GO WIPES CONFERENCE 2026

Stuck in the Pipes:

Global Gridlock on Flushability Standards—

But Is the Blockage Starting to Shift?

UK legislation • water sector reform • global ripple effects ahead of the SUPD review



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Principal Consultant
David E. James Consultancy Ltd

UK LEGISLATION
Setting a new global benchmark

WATER SECTOR REFORM
Driving clearer standards and accountability

GLOBAL RIPPLE EFFECTS
Influencing markets, brands and policy

AHEAD OF SUPD REVISION
A window of opportunity to unblock progress

WEDNESDAY 21 OCTOBER 2026

GO WIPES CONFERENCE 2026

LINDNER HOTEL COLOGNE CITY PLAZA

COLOGNE, GERMANY



DAVID E. JAMES CONSULTANCY

EXPERTISE. INNOVATION. IMPACT.

Driving sustainable solutions for the wet wipes industry

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PROFESSIONAL PROFILE

- 35+ years in the wipes and nonwovens industry.
- Principal Consultant at David E. James Consultancy Ltd.
- Former Chair, EDANA Wet Wipes Working Group (2020–2022).
- UK Expert on ISO Technical Committee TC224 Working Group 10 "on Flushable products".
- International speaker and advisor on regulation, flushability and sustainability.

QUALIFICATIONS AND PROFESSIONAL ASSOCIATIONS

LLM Environmental Law and Practice

PgDip Packaging Technology

Fellow (FTI) Textile Institute

Chartered Member IOM3 Institute of Materials, Minerals and Mining

APkgPrf Accredited Packaging Professional

DISCLAIMER

The views expressed in this presentation are my own and do not reflect any organisation / body. I am not expressing any views on behalf of or reflective of the GB delegation to ISO TC224WG10.

FOCUS Wipes production and sustainability

EXPERIENCE 30+ years in industry and research

VALUE Practical solutions for a sustainable future

COLLABORATION Working with industry and standards bodies

THE JOURNEY: SIX ACTS

From two decades of technical gridlock to a new contest between policy models

ACT 1 | THE GRIDLOCK
Twenty years of debate — and still no single global flushability standard.

ACT 2 | THE DEBATE SHIFTS
The question moves from how wipes should be tested to whether they should be flushed.

ACT 3 | THE ISO COMPROMISE
Consensus fails; ISO TS 18671 records a negotiated middle ground.

ACT 4 | THE UK POLICY BREAK
The WIS is withdrawn as legislation and water reform put infrastructure first.

ACT 5 | GLOBAL RIPPLES
Canada, Spain and the European Waste Water explore different standards and policy models.

"Reassessment of available options"

ACT 6 | THE NEXT DECISION
A new ISO proposal asks: convergence — or deeper fragmentation?

THE JOURNEY IN ONE LINE Testing gridlock → negotiated compromise → UK policy break → different international models → a new ISO decision → Other Options.

Speaker note / disclaimer

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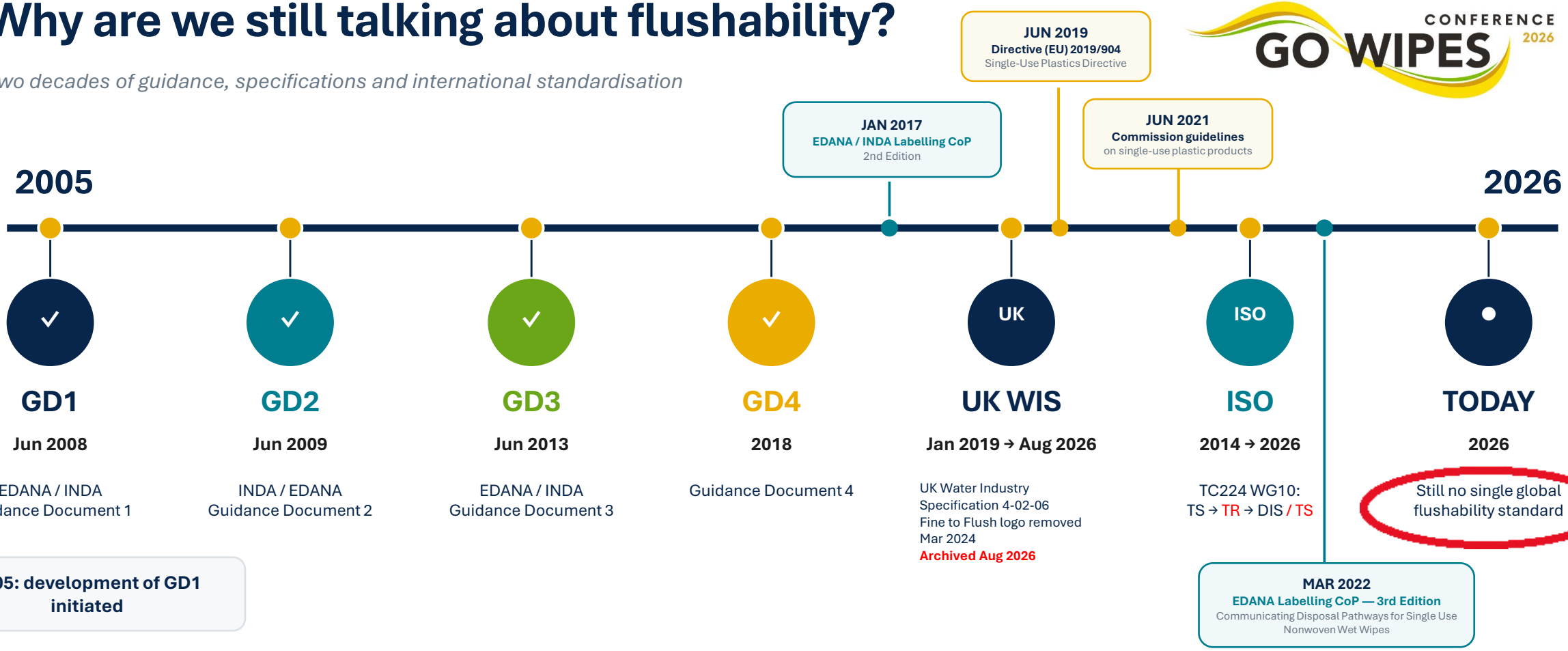
ACT I — THE GRIDLOCK

