

<b>TO:</b>	<b>CHAIR AND MEMBERS CIVIC WORKS COMMITTEE MEETING OF MAY 24, 2017</b>
<b>FROM:</b>	<b>KELLY SCHERR, P.ENG., MBA, FEC MANAGING DIRECTOR, ENVIRONMENTAL &amp; ENGINEERING SERVICES AND CITY ENGINEER</b>
<b>SUBJECT</b>	<b>INTERNATIONAL WATER INDUSTRY POSITION STATEMENT ON NON-FLUSHABLE AND 'FLUSHABLE' LABELLED PRODUCTS</b>

**RECOMMENDATION**

That, on the recommendation of the Managing Director, Environmental & Engineering Services & City Engineer, the International Water Services Flushability Group and Canadian Water and Wastewater Association position statements on non-flushable and 'flushable' labelled products **BE ENDORSED**.

**PREVIOUS REPORTS PERTINENT TO THIS MATTER**

None.

**2015-19 STRATEGIC PLAN**

The following report supports the Strategic Plan through a focus on Building a Sustainable City by Working together to protect all aspects of our natural environment including woodlands, wetlands, river and watercourses, and air quality as our city grows.

**BACKGROUND**

**Purpose**

This report seeks Municipal Council's support for the Canadian Water and Wastewater Association (CWWA) and International Water Services consortium (IWS) position statements on flushable/non-flushable product labelling.

**Context**

The global use of products marketed as "flushable" wipes has increased dramatically in recent years and has added an estimated \$250 million in operational costs to wastewater utilities across Canada. Several technical committees attempting to develop standards to protect wastewater systems have been unsuccessful so far.

## DISCUSSION

Improperly labelled wipes flushed into the municipal sewer systems can lead to backups and overflows into homes, businesses and the natural environment. Many products labelled as “flushable” do not disintegrate and are not biodegradable in wastewater systems. Associated utility costs include increased maintenance and repairs as well as property and environmental cleanup. When combined with other sewer discharge problems, such as fats, oils and grease (FOG), homes are also at risk of experiencing a backup from clogs in their own private drainage systems.

London has recognized these concerns and is presently communicating sewer system performance and cost concerns to the public through education and promotion programs:

- [Your Toilet is Not a Garbage Can](#)
- [Your Turn](#)
- [Washing Initiative to Protect Our Environment \(WIPE\)](#)

These programs are included on the City web site and are visible at public and environmental awareness events (Home Show, festivals, etc.)

Recognizing that more actions beyond public education is required, the City of London hosted the first International Standards (ISO) meeting in 2014 to develop standards for labelling and disposal of “flushable” products. Unfortunately this work has been suspended; between ISO and the Association of Nonwoven Fabrics Industry (INDA) there is not an agreement on the wastewater industry recommendations to strengthen the tests that evaluate the disintegration of these products in wastewater systems. Similarly, attempts to reach agreement on an updated INDA guideline have not been successful.

In response to these results, the IWS was created. It is an informal coalition of currently 300 stakeholders in 25 countries supporting IWS and the CWWA position statements that are willing to continue to pursue a legislated standard. The position statements make the interests of wastewater utilities clear. The [IWS statement](#) is included as Appendix “A” and the CWWA statement as Appendix “B”.

A set of tests agreed upon by the IWS to define characteristics of what is “flushable” and will not harm wastewater infrastructure is to be proposed to the Federal Government. Preliminary discussions have already taken place with Industry Canada, the Ministry of Government Consumer Services and the Competition Bureau. Any developed Federal testing and labelling standard (whether international or North American) would require adoption within Canada as a Canadian Standard to be enforceable.

The proposed IWS work maintains the past ISO goal to develop a Canadian national standard. However, funding is required to continue this work. The proposed contribution for a city the size of London is \$1,000. The financial contribution would be part of an initial \$150,000 effort on the research and development of ‘flushable’ test methods using 3<sup>rd</sup> party laboratories to confirm reliability of the test methods and for material analyses, as noted in Appendix C. Funding for London’s contribution is available within the Sewer Operating Budget.

Approval of the recommendations in this report will result in London being added to the growing list of world-wide supporters (including other municipalities across Canada) of the IWS and CWWA position statements, provision of \$1000 to support technical work, and the continued involvement of City technical staff in standard development.

## CONCLUSION

Supporting the IWS and the CWWA position statements and development of a flushable standard will help ensure wastewater utilities and supporting organizations have strong representation in the development of Federal testing and labelling standards for “flushable” wipes. To continue the work towards a standard a financial contribution of \$1000 would be provided.

### Acknowledgements

This report was prepared with the help of Tony Van Rossum, P.Eng. Environmental Services Engineer and Barry Orr, Sewer Outreach and Control Inspector of the Wastewater Treatment Operations Division.

