### **Overview: The Growing Controversy Over Disposable Wipes**

INDA is the Association of the Nonwoven Fabrics industry to which all wipes substrate manufacturers and most converters belong. It is a trade association of companies advancing the nonwovens industry, which includes wipes, absorbent hygiene products for baby care, femcare, and incontinence, and a variety of industrial products from filtration media to automotive insulation.

## 1. What is the Wastewater Industry concern with Wipes?

The Wastewater industry (WW) claims it has had a major increase in sewer-related clogs (in screens, pipes, pumps) due to the rapid rise in the sale of disposable wipes over the last 5 years or so, and the disposal of these wipes via the toilet instead of the trashcan. These clogs cost money to clear, impact system performance, and can lead to sewer system overflows that the EPA considers a violation of the Clean Water Act. WW wants to have something done to address their concerns.

WW operators, in general, blame "Flushable" wipes for the problems caused by anything and everything inappropriately flushed. They mistakenly believe that because some wipes are marketed as "Flushable" it encourages the flushing of all wipes: that all pipe/pump clogs are caused by wipes being flushed, and that there is no such thing as a "flushable" wipe. The "Flushable claim of a small share of wipes (only 7%) has served as a magnet attracting all of their ire.

To many of them, anything marketed as "Disposable" is considered as being marketed as "Flushable", not distinguishing between the trashcan and the toilet as two separate waste disposal paths. Over the last two years, many local WW utilities used the media to broadcast their complaints against disposable wipes with some national coverage, such as with the NYC issue. They erroneously believe that banning or fining "Flushable" wipes is the solution to their problems with excessive debris in their systems.

# 2. What is the wipes industry doing about the problem?

The wipes industry (through INDA) has developed a Code of Practice for the appropriate labeling of wipes products to address this problem. The Code asks wipes brand owners to go through a decision tree to determine if a wipe can be labeled "Flushable" (by passing all 7 tests of the Technical Flushability Assessment Guidelines, Edition 3, known as GD3) or if the wipe packaging should contain, in a prominent place, INDA's "Do Not Flush" symbol urging the consumer to dispose of the wipe in the trash can.



In 2013 with the publication of GD3, INDA engaged with the WW industry through its leading trade associations in a process to address the problem. First the problem was more accurately defined through forensic analysis of sewer system screen clogs. Only about 8% of what was found on screen clogs could be identified as wipes marketed with a claim of being "Flushable". The major burden (about 92%) was found to be inappropriately flushed paper towels (47%), baby wipes (18%), femcare items (13%), and household wipes (hard surface cleaning and disinfecting, 14%). None of these items were designed nor marketed as being "flushable".

#### 3. Can't this be worked out?

The major associations representing WW agreed with INDA to form a joint Technical Workgroup in 2014 to evaluate the GD3 test methods to determine common ground on what can be marketed as "flushable". As a result of that effort, a new joint WW/INDA GD4 Drafting Committee started work 1/15 and hopes to conclude by the end of 2016.

The bigger challenge, addressing the 90+% of the OTHER items found on inlet screens, including wipes not designed nor marketed to be flushed but flushed anyway do to use in a bathroom, is A) get more brand owners of NON-FLUSHABLE WIPES to adopt the Code of Practice, expected late 2016.

The biggest challenge INDA has is to get brand owners of non-flushable wipe products (national brands and some store brands) to adopt the industry Code of Practice on proper labeling. Too many do not yet acknowledge some responsibility to inform consumers, through prominent display of the "Do Not Flush" logo, of the proper disposal path for their wipe.

## 4. Why does the wipes industry resist legislation in NYC and other areas?

Legislation currently under consideration, such as Bill 666 in NYC, is totally misdirected and will cause more harm than good. It attacks flush-friendly wipes that are incapable of causing harm and only a very tiny part of the debris in sewers, and does nothing to address the real contributors to the problem. And it needs to be enforced with fines levied on retailers, another burden to small businesses in the boroughs of New York.

An unintended consequence of such misguided legislation is that it will make the problem worse. If it becomes more difficult for consumers to access flush-friendly wipes through normal retail channels, then they may substitute non-flush-friendly wipes, such as Baby Wipes, to fulfill their needs (which do not go away even if the wipes designed to meet these needs do) and Baby Wipes, made from synthetic (plastic) fibers are a major



contributor to the sewer system clogging issues. Consumers may also access their desired products on-line instead of through their local retailer, and perhaps transfer the purchase of other items on-line, further injuring the small neighborhood retailers.

We believe that education, not legislation, is the real solution to the 90+% of items flushed that should not be. Consumers will do the right thing, and dispose of products the right way, if they know what the right way is. So educating consumers that "Toilets Are Not Trashcans" will help the wastewater systems far beyond the wipes issue. Our "Do Not Flush" symbol is the on-package message that helps. Educating consumers to look for disposal instructions will help. And we are willing to collaborate with local wastewater entities to develop this educational outreach. When we did this in Portland, Maine, we reduced the appearance of Baby Wipes by 62% in the period following an outreach campaign. Education works.

