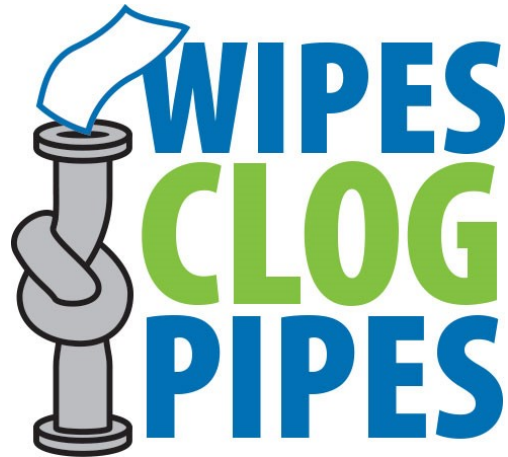


Wipes Labeling Legislation & Research Update



Presentation by Jessica Gauger
Director of Legislative Advocacy



Background – Wipes Clog Pipes

- Wipes issues with systems began showing up in wastewater systems in last 15-20 years
 - Direct correlation with proliferation of single use wipes on consumer market
 - Introduction of “flushable” wipes in late 90’s early 00’s
 - Increased O&M costs, energy consumption (pumps), infrastructure upgrades to facilities (grinders, bar screens) required to manage significant ragging

Wipes Background – Policy Efforts

- AB 2256 (Huffman) – 2010
- National effort to develop industry driven “flushability” guidelines, “do not flush” guidelines
- International Water Services Flushability Group (IWSFG) forms
- IWSFG adopts PAS 4 in late 2018 (performance standards)
- Assembly Member Bloom introduces AB 1672, February 2019

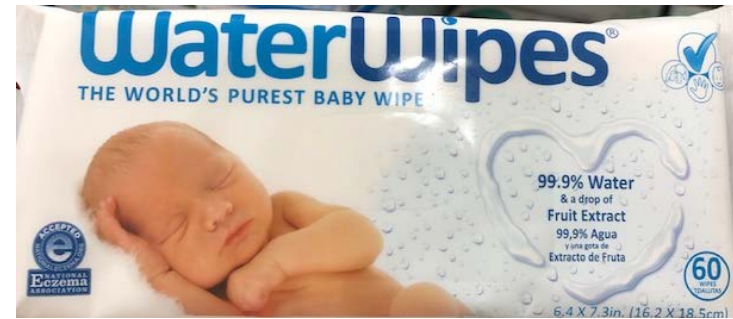
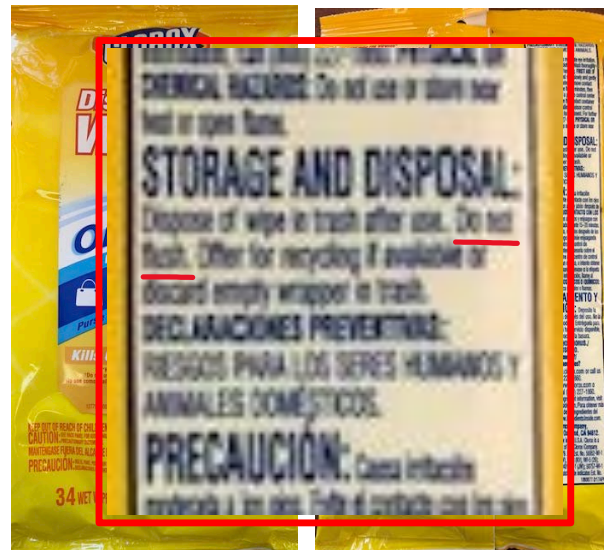
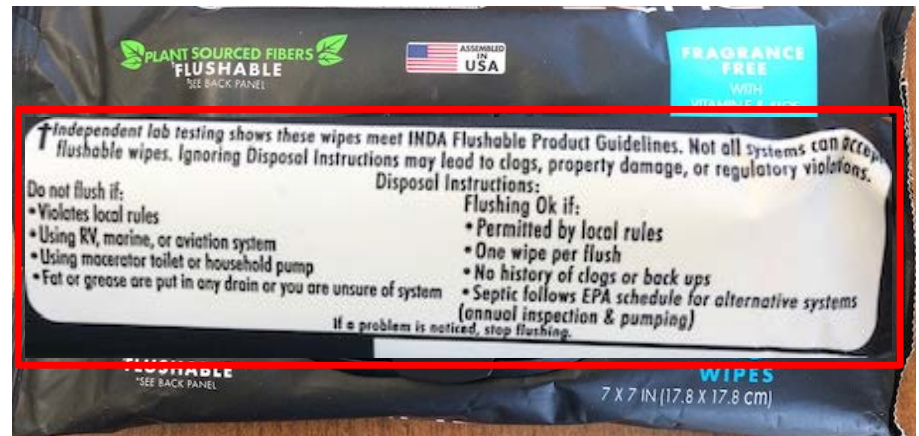
Flushability Standards & DNF Guidelines

