

CODE OF PRACTICE: Communicating Appropriate Disposal Pathways for Nonwoven Wipes to Protect Wastewater Systems

Second Edition 2017

INTRODUCTION

INDA & EDANA members represent the vast majority of nonwovens supplied to the market today in North America and EMEA respectively (including Western Central Europe, Eastern Europe, Turkey, C.I.S and the Middle East and Africa). The suppliers of consumer products constructed from nonwoven sheets, represented by EDANA and INDA (the Associations), are committed to communicating to consumers when the toilet is and is not an appropriate disposal route for finished products in the marketplace.

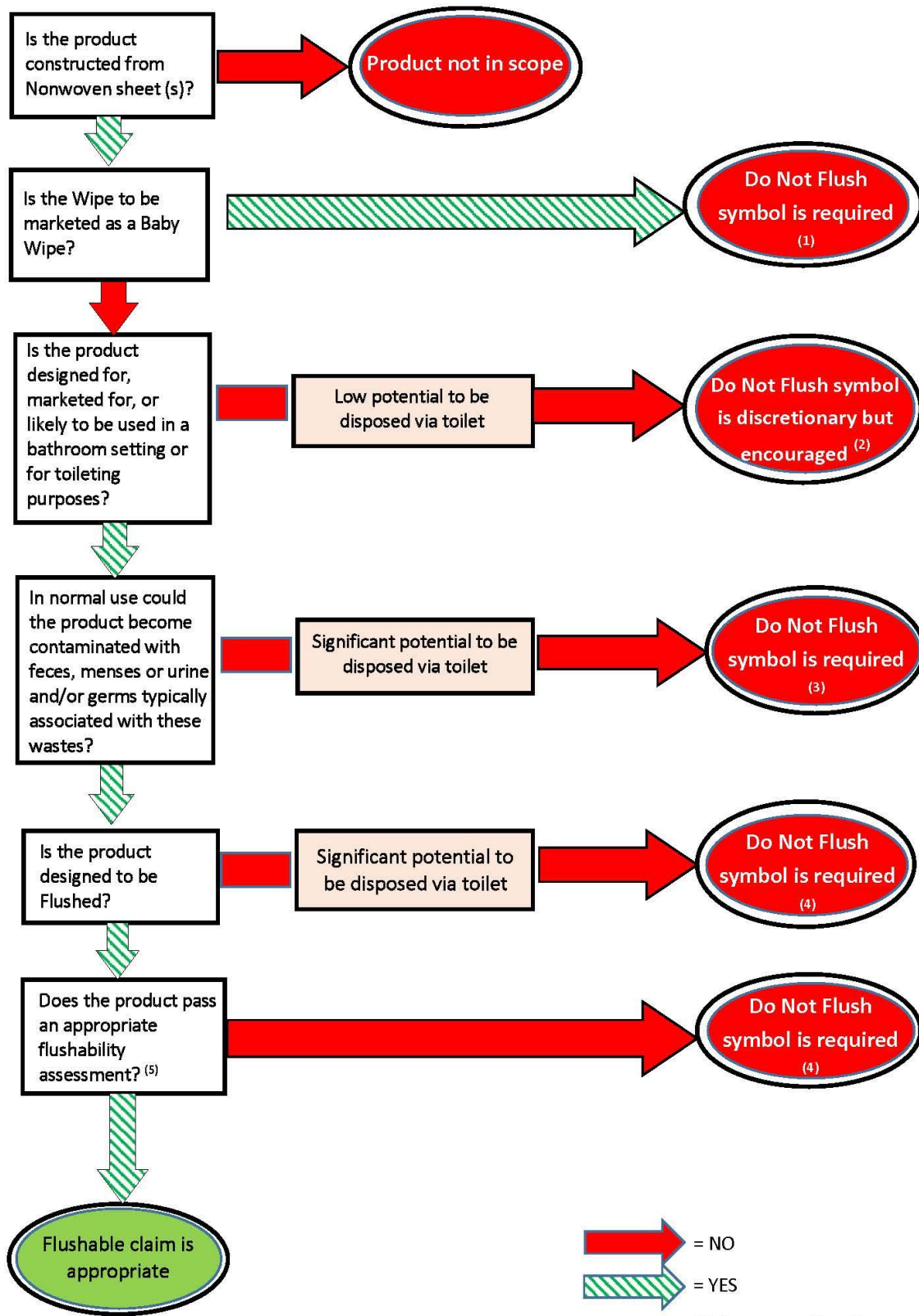
This Second Edition Code of Practice for the nonwoven wipes industry has been developed in collaboration with the major North American water and wastewater associations. Member and staff representatives from the National Association of Clean Water Agencies (NACWA), the Water Environment Federation (WEF), the American Public Works Association (APWA), and the Canadian Water and Wastewater Association (CWWA) worked with INDA and EDANA members to develop a strengthened Second Edition Code of Practice that directs brand owners to make it clear on the package to not flush non-flushable wipes that have the potential to be flushed. It will help ensure that only those products compatible with the wastewater system are disposed of by flushing. Two important recommendations of this new edition of the Code are that:

