

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

APPENDIX D

POSITION STATEMENT

**To adopt the IWSFG PAS for flushability and
to support the development of a Canadian standard on flushable products**

The IWSFG:

The International Water Services Flushability Group (IWSFG) was formed as an international coalition of national and regional wastewater services around the world. CWWA was a founding member and leading partner in the creation of the coalition. The formation of the IWSFG became a necessity after the failure of efforts to work directly with the wipes manufacturers or through the formal ISO process.

Background on the IWSFG:

All of us in the wastewater utility sector understand the harmful impact that products improperly labeled as 'flushable' have had on our municipal wastewater systems - from additional maintenance to equipment damage, to clogs and system failures, to contamination of sludge. This issue is costing Canadian municipalities an estimated \$250 million a year. Currently, there are no standards, regulations or definitions officially recognized in Canada for the use of the term 'flushable.' We feel strongly that there is a need to develop and adopt standards for the legal definition of the term 'flushable' that ensure a product's dispersibility and, therefore, its ability to pass easily through wastewater systems. We also feel strongly that all disposable bathroom products be clearly labeled for the consumer to understand if the product is safe to flush or is not.

The Canadian Water and Wastewater Association (CWWA), with our partners at the Municipal Enforcement Sewer Use Group (MESUG) have been trying to address this situation for over ten years. In partnership with the American water organizations, the Water Environment Federation (WEF) and the National Association for Clean Water Agencies (NACWA), we attempted to work directly with the wipes manufacturers (INDA) in the development of their Guidance Document version 4 (GD4), for manufacturing and a Code of Practice for labeling. Representing the wastewater utility sector, none of the utility associations were able to accept the manufacturers' guidelines that did not meet our requirements for dispersibility.

CWWA, MESUG, WEF and NACWA then joined with other wastewater associations around the world in an effort to develop an International Standards Organization (ISO) standard for flushability. Again, we were unable to come to an agreement with the wipes manufacturers on the standards for dispersibility or the testing for such. This ISO route may be attempted once more.

Arising from that ISO effort, the International Water Services Flushability Group (IWSFG) was formed as an international coalition of national and regional wastewater services, including CWWA. After rigorously testing various products that are flushed down toilets into the sewer system, the IWSFG set out the criteria for flushability and the appropriate test methods in the 2020 IWSFG Publicly Available Specifications (PAS). The three PAS documents are the product of a global consensus of the coalition members and reflect test methods and criteria to ensure a product labelled as 'flushable' will not impact drain lines, various onsite treatment, or wastewater collection systems as well as the downstream environment. The IWSFG PAS also contains guidance on appropriate labeling of products as either 'Flushable' or as 'Do Not Flush', and these labels are based on the accepted ISO practice. *The two labels are attached.*

The IWSFG PAS documents are intended as a Code of Practice for use by manufacturers, government organizations, and other entities to determine if products to be labeled as 'flushable' are indeed safe for wastewater infrastructure.

The effectiveness of the IWSFG PAS documents in protecting sewer networks has now been recognized in a legal settlement with the City of Charleston, South Carolina. In response to a civil action suit from the City of Charleston, manufacturers have agreed to a settlement that includes an agreement not to label their products as 'flushable' unless it meets the IWSFG PAS criteria and testing.

A table comparing the IWSFG PAS with the INDA GD4 is attached.

The Need for a National Standard

As of yet in Canada, there are no formally recognized standards for flushability, no official definitions for the term 'flushable', nor any regulations on the use of the term in marketing products. The CWWA along with Friends of the Earth, submitted a formal complaint to the Canadian Competition Bureau concerning the misleading use of the word 'flushable' by several manufacturers and retailers. The complaint and the subsequent appeal to the federal Minister of Innovation, Science & Economic Development were both dismissed without any investigation. The Competition Commissioner suggested that there were "a number of standards" and, thus, could not weigh in. We argued that there were really only two documents - the manufacturers' own INDA GD4 guidelines, and our utility sector's more stringent IWSFG PAS. To advance our efforts to regulate wipes, outside of the hands of the manufacturers alone, Canadian utilities and municipalities need to have the IWSFG PAS formally recognized as a scientific standard in Canada.