Twenty years of debate — and still no single global flushability standard.

Why are we still talking about flushability?

Two decades of guidance, specifications and international standardisation

GO WIPES CONFERENCE 2026



Twenty years later we still do not have one global standard.

WHAT HAS CHANGED SINCE GO WIPES 2025?

A fast-moving year for flushability standards, labelling, water policy and wet-wipe regulation

OCT 2024
ISO route changes
International Standard → Technical Specification after consensus could not be achieved.

03 NOV 2025
UK Parliament
Debate on banning plastic in certain plastic-containing wet wipes in England.

23 DEC 25– 17 MAR 26
EU SUPD review
Commission call for evidence: 579 feedback items; EurEau response significant.

20 JAN 2026
Vision for Water
UK Government response to the Cunliffe Review / Independent Water Commission.

MAR–MAY 2026
UK WIS archived
UK requests removal of WIS 4-02-06 references during DTS 18671 comments.

26 MAY 2026
DTS 18671 approved
21 of 24 P-members vote in favour; TS proceeds with UK WIS reference retained.

AUG 2026
ISO symbols
TC 145 approval concludes for DNF and OK-to-Flush; only DNF included in TS 18671.

12 AUG 2026
ISO TS18671:2026 published
Technical Specification published.

SEP 2026
NWIP route
Form 4 proposal planned for a new deliverable, potentially an International Standard voted on later in year.

18 DEC 2026
Wales ban starts
Plastic-containing wet-wipes ban begins; other UK nations follow during 2027.

THE STORY IN ONE LINE Consensus stalled → Technical Specification approved → ISO TS18671:2026 published → a potential new ISO route unlikely to open

UK Legislative implementation: Wales 18 Dec 2026 | Northern Ireland 18 May 2027 | England 19 May 2027 | Scotland 11 Aug 2027

ACT II — THE DEBATE SHIFTS

The central question moves from how wipes should be tested to whether they should be flushed.

CORE QUESTION FOR TODAY

HAS THE FLUSHABILITY DEBATE MOVED ON?

Make the most dispersible wipe. Position in UK until (ca) 2023

TESTING

THE TRADITIONAL QUESTION

How should flushability be tested? UK WIS or GD4?

OPINION

THE EMERGING QUESTION

Should wipes be flushed at all? (2026)

— at least in certain geopolitical regions- UK

THE MIDDLE GROUND

EurEau response to the SUPD Call for Evidence

Typical wet wipes are robust; **moist toilet tissue is different** and is designed to break up readily in the sewer.

Go beyond biodegradability: include dispersability, sewer-system behaviour and disintegration time, using clear pass/fail criteria.

Why? EPR/ Municipal WasteWater Treatment Directive/ SUPD Potential revision?

THE QUESTION IS SHIFTING FROM "HOW?" TO "WHETHER?"

Speaker note / disclaimer

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ACT III — THE ISO COMPROMISE

Consensus fails; ISO/TS 18671 records a negotiated middle ground rather than a final global answer.

ISO TS18671:2026 – Published

12th August, 2026

Available from:

https://knowledge.bsigroup.com/products/test-methodologies-for-assessing-the-compatibility-of-wet-wipes-and-moist-toilet-tissue-with-the-wastewater-collection-and-treatment-systems-and-appropriate-labelling

OPEN THE BSI PRODUCT PAGE ↗

£168.00
for non members

For BSI members, please log in to see your member price.