<b>PREPARED BY:</b>	<b>REVIEWED AND CONCURRED BY:</b>
<b>GEORDIE GAULD, DIVISION MANAGER WASTEWATER TREATMENT OPERATIONS</b>	<b>JOHN LUCAS, P. ENG. DIRECTOR, WATER AND WASTEWATER</b>
<b>RECOMMENDED BY:</b>	
<b>KELLY SCHERR, P.ENG., MBA, FEC MANAGING DIRECTOR ENVIRONMENTAL &amp; ENGINEERING SERVICES AND CITY ENGINEER</b>	

Support of the International Wastewater Industry position statement May2017CWC Report fnl

TVR

Attach: Appendix “A” – International Water Industry Position Statement on Flushable/non-flushable labelled products  
Appendix “B” Canadian Wastewater Industry Statement on Flushable/Non-flushable Products  
Appendix “C” Support and Funding for a Canadian Standard for Flushable Consumer Products

## APPENDIX A

### International water industry position statement on non-flushable and 'flushable' labelled products

To prevent problems with sewers, pipe and toilet blockages plus the human and environmental cost of sewer flooding and pollution, the organisations signing this statement below agree that:

- Only the 3Ps – Pee, Poo and toilet Paper – should be flushed.
- Currently, all wipes and personal hygiene products should be clearly marked as "Do Not Flush" and be disposed of in the bin or trashcan.
- Wipes labelled "Flushable" based on passing a manufacturers' trade association guidance document should be labelled "Do Not Flush" until there is a standard agreed by the water and wastewater industry.
- Manufacturers of wipes and personal hygiene products should give consumers clear and unambiguous information about appropriate disposal methods.

- Looking to the future, new innovations in materials might make it possible for certain products to be flushed, if they pass a technical standard which has been developed and agreed by the water and wastewater industry\*. Preferably this standard would be developed under the banner of the International Standards Organisation (ISO).
- Key requirements for any standard include that the product:
  - a) breaks into small pieces quickly;
  - b) must not be buoyant;
  - c) does not contain plastic or regenerated cellulose and only contains materials which will readily degrade in a range of natural environments.

*\*and in compliance with local legislative requirements*

### Déclaration du secteur de l'industrie internationale de l'eau sur les produits étiquetés non jetables et «jetables» dans les toilettes.

Pour éviter les problèmes environnementaux et économiques provoqués par l'obstruction des toilettes, des égouts et canalisations, les organisations signataires de cette déclaration ont convenu que:

- Seuls les urines, les selles et les papiers toilette doivent être jetés dans les toilettes.
- Actuellement, toutes les lingettes et les produits d'hygiène personnelle doivent être clairement étiquetés comme «non jetables dans les toilettes» et jetés dans la poubelle
- Les lingettes étiquetées «jetables dans les toilettes» et qui sont basées sur l'ancien document d'orientation de l'association commerciale des fabricants devraient être étiquetées «non jetables dans les toilettes» jusqu'à ce qu'une norme acceptable soit élaborée pour le secteur de l'eau et de l'assainissement.
- Les fabricants de lingettes et de produits d'hygiène personnelle

devraient donner aux consommateurs une information claire et sans ambiguïté sur les méthodes appropriées d'élimination.

- À l'avenir, de nouvelles innovations dans les matériaux pourraient permettre à certains produits d'être jetables dans les toilettes, s'ils se conforment à la norme technique élaborée et approuvée par l'industrie de l'eau potable et des eaux usées\*. De préférence, cette norme sera élaborée sous l'égide de l'Organisation internationale de normalisation (ISO).
- Les exigences requises pour cette norme stipulent que le produit:
  - a) se brise en petits morceaux rapidement;
  - b) ne flotte pas;
  - c) ne contient pas de plastiques ou de cellulose régénérée et ne contient que des matériaux qui se dégradent facilement dans le milieu naturel.

*\*Et en conformité avec les exigences législatives locales*

### Declaración sobre la posición del sector internacional del agua respecto a los productos no aptos para desechar por el inodoro y aquellos etiquetados como aptos

Para evitar los problemas medioambientales y económicos provocados por obstrucciones y daños en los equipos de las redes de alcantarillado y estaciones depuradoras, las organizaciones y entidades operadoras de aguas residuales que firman esta declaración acuerdan que:

- Por el inodoro sólo deben desecharse la orina, heces y papel higiénico (las 3Ps del Inglés: Pee, Poo and -Toilet-Paper).
- Actualmente, todas las toallitas y productos de higiene personal deben estar claramente etiquetados como "No tirar al inodoro" y ser desechados en la papelera o basura.
- Las toallitas y productos etiquetados como "Aptos para tirar por el inodoro" basados en una guía de recomendaciones de las asociaciones de fabricantes deben ser etiquetados como "No tirar por el inodoro" hasta que se acuerde un estándar técnico con el sector del agua.
- Los fabricantes de toallitas y productos de higiene personal deberían proporcionar a los consumidores información clara

y concisa sobre los métodos de desecho apropiados.

