

# **WSAA Flushable Products Standard Q&A**

### What is the Flushable Products Standard (AS/NZS 5328:2022)?

The Australian and New Zealand Flushable Products Standard is a voluntary standard that sets out a framework, test methods and criteria for determining if products are suitable for flushing down a toilet. It also provides guidance and requirements for the labelling of products that are likely to be flushed down the toilet. It excludes toilet paper, liquids and soluble products. Toilet paper is a specific exemption in the Standard and does not need to pass tests.

The Standard was released by Standards Australia in May 2022 and the grace period of two years ended on 20 May 2024.

#### What is considered a flushable product?

A flushable product is a product that is suitable for disposal through wastewater networks and treatment systems, including onsite treatment systems. It is not flushable if it materially adversely impacts those systems or is recognisable/likely to cause impact on the environment after being through the wastewater treatment process.

# How is WSAA addressing the issue of products that state they are flushable but haven't been tested or have appropriate labelling?

WSAA met with Woolworths in March 2024 to discuss their approach to the Standard. We have also written to other supermarkets to make them aware of the Standard and requested a meeting.

In response to the Standard, The Woolworths Group has developed a Flushability Requirements and Labelling Policy for their suppliers. The Policy states that the Woolworths Group is committed to supporting the criteria established in the Flushable Products Standard. The Policy requires suppliers to meet the Standard and be able to provide testing proof within 48 hours if requested. Woolworths advised that they are allowing some extra grace periods for specific suppliers as they do not want products to be wasted.

If products are still on the shelves after the grace period we will follow up with the ACCC and Choice to:

- make the supermarket aware that the product is not compliant with the Standard
- make the manufacturer aware of the need to be compliant with the Standard
- ask for proof that their product has passed the Standard; and
- remind them of the consequence of false and misleading claims.

## How can the flushable logo be used?

The Australian and New Zealand Standard provides examples of logos that could be used on



product packaging to indicate the product has passed the criteria in the Standard and is safe for flushing. The Standard specifies that the logo should be prominently visible on product packaging and not obscured by packaging seals or folds.

The Standard states that packaging for products that have a high potential to be flushed should clearly inform customers whether or not they are appropriate for disposal via the toilet. For example, if the product cannot be flushed it should clearly display a do not flush logo.

WSAA has worked with Standards Australia to allow the use of the 'flushable' logo in AS/NZS 5328. This agreement allows WSAA to share the logo with manufacturers for use on products that have met criteria outlined in the Standard and for WSAA members to use the logo in the Standard on social media and in other communications with their customers. If you would like to have access to full standards, please visit Standards Australia's <u>website</u>.

If your product has been tested at one of the accredited international laboratories (SGS in the USA or Centre Technique du Papier (CTP) in France) and has met the ANZ Standard, WSAA can issue an approval to use the Standards Australia logo for the product that has passed. Please provide a copy of the laboratory report to WSAA by emailing <a href="mailto:info@wsaa.asn.au">info@wsaa.asn.au</a>

### How many products have already met the Standard?

We currently know of four manufacturers that have products in the Australian market that have been tested and meet the Standard. We are aware of other products that reference the EDANA or INDA Code of Practice to indicate they are flushable. Whilst that standard has similar tests, the pass/fail criteria and parameters for some tests are more strict in AS/NZS 5328. Therefore, products need to demonstrate that they pass the criteria of AS/NZS 5328, as the INDA and EDANA Code of Practice is not equivalent.

WSAA maintains a <u>register of products</u> that have met the Standard and are approved to use the Standards Australia logo. Due to the delay in release of the AS/NZS logo, some manufacturers have developed their own logo. It is hoped that over time there will be a transition to the logo in the Australian Standard.

## Why are we using the words "complies with" or "meets" and not "certified"?

There is no certification body as part of this process. WSAA considered the option of becoming a certification body however we are not set up for this process and as part of the Standard development there was no plan to have a third-party certification body. This means once a company has completed testing that indicates a product has passed all of the tests in AS/NZS 5328 they can add the logo to that product.

# Will there be other products apart from wipes that pass the Standard?

Yes. The AS/NZS 5328 was established to protect the wastewater systems of Australia. The intent of the Standard was to ensure that products that passed behaved in a manner similar to traditional toilet paper, with a very low likelihood of any adverse impact on wastewater infrastructure or the environment.