ISO

Technical Specification

ISO/TS 18671:2026

Test methodologies for assessing the compatibility of wet wipes and moist toilet tissue with the wastewater collection and treatment systems, and appropriate labelling

Edition 1
2026-08

Reference number
ISO/TS 18671:2026(E)

© ISO 2026

Not adopted as a GB National publication - it would have been prefaced by **PD.** The work has **not had British implementation** based upon the vote of the national committee

ISO Deliverables: IS, TS and TR

Why the distinction matters for ISO/DTS 18671



ISO terminology

INTERNATIONAL STANDARD

An International Standard provides rules, guidelines or characteristics for activities or for their results, aimed at achieving the optimum degree of order in a given context. It can take many forms. Apart from product standards, other examples include: test methods, codes of practice, guideline standards and management systems standards.

TECHNICAL SPECIFICATION

A Technical Specification addresses **work still under technical development**, or where it is believed that there will be a **future, but not immediate, possibility of agreement on an International Standard**. A Technical Specification is published for immediate use, but it also provides a means to obtain feedback. The aim is that it will **eventually be transformed and republished as an International Standard.**

- STILL UNDER DEVELOPMENT
- FUTURE AGREEMENT NOT IMMEDIATE
- AIM: INTERNATIONAL STANDARD

TECHNICAL REPORT

A Technical Report contains information of a different kind from that of the previous two publications. It may include data obtained from a survey, for example, or from an informative report, or information of the perceived "state of the art".

Source: ISO — Deliverables (accessed June 2026)

Consensus.

- *“consensus: General agreement, characterized by the absence of sustained opposition to substantial issues by any important part of the concerned interests and by a process that involves seeking to take into account the views of all parties concerned and to reconcile any conflicting arguments.*
  NOTE ***Consensus need not imply unanimity****.”*

- Source: **Document**: ISO/IEC Directives, Part 1 — *Consolidated ISO Supplement* (with IEC Supplement), Edition 2024 (Clause 2.5.6)



TYPICAL ISO DELIVERABLE (e.g. STANDARD) DEVELOPMENT PROCESS

A staged progression from proposal to publication — with repeated opportunities for expert comment and voting

PROPOSAL & DEVELOPMENT

FORMAL APPROVAL → PUBLICATION

Preliminary Work Item	New Work Item Proposal	Working Draft	Committee Draft	Draft International Standard	Final Draft International Standard	International Standard
PWI	NWIP	WD	CD	DIS	FDIS	IS
	COMMENTS & VOTING	COMMENTS & VOTING	COMMENTS & VOTING	COMMENTS & VOTING	COMMENTS & VOTING	



WHO SHAPES THE PROCESS?

WASTEWATER SERVICES

Publicly and privately owned services,
regulated as to performance, rates and fees.

MANUFACTURERS

Publicly and privately owned manufacturers
participating as technical experts.

The process is iterative: technical drafting is repeatedly tested through expert comments and formal voting.

HOW DID WE ARRIVE AT A TECHNICAL SPECIFICATION RATHER THAN AN INTERNATIONAL STANDARD?

The change in deliverable also changed the framing of the project.

JULY 2022 — ORIGINAL NWIP

TARGET DELIVERABLE : INTERNATIONAL STANDARD

"Method for determining products suitable to be flushed down a domestic toilet and establishment of appropriate labelling requirements".

ORIGINAL FRAMING

- Criteria for flushable products
- Products passing could carry a standard flushable label
- Tests across plumbing, sewerage infrastructure and environment
- Toilet paper excluded

NO VOTE

OCT 2024 CONSENSUS NOT ACHIEVED

OCTOBER 2024 — REFRAMED PROJECT

TARGET DELIVERABLE : TECHNICAL SPECIFICATION

"Test methodologies for assessing wet wipes and moist toilet tissue compatibility with the wastewater collection and treatment systems, and appropriate labelling".

REFRAMED POSITION

- 'Suitable to be flushed' wording removed
- Wet wipe and moist toilet tissue definitions introduced (Scope narrowed)
- Suggested Do Not Flush label only
- No positive label.

"Nothing was to "PROMOTE" flushability"

Work was reframed into a less prescriptive Technical Specification that could capture areas of agreement while leaving unresolved issues unresolved.

TC 224 SCOPE CONSTRAINT

The scope of TC 224 excludes development of a normative Standard setting normative targets or threshold values for "Water service quality criteria". The proposed Standard would therefore include methodologies without pass/fail criteria, identify and harmonise equivalent tests, and provide pass/fail criteria only as examples or recommendations.

