BOOMERANG ALLIANCE

27/10/21

PREFACE

SUGGESTED CHANGE:
The objective of this document is to clarify the purpose of the sewerage system to manage human waste and toilet paper only, to acknowledge the problems presented when other items are flushed and to provide guidance on and requirements for the labelling and marking of products to be labelled DO NOT FLUSH.

INTRODUCTION COMMENT 1

EDITORIAL

"Some of the these items (claiming to be flushable) are not compatible with current infrastructure"

Before asking the infrastructure question - it is essential to ask the "Does it contain plastic?" question. If the answer is YES, then automatically it must be labelled DO NOT FLUSH, with standard graphic.

The principal objective of wastewater systems management is to protect public health, the environment, the work, health and safety of workers and sustainable development."

CSIRO has thoroughly documented the harm caused by marine debris, most of which is plastic - which "injures and kills wildlife, has the potential to transport chemical contaminants, and may pose a threat to human health….Water flow (e.g. storm water) and wind contribute to the transport of debris towards marine ecosystems." [https://www.csiro.au/en/research/natural-environment/oceans/marine-debris]
It is well documented by beach clean up volunteers and researchers that certain kinds of plastic waste is found near sewerage outfalls eg plastic stemmed cotton buds [https://www.betterbuds.org.au/ and https://www.tangaroablue.org/event/sea-week-clean-up-boat-harbour-ocean-outfall-kurnell-nsw/].
Education and product changes are needed to prevent this problem.

Sustainable Development Goal #14: Life Below Water
Healthy oceans and seas are essential to our existence. They cover 70 percent of our planet and we rely on them for food, energy and water. Yet, we have managed to do tremendous damage to these precious resources. We must protect them by eliminating pollution ….. and immediately start to responsibly manage and protect all marine life around the world. https://www.globalgoals.org/14-life-below-water

SUGGESTED CHANGE:
REPLACE "This document is especially relevant for products designed and marketed for use in a bathroom setting and suitable for toilet flushing. Appropriate labelling of products will enable greater public education and awareness of the types of products that are suitable for toilet disposal and reduce the burden on the wastewater systems and the environment."

WITH "This document is especially relevant for manufacturers and retailers who have designed and marketed products for use in the bathroom setting and will now be required to label those products DO NOT FLUSH (with a standard graphic); to educate the community, promote responsible disposal to a bin, and consequently reduce the burden on the wastewater systems and the environment."
(NO FLUSH BLACK ATTACHED)

3. Intro General Comment 2

There are many factors that contribute to successful wastewater treatment systems:
One of these is the prevention of blockages. When blockages occur, there is an unacceptable risk that wastewater may spill from the system and create public health and environmental risks along with otherwise unnecessary expenditure in rectifying the issues. (page v)

This is another reason to ensure no plastic enters the wastewater system in the first place, as various screening systems may be by-passed and be ineffective in removing them. Other systems, such as grinders (page 4, 2.4) may create more microplastics downstream.

Suggested change:
Prevent blockages by making it clear that all bathroom products found to have caused blockages or become marine debris, are clearly labeled DO NOT FLUSH, eg wipes, cotton buds, dental and sanitary items. Promote the importance of bathroom bins to prevent blockages. Stop it before it enters the toilet.

4. Introduction - Editorial Comment 3

Introduction Paragraphs 5 and 6: *"and suitable for toilet flushing" and "compatibility of products flushed via the toilet"*
We suggest "at risk of being flushed down a toilet" instead of 'suitable' and stronger language that makes it clear that items containing plastic must not be flushed down the toilet/ are INCOMPATIBLE, regardless of whether they can be flushed.

Proposed Change
Change text to: "This document is especially relevant for products designed and marketed for use in a bathroom setting and at risk of being flushed down a toilet. Appropriate labelling of products will enable greater public education and awareness of the types of products that must not be discarded in a toilet due to the burden on the wastewater systems and the environment.

This document can also assist stakeholders in communicating with consumers and communities about the environmental impact of flushing anything other than poo, pee and (toilet) paper down the toilet."

5. Page 1: Definitions

1.4.2 Flushable product = product considered suitable for disposal through sewer networks and wastewater collection and treatment systems, including onsite treatment systems because it will *not materially adversely impact* those systems *or be recognisable* in effluent leaving onsite and municipal wastewater treatment systems or in the post-treatment products of treatment sludge.

