



Clean Water Summit Partners  
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Sacramento, CA 95814  
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Summit Partners:  
- Bay Area Clean Water Agencies (BACWA)  
- California Association of Sanitation Agencies (CASA)  
- Central Valley Clean Water Association (CVCWA)  
- California Water Environment Association (CWEA)  
- Southern California Alliance of Publicly Owned Treatment Works (SCAP)

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March 14, 2013

Mr. Richard DiCerchio  
Senior Executive Vice-President, COO  
Costco Wholesale Corporation  
999 Lake Drive  
Issaquah, WA 98027

Subject: Labeling of Non-Flushable Products

Dear Mr. DiCerchio

The undersigned California clean water associations, collectively the Clean Water Summit Partners, are statewide and regional organizations representing local public agencies engaged in providing clean water services to their communities. The Clean Water Summit Partners members serve over 90 percent of the sewered population of California, and over 9,000 individual members working in the water quality field within the State of California.

In a letter dated August 20, 2012 (copy enclosed), we conveyed our support of efforts to address the problems encountered in our publicly owned wastewater collection and treatment systems as a result of disposal of items claimed to be "flushable" that do not rapidly disperse in the sewer system<sup>1</sup>. To increase understanding and encourage action, many clean water associations across the nation, such as the California Water Environment Association (CWEA), are either currently working on or have completed non-dispersible position papers such as the attached paper prepared by the New England Water Environment Association (NEWEA).

The labeling of such products as "flushable" creates a mixed message to the consumer. Based on our significant experience with sanitary sewer systems, we believe that currently the only products that disperse rapidly enough in the sewer system to prevent problems are toilet tissues. Examples of positive messages we advocate can be found at [www.What2Flush.com](http://www.What2Flush.com). More examples exist nationally.

We joined the named associations in requesting that Costco, as the fifth largest retailer in the United States and as a corporation committed to sustainability, modify packing of your Kirkland Brand products to remove the term "flushable" and to undertake a simple consumer education campaign to inform customers of the problems associated with flushing any products other than toilet tissue.

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<sup>1</sup> These efforts have been led by the American Public Works Association (APWA), the Water Environment Federation (WEF) and the National Association of Clean Water Agencies (NACWA)


March 14, 2013


Mr. Richard DiCerchio, Senior Executive Vice-President, COO, Costco Wholesale Corporation  
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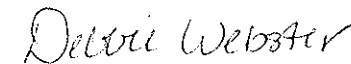
We would very much like to hear from you as to what, if any, actions have been undertaken by Costco to address this serious problem. Please contact John Pastore at (760) 479-4121 with any questions or if you would like additional information.

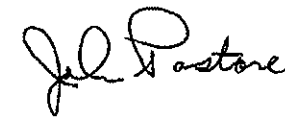
Sincerely,

  
David R. Williams, Executive Director  
Bay Area Clean Water Agencies

  
Roberta L. Larson, Executive Director  
California Association of Sanitation Agencies

  
Elizabeth Allan, Executive Director  
California Water Environment Association

  
Debbie Webster, Executive Officer  
Central Valley Clean Water Association

  
John Pastore, Executive Director  
Southern California Alliance of POTWs

Cc: Kim Walior, Costco  
Bobbi Wallace, City of Kirkland, WA  
Karen Raines, Director of Corporate Sustainability, Costco  
Cynthia Finley, Director of Regulatory Affairs, NACWA  
Jeff A. Eger, Executive Director, WEF  
Peter B. King, Executive Director, APWA  
Nick J. Arhontes, P.E. Orange County Sanitation District, CA



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August 20, 2012

Mr. Richard DiCerchio  
Senior Executive Vice-President, COO  
Costco Wholesale Corporation  
999 Lake Drive  
Issaquah, WA 98027

Subject: Labeling of Non-Flushable Products

Dear Mr. DiCerchio

The undersigned California clean water associations, otherwise referred to as the Clean Water Summit Partners, is a coalition of statewide and regional organizations representing local public agencies engaged in providing clean water services to their communities. Included in the Clean Water Summit Partners are the California Association of Sanitation Agencies (CASA); the Bay Area Clean Water Agencies (BACWA); the Central Valley Clean Water Association (CVCWA), the Southern California Alliance of Publicly Owned Treatment Works (SCAP), whose collective members serve over 90 percent of the sewered population of California, and the California Water Environment Association (CWEA) that includes over 9,000 individual members working in the water quality field within the State of California. Tri-TAC ([www.tritac.org](http://www.tritac.org)) also endorses the Clean Water Summit Partners position.

