



November 21, 2019

The Honorable Alan Lowenthal  
United States House of Representatives  
Washington, D.C. 20510

The Honorable Tom Udall  
United States Senate  
Washington, D.C. 20510

Dear Senator Udall and Representative Lowenthal:

On behalf of the undersigned coalition of public agencies providing wastewater, water recycling and biosolids management services in California, we write to convey our support for your landmark legislation relating to plastic pollution.

Our coalition is especially supportive of the inclusion of provisions in the legislative discussion draft related to the proper labeling of wet wipes products sold in the United States. Wet wipes products made with plastics or other synthetic materials pose a great risk to our communities' clean water infrastructure, public health, and the environment. There are currently no statutory requirements for wet wipes products to be labeled with information about their intended disposal, and many wet wipes that are supposed to go into the trash end up being flushed and contribute to system problems and microplastic pollution. Compounding the problem is the increasing popularity of "flushable" wipes, which look and feel the same as other wipes and create consumer confusion about how to properly dispose of the products intended to be disposed of in the trash.

When wet wipes enter the municipal sewer systems, they commonly rope together and congeal with fats, oils, and grease and other obstructions in the sewer, leading to costly maintenance issues and causing sanitary sewer overflows in private residences, businesses, and our communities. Since over 90% of wet wipes contain plastic fibers, when they are flushed, those fibers shed and can be discharged to waterways in wastewater effluent.

Information gathered by the State of California indicates that in the last decade, the number of sewer spills have decreased by over 55%; however, the percentage of sewer spills related to wet wipes have increased 35% in the same time. In fact, the improper disposal of wet wipes in sewers over this same time period has resulted in over 1.2 sewer spills per week for which public agencies could have been liable for \$350 million in fines for such violations. As such, this addition in your legislation is important to our coalition, and we support its inclusion.

With regard to input on the bill language, we have two comments: (1) we support modifying § 12304(d) such that this bill would expressly utilize the performance standards for flushability developed by the International Water Services Flushability Group, which include a prohibition of plastics, amongst other vital criteria, and (2) we affirm your recognition and prohibition of synthetic materials and fibers such as regenerated cellulose, as these materials are not natural, significantly reduce a wet wipe's ability to disintegrate, and do not biodegrade in the environment in a short period of time thus making them functionally equivalent to microplastics.

For these reasons, our coalition appreciates your initiative to introduce federal legislation on this important topic and look forward to working with you as the legislation progresses.

Sincerely,

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