

Interview Questions for Technical Workgroup on Flushability: Individual Participant Interviews

Interview Format

- Sixty minute call conducted confidentially on a one-on-one basis. Full candor requested.
- Brief introductions and answer questions about Ross Strategic.
- Work through interview questions – we can take these sequentially, start wherever you would like, or just have you take the conversation where you would like to go consistent with the information needs we have as reflected in the questions.
- We will treat your answers as reflecting your individual, personal perspective, unless you otherwise indicate that they also reflect your organization's policy.
- Quick wrap up and description of next steps and time line.

Interview Questions

1. What is your role within your organization, and what has been your involvement in the arena of the flushability of disposable wipes? - In my day job I am the CEO of a public wastewater utility in NJ. As far as WEF, I served as chair of the Collection System Committee from 2010- 2012, I have been involved with the wipes issue since 2010 and have been actively interacting with INDA and the manufacturers since early 2011 (further details in other documents)
2. What are your impressions of the current debate taking place relating to the flushability of disposable wipes? It's a red herring to mask the actual issue that these same manufacturers have been marketing baby wipes, have had ample opportunity to provide prominent Do-Not-Flush (DNF) labeling on baby wipes and provide point of sale instructions on their proper disposal. Instead they allowed these products to be sold side by side without clear delineation which products could be flushed (Flushable labeled wipes) and which products (baby wipes) need to be disposed of via the trash. The issue is compounded by price difference where baby wipes are about ½ the cost of flushable labeled wipes, so a consumer not understanding the difference shops with their wallet. Given the above factors, baby wipes have increasingly been used for off-label purposes, to the point that INDA based on point of sale data analysis has stated that 40% of baby wipes purchased are purchased for uses other than cleaning babies. This coupled with a heavy marketing campaign that flushable personal hygiene wipes provide a cleaner clean has led to baby wipes being used in place of flushable labeled wipes and being flushed down the toilet as the disposal method. Although recently there has been a segregation of the baby and flushable labeled wipes in many retail stores, and DNF labeling has improved somewhat, the consumer has already settled into off-label usage of baby wipes and is unlikely to change that behavior even with public education programs
 - a. Are you troubled in any way about what has been said or done? – Yes, the term disingenuous comes to mind frequently when talking about INDA – Statements like: ED3 contains 7 rigorous tests to protect the sewer system, Any wipe that passes ED3 is Flushable ; it isn't flushable wipes, it's everything else that shouldn't be flushed. I think there is a general distrust of INDA amongst those of us who have dealt with them. A number of us have been promised things like labeling improvements and review of ED3 -- none of those things came through and really ended a period of cooperation, but not agreement that ran from 2011- mid 2012. The low point of the relationship was probably early 2013 – phone calls became contentious and to be honest I thought the only way out was to go back to trying legislative efforts Back in June Scott, Nick and I offered comments on ED3 and offered minor changes to the slosh box test

and DNF Labeling that likely would have gained buy in from the wastewater industry – nothing was done