We wish to thank you for allowing regional representatives led by the City of Kirkland and members of the following referenced national wastewater associations to meet with Costco staff on July 10 to discuss our wastewater industry's concerns over the labeling of products as "flushable". The purpose of this letter is to add the Clean Water Summit Partners support to the efforts of the American Public Works Association (APWA), the Water Environment Federation (WEF) and the National Association of Clean Water Agencies (NACWA) to address the problems encountered in our publicly owned wastewater collection and treatment systems as a result of disposal of items claiming to be "flushable" that do not rapidly disperse in the sewer system.

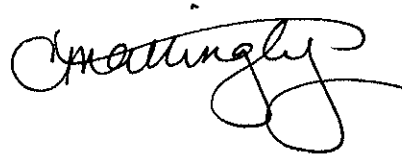
The labeling of products as "flushable" creates a mixed message to consumers. We believe that many products carrying this label do not disperse rapidly enough in the sewer system to prevent problems. As the fifth largest retailer in the United States and as a corporation committed to sustainability, Costco is perfectly positioned to "lead by example" (Costco Corporate Sustainability Report, p.11, 2009) by considering our wastewater industry's request to modify packaging of your Kirkland Brand products to remove the term "flushable" and to undertake a simple consumer education campaign to inform customers of the problems associated with flushing any products other than toilet tissue.

We sincerely appreciate Costco's consideration and the time Kim Wailor and her team gave to our wastewater industry's request for collaboration in this effort to solve this problem.

Sincerely,



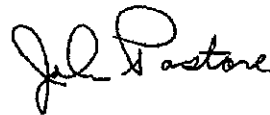
James Kelly, Executive Director  
Bay Area Clean Water Agencies



Carrie Mattingly, President  
California Water Environment Association



Roberta Larson, Executive Director  
California Association of Sanitation Agencies



John Pastore, Executive Director  
Southern California Alliance of POTWs



Debbie Webster, Executive Officer  
Central Valley Clean Water Association

Cc: Kim Wailor, Costco  
Bobbi Wallace, City of Kirkland, WA  
Karen Raines, Director of Corporate Sustainability, Costco  
Cynthia Finley, Director of Regulatory Affairs, NACWA  
Jeff A. Eger, Executive Director, WEF  
Peter B. King, Executive Director, APWA  
Nick Arhontes, Orange County Sanitation District



## NEWEA Position Paper

# Management of Non-Dispersibles in Wastewater

*Ratified January 27, 2013 by the New England Water Environment Association*

The New England Water Environment Association (NEWEA) is a not-for-profit technical and educational organization that promotes the protection and enhancement of our water environment. Comprised of the six New England States, NEWEA serves over 2,000 members and is a member association of the Water Environment Federation (WEF), an internationally renowned organization. NEWEA's mission is to promote education and collaboration while advancing knowledge, innovation, and sound public policy for the protection of the water environment and our quality of life.



**In recent years, municipalities and sewer districts have faced an increasingly frequent challenge:** the tendency for consumer products—such as baby wipes, cleaning wipes (i.e., sanitizing wipes, shop wipes, dusting wipes, and mop heads, etc.), personal wipes, and feminine hygiene products - to interfere with private plumbing and public collection systems, to plug pumps, and to cause further interference at treatment plants. This interference often requires equipment to be taken offline for maintenance or replacement. Consequences of this trend include increased operating costs, a reduced level of service to customers, increased risk for personnel to be injured when responding, capital expenses to replace equipment, difficulty pumping septic tanks, emergency plumber costs and property damage incurred by homeowners. Utilities may experience environmental damage from sanitary sewer overflows that occur when interference reduces the capacity of wastewater conveyance and treatment systems.

Flushability Assessment Guidelines were developed in 2009 by the Association of the Nonwoven Fabrics Industry (INDA), which represents many manufacturers of these consumer products. To satisfy the Assessment, a material must be: 1) able to clear residential plumbing systems; 2) compatible with wastewater conveyance, treatment, reuse and disposal systems; and 3) unrecognizable in a reasonable period of time. Materials that do not satisfy these three conditions are termed “non-dispersible” by NEWEA and other associations, to differentiate them from the small portion of products that satisfy the Assessment and are marketed as “flushable” by manufacturers. Non-dispersibles can be identified by the presence of a “Do Not Flush” logo, also developed by INDA. The three-part Assessment is a guideline, not a standard, so its use is voluntary. It is not implemented by all INDA members, and is used by few (if any) manufacturers that are not INDA members.