THE PIVOT: from defining products suitable to flush → assessing wastewater-system compatibility and appropriate labelling

ISO/DTS 18671 — BALLOT RESULT (25th May 2026)

Draft Technical Specification approved — with comments

APPROVED

P-MEMBERS VOTED IN FAVOUR

21 of 24 **88%**

Approval threshold: ≥ 66.66%

P -MEMBER BODIES VOTED TO DISAPPROVE

3 of 24 **12%**

Disapproval limit: ≤ 25%

WHY DID THREE DELEGATIONS DISAPPROVE?

GREAT BRITAIN	Water UK was withdrawing WIS 4-02-06 "Fine to Flush"; GB requested removal of WIS 4-02-06 from the DTS bibliography and all references to it. The UK committee considered that, although the DTS may be useful to other countries**, its nature ran contrary to DEFRA guidance and the Water UK position**. The negative vote reflected that **policy position** — not a view that the TS was of poor quality.
JAPAN	Multiple testing methodologies could allow products that are not compatible with the target country to be accepted, particularly where no national standard exists. Japan considered that there should be only one testing method (except in a Technical Report).
SWEDEN	Swedish law does not permit anything other than pee, poo and toilet paper to be flushed. Sweden therefore opposed publication of ISO/DTS 18671, considering it contrary to Swedish environmental law.

Reasons summarised from delegation comments submitted with the ballot. P-members abstaining were not counted in the ballot calculation.

Delegations to ISO TC 224 WG 10

Active participation is the best strategy! — and for sure if the process is ever resurrected.

The wipes industry stakeholders are very much in the minority .

LIAISONS

INDA, EDANA, TC6.

EurEau is NOT a Liaison.

KEY MESSAGES

- Active participant in ISO TC224WG10.
- France is the Secretariat for the process.
- Delegations with nonwoven representation: USA, UK and Spain.
- United Kingdom consistently do not believe in flushables other than pee, poo and paper.

SUMMARY

14 delegations are countries in which there are potential EurEau members.

- **Argentina** — IRAM
- **Australia** — SA
  Active participant
- **Austria** — ASI
  Active participant
  Potential EurEau member
- **Bolivia, Plurinational State of** — IBNORCA
- **Canada** — SCC
  Active participant
- **China** — SAC
  Active participant
- **Czech Republic** — UNMZ
  Potential EurEau member
- **Denmark** — DS
  Potential EurEau member
- **Finland** — SFS
  Potential EurEau member
- **France** — AFNOR (Secretariat)
  Active participant
  Potential EurEau member
- **India** — BIS
  Active participant
- **Indonesia** — BSN
- **Ireland** — NSAI
  Active participant
  Potential EurEau member
- **Israel** — SII
- **Japan** — JISC
  Active participant
- **Kenya** — KEBS
- **Korea, Republic of** — KATS
- **Morocco** — IMANOR
- **Norway** — SN
  Participates at comments stage
  Potential EurEau member
- **Sweden** — SIS
  Participates at comments stage
  Potential EurEau member
- **Portugal** — IPQ
  Potential EurEau member
- **Russian Federation** — GOST R
- **Saudi Arabia** — SASO
- **Senegal** — ASN
- **Singapore** — SSC
- **Slovakia** — UNMS SR
  Potential EurEau member
- **South Africa** — SABS
- **Spain** — UNE
  Active participant
  Nonwoven representation
  Potential EurEau member
- **Switzerland** — SNV
  Potential EurEau member
- **Tunisia** — INNORPI
- **Uganda** — UNBS
- **United Arab Emirates** — MoIAT-STR
- **United Kingdom** — BSI
  Active participant
  Consistently do not believe in flushables other than pee, poo and paper.
  Nonwoven representation
  Potential EurEau member
- **United States** — ANSI
  Active participant
  Nonwoven representation
- **Egypt** — EOS
- **Germany** — DIN
  Potential EurEau member

LEGEND

- Secretariat — France (AFNOR)
- Active Participant in the Process
- Participates at Comments Stage
- Potential EurEau Member Delegations (14 delegations)
- Delegations with Nonwoven Representation *(USA, UK and Spain)*
- Other Delegations — Not currently active in the process

Note: *Classification reflects current status based on available information.*

195 countries in the world. 34 delegations to ISOTC224WG10

Table B.1 — Overview of known flushability methodologies and regions or countries of applicability (as of 2024).

Is TS18671:2026 a catalogue of worldwide test methods?

	INDA/ EDANA GD3[17][a]	INDA/ EDANA GD4[18][a]	UNE 149002[13][b]	IWSFG 2020[21][b]	Australian/ New Zealand Standard AS/NZS 5328[9][b]	Chinese Standard GB/T 40181[10][a]	UK WIS 4-02-06 Issue 1.2 [24][b]
Published	2013	2018	2019	2020	2022	2021	2019
United States of America		✓		✓			
Canada		✓		✓			
United Kingdom		✓					✓
Europe		✓					
Belgium	✓	✓					
Spain		✓	✓				
Israel		✓			✓		
Australia					✓		
New Zealand					✓		
Korea					✓		
China		✓				✓	

[a] Applies only to wipes products.
[b] Applies to all products.
GD4 based methodology

Source: ISO/TS 18671, Table B.1

TS 18671 CAPTURES THE END OF ONE PHASE OF THE DEBATE

The Technical Specification records a compromise that was already beginning to change by the time of publication.

