

[Insert Date]

The Honorable [Insert Representative's Name]
[Insert Room Number] State Office Building
St. Paul, MN 55155

RE: H.F. No. 2842 - Labeling Requirement for Certain Nonwoven Disposable Products

Dear Representative [Insert Representative's Name]:

I am writing you today in support of amending the above referenced legislation to include better protection for wastewater systems.

Disposable wipes — used for changing diapers, personal hygiene, housecleaning, and more — cause major problems when flushed down toilets. In the past five years, the city of St. Peter has spent about \$100,000 on clearing clogs and repairing pumps after wipes gummed them up. The average monthly sewer charge for St. Peter residents is \$70.80. Lewiston spends about \$15,000 a year to hire a company to clear wipes clogs in its lift station pumps. The city spent \$70,000 on a machine that grinds up wipes before they can clog pumps. The average monthly sewer charge for Lewiston residents is \$75.66.

In its current form, this legislation does not establish a basis for a claim of 'flushable', and does not provide detailed guidance for labeling non-flushable products.

The Federal Trade Commission, in a 2015 settlement with wipe producer Nice-Pak, established that in order to be labeled 'flushable', a wipe must disperse (break into pieces) in a short amount of time after it is flushed, and that any tests must replicate the conditions into which a wipe will be discharged.

INDA (Association of the Nonwoven Fabrics Industry) and the wastewater industry's professional associations (Water Environment Federation, National Association of Clean Water Agencies, American Public Works Association, and Canadian Water and Wastewater Association) are currently negotiating Flushability Guidelines (GD4) that will provide such a basis for establishing a 'flushable' claim, as well as a Product Stewardship Initiative (PSI) that will establish appropriate labeling.

Since those negotiations are not yet complete, ***this legislation should establish that any 'flushable' claim shall depend on compliance with a guideline or standard approved by standard set by the Minnesota Pollution Control Agency to ensure that such standard is approved by the majority of the US wastewater associations APWA, NACWA and WEF.***

This legislation must also establish a standard for Do-Not-Flush labeling of non-flushable products, so that consumers can clearly identify products as non-flushable,

as well as a common positive symbol and text for wipes that meet the standard for 'flushable' claims.

Please support this legislation with amendments.

Thank you very much for your time and any efforts you take to increase protection of wastewater systems in our state.

Sincerely,

Your Signature

[Insert Your Name]

Member, APWA Minnesota Chapter

[Insert Your Street Address]

[Insert Your City, State and Zip Code]