



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

### How much \$ are wipes costing your utility? Invest in a solution!

It is well past time that Canada had a recognized definition of the word 'flushable' and an enforceable standard to address what can and cannot be labeled as 'flushable'. This can be an expensive effort to develop a Canadian standard and then have it recognized by governments and by the public, but with your support, we can accomplish this together.

With this letter, we are asking Canadian wastewater utilities and private sector partners to contribute to a common fund to push through to the final steps for the development, adoption and implementation of a Canadian standard for 'flushability'. For too long we have left it to manufacturers to decide what is acceptable in our municipal wastewater systems. With your support, we have the potential and means to change that.

We all know the immensely negative impact of wipes on our wastewater collection systems – exacerbating FOG problems; promoting toilets as garbage cans for an array of inappropriate products; causing costly clogs and damage to equipment; requiring additional staffing resources; putting our staff at risk; and threatening the local environment. It is estimated that this is costing Canadian utilities over \$100 million each year. Many of these costs are not easily measurable, but how much is the uncontrolled use of wipes costing your community?

**Your contribution to this fund is a preventative investment to reduce the impact of wipes and, therefore, reduce your costs in reacting to wipes problems. There is a clear return on investment with this contribution. (*Payment details and suggested contribution levels are attached as Appendix A*)**

Over the past 10 years, MESUG (Municipal Enforcement Sewer Use Group) and CWWA (Canadian Water and Wastewater Association) have been working on behalf of our municipal sector to address the growing impact of wipes and the absence of a legislated industry standard for the term 'flushable' – here in Canada, and around the world. We have tried to work with the manufacturers' association (INDA) and have tried to develop a global standard through the International Organization for Standardization (ISO), but these efforts all failed to get reasonable cooperation from the manufacturers.

In 2017, MESUG and CWWA led the creation of the International Water Services Flushability Group (IWSFG), comprised of wastewater associations from around the world. IWSFG released a position statement on non-flushable and flushable labelled products. This statement was supported by 25 countries and over 300 stakeholders. Together, CWWA and MESUG sent out requests to our members for financial support to assist with the development of a national standard. In response, \$58,500 in funds were collected from our municipal utility members.



These first funds were used to:

- support our participation in the creation of the IWSFG Publicly Available Standard (PAS) in 2018 and revised in 2020
- finance formal research conducted to test products using the IWSFG PAS
- cover expenses for our participation in the Charleston, SC lawsuit against manufacturers leading to settlements that recognize the IWSFG PAS
- promote the IWSFG PAS and logo in the United States and Canada as well as lobby for it to be the basis for a Standard for Flushability.

*(Appendix B details some of our efforts)*

*(Appendix C details how the funds were used)*

CWWA and the Friends of the Earth then co-sponsored a formal complaint to the Canadian Competition Bureau citing 10 manufacturers that were inappropriately marketing their products as 'flushable'. Disappointingly, the federal agency, and the minister, dismissed our complaint suggesting there was insufficient clarity on industry standards. This decision further solidifies our need for a formally recognized Canadian standard that the federal government can adopt for enforcement.

Earlier this year the CWWA Flushables Committee put forth a Position Statement that supported and endorsed the IWSFG PAS and IWSFG logo. The Position Statement was approved and passed by the CWWA Board of Directors.

*(CWWA Position Statement is attached as Appendix D)*

Now it's time to take this project home with a formally recognized Canadian standard, to advocate for its acceptance by the federal government, and to promote its adoption by Canadian municipalities. But we need your financial support once more to fund these final stages. The Federation of Canadian Municipalities (FCM) has recognized the value in what we are doing and passed a resolution calling on their members, the municipal leaders across Canada, to support this effort. *(FCM resolutions attached as Appendix E)*

Please consider how your municipal utility can contribute to this project as an investment to reduce the impact of wipes in our communities.

If you have any questions or would like more information, please do not hesitate to call any one of us.

Sincerely,

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