WHAT DTS 18671 RECORDS

Coexistence of competing approaches

At the point the Technical Specification was developed, ISO/DTS 18671 still documented more than one methodological pathway.

PUBLICATION

WHAT WAS CHANGING

The UK was withdrawing from the compromise

- Water UK was withdrawing and archiving WIS 4-02-06.
- The UK delegation asked ISO secretariat to remove references to UK WIS before publication. This late request was not accepted by ISO Secretariat
- UK WIS therefore should not be presented as an enduring alternative international pathway.

THE KEY INTERPRETATION

TS 18671 is best read as a **snapshot of an unresolved compromise** — not necessarily a map of the future.

AS WRITTEN THE TS: A SNAPSHOT OF AN UNRESOLVED COMPROMISE

Two predominant methodologies are recognised — but they reflect different perspectives on wastewater-system protection.

GD4

One predominant methodology

- Assesses performance across the wastewater pathway
- Methodology should be adopted in full

THE TS DOES NOT SELECT ONE GLOBAL METHOD

The appropriate methodology should reflect the sewer infrastructure of the country concerned.

UK WIS

The other predominant methodology

- Assesses performance across the wastewater pathway
- Methodology should be adopted in full

WHERE THE COMPROMISE REMAINS

GD4-derived approaches use different operating conditions and pass/fail criteria.

Those differences reflect different perspectives on the level of protection required for wastewater systems.

THE RESULT: recognition of two established approaches — without resolving the underlying methodological divide.

WIS 4-02-06 Issue 1.2 November 2019 Fine to Flush: Specification for a testing methodology to determine whether a product is suitable for disposal through a drain or sewer system

WIS

Issue: **November 2019**

Code: **4-02-06**

Status: **Archived**

The Water Industry Standard on Flushability was developed to establish a minimum performance threshold for products marketed as flushable and to protect the sewer system. However, given the UK Government's forthcoming ban on plastic-containing wet wipes and the sector's longstanding public messaging that only the 3Ps (pee, paper and poo) should be flushed, Water UK has taken the decision to archive the Standard, and any references to product 'flushability'

Why ? :Only Pee, Poo and Paper is flushable.

https://standards-board.water.org.uk/document/WIS 4-02-06 Issue 1.2 November 2019 Fine to Flush: Specification for a testing methodology to determine whether a product is suitable for disposal through a drain or sewer system | Water UK Standards Board

THE UK(Water Industry) POSITION HAS FUNDAMENTALLY SHIFTED

From demonstrating wastewater-system compatibility to a much simpler disposal message

THE WIS POSITION

“Can this product be shown to be suitable for flushing?”

Certain non-toilet-paper products could be considered suitable for flushing if they met a sufficiently demanding wastewater-system compatibility specification.

TEST-BASED APPROACH

Drainline + sewer-system disintegration tests

DTS 18671 describes the UK drainline test as assessing sufficient disintegration to minimise blockage risks.

SHIFT

THE NEW POSITION

The question is no longer primarily about proving flushability.

ONLY PEE, POO AND TOILET PAPER
SHOULD BE FLUSHED

A simple behavioural rule replaces the earlier product-by-product compatibility pathway.

WHY THIS MATTERS

The UK (*Water industry*) has moved from **“which products can pass?”** to **“what should consumers flush?”**

THE MOST SIGNIFICANT PARTS OF THE TECHNICAL SPECIFICATION

Two levels of significance — one technical, one political / strategic

1

TECHNICAL SIGNIFICANCE

Clause 5.1 remains central

It acknowledges different methodologies, recognises infrastructure differences and explicitly prevents mixing individual tests from different methodologies.

2

POLITICAL / STRATEGIC SIGNIFICANCE

The context has moved on

The more important feature may now be the disconnect between the document being published and the position from which the UK Water Industry has subsequently moved away.

WHAT DOES THAT MEAN?

TS 18671 therefore potentially becomes a **transitional document** rather than the foundation of the eventual International Standard.