- b. What are the most positive experiences you have had or signs of progress you have seen? – that an individual manufacturer, Kimberly Clark, has developed a basesheet that rapidly loses strength when wet and is listening to the concerns of the wastewater industry – their 2014 basesheet will be even better – this is the model for a DISPERSIBLE WIPE --- David Powling of KC and I have talked at length about this – we both understand what the tests need to be and what the pass/fail value should be to ensure a wipe is dispersible
3. What are the most compelling reasons for convening a technical workgroup at this time? – To develop the final version of the Flushability Guidelines with real input from the wastewater industry. We don't need Edition 4, Edition 5, etc – this should be it because there is enough collective knowledge about what it will take for a wipe to be dispersible. The manufacturers need a goal to design to – the current goal in ED3 is set so low that it allowed all the “flushable labeled” wipes currently on the market to remain there
4. Are you (or is your organization) hesitant to engage in a technical workgroup process and, if so, why? Yes - I am concerned that without the proper framework in place, this will be a colossal waste of time and money
5. What constraints, if any, will you or your organization operate under while participating in a technical workgroup process? Some sort of CDA is OK – I would prefer to be able to talk about “brands” and not wipe y and z
6. Have you previously participated in a multi-interest process of this type and, if so, what did you experience as the key ingredients to productive dialog? – Yes, but never one where the opposing view is this strong, although this one does have some cracks in they are not unanimous in their views
7. How do you define “disposable” wipes, - any wipe designed to be disposed of (use and dispose) and how do you define “flushable” wipes? – a wipe that must rapidly lose strength when wet and break apart (disperse) in a wastewater collection system with minimal physical force – rapid loss of wet strength is the key indicator. The faster it loses strength, the better it will perform on all the INDA tests, and on the variations both myself and David Powling have come up with
8. What are your primary concerns relating to these products? – As I stated in Q2, the manufacturers allowed the lines between baby wipes and “flushable labeled wipes, to become so blurred that the consumer now views these as a single category of wipes; Personal Hygiene Wipes. If flushable wipes become too expensive or leave the marketplace the consumer will seek out alternatives, namely baby wipes. As long as they don't cause issues in the household plumbing the consumer will use them. Regulating flushable wipes instead of personal hygiene wipes could actually cause the problems in our sewers to become worse
9. What changes are needed to alleviate entirely your concerns? – all wipes designed to be used for personal hygiene, or likely to be disposed of via the toilet due to their use, must be made of a basesheet that rapidly loses strength when wet and breaks apart (dispersed) in a wastewater collection system with minimal physical force (this must include baby wipes due to their high percentage of off-label use, and their substitution for “flushable labeled” wipes)
10. Given your concerns and needed changes, what are the “must discuss topics” substantive changes to ED3, specifically to the FG 502 Disintegration tests (Slosh Box) and the Municipal Pump Test FG507 and “absolutely off the table topics” I don't have any items that are specifically off the table, although I do think we should limit the preliminary discussions regarding pump clogs etc. – the time could be better used elsewhere for the proposed technical workgroup?
11. What are the most important outcomes for you to judge a technical workgroup a success? substantive changes to ED3, specifically to the FG 502 Disintegration tests (Slosh Box) – I would be OK getting the changes the wastewater industry needs but providing a timetable for implementation
12. Given your primary concerns and the changes you believe necessary, what are your best available alternatives to participation in the proposed technical workgroup, and what are the advantages\disadvantages of these alternatives relative to the proposed workgroup? – there are 2 alternative processes that I think would work

- a. Legislation – legislation is potentially the most expedient way of doing this – the downside is that the manufacturers and INDA will roll out the lobbying machines so any attempt at doing this needs to be well planned. It is this lack of planning, as well as the reliance of the INDA flushability guidelines as the reference for “flushability” that have caused issues with previous legislative efforts. INDA fears legislation, because they know that if it passes in one state there may be a domino effect. They also know that future efforts will likely go after all personal hygiene wipes.
 - b. Standard – I am not as familiar with this process, but my understanding is that it will take years, involves multiple stakeholders including the manufacturers – Canada is beginning to work on one and we (the US group) are supporting that effort
13. To the extent this applies, how does convening a technical workgroup at this time fit with any broader strategy that you or your organization have for influencing the future of these products? – as a broad strategy the Technical Workgroup is consistent with the overall strategy of trying to make wipes dispersible in the wastewater collection system, or at least it has the potential to – again it is all about the ground rules
14. From a technical workgroup process standpoint:
 - a. What are your must have ground rules? - must have ground rules are a simple majority consensus and INDA must agree to implement changes agreed upon
 - b. What are your must not have ground rules? Anything other than the above
15. What do you believe I need to know to convene the proposed workgroup successfully (are there background materials you can suggest\provide)? - see attached documents