



# The New York Water Environment Association, Inc.

## *The Water Quality Management Professionals*

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December 19, 2016

Costa Constantinides  
Chair, Committee on Environmental Protection  
250 Broadway – Suite 1808  
New York, NY 10007

Antonio Reynoso  
Chair - Committee on Sanitation & Solid Waste Management  
250 Broadway – Suite 1740  
New York, NY 10007

Re: Proposed New York City Local Law #0666-2015  
Sale of nonwoven disposable products

Chairs Constantinides and Reynoso,

The New York Water Environment Association (NYWEA) is a professional organization of over 2,500 members dedicated to improving New York's water resources. Many NYWEA members work at or support water resource recovery facilities (formerly referred to wastewater treatment facilities) that protect water quality and public health 24-hours a day, 7-days a week.

An important issue facing many water resource recovery facilities is the increased use of nonwoven disposable products. Many NYWEA members have observed firsthand the problems these products flushed into our systems pose in sewers, pumping stations, and treatment processes. Sewer blockages, clogged sewers, pumps and pipes, premature failure of equipment, and increased operation and maintenance costs have been experienced by facilities across the state with increasing costs. These problems adversely affect the ability of municipalities to provide these critical services to residents.

To date, tests determining the "flushability" of these products have been based on experimental conditions developed by the nonwovens industry. These tests do not necessarily represent the conditions commonly encountered in municipal wastewater systems. It is for this reason that a number of stakeholders – including NYWEA's parent organization the Water Environment Federation – have signed onto the enclosed statement. This diverse group of organizations from across the globe are advocating for the type of approach that proposed New York City Local Law #0666-2015 suggests.

Thank you for your consideration. If you have any questions, please contact our Executive Director, Patricia Cerro-Reehil at (315) 422-7811 x 2.

Sincerely,

Joseph Fiegl, P.E.  
President

Encl.

# 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.

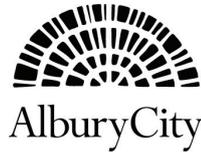
*\*and in compliance with local legislative requirements*

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