WSAA have had inquiries from manufacturers of a few other products such as kitty litter and disposable toilet seat covers. At present the testing labs are indicating they are not set up to test for these products. We expect there will continue to be other products in the coming years like



feminine hygiene products or colostomy bags attempting to pass the Standard.

#### Are there other Standards like this around the world?

This Flushable Products Standard is one of the first of its kind in the world where there has been collaboration between water utilities and manufacturers in its development. There is already interest in adopting the Australian and New Zealand Standard from other countries. Israel has advised they are planning to adopt the Standard with no changes. Other countries with a flushability standard include: Belgium, Spain and China. Noting that these three countries have based their standard on a wipes manufacturer Code of Practice.

Separately, there is an international standards Committee – ISO TC 224/WG10 that is working to develop an international flushability standard. Australia is an active participant in the development of this standard.

#### Who was involved in drafting the Standard?

The ANZ Standard has been many years in the making. In 2014 WSAA initiated discussions between water utilities and peak bodies representing manufacturers of wipes products. Over the years these discussions evolved and it was agreed that the development of a Standard would provide a way forward in assisting all concerned parties, including customers.

The Standard was developed by a technical committee including manufacturers, water utilities, peak bodies and consumer groups. The members of the technical committee were:

- Australian Food and Grocery Council
- Water Services Association of Australia
- Standards New Zealand (SNZ)
- Consumers Federation of Australia
- Water New Zealand
- Australian Local Government Association
- Australian Water Association

- Water Industry Operators Association
- Accord Australasia Ltd
- Independent Chairperson (Australia)
- New Zealand Plumbers Gasfitters and Drainlayers Board
- New Zealand Food & Grocery Council
- EPA Victoria
- Engineers Australia

# Is the Standard voluntary?

Almost all Australian Standards are voluntary. However, for products to use a flushable logo they must meet the requirements of the Standard. If they have not met the Standard requirement and use the logo or any alternative that indicates that the product is flushable, they could be the subject of legal action. We are encouraging manufacturers of products to comply with the Standard, including the labelling requirements and will be following up with manufacturers of products that do not appear to have met the Standard and still indicate their product is flushable.

What type of products might NOT pass the criteria in the Standard?



Those that are not compatible with household plumbing, the wastewater network or the downstream environment. This includes products containing plastic, products that don't disintegrate to a high level, or those that cannot pass easily through pipework or pumps. Essentially products that do not behave like traditional toilet paper in the wastewater system (noting that toilet paper is also changing, moving from 2 ply to 3 to 6 ply, and the recent introduction of plastic into some toilet papers).



# Who does the testing?

At present, there are two international laboratories capable of doing the testing: SGS in the United States and CTP in France.

#### What does the test involve?

There are six tests and an attestation:

- 1) The product needs to clear a toilet and the drain line test indicative of plumbing on the customer property.
- 2) It needs to not block pumps or affect their power draw, both household level pumps and wastewater network pumps (2 tests).
- 3) It needs to break apart readily as it moves through the wastewater pipework to an extent that shouldn't cause blockages or fatbergs. After 60 minutes in forces similar to those of a wastewater pipe, the majority of the product should be in pieces smaller than 2.45cm square.
- 4) The product should sink and not float as it moves through a treatment plant
- 5) The product should degrade biologically so that it doesn't adversely affect treatment plant processes or leave a residue in the environment.



6) The manufacturer attests that the product does not contain any plastic. Plastics are known to cause environmental harm, even in small pieces. Rather than test for their presence the Standard requires that the manufacturer should attest that plastic is not present at all in the product.

#### Does this affect the 3Ps messaging in customer communications?

Now that the Standard has come into effect, we need to reinforce our messaging of what is and is not flushable by including reference to the Standard or to products that include the flushable logo.

We know the 3Ps messaging has been successful and widely used by water utilities in Australia and New Zealand. Options for new messaging include:

- Only flush the 3Ps and look for a flushable logo
- Only flush the 3Ps and look for products that pass the Flushable Standard
- Only flush the 4Ps poo, pee, (toilet) paper and PROOF look for proof that a product/wipe meets the Standard.