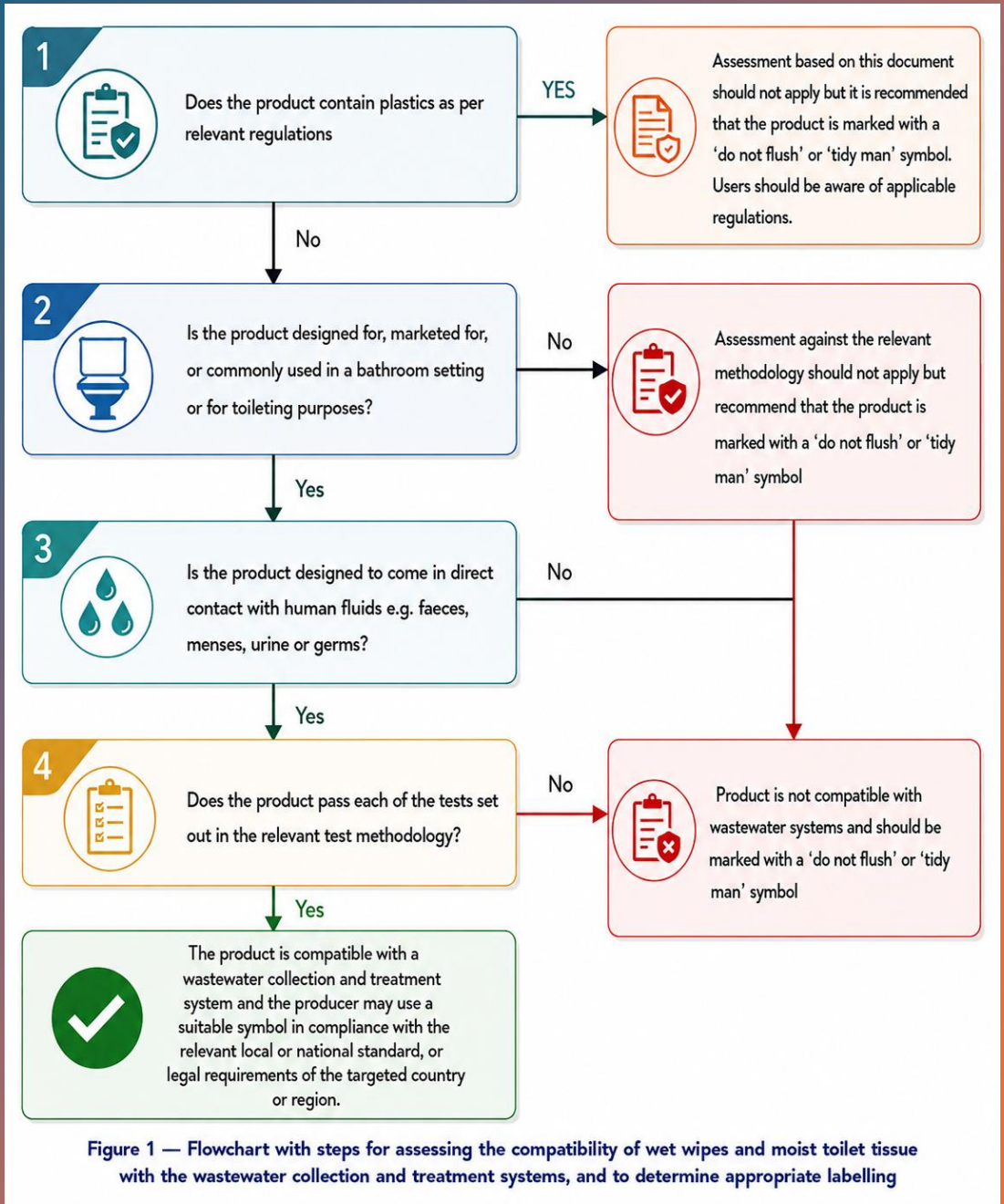


Figure 1 — Flowchart with steps for assessing the compatibility of wet wipes and moist toilet tissue with the wastewater collection and treatment systems, and to determine appropriate labelling

Figure 1 decision pathway
Pass relevant methodology → potentially compatible.
Fail → Do Not Flush.

Based upon ISO TS 18671:2026 (**Clause 5.1**)

NEW DO NOT FLUSH LOGO

Developed internationally with the wastewater & nonwovens industry

INTERNATIONAL DESIGN

A single, clear visual message: this product should not be flushed.

01

COLLABORATIVE DEVELOPMENT

Developed internationally with the wastewater and nonwovens industry.

02

ISO DESIGN CRITERIA

Developed according to ISO/TC 145 design criteria.

https://www.iso.org/obp/ui/en/#iso:grs:7001:PI_BP_022

THE SYMBOL



DO NOT FLUSH

Clear disposal instruction

ONE MESSAGE • ONE SYMBOL • DO NOT FLUSH

DO NOT FLUSH: Negative Labelling in Use Around the World

Different symbols – Same message

PRESCRIBED

1. ISO TS18671:2026



DO NOT FLUSH

International Technical Specification for assessing wet wipes compatibility and labelling.

2. EDANA DNF LOGO FOR PLASTIC FREE NON FLUSHABLE WIPES



Used for plastic free non-flushable wipes.

