



# Washington Suburban Sanitary Commission

14501 Sweitzer Lane • Laurel, Maryland 20707-5901

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June 18, 2015

Ms. Edith Ramirez  
Chairwoman  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Suite CC-5610 (Annex D)  
Washington, DC 20580

**Re: Nice-Pak Products Inc. – Consent Agreement; File No. 132-3272**

Dear Chairwoman Ramirez:

The Washington Suburban Sanitary Commission (WSSC) supports the Federal Trade Commission's Consent Agreement with Nice-Pak Products, Inc. requiring manufacturers to prove that products advertised as "flushable" are actually safe to flush. One of the largest drinking water and wastewater service providers in the country, WSSC provides services to 1.8 million residents in Montgomery and Prince George's counties in Maryland, right outside of the Nation's Capital.

The use of "flushable" wet wipes, like those manufactured by Nice-Pak Products Inc., has negatively impacted WSSC's sewer system. A study conducted by *Consumer Reports* found that "flushable" wipes remain intact in water for over 30 minutes, while toilet paper disintegrates in eight seconds. Build-up of "flushable" wipes that have not disintegrated has the potential to cause blockages and damage to WSSC's 5,600 miles of sewer pipelines. The result can be system failures that potentially cause raw sewage leakages that result in soil and water contamination that may jeopardize public health. Additionally, WSSC and private property owners could potentially incur significant, unbudgeted costs to repair affected pipes. In recognition of the issues that "flushable" wipes can cause, WSSC launched a "Keep Wipes Out of the Pipes!" campaign in November 2013 to discourage our customers from disposing of "flushable" wipes by flushing them, and to only flush human waste and toilet paper. This Consent Agreement further supports WSSC's efforts to encourage customers to dispose of these wipes through other means.

WSSC urges the Federal Trade Commission to enact similar agreements that requires all "flushable" wipe manufacturers to prove that their products are indeed safe to flush and will disintegrate within a "sufficiently short amount of time". If the wipes are not found to be "flushable" under articulated standards,

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manufacturers should be required to prominently display labels on all packaging instructing consumers not to flush the wipes. Such requirements of all manufacturers are an important step in reducing adverse impacts on sewage systems across the country.

WSSC has been an active participant in ongoing discussions concerning this issue led by The National Association of Clean Water Agencies (NACWA), and the Association of Nonwoven Fabrics (INDA), the trade association for the industry's leading manufacturers. As the Federal Trade Commission articulates how a wipe is deemed "flushable", WSSC requests that wastewater industry professionals be included in evaluating whether the evidence supporting the "flushable" standard is reliable, and not a detriment to sewage systems.

WSSC applauds the Federal Trade Commission's commitment to this issue, and strongly supports the proposed Consent Agreement. WSSC is available as a source of industry knowledge, and is available for any questions that you or your staff may have. Please do not hesitate to contact me should you need additional information or any other assistance; I would also welcome the opportunity to host you and your staff at WSSC facilities for further discussions.

Thank you for allowing WSSC the opportunity to express support for the Nice-Pak Products, Inc. Consent Agreement that I firmly believe will help to ensure the safety of our sewer system, public health and the environment.

Sincerely,

Jerry N. Johnson  
General Manager/CEO