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Water District

Yorba Linda
Water District

June 18, 2015

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Ave, NW
Room CC-5610 (Annex D)
Washington, DC 20580

RE: Consent Agreement and Request for Public Comments In the Matter of Nice-Pak Products, Inc. File No. 132-3272

The Orange County Sanitation District (OCSD) appreciates the opportunity to comment on the proposed consent agreement between the Federal Trade Commission (FTC) and Nice-Pak Products, Inc. While fully supporting the draft decision, OCSD believes it should go one step further and require wet wipes to have a label in a prominent top of the package position, to assist consumers, that states: Not flushable – dispose in the garbage.

OCSD is directly impacted by the increase of products labeled as “flushable”. Wipes do not easily break down, causing clogs and sewage backups when flushed. These clogs increase maintenance costs and create a higher risk of sewage overflow that could be hazardous to public health and the environment. As part of our educational outreach, we are promoting the What2flush campaign to help guide residents and businesses on what is safe to flush.

We believe that the requirements for substantiating a claim of flushability as outlined in the proposed agreement are appropriate. It is important that standards are in place to help ensure that only dissolvable materials and dispersible human waste is flushed down the toilet. OCSD also believes that these requirements should apply to all wipes manufactured and sold in the United States.

OCSD also would like the FTC to consider the issues presented by wipes that contain plastic, since plastics in wastewater can reduce OCSD and other treatment agencies ability to recover wastewater resources.

Thank you for the opportunity to provide comments on the proposed consent agreement. If you have any questions or require further information, please contact me at (714) 593-7110 or via email at jherberg@ocsd.com.

Sincerely,

James D. Herberg
General Manager