- Both IWSFG and INDA standards for flushability require products to meet certain performance requirements to be labeled as flushable
 - IWSFG requires disintegration rate of 95%
 - INDA/ENDANA requires disintegration rate of 60%
- INDA “Do Not Flush” guidelines prescribe best practices for labeling products with the “Do Not Flush” moniker (size of logo, contrast, placement on package)

Do Not Flush Labeling



Wet Wipe Product Labeling: Wild West



AB 1672 – What does it do?

- Two pronged approach:
 - Prohibits the sale of wet wipe products in CA unless they are labeled as prescribed in this statute
 - For products intended to be disposed of in the trash, they must be labeled “Do Not Flush” according to existing voluntary industry standard
 - For products that are marketed as “flushable,” manufacturers must demonstrate that they break down according to the specifications set by the IWSFG PAS 4.
 - Standalone statute, enforceable by local District Attorneys, City Attorneys, Attorney General. \$2500 fine per violation.

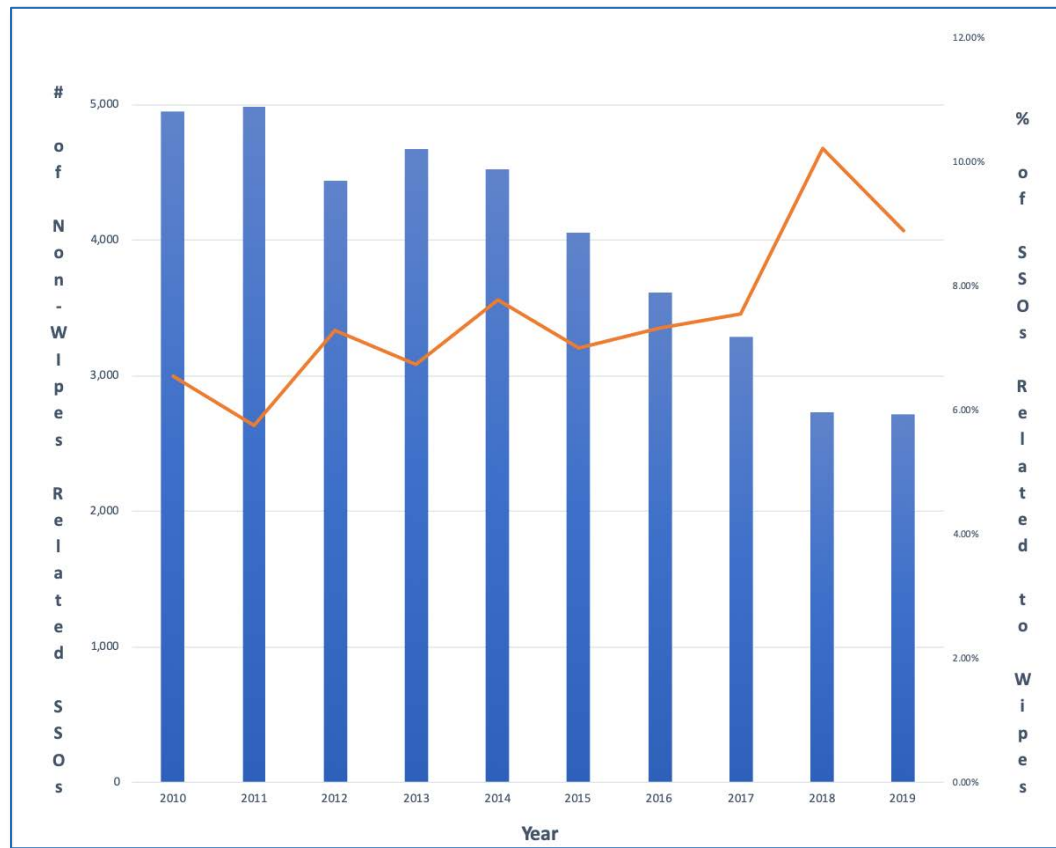
Our main advocacy points

- We know it's both "flushable" and non-flushable products causing problems: consumer confusion
 - Non-flushable wipes nearly all made of plastic fiber: microplastic loadings in wastewater effluent
 - "Flushable" wipes made with synthetic content (regenerated cellulose) and have same tensile strength as non-flushable wipes
- Voluntary industry standards are insufficient and loosely followed
- Major burden on local governments and costs are borne by ratepayers



State data supports our advocacy

- CIWQS SSO database demonstrates increase in wipes related SSOs over time:



Research Indicates Policy Change Warranted

- *S. Durukan, F. Karadagli (2019) Physical characteristics, fiber compositions, and tensile properties of nonwoven wipes and toilet papers in relevance to what is flushable. Science of the Total Environment 697*
 - “Our data demonstrate no clear difference between flushable, and non-flushable wipes on the basis of their physical properties and their response to moisture... all wipes are much stronger than TPs, and they retain most of their strength in wet states.”
 - Wipes pose adverse effects on microbiological communities... and that their structures can create conditions that produce H₂S and methane (more research on this issue is underway).

Opposition Arguments

- It's not the “flushable” wipes: it's diaper wipes and cleaning wipes that cause the problems
- This IWSFG standard is a de facto ban on all flushable wipes
- No forensic evidence that flushable wipes are the cause of clogs
- Voluntary Industry standards are working
- No other countries have adopted the IWSFG standards for flushability
- This is a hygiene issue – can't throw “butt wipes” in the trash
- There are no flushable wipes that contain plastic