- **Only wipe products designed to come in contact with human waste and/or related germs while in the bathroom be considered for disposal via the toilet.**
- **To reduce existing consumer confusion, wipes marketed as “Baby Wipes,” generally intended to be used by a parent on an infant and disposed of with a diaper/nappy via the trashcan/rubbish bin or in a diaper pail, should not be marketed as “flushable” even if able to pass an appropriate flushability assessment.**

The appeal of wipes comes from the advantages they offer in effectiveness, convenience and ease of use. However, the context or location of their usage can inadvertently encourage flushing as the means for disposal which, in certain cases, is not the correct route. Our industry seeks to reduce the burden of unnecessary solid waste being disposed via the toilet, including several types of nonwoven wipe products, and to support public education and awareness that “The Toilet is NOT a Trashcan”.

Presented below is the Decision Tree all wipes brand owners should go through to determine the proper labeling requirements for their product to be in compliance with this Code of Practice:

Code of Practice / Decision Tree



- (1) Because of consumer confusion, it is highly recommended and strongly encouraged that Baby Wipes should not be marketed as “Flushable” and all Baby Wipes are required to display the “Do Not Flush” symbol both on the top or front panel of the package visible to the consumer “on shelf” without the consumer having to touch the package, and also a “Do Not Flush” symbol reasonably visible near the point where individual wipes are taken out of their container.

- (2) Below is a sample listing of the type of wipes (not an exhaustive summary) that would fit the category of "Not likely to be used in a bathroom; Low potential to be disposed via toilet, **"Do Not Flush" symbol is discretionary but encouraged**"
 - Wet Floor Cleaning Wipes
 - Electrostatic Dry Floor Cleaning Wipes; Stovetop/Kitchen cleaning wipes;
 - Automotive Wipes (i.e., wheel or dashboard cleaning wipes)
 - Furniture Polishing Wipes; Metal/Stainless Cleaning Wipes
 - Lens Wipes; Pre-injection swabs/Alcohol Prep Pads
 - Glass/Screen Cleaning Wipes
 - Shoe polishing wipes
 - Plant/garden wipes

- (3) Below is a listing of the type of wipes (not an exhaustive summary) that fit the category of "Likely to be used in a bathroom with significant potential to be flushed, **DNF symbol required whether or not it is contaminated with feces, menses or urine and/or related germs**":
 - Hand Sanitizing/Antibacterial Wipes
 - Facial/Makeup Removal Wipes
 - General Purpose Cleaning or Disinfecting Wipes
 - Hard Surface/Granite/Marble Cleaning Wipes
 - Personal Care Wipes (e.g., Anti-Aging, Skin Care, Body Cleaning, Sunscreen, Personal Cleansing Cloths, etc.)
 - All wipes listed below in note (4)

- (4) Below is a listing of the type of wipes (not an exhaustive summary) that would fit the category of "Likely to be used in a bathroom; likely to be contaminated with feces, menses or urine and/or related germs; Significant potential to be flushed; does not pass Flushability tests, **DNF symbol required**":
 - Baby Wipes
 - Bathroom/Toilet Cleaning Wipes NOT passing appropriate flushability assessment
 - Feminine Hygiene Wipes, Adult Incontinence Wipes, and Body Cleansing Wipes NOT designed to be flushable and/or NOT passing the appropriate flushability assessment.

This Code of Practice outlines the commitments of the Associations and their member companies to:

- Use appropriate guidelines or standards for evaluating flushability of products prior to making a flushable claim ⁽⁵⁾ and only identify products as flushable when they meet all of the criteria of the appropriate flushability guidelines or standards.
- Clearly label all products with the 'Do Not Flush' symbol whenever they are not in the scope of "flushable" products defined above or not designed to be flushed or if they fail to pass the appropriate flushability assessment;
- Prominently and clearly display on these non-flushable products the recommended symbol, and provide instructions indicating that they should be disposed of via the solid waste system and not flushed into the wastewater system;
- Communicate appropriate disposal information for such products in relevant print literature and other communications channels (i.e. websites);
- For those flushable products designed to come in contact with feces, menses or urine and/or related germs while used in a bathroom setting and passing the appropriate flushability assessment, to clearly provide on the packaging explicit product use and flushing instructions;
- Encourage companies who are not members of the Associations to comply with this Code of Practice;
- Encourage retailers to subscribe to this Code of Practice for proper labeling of wipes products, particularly when sourcing private label products, and where possible reinforce proper disposal practices with their customers; and
- Where appropriate, support work at national and local levels to increase public awareness of proper disposal practices.