3. STANDARD EDANA DNF LOGO (ALSO PRESCRIBED IN SOME USA STATES)



Standard EDANA Do Not Flush (DNF) logo also prescribed in some USA States.

4. USA – WIPPES ACT DO NOT FLUSH LABELLING



DO NOT FLUSH

Requires the DNF symbol specified by reference to the INDA/EDANA Guidelines, together with the written "Do Not Flush" label notice.

5. SPANISH UNE STANDARD DO NOT FLUSH SYMBOLS



Two symbols prescribed by the Spanish UNE Standard for plastic free non-flushable products.

6. AUSTRALIA / NEW ZEALAND DO NOT FLUSH LOGOS (AS/NZS 5328:2022)



One symbol specified in AS/NZS 5328:2022.

7. EU SINGLE USE PLASTICS LABEL (PLASTIC CONTAINING WET WIPES)



EU Single Use Plastics marking for plastic containing wet wipes.

This label is prescribed in Spain as a DNF logo in UNE149002 for plastic containing wipes.

ONE MESSAGE – MANY SYMBOLS

DO NOT FLUSH



Multiple symbols can create confusion. A clear, consistent message is critical.

Sources: ISO, EDANA, USA WIPPES Act, UNE (Spain), AS/NZS 5328:2022 (Australia/New Zealand), EU (SUP Directive)

SOME OF THE MOST SIGNIFICANT PARTS OF THE TS

The **DEFINITIONS** matter: the document distinguishes moist toilet tissue, toilet paper and the much broader category of wet wipes.

MOIST TOILET TISSUE

Moist toilet paper

Prewetted nonwoven material intended for sanitary use after using the toilet.

NOTE 1 TO ENTRY

Products labelled as “moist toilet paper” are made from nonwoven material and are not considered as “toilet paper” for the purpose of this document.

TOILET PAPER

Bathroom tissue • Bath tissue • Dry toilet paper

Tissue paper intended for sanitary use after using the toilet.

NOTE 1 TO ENTRY

Products labelled as “moist toilet paper” are often made from nonwoven material and are not considered as “toilet paper” for the purpose of this document.

WET WIPE

Small piece of premoistened or prewetted material conceived, designed and placed on the market for single use (disposable), intended for personal care or domestic use.

NOTE 1 TO ENTRY

Personal care is intended to be used for hygiene purposes, these include cleansing and caring of skin of both adults and babies e.g. cosmetics, baby wipes, intimate care wipes.

NOTE 2 TO ENTRY

A domestic use wet wipe is intended to be used in domestic premises. These include wet wipes used for household cleaning purposes, e.g. wipes used to clean.

KEY POINT: “Wet wipe” is defined broadly, while moist toilet tissue is separately identified as a prewetted nonwoven sanitary product.

WHAT ISO/TS 18671:2026 ASSURES — AND DOES NOT ASSURE

A technical reference framework for wastewater-system compatibility — not, by itself, a national disposal policy

WHAT IT CAN PROVIDE

- Common definitions, scope and terminology for wet wipes, moist toilet tissue and toilet paper.
- A structured framework for assessing compatibility with wastewater collection and treatment systems.
- Recognition of established methodologies — with the relevant methodology followed in full.
- A technical basis for examining evidence behind product claims and for discussing appropriate labelling.
- A common reference point for comparison, stakeholder dialogue and future policy development.

WHAT IT DOES NOT PROVIDE

- One universal global flushability test or one globally harmonised set of pass/fail criteria.
- A UK legal or policy definition of what consumers should be advised to flush.
- An automatic right to describe a product as “flushable” or to carry a positive flushability label.
- A guarantee that a product is compatible with every sewer network, infrastructure type or operating condition.
- A substitute for national regulation, sewer-use policy or the UK water industry's wider precautionary position.

KEY DISTINCTION: demonstrating wastewater-system compatibility is not the same as deciding what consumers should be advised to flush.

HOW COULD ISO/TS 18671 POTENTIALLY BE USED?

A **DISCUSSION FRAMEWORK** for government, the water sector, regulators and industry (UK, Europe, rest of the world)

A TECHNICAL REFERENCE FRAMEWORK FOR STAKEHOLDERS — NOT, BY ITSELF, A POLICY DECISION ON WHAT SHOULD BE FLUSHED

1

COMMON LANGUAGE

Definitions, scope and terminology

2

TECHNICAL EVIDENCE

Recognised wastewater-compatibility methodologies **one ISO document, not one global test**.

3

LABELLING

A reference point for appropriate disposal labelling

4

POLICY INPUT

Evidence for future regulation and impact assessment

KEY DISTINCTION: demonstrating wastewater-system compatibility is not the same as deciding what consumers should be advised to flush.

