoven Fabrics Industry (INDA) and The European Disposables and Nonwovens Association (EDANA). (2013). Guidelines for Assessing the Flushability and Disposable Nonwoven Products. 3rd Edition AKA: GD3 <https://www.inda.org/issues-advocacy/flushability/edition-three-of-the-guidelines-complete-archives/>
- 5) Association of the Nonwoven Fabrics Industry (INDA) and The European Disposables and Nonwovens Association (EDANA). (2018). Guidelines for Assessing the Flushability and Disposable Nonwoven Products 4th Edition AKA: GD4 <http://www.inda.org/issues-advocacy/flushability/edition-four-of-the-flushability-assessment-guidelines-2018/>
- 6) "Forensic Evaluation of Non-Dispersables New York City Law Department" <http://www.inda.org/wp-content/uploads/2018/05/NYC-Law-Department-Forensic-Evaluation-NonDispersables-Final.pdf>
- 7) Association of the Nonwoven Fabrics Industry (INDA) and The European Disposables and Nonwovens Association (EDANA). (2009). Guidelines for Assessing the Flushability and Disposable Nonwoven Products 2nd Edition AKA: GD2. APPENDIX 8.3 - Manufacturers Code of Practice on Communicating Disposal Pathways for Personal Hygiene Wet Wipes.
- 8) Karadagli F., and Orr B., (n.d.). EFFECTS OF FLUSHABLE PRODUCTS ON WASTEWATER INFRASTRUCTURE AND NATURAL AQUATIC ENVIRONMENTS, Report to Fisheries and Oceans Canada. https://cwwa.ca/wp-content/uploads/2020/04/Effects_of_Wipes_Report_DFO.pdf accessed (19 June 2019).
- 9) Transparency App <https://www.barcode.graphics/amazon-transparency-program/>
- 10) Khan A., Orr B., and Joksimovic D., (2019). Defining 'Flushability' for Sewer Use', Ryerson Urban Water. <https://www.ryerson.ca/content/dam/water/Research/FinalReport-FlushablesApril1.pdf> accessed (19 June 2019).
- 11) Karadagli, F., Orr, B. 2019 Regulations and testing are needed to fight 'flushable' wipes. Environmental Science & Engineering Magazine Feb 26, 2019 <https://esemag.com/wastewater/regulations-and-testing-are-needed-to-fight-flushable-wipes/>











12) European Commission Report “ on the impact of the use oxo-degradable plastic on the environment” <https://ec.europa.eu/environment/circular-economy/pdf/oxo-plastics.pdf>

APPENDIX A

APPENDIX "A"

Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top Panel + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Number = Yes			66	24	18	28	20	9	74	16	46	11	1	1	0	3	103	108	11	1	
Number = No			54	96	102	92	100	111	46	104	74	109	119	119	120	117	17	12	109	119	
Percentage = Yes			55%	20%	15%	23%	17%	8%	62%	13%	38%	9%	1%	1%	0%	3%	86%	90%	9%	1%	
Percentage = No			45%	80%	85%	77%	83%	93%	38%	87%	62%	91%	99%	99%	100%	98%	14%	10%	91%	99%	
Walmart - Equate Baby Everyday Clean Wipes-Fragrance free		Individual	YES	NO	YES	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Undersized DNF (12mm where 15mm) is required - Top Panel has the Do-Not-Flush text under the symbol - Package has a 2nd DNF symbol, and "Do Not Flush These Wipes" text under the dispenser flap. However these are both printed on the tear off strip, so they are only visible until the first wipe is removed
Walmart - Equate Baby Refreshing Wipes- Cucumber and Green Tea		Individual	YES	NO	YES	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Undersized DNF (12mm where 15mm) is required - Top Panel has the Do-Not-Flush text under the symbol/Package has a 2nd DNF symbol, and "Do Not Flush These Wipes" text under the dispenser flap. However these are both printed on the tear off strip, so they are only visible until the first wipe is removed
Walmart Equate Premoistened Softwipes-Paraban/Alcohol free - Lightly Scented		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Package has DNF symbol on bottom panel only. In low contrast Green on Green
Walmart Equate Premoistened Softwipes-Paraban/Alcohol free - Unscented		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Package has DNF symbol on bottom panel only. In low contrast White on Lavender
Walmart - Parent's Choice Cotton Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Disingenuously labeled Cotton Wipes -the product is "plant based" with at least (only) 25% cotton. What plant based really means is unspecified and not available on the website. Likely to contain regenerated cellulose
Walmart - Parent's Choice Fragrance Free Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Disingenuously green labeled -the product is "plant based". What plant based really means is unspecified and not available on the website. Likely to contain regenerated cellulose
Walmart - Parent's Choice Fragrance Free Baby Wipes Hard case		Individual	NO	YES	YES	YES	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Disingenuously green labeled -the product is "plant based". What plant based really means is unspecified and not available on the website. Likely to contain regenerated cellulose
Walmart - Parent's Choice Shea Butter Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on an all white top panel
Walmart - Parent's Choice Fresh Scent Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Maroon DNF symbol on white and yellow background
Walmart - Parent's Choice Powder Fresh Baby Wipes		Individual	YES	YES	YES	YES	YES	NO	YES	TRUE	FALSE	TRUE	TRUE	TRUE	FALSE	N	U	U	N	FALSE	Medium Contrast (Maroon on Pink) DNF Symbol on Front Panel Small (9mm where 15mm is required) low contrast white DNF Symbol on the top panel along with text "Do Not Flush This Product". Package label claims product is 100% cotton, but it is not in the ingredient list. Text on the back claims there are no synthetic fibers. Package also makes an unsubstantiated claim of biodegradable on the label.
Naturalena Happy Little Camper Baby Wipes -100% Cotton		Individual	YES	NO	NO	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	Y	N	N	Y	TRUE	












Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Seventh Generation Free & Clear Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on Top and Front panels - Small DNF Symbol and Do Not Flush Text on Bottom panel
Babyganics Baby Wipes - Fragrance Free		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	DNF Symbol is the same color as the text and artwork. DNF Symbol is 10mm where 15mm is required
Hello Bello Wipes- Biodegradable		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	Y	U	Y	Y	FALSE	No DNF Labeling - Disingenuously green labeled -the product is "plant based", and biodegradable. The package lists the product as 100% Viscose, and that the wipe is biodegradable and compostable in municipal/industrial facilities according to ASTM D5338 and OECD 311 standards. Based on these biodegradable standards this product will not decompose in Marine Environments
The Original Wet-Nap Hands & Face Cleansing Wipes - Fragrance free		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	No DNF Labeling on the Top or Front Panels. Small DNF symbol and small Do Not Flush text on three bottom panel
Honest Wipes		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	Y	FALSE	No DNF Labeling - Disingenuously green labeled -the product is "plant based", and biodegradable. The package states that the wipe is biodegradable and compost in municipal/industrial facilities according to ASTM D5338 and OECD 311 standards. Based on these biodegradable standards this product will not decompose in Marine Environments
Burt's Bees Baby - Chlorine Free Wipes		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on the package
Aden & Anais Super Soft Wipe		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on the package
Wegmans Thick Wipes		Individual	YES	NO	YES	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	Y	FALSE	Claims to be made with plant-based fibers... DNF Label on the top panel is 10mm where 15mm is required. Small Do-Not-Flush text under the top panel symbol. Per the Brand owner(via Phone call) Contains polyester and cellulosic fibers
Wegmans Soft Wipes		Individual	YES	NO	YES	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	Y	FALSE	Claims to be made with plant-based fibers... DNF Label on the top panel is 10mm where 15mm is required. Small Do-Not-Flush text under the top panel symbol. Per the Brand owner(via Phone call) Contains polyester and cellulosic fibers
Pure'n Gentle Fragrance Free Baby ipe		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	N	Y	Y	FALSE	No DNF Labeling -Green labeled with an unknown plant based symbol. According to the manufacturer it is more than 80% pulp(cellulose) based with a polymer emulsion binder. There is small Do Not Flush text on the bottom panel hidden under the flap. The manufacturer has not responded to a folowup question about whether pulp based means the product contains regenerated cellulose like rayon or viscose.
Water Wipes - Baby Wipes		Individual	YES	NO	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	Y	FALSE	Undersized DNF (12mm where 15mm) is required - Water Wipes per the website info are: "made using a blend of 80% Polyester and 20% Viscose. Viscose comes from wood so its 100% natural and biodegradable, which makes 20% of our wipe material biodegradable- Disingenuously green labeled with an unknown plant based symbol
Dove - Baby Wipes		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Undersized DNF (12mm where 15mm) is required - Low Contrast DNF Symbol (tan on white). There is very small Do Not Flush text on the bottom panel. Per the manufacturer, Unilever, the product contains viscose and polyester
Johnson's Head to Toe Cleaning Cloths		Individual	YES	NO	YES	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Undersized DNF (8mm where 15mm is required) Per an email from the Brand owner it is made from Viscose (Regenerated Cellulose) and PET (Polyethylene).










Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size, Contrast, DNF Symbol on Top Panel	Correct Size, Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top Panel + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Aveeno (J&J) Baby Wipes		Small Individual	YES	NO	YES	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Undersized DNF (8mm where 10mm is required) Per an email from the Brand owner it is made from Viscose (Regenerated Cellulose) and PET (Polyethylene).
Boogie Wipes (Nehemiah MFG) - Unscented		Small Individual	YES	NO	NO	YES	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol - Purple on a clear background with purple faces makes it difficult to see. There is very small Do Not Flush text on the bottom panel. Reply from the company hotline - A blend of pulp and resinbased fibers used in clothing.
Boogie Wipes (Nehemiah MFG) - Fresh		Small Individual	YES	NO	NO	YES	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol - Purple on a clear background with purple faces makes it difficult to see. There is very small Do Not Flush text on the bottom panel. Reply from the company hotline - A blend of pulp and resinbased fibers used in clothing.
Boogie Wipes (Nehemiah MFG) - Great Grape		Small Individual	YES	NO	NO	YES	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol - Purple on a clear background with purple faces makes it difficult to see. There is very small Do Not Flush text on the bottom panel. Reply from the company hotline - A blend of pulp and resinbased fibers used in clothing.
Acme Supermarkets Signature Care Sensitive Wipe		Individual	YES	NO	NO	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized (8mm where 15mm is required, low contrast white on a light blue background DNF symbol of top panel. Top panel has the optional DNF text in a small low contrast font. DNF text on the bottom panel in a small low contrast font. Per the Brand owner (via phone call) the product contains nonwoven cotton and viscose fibers.
Acme Supermarkets Signature Care Scented Wipe		Individual	YES	NO	NO	NO	NO	YES	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized (8mm where 15mm is required, low contrast white on a light green background DNF symbol of top panel. Top panel has the optional DNF text in a small low contrast font. DNF text on the bottom panel in a small low contrast font. Per the Brand owner (via phone call) the product contains nonwoven cotton and viscose fibers.
Open nature Free & Clear Ultra Soft Baby Wipes		Individual	YES	YES	NO	NO	YES	YES	YES	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized (12mm where 15mm is required, low contrast white on a light green background DNF symbol of top panel. Top panel has the optional DNF text in a low contrast font. Side Panel has a low contrast white on light green DNF Symbol and Do Not Flush Text. DNF text on the bottom panel in a small low contrast font. Per the Brand owner (via phone call) the product contains nonwoven cotton and viscose fibers.
Kimberly Clark - Huggies Simply Clean Wipes		Individual	YES	NO	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	Undersized DNF (12mm where 15mm is required), Low Contrast DNF Symbol - Blue on a background of blues and circles makes it difficult to see. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Huggies Wipes- Mickey Mouse & Friends Hard case		Individual	YES	NO	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	No DNF Symbol on the Top Panel that is white and totally blank. Undersized DNF (12mm where 15mm is required). Low Contrast Front Panel DNF Symbol - White on a Red Background. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Huggies Simply Clean Wipes- Mickey Mouse - Light Blue/Dark Blue Package		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	Low Contrast DNF Symbol -White on a background of blues and shadow lettering on the Top panel and white on a dark blue background with shadow lettering on the front panel makes them difficult to see. Additionally the placement of the symbol in the lower right corner of the front panel almost obscures it from view. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Huggies Simply Clean Wipes- Mickey Mouse Light Blue/White package		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	Low Contrast DNF Symbols -White on a background of blues and shadow lettering on the Top panel and light blue on a white background with shadow lettering on the front panel makes them difficult to see. Additionally the placement of the symbol in the lower right corner of the front panel almost obscures it from view. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.


Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Kimberly Clark - Nourish & Care Wipes		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	DNF Symbol in the same color (brown) as all the other package lettering makes it low contrast, and less noticeable. Additionally the placement of the symbol in the lower left corner of the front panel almost obscures it from view. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Natural Care Wipes - Fragrance Free		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	The top panel DNF Symbol is green and hidden in the green leaf artwork. Front Panel DNF Symbol in the same color (green) as all the other package lettering makes it low contrast, and less noticeable. Additionally the placement of the symbol in the lower right corner of the front panel almost obscures it from view. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Refreshing Clean Wipes		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	The top panel DNF Symbol is blue and hidden in the blue circle artwork. Additionally there is an intersecting line of the same color that cuts through the DNF Symbol. Front Panel DNF Symbol in the same color (green) as all the other package lettering makes it low contrast, and less noticeable. Additionally the placement of the symbol in the lower left corner of the front panel almost obscures it from view. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Huggies One & Done Wipes - Cucumber and Green Tea scent		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	The top panel DNF Symbol is green and hidden in the green leaf artwork. Front Panel DNF Symbol in the same color (green) as all the other package lettering makes it low contrast, and less noticeable. Additionally the placement of the symbol in the lower right corner of the front panel almost obscures it from view. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Kleenex Wet Wipes Sensitive		Small Individual	YES	NO	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	Undersized DNF (11mm where 15mm is required) Low Contrast DNF Symbol - Green on Green Background. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Kleenex Wet Wipes - Germ Removal		Small Individual	YES	NO	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	Undersized DNF (11mm where 15mm) is required - Low Contrast DNF Symbol - Orange on an Orange Background. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Huggies Cleansing Wipes		Small Individual	YES	NO	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	N	N	FALSE	Undersized DNF (8mm where 10mm is required), Low Contrast DNF Symbol - Blue on a background of blue/lavender. From the Kimberly Clark website: A stretchy non-woven fabric called Coform. Coform is made by combining microscopic and continuous plastic fibres with wood pulp (cellulose) fibres that provide gentle care to baby's skin.
Kimberly Clark - Europe - Huggies Baby Wipes - Soft Skin		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	European Version of Huggies, but available in the US at both K-Mart and Buy Buy Baby stores. No DNF symbol on the top or front panels. No DNF symbol or text on bottom panel - Small DNF symbol on the non-display side panel. Also on this side panel it has a partial substrate composition list. Unfortunately it only lists that it is 65% cellulose/pulp, and does not include the plastic fibers that are likely in the product if it is similar to the US version (see above)
Kimberly Clark - Europe - Huggies Baby Wipes - Pure		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	European Version of Huggies, but available in the US at both K-Mart and Buy Buy Baby stores. No DNF symbol on the top or front panels. No DNF symbol or text on bottom panel - Small DNF symbol on the non-display side panel. Also on this side panel it has a partial substrate composition list. Unfortunately it only lists that it is 65% cellulose/pulp, and does not include the plastic fibers that are likely in the product if it is similar to the US version (see above)
Cloud Island (Target) Sensitive Care Ultra Thick Wipes		Individual	NO	YES	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on the Top Panel - Low Contrast Green on Green DNF Symbol on the Front Panel - Very Small Do-Not-Flush Text on the Bottom panel













Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size, Contrast, DNF Symbol on Top Panel	Correct Size, Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top Panel + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Target Up & Up Baby Wipes - Green Tea Melon		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	Y	N	FALSE	Undersized DNF (12mm where 15mm) is required - Medium Contrast Light Gray on a Green background DNF Symbol - Very Small Do-Not-Flush Text on the Bottom panel
Target Up & Up Baby Wipes - Sensitive Skin		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	Y	N	FALSE	Undersized DNF (12mm where 15mm) is required - Medium Contrast Light Gray on a Purple background DNF Symbol - Very Small Do-Not-Flush Text on the Bottom panel
Target Up & Up Baby Wipes - Cucumber		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	Y	N	FALSE	Undersized DNF (12mm where 15mm) is required - Low Contrast Light Gray DNF Symbol on a Dark Green with shamrocks background - Very Small Do-Not-Flush Text on the Bottom panel
Target Up & Up Hand and Face Wipes		Small Individual	YES	NO	NO	YES	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	Y	N	FALSE	Medium Contrast Light Gray on a Yellow background DNF Symbol - Very Small Do-Not-Flush Text on the Bottom panel
Kirkland(COSTCO) Signature Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	NO	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	Y	N	Y	N	FALSE	Most Visible DNF Symbol - 100% Tencel (regenerated Cellulose) - Large white area on Top panel that could be used to better convey that these wipes are not flushable
Shop-Rite Baby Wipes - Sensitive/Unscented		Individual	YES	YES	NO	NO	YES	NO	YES	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Blue DNF Symbol on top panel is visible on a large white area, but of similar color to the rest of the package artwork. The blue DNF symbol on the front panel is set amongst the art work and is difficult to see. Very small Do Not Flush text on bottom panel in a color contrast that is almost not readable
Shop-Rite Baby Wipes - Green Tea & Cucumber		Individual	YES	YES	NO	NO	YES	NO	YES	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Green DNF Symbol on top panel is only partially visible on a large white area, and of similar color to the rest of the package artwork. The green DNF symbol on the front panel is set amongst the art work and difficult to see. Very small Do Not Flush text on bottom panel in a color contrast that is almost not readable
Procter & Gamble - Pampers Baby Wipes - Complete Clean (Blue Whale)		Individual	YES	YES	NO	NO	YES	NO	YES	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Low contrast DNF Symbol on top of other circular art work. DNF symbol wraps over the edge to the rear panel, partially obscuring it. Low Contrast symbol on the front panel set amongst the background art work. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
Procter & Gamble - Pampers Baby Wipes - Complete Clean Baby Fresh Scent (Ahoy)		Individual	YES	YES	NO	NO	YES	NO	YES	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Low Contrast DNF Symbol on Top Panel Light Blue/Aqua on a light background set on top of other art work. Medium contrast symbol on the front panel set amongst the background art work. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
Procter & Gamble - Pampers Baby Wipes - Sensitive		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol on Top Panel Light Blue/Aqua on a white background set on top of other art work. Low Contrast symbol on the front panel set amongst the rainbow background art work. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
Procter & Gamble - Pampers Baby Wipes - Complete Clean Unscented		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Medium Contrast DNF Symbol on Top Panel Light Blue/Aqua on a green with white dot background set in with the other art work. Low Contrast symbol on the front panel set amongst the background art work. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
Procter & Gamble - LUVS Wipes - Clean Scent		Individual	YES	NO	NO	YES	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol on Top Panel Purple on a Purple background. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.






Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size, Contrast, DNF Symbol on Top Panel	Correct Size, Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Procter & Gamble - Pampers Baby Wipes - Complete Clean Unscented Hard Case		Individual	NO	YES	NO	NO	YES	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol on Front Panel Light Blue/Aqua. No DNF symbol on the Top panel. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
Procter & Gamble - Pampers Baby Wipes - Sensitive - Hard case		Individual	NO	YES	NO	NO	YES	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol on Front Panel Light Blue/Aqua. No DNF symbol on the Top panel. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
Procter & Gamble - Pampers Baby Wipes - Aqua Pure		Individual	YES	NO	NO	YES	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol on Top Panel - Aqua on a white background set in with the other art work. Cotton Enhanced (contains 15% cotton) From the P&G website - Made with premium cotton, regenerated cellulose and polyester for a soft and gentle clean against baby's skin.
Procter & Gamble - Pampers Baby Wipes - Sensitive (sheep and rabbit artwork)		Individual	YES	YES	NO	YES	YES	NO	NO	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Low Contrast DNF Symbol on Top Panel Light Blue/Aqua on a white background set on to of other art work. Low Contrast symbol on the front panel set amongst the rainbow background art work. From the P&G Website: The foundation of a Pampers Baby Wipe is a fiber-blend material specifically chosen for its softness and flexibility. Made from modified cellulose and polypropylene, each fiber adds a unique property to generate a cloth-like feel.
CVS Health - Ultra-Soft Cleansing Wipes - Fresh Scent		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized, 12mm where 15mm is required, low contrast white on a red background DNF Symbol on the Top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health - Ultra-Soft Sensitive Cleansing Wipes with Silky Skin Formula - Fragrance Free		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized, 12mm where 15mm is required, low contrast, hidden by artwork DNF Symbol on the Top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health - Ultra-Soft Sensitive Cleansing Wipes - Fragrance Free		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized, 12mm where 15mm is required, low contrast white on a light blue background DNF Symbol on the Top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health - Ultra-Soft Cleansing Wipes - Fragrance Free		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Undersized, 12mm where 15mm is required, low contrast white on a orange background DNF Symbol on the Top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health - Ultra-Soft Cleansing Wipes - Fresh Scent - Small pack		Small Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Low contrast white on a purple background DNF Symbol on the Top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health - Ultra-Soft Toddler Cleansing Wipes - Fresh Scent - Small Pack		Small Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Low contrast white on an orange background DNF Symbol on the Top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health - Ultra-Soft Cleansing Wipes - Fragrance free - Hard Case		Individual	NO	YES	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	N	Y	N	FALSE	Low contrast white on an orange background DNF Symbol on the front panel. No DNF Symbol on the top panel. Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.
CVS Health Basic Baby Wipes		Individual	NO	YES	NO	NO	YES	YES	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	Y	N	FALSE	Low contrast white on a light blue background DNF Symbol on the Top panel. No DNF symbol on the top panel Research on the CVS website says they are made from a "Botanic Fiber". Further research shows that this likely to be a Lenzing regenerated cellulose fiber such as Tencel. CVS does not claim biodegradability but Lenzing does.

Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Walgreens Well Beginnings Fragrance Free Natural Care Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on Top or Front Panel. DNF symbol and Do Not Flush Text on Bottom Panel.
Walgreens Well Beginnings Green Tea & Cucumber Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on Top or Front Panel. DNF symbol and Do Not Flush Text on Bottom Panel.
Walgreens Well Beginnings Shea Butter Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on Top or Front Panel. DNF symbol and Do Not Flush Text on Bottom Panel.
Walgreens Well Beginnings Fragrance Free Natural Care Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on Top or Front Panel. DNF symbol and Do Not Flush Text on Bottom Panel.
Walgreens Well Beginnings Sensitive Baby Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on Top or Front Panel. DNF symbol and Do Not Flush Text on Bottom Panel.
Whole Foods "365" Chlorine Free Baby Wipes - Pop-Up Tub		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on Packaging.
Whole Foods "365" Chlorine Free Baby Wipes - 80 Pack		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on Packaging. Small Do Not Flush Text on bottom of package, but hidden under the thermoseal flap.
Whole Foods "365" Chlorine Free Baby Wipes - 30 Pack		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on Packaging. Small Do Not Flush Text on bottom of package, but hidden under the thermoseal flap.
Amazon Elements Fresh Scent- Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Proper sized DNF symbol on the top panel. No Side Panel DNF. Small do-not-flush text and DNF symbol with text in low contrast white on light green on bottom panel. Product has a "Transparency" sticker on the bottom. When scanned it tells us this product was made by Nice-Pak, but despite claims to list the ingredients, does not include what the substrate is made of. Calls to Amazon were not helpful, since they did not have the information and did not know that they were manufacture for them by Nice-Pak
Amazon Elements Unscented Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Proper sized DNF symbol on the top panel. No Side Panel DNF. Small do-not-flush text and DNF symbol with text in low contrast white on light blue on bottom panel
Amazon Elements Sensitive Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Proper sized DNF symbol on the top panel. No Side Panel DNF. Small do-not-flush text and DNF symbol with text in low contrast white on lavender on bottom panel

Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Lansinoh Clean and Condition Baby Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	No DNF Symbols on Packaging. Very small Do Not Flush text and non-compliant DNF symbol on bottom of package. Per the manufacturer the wipe is 30% rayon and 70% polyester
Rite-Aid Tugaboos Fragrance Free Baby Wipes		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	DNF Symbol n the top panel is 12mm where 15mm is required, and set on background of busy artwork that partially obscures it. DNF symbol and text on bottom panel.
Rite-Aid Tugaboos Fresh Scented Baby Wipes		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	DNF Symbol on the top panel is 12mm where 15mm is required, and the purple DNF symbol is set right on top of a purple leaf in a very busy package artwork. DNF symbol and text on bottom panel.
Rite-Aid Tugaboos Sensitive Baby Wipes		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	DNF Symbol n the top panel is 12mm where 15mm is required, and set on background of busy artwork that partially obscures it. DNF symbol and text on bottom panel.
Rite-Aid Tugaboos Shea Butter Baby Wipes		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	DNF Symbol on the top panel is 12mm where 15mm is required, and is brown on a tan background of busy artwork that partially obscures it. DNF symbol and text on bottom panel.
Rite-Aid Tugaboos Melon Berry Kids Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on package
Rite-Aid Tugaboos Green Tea and Cucumber Baby Wipes		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbols on package
Stop & Shop Always My Baby Thick & Gentle Baby Wipes		Individual	YES	NO	NO	YES	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Correct Size DNF Symbol on top panel, but color and other circular artwork make it difficult to see. Polyester and Cellulosic fibers according to the manufacturer.
Stop & Shop Always My Baby Thick & Gentle Baby Wipes - Tub		Individual	NO	YES	NO	NO	YES	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on top panel. Correct Size DNF Symbol on front panel, but purple on a lavender background make it hard to see. Polyester and Cellulosic fibers according to the manufacturer.
Honest Wipes		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	Y	FALSE	No DNF Symbols or text anywhere on the package. Makes a claim of biodegradability & compost in municipal/industrial facilities according to ASTM D5338 & OECD 311 standards. A call to customer service was not able provide the composition of the substrate.
Honest Wipes		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	Y	FALSE	No DNF Symbols or text anywhere on the package. Makes a claim of biodegradability & compost in municipal/industrial facilities according to ASTM D5338 & OECD 311 standards. A call to customer service was not able provide the composition of the substrate.

Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Natures Promise Free From Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Correct size DNF symbol on top panel, but hidden among the leaf artwork. DNF Symbol and Do Not Flush text on bottom panel.
B4Y (Better For You) Free From Baby Wipes		Individual	YES	NO	YES	YES	NO	NO	YES	FALSE	FALSE	TRUE	FALSE	FALSE	FALSE	N	U	U	Y	FALSE	Correct size DNF symbol on top panel. DNF Symbol and Do Not Flush text on bottom panel. Claims, "Fabric is FSC certified and made of biodegradable and plant based fabrics". Forest Stewardship Council (www.fsc.org)
Noodle & Boo Baby Wipes		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol or Text on the entire Package. Available at Buy-Buy Baby
Mustela Baby Wipes - Very Sensitive Skin		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby
Mustela Baby Wipes - Delicately Fraganced.		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby
Walgreens Smile & Save Unscented Baby Wipes		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF Symbol on Package
Kroger Baby Wipes/ Comforts For Baby - Sensitive		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	10mm where 15mm DNF symbol is required on the top panel. DNF Symbol is blue and is hidden in the blue hippopotamus artwork. Small Do Not Flush Text on bottom panel
Kroger Baby Wipes/ Comforts For Baby - Fragrance free		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	10mm where 15mm DNF symbol is required on the top panel. DNF Symbol is green but there is other artwork of similar colors on the panel. Small Do Not Flush Text on bottom panel
Kroger Baby Wipes/ Comforts For Baby - Scented		Individual	YES	NO	NO	NO	NO	NO	YES	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	10mm where 15mm DNF symbol is required on the top panel. DNF Symbol is purple and is hidden in the purple artwork. Small Do Not Flush Text on bottom panel
Kroger Baby Wipes/ Comforts For Baby -Hardcase		Individual	NO	YES	NO	NO	NO	NO	NO	FALSE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	Y	FALSE	
Smart Sense Clean Coths Moist Wipes (K-Mart)		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol or Do Not Flush Instructions on the entire package
K-Mart Little Ones Baby Wipes - Sensitive Skin - Plastic Tub		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol or Do Not Flush Instructions on the entire package

Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
K-Mart Little Ones Baby Wipes - Scented - Plastic Tub		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol or Do Not Flush Instructions on the entire package
K-Mart Little Ones Baby Wipes - Shea Butter - Plastic Tub		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol or Do Not Flush Instructions on the entire package
K-Mart Little Ones Baby Wipes - Sensitive Skin		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol on the entire package - JUST A VERY SMALL Do-Not-Flush Text on the bottom panel
K-Mart Little Ones Baby Wipes - Scented		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol on the entire package - JUST A VERY SMALL Do-Not-Flush Text on the bottom panel
K-Mart Little Ones Baby Wipes - Shea Butter		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Made By US Nonwovens. No DNF symbol on the entire package - JUST A VERY SMALL Do-Not-Flush Text on the bottom panel
Bloom Baby Wipes - Night Calming Lavender		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the rear panel, just a same color as the text. DNF symbol. - Available at Buy-Buy Baby
Bloom Baby Wipes - Medicated Rash Guard		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the rear panel, just a same color as the text. DNF symbol. - Available at Buy-Buy Baby
Buy-Buy Baby Baby Wipes - Fresh Scent		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby
Buy-Buy Baby Baby Wipes - Sensitive		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby
Buy-Buy Baby Baby Wipes - Sensitive (2)		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby
Buy-Buy Baby Baby Wipes - Soothing Chamomile		Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby
Buy-Buy Baby Baby Wipes - Scented		Small Individual	NO	NO	NO	NO	NO	NO	YES	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol on the top or front panel. No Do-Not-Flush Text on the bottom panel, just a same color as the text DNF symbol. - Available at Buy-Buy Baby