This definition needs improvement - it is not enough to say "not recognisable in effluent leaving onsite and municipal wastewater treatment systems or in the post treatment products of treatment sludge"* - This

implies it just has to be small enough so it is not seen and will pass through without causing a blockage. Microplastics are often hard to see, especially in water, but cause great harm in the receiving environment and are known to be entering the food chain. Studies have shown that plankton will eat plastic [https://www.newscientist.com/article/dn27849-plankton-snacking-on-plastic-caught-on-camera-for-the-first-time/]. The only (allowable) 'flushable product' should be toilet paper. Everything else to be flushed is human excreta.

Suggested change:
New Text: 1.4.2 Flushable product = product considered suitable for disposal through sewer networks and wastewater collection and treatment systems, including onsite treatment systems = approved toilet paper. Everything else to be flushed is human excreta.

6. Comment on Environmental Considerations:

Page 5 - 2.7 Environmental considerations
Stakeholders and the general public need to be mindful of materials that could enter wastewater treatment systems and how they may affect wastewater systems and the receiving environment. From time to time, sewers overflow to the environment for a multitude of reasons. Therefore, compatibility (or environmental fate) of materials that enter sewers by whatever means is important.
[SOURCE: ISO/TR 24524:2019 Clause 9, modified. Copyright ISO. All rights reserved.]

YES - environmental fate of materials is critical. The receiving environment is critical . No plastic should be entering the wastewater system. The water ecosystems must be kept healthy. Any plastic, no matter how small, is a threat to marine life at the end of the pipe.

Proposed change:
Make necessary changes to whole document to reflect the importance of protecting the environment from plastic pollution entering via the wastewater system:
If you are asking the question: Is it suitable for flushing?

If the item contains any plastic (fossil fuel derived, bioplastic, oxodegradable or any other polymer - as defined on page 2 - 1.4.5) the answer must be no and it should be labeled clearly: DO NOT FLUSH, in english, community languages and/or with universally recognised graphic, such as the one attached.

To determine which items need this label: refer to items found and documented by the CSIRO, in the Australian Marine Debris Initiative or by Sydney Water, including but not limited to:

- Cotton buds
- Wipes
- Sanitary items
- Other personal care products eg dental floss and picks
- Clothing tags

[https://www.news.com.au/technology/environment/ad-campaign-launched-to-target-shocking-items-flushed-down-sydney-toilets/news-story/f2ffb0b188c3fdfa14d658c516fa2ca3]

Simple solutions for everyone:

- Have a bin in your bathroom
- Only flush poo, pee and paper

- consume wisely and help to reduce demand for materials that are possible sources of marine debris via the sewerage system or storm water. [https://www.awe.gov.au/environment/marine/marine-pollution/marine-debris]

Simple solution for Manufacturers:

- Do not mislead the public by calling your products 'flushable'
- Label any potential marine debris items clearly DO NOT FLUSH - and use an approved standard graphic, universally understood to mean the same.

Simple solutions for retailers, marketing teams, Influencers, media providers

- Be clear that products that should not be flushed are promoted that way
- Promote responsible disposal of bathroom products.
- Do not condone messaging that may encourage inappropriate behaviour eg flushing wipes, without a disclaimer that this practise is harmful to plumbing infrastructure, public health and marine life. eg scene in Deadpool 2: Toilet Paper scene - Man raves about "Huggies Natural care wet wipes" used with toilet paper - https://www.youtube.com/watch?v=OpBM4JRs1mU

7. Comment on 3.1

If a product is suitable for flushing, it may be labelled as flushable. If a product is not suitable for flushing, then it should not be labelled as flushable. Instead, it may be labelled with a "Tidy Man" or a "Do Not Flush" symbol.

The only product that should be approved as flushable is toilet paper.
The Boomerang Alliance suggests an alternative flow chart and text.

Proposed Changes:
Toilet paper is suitable for flushing, and may be labelled as flushable. If a bathroom product contains plastic of any kind it is not suitable for flushing, and it should not be labelled as flushable. Instead, it must be labelled with a "Tidy Man" or a "Do Not Flush" symbol.