PRODUCT DISPOSAL

There are two primary disposal routes for disposable nonwoven products; via the solid waste route (trash or rubbish bin) or with wastewater (toilet).

Only products which are designed to come in contact with human wastes (feces, menses or urine and/or related germs) while used in a bathroom setting and have been assessed as flushable according to the appropriate flushability assessment may be disposed via the toilet. All other products should be disposed of via the solid waste route.

⁵ Nonwoven wipes industry companies will use the most current edition of "Guidelines for Assessing the Flushability of Disposable Nonwoven Products" unless directed otherwise by local laws. While there is not yet agreement between the wastewater associations and the wipes industry on appropriate flushability assessment criteria, and the wastewater associations do not accept the Guidelines as being adequate, the industry remains committed to working towards more universally acceptable flushability guidelines.

ON-PACK CONSUMER INFORMATION

The packaging of all finished products that have high potential to be discarded via the toilet must clearly inform consumers whether or not the products are appropriate for disposal via the wastewater system.

Packaging for non-flushable products that have a potential to be flushed must clearly indicate that the product should not be disposed of via the toilet by displaying the 'Do Not Flush' (DNF) symbol. The additional use of the 'Dispose via the Solid Waste Stream' ('Tidy Man') symbol to confirm disposal via the solid waste system is discretionary; where used, it is recommended to be the same size as the DNF symbol.



'Do Not Flush' symbol



Optional 'Tidy Man' symbol

Location: The symbol(s):

- A. Must be prominent, permanently affixed and reasonably visible near the point where individual wipes are taken out of the container holding and dispensing the wipes.
- B. Must be prominently visible on the on-shelf package consumers are purchasing so that a consumer looking for proper disposal instructions can find them on the package being purchased without opening the pack.
- C. Should not be obscured by packaging seals or folds or obscured by other package design elements

Additionally, for the categories of Baby Wipes, Feminine Hygiene Wipes, Adult Incontinence Wipes, and Body Cleansing Wipes, it is strongly recommended and highly encouraged that this symbol be placed on the front or top of the on-shelf packaging so a consumer can see the symbol without having to touch the package.

Color: Symbol artwork should have sufficiently high contrast with the background to be highly readable (i.e., dark on a light background). Embossed symbols on injection molded plastic parts should be designed to provide a high visual impact.

Size ⁽⁶⁾:

- a. Diameter \geq 6.35mm (0.25") for small packs with a Primary Display Panel \leq 32 sq.cm (5 sq. in.)
- b. Diameter \geq 10 mm (0.375) for Primary and Secondary consumer packaging with a display panel $>$ 32 sq. cm. (5 sq. in.) and \leq 161 sq. cm. (25 sq. in.)
- c. Diameter \geq 15 mm (0.60) for Primary and Secondary consumer package with a display panel $>$ 161 sq. cm. (25 sq. in.) and \leq 290 sq. cm. (45 sq. in.)
- d. Diameter \geq 19 mm (0.75) for Primary and Secondary consumer packaging with a display panel $>$ 290 sq. cm. (45 sq. in.) and \leq 484 sq. cm. (75 sq. in.)
- e. Diameter \geq 25 mm (1") for Primary and Secondary consumer packaging with a display panel $>$ 484 sq. cm. (75 sq. in.)
- f. For large package with a display panel \geq 591 sq. cm. (90 sq. in.) the symbol should be appropriately scaled \geq 25mm (1").

Wording: Use of the written instruction "Do Not Flush" with the DNF symbol is optional. Any on-pack instruction for product disposal needs to be clear and explicit.

Timing: It is expected that all wipes manufactured starting 18 months from the adoption date of this Code of Practice will be labeled according to this Code of Practice, and that brand owners will start the process of assessing and updating labels between now and that date.

⁽⁶⁾ Exclusions: Regulated products need to comply with size/placement requirements given by any relevant regulation or legislation.

RAISING PUBLIC AWARENESS OF RESPONSIBLE DISPOSAL PRACTICES

Responsible consumer behavior is a key aspect in preventing non-flushable products from entering wastewater systems. The improper disposal of such products is one part of a much broader problem.

The Associations and their member companies will consider opportunities to support governments, municipalities and wastewater authorities in implementing awareness-raising activities designed to increase understanding of the appropriate disposal routes for flushable and non-flushable wipes.

PROMOTION OF THIS CODE OF PRACTICE

Although voluntary, the Associations will promote this Code of Practice to its membership and will encourage member companies to operate within the spirit of the Code.

The Associations will also seek to ensure that non-member companies are made aware of the Code and are encouraged to comply with it.