Product Manufacturer and Name	Product Picture	Package Type	Symbol on Top Panel	Symbol on Front Panel	High Contrast Color for DNF Symbol	Proper Size DNF Symbol - Top Panel	Proper Size DNF Symbol - Front Panel	Optional Do-Not-Flush text on Top or Front Panel	Optional Do-Not-Flush text on Bottom panel	DNF Symbol on Top & Front Panels	No DNF Symbol on Either Top or Front Panel	Correct Size Contrast, DNF Symbol on Top Panel	Correct Size Contrast, DNF Symbol on Front Panel	Correct Size, Contrast, DNF Symbol on Top & Front Panels	Correct Size, Contrast, DNF Symbol on Top & Front Panels + DNF Text on Top Panel	Substrate Composition On Package	Contains Plastics	Contains Regenerated Cellulose	Biodegradability Claim	Does not contain either Plastic or Regenerated Cellulose	Comments
Harmon - Face Values Wipes		Small Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	No DNF symbol or text on the entire package
Sesame Street - Hushables Baby Wipes - Sensitive		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Made By US Nonwovens. No DNF symbol or text on the entire package - Just a same color as the text DNF Symbol on the bottom panel
Sesame Street - Hushables Baby Wipes - Sensitive - Cushiony Thick		Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Made By US Nonwovens. No DNF symbol or text on the entire package - Just a same color as the text DNF Symbol on the bottom panel
Saline Soothers - Nehemiah Mfg.		Small Individual	NO	NO	NO	NO	NO	NO	NO	FALSE	TRUE	FALSE	FALSE	FALSE	FALSE	N	U	U	N	FALSE	Made By Nehemiah Mfg.. No DNF symbol or text on the top or front panels - Just a same color as the text DNF Symbol and text on the bottom panel
Kimberly Clark - Australia Huggies Fragrance Free Baby Wipes		Individual	YES	YES	NO	NO	YES	NO	YES	TRUE	FALSE	FALSE	FALSE	FALSE	FALSE	N	Y	Y	N	FALSE	Dark Green on Light Green DNF symbols on top and front panels Front panel DNF hidden on the fold between the top and front panels. Very small, partially hidden DNF symbol on bottom panel. From Australia.

APPENDIX B

Appendix “B”

<i>Product Category</i>	<i>% of products that require a DNF symbol</i>	<i>% of products that display a DNF symbol</i>	<i>% of products that meet DNF symbol criteria</i>
<i>Baby Wipes</i>	100	56	0
<i>Bathroom Tissue</i>		0	
<i>Cleaning Cloths</i>	25	75	0
<i>Cleaning Wipes</i>	86	15	0
<i>Cleansing Cloths</i>		20	
<i>Cleansing Wipes</i>	100	26	0
<i>Diaper Liners</i>	100	0	0
<i>Dog Waste Bags</i>		0	
<i>Facial Tissue</i>		17	
<i>Paper Towel</i>		0	
<i>*Note</i>		Greyed out cell indicates that based on Code of Practice, product category does not require a DNF symbol or is out of scope (used for comparison only)	

APPENDIX C

Appendix "C"

2.3.2 Consumer Education and Awareness

Manufacturers, retailers and wastewater authorities can all assist with educating the public about the circumstances when flushing is an appropriate disposal route and thus decrease the extent to which inappropriate materials are flushed down the toilet. These guidelines provide a useful reference point in this regard. While it was beyond the scope of the Guidance Document to address this topic directly, INDA and EDANA committed in June 2008 to hold further discussions with relevant stakeholders about how consumer education can most effectively be progressed.

*As a result, EDANA decided to produce a "Manufacturers' Code of Practice on Communicating Disposal Pathways for Personal Hygiene Wet Wipes" which was published in March 2009. It obliges EDANA member companies to ensure not only that they follow the guidelines for assessing flushability before marketing products as flushable, but also that they ensure that products which are **not** designed to be flushed are labeled with a specified symbol to indicate this clearly. The Code will help to ensure that there is a clear and consistent approach to product labeling regarding the appropriate way to dispose of non-flushable products. EDANA members who manufacture and/or market personal hygiene wet wipes have until the end of 2010 to comply with the code. The code is included in this document as Appendix 8.3.*

8.3 EDANA Code of Practice on Disposal of Personal Hygiene Wipes

MANUFACTURERS' CODE OF PRACTICE ON COMMUNICATING DISPOSAL PATHWAYS FOR PERSONAL HYGIENE WET WIPES

INTRODUCTION

The manufacturers of personal hygiene wet wipes in Europe, represented by EDANA, are committed to communicating in a clear, concise and consistent way the recommended disposal route for their products. In this way the industry will help ensure that only personal hygiene wet wipes that are compatible with the wastewater system are disposed of in this way.