- Mirando al futuro, las nuevas innovaciones en materiales podrán hacer posible que algunos productos sean etiquetados como "Aptos para tirar por el inodoro" una vez cumplan un estándar técnico que haya sido desarrollado y acordado con el sector del agua. Este estándar debería elaborarse preferiblemente en el marco de la Organización Internacional de Estandarización (ISO, por sus siglas en Inglés).
- Los requerimientos clave para cualquier futuro estándar incluyen que el producto:
  - a) se fragmente en pedazos rápidamente;
  - b) no flote;
  - c) no contenga plástico o celulosa regenerada y sólo contenga materiales que se degraden fácilmente en una variedad de entornos naturales.

*\*y en cumplimiento con los requerimientos de la legislación local*

## APPENDIX B

### CWWA Statement on Flushable/Non-flushable Products

#### Executive Summary

All around the world, water/wastewater utilities (municipal and/or regional governments) have the task to treat and deliver drinking water to homes and businesses and then collect and treat the associated wastewater. We must do so in a way that ensures safe drinking water, protects the local environment and does so in the most economically-efficient manner to ensure systems are sustainable, viable and affordable.

Our wastewater collection systems were designed to convey what we refer to as the “3Ps” - Pee, Poop and Paper (toilet paper). Other items entering our collection systems cause tremendous problems with sewer and equipment clogs or damage, and effect our ability to deal with the final sludge from our treatment. These products cost local utilities 250 million dollars every year in additional maintenance, repairs, replacements and transportation. Clogs can cause overflows that threaten the local environment and wildlife.

As the water/wastewater utilities (municipal and/or regional governments), we continue to educate our citizens on the 3Ps and discourage the use of toilets as garbage cans for paper towels, fats/oils/grease, medications, hygiene products etc. Meanwhile, some manufacturers are marketing wipes and other products labeled ‘flushable’ and are encouraging users to flush their products into toilets. At the same time, other products commonly used in a bathroom are being labeled bio-degradable or disposable, leading to their disposal into a toilet.

Water and wastewater organizations that represent the water/wastewater utilities, municipal and/or regional government agree:

- Until a wastewater industry approved standard for Flushability is established, only the 3Ps – should be flushed.
- All products designed to come in contact with human waste and/or related germs while in the bathroom that have a high likelihood of being flushed into a toilet (including wipes and personal hygiene products) should be clearly marked as ‘non-flushable’. Such labelling should:
  - Use the words “**Do Not Flush**” and a clearly understood symbol
  - Be clearly visible to the consumer at point of purchase
  - Be clearly visible for user at point of dispensing
  - Include instructions for the product to be disposed of in the bin or garbage/trash
- We do not accept INDA/EDANA’s (manufacturer trade groups) Guidance Document 3 (GD3) or any other manufacturing industry’s determination of ‘Flushability’ at this time. Until there is a standard agreed upon by the wastewater utility industry, all such products should be labeled as “**Do Not Flush**” as laid out above.
- Key requirements for a Wastewater Utility Industry standard include that the product:
  - a) breaks into pieces quickly;
  - b) must not be buoyant;
  - c) does not contain plastic or regenerated cellulose and only contains materials which will readily degrade in a range of natural environments.

ORGANIZATION NAMES:



# Ontario Onsite Wastewater Association

## SUPPORTING GROUPS:



environmental  
defence  
INSPIRING CHANGE



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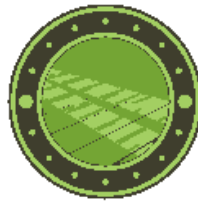
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## APPENDIX C



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

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

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

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

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

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

So this leaves us with the original question of "what is flushable?" With the suspension of the ISO work and collaboration with INDA failing, the wastewater associations joined together to form the **International Water Services Flushability Group (IWSFG)**. This informal coalition put together a position statement on non-flushable and flushable labelled products which is now supported by wastewater services in 25 countries and by over 300 stakeholders. You can see the position statement and the entire list at <http://bit.ly/MultiLangFlushabilityStatement>. The IWSFG is also developing a flushable product standard that would be acceptable to wastewater services.

#### How You Can Help:

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

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

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

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

**Conclusion:**

Thus far, the manufacturers have, in their own interests, decided what is ‘flushable’ in our sewer systems without any agreement from our wastewater professionals. MESUG and CWWA have put in a lot of time and effort into getting this ‘flushables’ issue this far, but now we need the help and support of our fellow municipalities to develop an enforceable standard. Let’s collectively put an end to the treatment of our sewer systems as garbage cans. If you believe that you are not being impacted by this issue, then please take a second glance. We are all impacted, as our systems are all fairly similar. (<https://www.youtube.com/watch?v=h0Egfc89-Q>)

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

Sincerely,

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## Canadian Standard for Flushability Campaign

Suggested donation levels are:

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

Show your leadership with your logo on the supporting organizations page on the CWWA website.

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

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

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

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

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Funding will be directed in a two-stage approach:

Immediate (Short Term) Expenses:

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

Long Term Expenses:

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