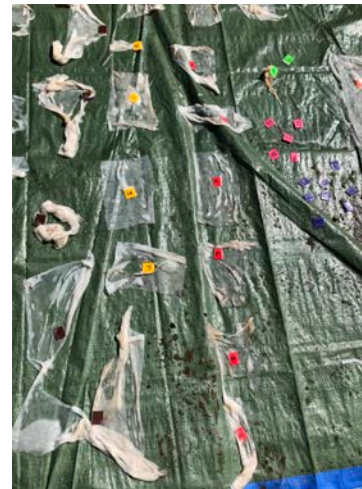
AB 1672 – What does it do? 2020 Update

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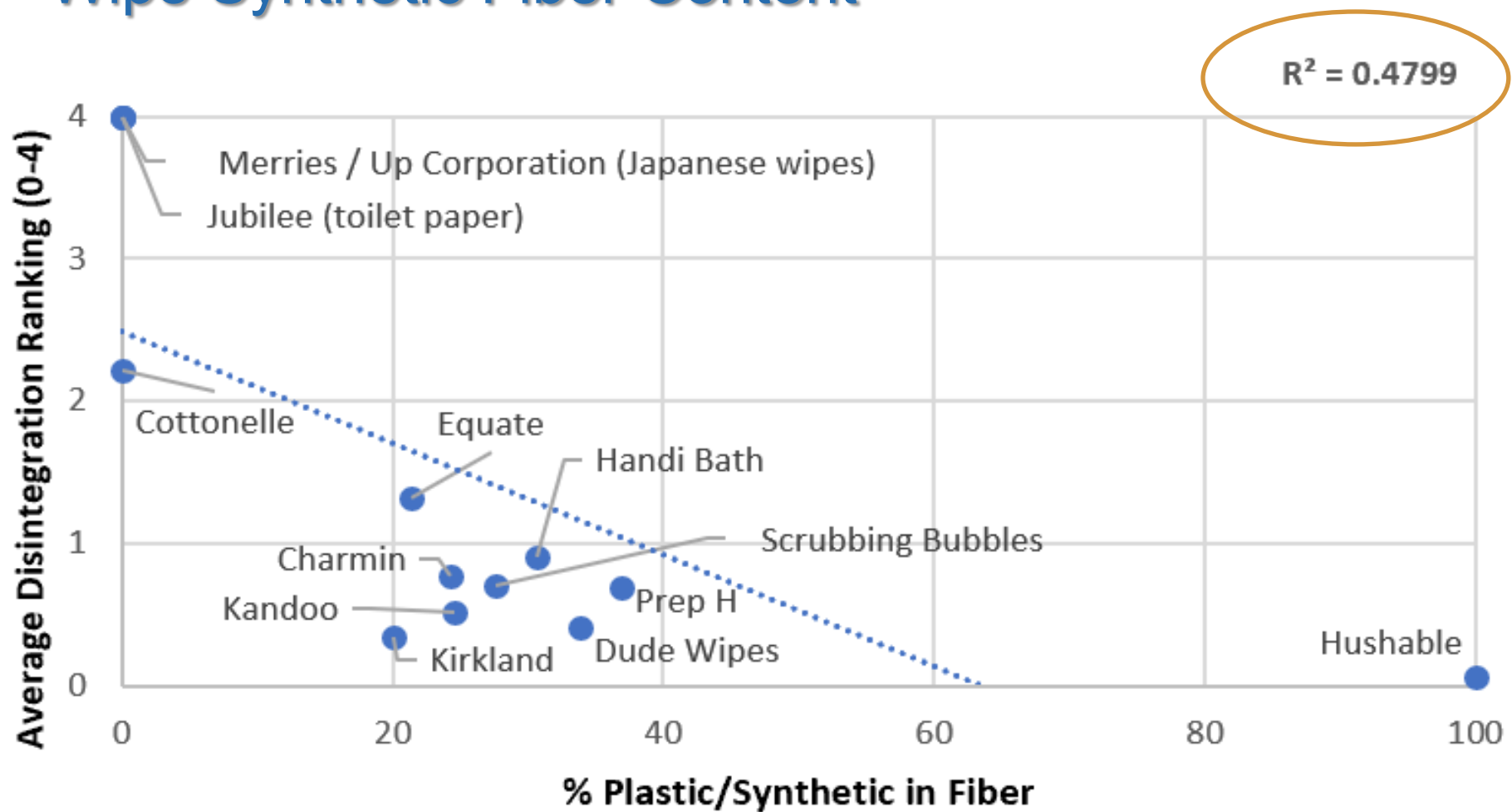
Dispersibility Field Study Project

- Based on field studies conducted in context of class action litigation
- Manhole drop process with marked wipes traveling a predetermined section of line and being retrieved at a downstream manhole
- Samples collected are arranged and evaluated for their dispersibility performance
- Independent laboratory analysis to evaluate the makeup of different types of flushable wet wipe products
- Partner with associate engineering firms for independent data analysis

Dispersibility Field Study Project



Linear Correlation Between Disintegration and Wipe Synthetic Fiber Content



#WipesClogPipes Social Media Blitz

LA Sanitation & Engineering @LACitySAN
#WipesClogPipes

Silicon Valley Clean Water | SVCW @SVCWNews
video on wet wipes.

Tuolumne County CRA @TuolumneCRA

City of San Carlos
Apr 11
SHOULD flush it. Here is
after a

Don't Flush Your Wipes!
WIPES CLOG PIPES!

Watch later Share

0:00 / 1:03

YouTube

CALIFORNIA ASSOCIATION OF SANITATION AGENCIES
casaweb.org/wipes
Web Client
4:36 PM · May 22, 2019 · Twitter for iPhone
1 Retweet 4 Likes

CASA

What's Next?

- AB 1672 (Bloom) moving forward this Spring
 - Negotiations with wipes manufacturers ongoing
 - Will likely address “Do Not Flush” labeling
 - Bill has to be passed by August 2020
- WA likely passing HB 2565 in 2020
- Lowenthal/Udall Single-use plastics legislation in Congress
 - Includes provisions relative to designating wipes as single use plastics and prescribing labeling requirements for flushable and non-flushable wipes
- Pending regulatory action in Australia, Canada

What's Next?

- **CASA Wipes Dispersibility Report: Coming Soon!**
 - Review of the field work from this summer evaluating the dispersibility of 10 brands of “flushable” wipes in a live sewer setting
- **NACWA Cost of Wipes Report**
 - Estimates \$47 million annually spent by local agencies in California for O&M costs relating to wipes management
 - Conservative estimate: doesn't account for capital improvements, public outreach, or fines & penalties
- **CASA Wipes Toolkit (Spring 2020)**

Questions? Contact Us!

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