Personal hygiene wet wipes are used for intimate cleansing. Specific products covered by this code are baby and toddler wipes, feminine hygiene wipes, incontinence wipes and moist toilet tissue.

This Code of Practice outlines the commitments of EDANA and its member companies to:

- Use the Guidance Document for Assessing the Flushability of Nonwoven Consumer Products¹ to establish the flushability of individual products prior to making a Flushable claim;
- Clearly label all packs of personal hygiene wet wipes that are **not flushable** to indicate that they should be disposed of via the solid waste system;
- Communicate the appropriate disposal pathway for personal hygiene wet wipes on relevant printed and online product material;
- Encourage manufacturers and private label producers who are not members of EDANA to comply with this code of practice
- Encourage retailers to subscribe to this code of practice in their private label activities and where possible reinforce this at the consumer level.
- Where appropriate, support the work of stakeholders at national and local level to increase public awareness of good wastewater disposal practices.

EDANA members represent over ninety percent of the total volume of nonwoven consumer products on the market in Europe.

PRODUCT USAGE INFORMATION

The appeal of personal hygiene wet wipes comes from the advantages they offer in personal hygiene, convenience and ease of use. Their portability has important hygiene benefits. They enable users more easily to maintain and even improve personal hygiene standards.

¹ For information on how to obtain a copy of the Guidance Document visit www.edana.org

There are two disposal routes for wet wipes; the first is via the municipal solid waste system, the second is via the wastewater disposal system.

The Municipal Solid Waste System

By far the majority of wipes are manufactured to be disposed of via the municipal solid waste system being made from materials that will not adequately degrade or pass through the wastewater system without potentially causing problems. These wipes are compatible with all current forms of municipal solid waste treatment methods including landfill, incineration, composting and mechanical biological treatment.

The Wastewater Disposal System

This disposal route is only appropriate for products which address public health and hygiene considerations. It is limited to products which:

- could be contaminated with faecal/body waste; and
- have been assessed as flushable according to the definition of flushability and the assessment approach outlined in the Guidance Document for Assessing the Flushability of Nonwoven Consumer Products.

The Flushability Guidance Document Definition of Flushability

For a wet wipe to be flushable it must:

- clear toilets and properly maintained drainage pipe systems under expected product usage conditions
- be compatible with existing waste water conveyance, treatment, reuse and disposal systems; and
- become unrecognizable in a reasonable period of time and be safe in the natural receiving environment.

Manufacturers will ensure that all packs of personal hygiene wet wipes provide consumers with information about whether the product is appropriate for disposal via the wastewater system.

At a minimum this will comprise a symbol for all non-flushable products which clearly indicates that the product should not be disposed of via the toilet. The EDANA recommended symbol is shown below. EDANA will encourage members to use this symbol with the aim that over time it will become a universal symbol.



In moving towards use of the universal symbol, EDANA member companies may continue to use a different symbol to minimize the need for unplanned art work changes. Member companies may also select a colour for the above symbol which is compatible with their product packaging artwork. Whichever symbol is used, the following principles should apply:

- The meaning of the symbol must be clear and unambiguous in all European markets and should not require textual clarification.
- The symbol can be placed anywhere on the pack but must be prominent, clearly visible and legible.

Manufacturers may elect to include additional information in the form of:

- Written text in all relevant languages informing consumers to dispose of products in waste bins
- A waste bin symbol such as the one provided below.



In applying the assessment approach contained within the Flushability Guidance Document, it is possible that some products previously marketed as flushable will not meet the newly developed acceptance criteria and should not therefore continue to be marketed as flushable. It is expected that such products would either be changed so that they will comply with the Guidance Document or would no longer be placed on the market.

OFF-PACK CONSUMER INFORMATION

EDANA will include guidance and information about the appropriate disposal route for personal hygiene wet wipes in printed and web-based product information and will encourage its members to do likewise.

RAISING PUBLIC AWARENESS OF RESPONSIBLE DISPOSAL PRACTICES

Consumer behaviour in using and/or abusing wastewater disposal systems is a much broader subject than the disposal of personal hygiene wet wipes. It is primarily the role of Governments and wastewater authorities to address public behaviour in this regard.

EDANA, its sister organizations at national level and its member companies will consider opportunities to support governments and wastewater authorities in implementing awareness-raising activities designed to increase understanding of the appropriate disposal routes for flushable and non-flushable wet wipes.

PROMOTION AND MONITORING OF THIS CODE OF PRACTICE

EDANA will promote this code of practice to its membership and will encourage member companies to agree to operate within the spirit of the Code. EDANA will also seek to ensure that non-member companies are made aware of the Code and are encouraged to comply with it. EDANA will monitor both the effectiveness of the code and its implementation.