CWWA and MESUG have been considering options for the development of a standard to be recognized by a Canadian standards organization. At this time, we have commenced a formal process with the Standards Council of Canada (SCC) to have the IWSFG PAS adopted as a Canadian standard. Such a formal standard could then be formally recognized and used by provincial and federal governments to develop appropriate regulations; similar to those used for other product marketing terms, such as 'organic' or 'Kosher'.

The Adoption and Promotion of the IWSFG logo

For decades, Canadian municipal utilities have tried to educate the public on the proper items to be flushed in a toilet and have generally endorsed the concept of flushing only the 3P's – referring to pee, poop and paper (toilet paper). Continuing with the restricted 3P's messaging could become difficult for municipalities to defend if there are now wipes recognized as 'flushable' by the IWSFG, an international association of wastewater associations.

Also, throughout our efforts to develop an acceptable standard in cooperation with the manufacturers, it was understood that utilities would adapt their messaging to recognize flushable products if they indeed met this accepted standard. That accepted standard is here now in the form of the international IWSFG PAS and should soon be recognized as a Canadian standard. We believe that it is essential that Canadian municipal utilities adopt the IWSFG PAS as a standard for products to be considered 'flushable' and for them to promote the recognition of the IWSFG logo by their customers as the only products certified to be 'flushable'. This could include public education campaigns such as the 4P's – pee, poop paper and now proof (the IWSFG logo as proof). We believe that the adoption and endorsement of the IWSFG logo by municipal utilities will serve to encourage even more manufacturers to meet the IWSFG PAS and adhere to the labeling protocols.

Position Statements

That CWWA recognizes and endorses the International Water Services Flushability Group's Publicly Available Specification (IWSFG PAS) as an acceptable standard for defining and labeling a product as 'flushable'.

That the CWWA supports the adoption of the IWSFG PAS as a Canadian standard formally recognized by the Standards Council of Canada (SCC).

That the CWWA encourages the adoption of the IWSFG PAS as the basis for enforceable federal, provincial, and territorial regulations. And that such regulations call for all other disposable bathroom products be clearly labeled as 'Do Not Flush'.

That CWWA supports a renewed effort to develop an internationally recognized ISO standard.

That the CWWA encourages Canadian utilities to adapt their sewer use by-laws and education campaigns to accept products with the IWSFG logo and to promote the recognition of the IWSFG logo.



IWSFG PAS (2020) Compared to INDA/EDANA GD-4 (2018)

Six differences that prove the effectiveness of the more stringent IWSFG specifications:

Criteria	IWSFG PAS 2020	INDA/EDANA GD4 2018
Conformity Assessment	Testing in reference to these specifications is recommended to be undertaken by third party laboratories accredited to ISO/IEC 17025 General Requirements for the Competence of Testing and Calibration Laboratories	A Flushability Assessment is conducted in-house by manufacturers on the products that they produce
Fibre Analysis	Fibre analysis is to be completed. No product shall have intentional plastic fibres as an ingredient	Fibre analysis requirement is absent
Toilet and Drain Line Clearance	No toilet flush containing product shall be associated with clogs that require the use of a plunger to clear product	No more than one of the flushes containing nonwoven wipes should be associated with a clog that requires use of a plunger to clear product
Disintegration Slosh Box Test	The percentage of the Total Initial Dry Mass of the Sample passing through the 25mm sieve for the five test products after 30 minutes of testing shall be greater than 80%	The percent of the starting dry mass passing the 12.5mm perforated sieve after 60 minutes must be greater than 60% for at least 80% of the individual replicates tested
Settling	In at least 90% of the tests, the specimens should settle at an average velocity of at least 1mm/second over the 1150mm measuring distance In tests that are regarded as successful the specimen or disintegrated parts of the specimens tested should not become sufficiently buoyant to rise more than 300 mm from the bottom of the column within 24 hours. At least 90% of all specimens should pass both criteria 1 and 2 above	This average settling velocity for wipes that settle must exceed 1mm/sec and at least 95% of the total articles tested must settle AND At least 95% of the wipes tested must not become sufficiently buoyant to rise more than 300 mm from the bottom within 24 hours
Biodisintegration	To be acceptable: If there is material left on the 1-mm sieve after the 2-minute rinse, the percent of the initial dry mass of a test specimen passing through the 1-mm sieve shall be greater than 95%.	Choice of doing 1 of 2 test methods: Biodisintegration/ or Biodegradation Tests OECD 311 allows a pass at 70% degradation.