



WASTEWATER TREATMENT PLANT

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June 19, 2015

Federal Trade Commission
Office of the Secretary
Constitution Center
400 7th Street NW
5th Floor
Suite 5610 (Annex D)
Washington, DC 20024

Re: Nice-Pak Products – Consent Agreement
File Number 132 3272

The City of Bangor is a community of 33,000 located in the central coast of Maine. Our wastewater utility has, for some ten years, been dealing with flushed consumer products. The majority of these products do not readily disperse when flushed and have caused sanitary sewer overflows, failed pump stations and increased maintenance in our collection system. On June 18, 2015, we nearly experienced another sanitary sewer overflow but for the quick response from our sewer collection maintenance crew. The cause was the use of wipes at a nursing home.

The City of Bangor is pleased to see that the FTC's proposed settlement includes the need for a product marketed as "flushable" to disperse in a short period of time after flushing. Documentation of the behavior of these products under "real world" conditions has been severely lacking in many "flushable" products in the marketplace- those named in the settlement, and others.

We believe it's critical that a standard for "flushable" be implemented, so that the responsibility to demonstrate that a wipe disperses in "real world conditions" noted in FTC's settlement is applicable to all manufacturers of wipes marketed as flushable, not just manufacturers that elect to test their product under INDA's voluntary guidelines.

We also urge the FTC to develop a definition of "Flushable" for inclusion in its Green Guides, as it has for such terms and claims as "Compostable", "Degradable",

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“Recyclable”, and “Made with Renewable Content”. The Green Guides were developed by FTC to ensure that the claims made by a manufacturer about behavior of their products in the environment are truthful and non-deceptive- a need that applies directly to the product category addressed in the FTC’s proposed settlement.

Finally, we appreciate the opportunity to comment and please contact me if you have any questions concerning this submission.

Sincerely,



Bradley Moore
Superintendent
City of Bangor Wastewater Treatment Plant