Clogs are caused by products that are not truly dispersible, as well as non-dispersible products that are not intended to be flushed. These products make their way into sewers by



A Portland Water District (Maine) pump, clogged with wipes—an occurrence repeated across the country

a combination of inconsistent or misleading labeling, poor marketing, and lack of attention by consumers. Examples of challenges and inconsistency include the following:

- Difficulty developing a standard for “compatible,” “unrecognizable,” and “reasonable period of time”, and determining how these attributes would be evaluated consistently in a third-party testing environment;
- Products that do not satisfy the above Assessment but are nevertheless marketed as flushable;
- Package labeling states that a product is flushable, when it has not been certified as satisfying the three-part Assessment;
- Package labeling or design implies flushability, such as packages designed to hang from a standard toilet paper holder, or label is silent on disposal method;
- Package labeling includes disposal instructions in fine print, not displayed prominently, or with qualifiers (e.g., the number of products disposed, disposal in septic systems vs. public sewer);
- Non-dispersible products are placed on the same store shelf as toilet paper, confusing the customer and implying flushability; and
- Non-dispersible products intended for a use that promotes disposal by flushing, such as baby wipes, personal care wipes, feminine hygiene products, and disposable toilet wand heads.



Manufacturers have tried to limit responsibility for disposal of baby wipes and personal care wipes, saying that the “preferred disposal method” is to leave it “up to the consumer to decide” how a product should be disposed. This position is contrary to results of two recent focus groups in Maine, at which consumers were vocal about the need for labeling to show- with a large, clear icon- how a product should be disposed, and is also unsupported by existing inconsistent labeling practices.

The consumer market for flushable products is forecast to increase substantially in the next decade, so resolving this issue needs to be a priority. National water quality organizations such as the Water Environment Federation (WEF), the American Public Works Association (APWA), and the National Association of Clean Water Agencies (NACWA) understand this, have focused attention on this issue, and support NEWEA’s development of this Position Paper.

The solution will not involve a single action or change, but needs to address product manufacturing, labeling, marketing, consumer education, and product stewardship. NEWEA strongly encourages that the following efforts be undertaken:

1. **Manufacturing Changes.** Manufacturers should continue to develop alternative binders and substrates that are truly dispersible, such as those made from starch, acrylics, and other media. Progress in this area has been encouraging.
2. **Flushability Standard.** INDA should increase efforts to implement the 2009 three-part Flushability Assessment (and updates) with members as a standard instead of a guideline. INDA should work closely and cooperatively with water quality organizations to develop and implement the Standard and subsequent updates. When INDA finds non-member manufacturers with products that are not compliant, the Flushability Standard methodology and support should be made available free of charge.

3. **Manufacturer Acknowledgement of Behavior.** Manufacturers should acknowledge that products used for baby care and personal hygiene are likely to be flushed. Products likely to be flushed should be tested per the Flushability Standard. Paper towels and feminine hygiene products, documented in clogs in pilot testing completed in Maine, should clearly bear the “Do Not Flush” logo.

4. **Develop a “Safe to Flush” Logo.** This logo would be used only on products that satisfy the Flushability Standard. INDA should work with a third-party testing lab (such as NSF) and national water quality organizations to develop this logo. Manufacturers should be encouraged to see the logo as positive, and consistent with campaigns to brand their firm and products as “green,” “eco” or “sustainable.”



“Do Not Flush” logo developed by INDA, which represents manufacturers of consumer products.

5. **Consistent Use of Logos.** Tested products should bear either the existing “Do Not Flush” or new “Safe to Flush” logo, consistently. A third-party testing lab (such as NSF) should maintain a list of tested products on its website, with the result of the test.
6. **Cooperation with Water Quality Organizations.** INDA should view these organizations as resources, and utilize them to assist with update of standards, logo development, marketing support, and education and outreach to consumers.

NEWEA also supports the work of states such as California, New Jersey, and Maine that attempted to utilize legislation to make the three-part Assessment a standard for all products likely to be flushed. Legislation would resolve the issue of non-membership in INDA by applying the standard to all manufacturers. If efforts in this Position Paper are not fully implemented, NEWEA will work with WEF, APWA, and NACWA to provide support for such legislation where it is introduced.