



# ARKANSAS WATER ENVIRONMENT ASSOC. NON-DISPERSIBLES POSITION PAPER

In recent years, municipalities and sewer districts have faced an increasingly frequent challenge: the tendency for consumer products - such as baby wipes, cleaning wipes (i.e., sanitizing wipes, shop wipes, dusting wipes and mop heads, etc.), personal wipes, and feminine hygiene products - to interfere with private plumbing and public collection systems, to plug pumps, and to cause further interference at treatment plants. This interference often requires equipment to be taken offline for maintenance or replacement. Consequences of this trend include increased operating costs, a reduced level of service to customers, increased risk for personnel to be injured when responding, capital expenses to replace equipment, difficulty pumping septic tanks, emergency plumber costs and property damage incurred by homeowners. Utilities may experience environmental damage from sanitary sewer overflows that occur when interference reduces the capacity of wastewater conveyance and treatment systems.

Flushability Assessment Guidelines were developed in 2009 by the Association of the Nonwoven Fabrics Industry (INDA), which represents many manufacturers of these consumer products. To satisfy the Assessment, a material must be: 1) able to clear residential plumbing systems; 2) compatible with wastewater conveyance, treatment, reuse and disposal systems; and 3) unrecognizable in a reasonable period of time. Materials that do not satisfy these three conditions are termed "non-dispersible" by AWEA and other associations, to differentiate them from the small portion of products that satisfy the Assessment and are marketed as "flushable" by manufacturers. Non-dispersibles can be identified by the presence of a "Do Not Flush" logo, also developed by INDA. The three-part Assessment is a guideline, not a standard, so its use is voluntary. It is not implemented by all INDA members, and is used by few (if any) manufacturers that are not INDA members.



**"Do Not Flush" logo developed by INDA, which represents manufacturers of consumer products.**

Clogs are caused by products that are not truly dispersible, as well as non-dispersible products that are not intended to be flushed. These products make their way into sewers by a combination of inconsistent or misleading labeling, poor marketing, and lack of attention by consumers. Examples of challenges and inconsistency include the following:

- Difficulty developing a standard for "compatible", "unrecognizable", and "reasonable period of time", and determining how these attributes would be evaluated consistently in a third-party testing environment;
- Products that do not satisfy the above Assessment but are nevertheless marketed as flushable;
- Package labeling states that a product is flushable, when it has not been certified as satisfying the three-part Assessment;
- Package labeling or design implies flushability, such as packages designed to hang from a standard toilet paper holder, or label is silent on disposal method;
- Package labeling includes disposal instructions in fine print, not displayed prominently, or with qualifiers (e.g., the number of products disposed, disposal in septic systems vs. public sewer);
- Non-dispersible products are placed on the same store shelf as toilet paper, confusing the customer and implying flushability; and
- Non-dispersible products intended for a use that promotes disposal by flushing, such as baby wipes, personal care wipes, feminine hygiene products, and disposable toilet wand heads.

Manufacturers have tried to limit responsibility for disposal of baby wipes and personal care wipes, saying that the "preferred disposal method" is to leave it "up to the consumer to decide" how a product should be disposed. This position is contrary to results of two recent focus groups in Maine, at which consumers were vocal about the need for labeling to show- with a large, clear icon- how a product should be disposed, and is also unsupported by existing inconsistent labeling practices.

The consumer market for flushable products is forecast to increase substantially in the next decade, so resolving this issue needs to be a priority. National water quality organizations such as the Water Environment Federation (WEF), the American Public Works Association (APWA), and the National Association of Clean Water Agencies (NACWA) understand this, have focused attention on this issue, and support AWEA's development of this Position Paper.

The solution will not involve a single action or change but needs to address product manufacturing, labeling, marketing, consumer education, and product stewardship.

AWEA strongly encourages that the following efforts be undertaken:

1. **Manufacturing Changes.** Manufacturers should continue to develop alternative binders and substrates that are truly dispersible, such as those made from starch, acrylics, and other media. Progress in this area has been encouraging.
2. **Flushability Standard.** INDA should increase efforts to implement the 2009 three-part Flushability Assessment (and updates) with members as a standard instead of a guideline. INDA should work closely and cooperatively with water quality organizations to develop and implement the Standard and subsequent updates. When INDA finds non-member manufacturers with products that are not compliant, the Flushability Standard methodology and support should be made available free of charge.
3. **Manufacturer Acknowledgement of Behavior.** Manufacturers should acknowledge that products used for baby care and personal hygiene are likely to be flushed. Products likely to be flushed should be tested per the Flushability Standard. Paper towels and feminine hygiene products, documented in clogs in pilot testing completed in Maine, should clearly bear the "Do Not Flush" logo.
4. **Develop a "Safe to Flush" Logo.** This logo would be used only on products that satisfy the Flushability Standard. INDA should work with a third-party testing lab (such as NSF) and national water quality organizations to develop this logo. Manufacturers should be encouraged to see the logo as positive, and consistent with campaigns to brand their firm and products as "green", "eco-" or "sustainable".
5. **Consistent Use of Logos.** Tested products should bear either the existing "Do Not Flush" or new "Safe to Flush" logo, consistently. A third-party testing lab (such as NSF) should maintain a list of tested products on its website, with the result of the test.
6. **Cooperation with Water Quality Organizations.** INDA should view these organizations as resources, and utilize them to assist with update of standards, logo development, marketing support, and education and outreach to consumers.



AWEA also supports the work of states such as California, New Jersey, and Maine that attempted to utilize legislation to make the three-part Assessment a standard for all products likely to be flushed. Legislation would resolve the issue of non-membership in INDA by applying the standard to all manufacturers. If efforts in this Position Paper are not fully implemented, AWEA will work with WEF, APWA, and NACWA to provide support for such legislation where it is introduced.

Ratified by the Board of the Arkansas Water Environment Association 8/13/13

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