8. Comment on 3.2 editorial

3.2 TESTING FOR COMPATIBILITY WITH TOILET FLUSHING
To protect the wastewater system, a discharged material or product needs to be compatible with existing wastewater infrastructure. A discharged material or product that is flushed or disposed via the toilet shall be able to —
(a) be flushed from the toilet bowl;
(b) pass through the drain line (pipes inside and/or immediately outside property);
(c) be transported through the wastewater collection system to the treatment facility;
(d) not adversely affect the intended performance of wastewater treatment systems; and
(e) not adversely affect the downstream environment when in a disintegrated state.

If the principle is that only the three P's are acceptable, why is such are all these tests being conducted before asking does the product contain plastic? Unsuitable/unacceptable products should be tested against other discard options to gauge their suitability, not the sewage system. Only toilet paper should be the subject of any testing.

Figure 3.2 — Components of the wastewater system and locations for testing the compatibility of products flushed down the toilet

Boomerang Alliance disagrees with the final stage of 'Location being Protected' being: ENVIRONMENT - ZERO PLASTICS ATTESTATION

If the product contains plastic it needs to be marked DO NOT FLUSH at the beginning, regardless of whether it passes the 8 other tests (Toilet clearance test, drain line clearance test, Household Pump Test, Disintegration Test, Municipal Pump Test, Settling Test, Aerobic bio disintegration test and Anaerobic bio disintegration test).

We need to stop it at the source.

The Zero Plastics Attestation needs to come first and it needs to be explained in the standard. It should include all plastics - (fossil fuel derived, bioplastic, oxo-degradable or any other polymer - as defined on page 2 - 1.4.5)

Suggested Changes:
We recommend this change in order of priority:
To protect the wastewater system, a discharged material or product needs to be compatible with existing wastewater infrastructure. A discharged material or product that is flushed or disposed via the toilet shall be able to —
(a) not adversely affect the downstream environment when in a whole or disintegrated state
(b) be flushed from the toilet bowl;
(c) pass through the drain line (pipes inside and/or immediately outside property);
(d) be transported through the wastewater collection system to the treatment facility and
(e) not adversely affect the intended performance of wastewater treatment systems.

See attached alternate flow chart - Figure 3.2

9. Page 9 Section 4 - Labelling

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

This is good and use of the term ‘potential to be discarded’ is better than ‘disposed’.
Boomerang Alliance agrees that the packaging should clearly inform consumers whether or not it is approved to be flushed.

Suggested changes:
include image of DO NOT FLUSH symbol (attached)

10. Comments – wording

Page 10 - 4.6 states

The written instruction "Flushable" may be used with a flushable symbol. The written instruction "Do Not Flush" may be used with a DNF symbol. Any on-pack instruction for product disposal shall be clear, explicit and in English.

This should not be only in English - other community languages AND a universally recognised DNF picture should be used. See our example below: 'flushable and do not flush symbols'.

Proposed changeS: *The written instruction "Flushable" may be used with a flushable symbol. The written instruction "Do Not Flush" must be used with a DNF symbol. Any on-pack instruction for product disposal shall be clear, explicit and in English and other community languages where possible.*

11. Comment on whole documents

Boomerang Alliance, representing 55 environment groups, applauds the collaboration between manufacturers, water utilities, peak bodies and consumer groups to develop these important standards for Australia. Thank you for giving us the opportunity to comment.

Our Position:
The toilet is not a bin and the most important question should not be "can it be flushed?" or "is it flushable?" but "SHOULD it be flushed?"

Put simply by many water authorities, only the three P's: poo, pee and (toilet) paper should be flushed. Vomit and menorrhea (menstrual fluid) are also acceptable.

This SYDNEY WATER animation sums it up well: https://youtu.be/tL9PjkzfaU8

Proposed changes:
Avoid references to 'disposal' via the toilet, 'suitability for flushing' which give the impression that the toilet can be treated as a bin.
Consider the opportunity these standards pose to address a signficant source of microplastics entering out waterways.

If the product contains plastic it needs to be marked DO NOT FLUSH at the beginning, regardless of whether it passes the 8 other tests (Toilet clearance test, drain line clearance test, Household Pump Test, Disintegration Test, Municipal Pump Test, Settling Test, Aerobic bio disintegration test and Anaerobic bio disintegration test). We need to stop it at the source.

Others questions to be addressed:
How will Standards Australia promote the new labels and educate the community?
What are the penalties for companies who put misleading labels on packaging?

The Zero Plastic Attestation needs to be the first test not the last.