POTENTIAL PRACTICAL USES FOR STAKEHOLDER MANAGEMENT

Where ISO/TS 18671 could add value without being treated as a regulatory pass/fail standard

01 **POLICY & REGULATION**

Inform future policy, regulatory impact assessment and **discussions on claims, disposal and labelling.**

02 **CLAIMS & EVIDENCE**

Provide questions for **scrutinising manufacturer evidence**: which methodology, was it followed in full, and what criteria were applied?

03 **LABELLING**

Support discussion of **Do Not Flush labelling** and help separate disposal messaging from positive flushability claims.

04 **STAKEHOLDER DIALOGUE**

Give government, water companies, regulators and manufacturers **a shared technical reference point. (In English !)**

05 **INTERNATIONAL ALIGNMENT**

Compare approaches used in other jurisdictions and distinguish technical differences from policy differences. The globalised world.

06 **FUTURE EVIDENCE BASE**

Provide a baseline if wider measures are later considered, while allowing e.g . UK policy to remain more precautionary.

WHAT DO WE ACTUALLY KNOW ABOUT NATIONAL USE OF ISO/TS 18671?

Separate confirmed positions from possible future use — ballot support is not the same as national adoption

KNOWN OPPOSITION / NON-IMPLEMENTATION

- **GREAT BRITAIN** — voted against the DTS; the published TS has not been implemented as a British national publication.
- **SWEDEN** — opposed publication because its position/law permits only pee, poo and toilet paper to be flushed.
- **JAPAN** — opposed the multiple-methodology approach; argued for a single testing methodology. A Technical report not a Technical Specification.

POTENTIAL REFERENCE USE

- Countries already using GD4 or GD4-derived approaches may be able to use ISO/TS 18671 as an international technical reference.
- It can support comparison of methodologies, terminology, evidence and labelling approaches.
- But this should not be presented as confirmed national adoption unless a country or standards body has said so.

NATIONAL DEVELOPMENTS

- **CANADA** — a Canadian national flushability standard is proceeding through CWWA/CSA, with test/pass-fail and labelling ambitions.
- **SPAIN, AUSTRALIA/NEW ZEALAND and CHINA** already have national or regional flushability approaches.
- These developments show continuing national activity, but do not by themselves prove adoption of ISO/TS 18671.

CURRENT EVIDENCE: formal national adoption or intended implementation of ISO/TS 18671 appears limited; approval in the ISO ballot should not be read as a commitment to adopt it nationally.

ACT IV — THE UK POLICY BREAK

The WIS is withdrawn as legislation and water-sector reform put infrastructure protection first.

JURISDICTION	TITLE OF REGULATIONS	STATUTORY INSTRUMENT NO.	MADE (YEAR)	ENTRY INTO FORCE	CORE PROHIBITION	KEY EXEMPTIONS	NOTABLE FEATURES
Wales 	*The Environmental Protection (Single-use Plastic Products) (Wet Wipes) (Wales) Regulations 2025*	SI 2025/716 (W.124)	2025	**18 Dec 2026** (GOV.WALES)	Ban on **supply (including free supply)** of plastic-containing wet wipes to **consumers**	Medical-use wipes	Earlier implementation; framed under broader *single-use plastic products* regime
England 	*The Environmental Protection (Wet Wipes Containing Plastic) (England) Regulations 2025*	SI 2025/1218	2025	**19 May 2027** (GOV.UK)	Ban on **sale and supply to end users**	Medical use; pharmacy sales under restrictions; business-to-business supply	More detailed retail restrictions (e.g. pharmacy display rules) Most **operationally detailed regime**
Scotland 	*The Environmental Protection (Wet Wipes Containing Plastic) (Scotland) Regulations 2026*	SSI 2026/75	2026	**11 Aug 2027** The Environmental Protection (Wet Wipes Containing Plastic) (Scotland) Regulations 2026	Ban on **supply to consumers/end users**	Expected: medical and similar exemptions	Latest commencement date; mirrors England model closely
Northern Ireland 	*The Environmental Protection (Wet Wipes Containing Plastic) Regulations (Northern Ireland) 2025*	SR 2025/178	2025	**18 May 2027** The Environmental Protection (Wet Wipes Containing Plastic) Regulations (Northern Ireland) 2025	Ban on **sale and supply** of plastic wet wipes	Medical use; aligned with UK approach	Closely aligned timing with England

But not manufacture !

The UK – a case study in regulatory evolution

Not just a plastic ban.

This is the story.

Where we are at NOW "**PRE-PIPE SOLUTIONS**":
LABELLING + BEHAVIOURAL CHANGE

STAGE 1

1

PLASTIC POLLUTION

Evidence of plastic and **MICROPLASTIC** in rivers, seas and ecosystems drives action. 1 year ago- **"WET WIPE ISLAND"**

STAGE 2

2

PLASTIC-FREE ALTERNATIVES



PLASTIC-FREE

Innovation delivers plastic-free wipes. Regulation removes plastic from wet wipes placed on the UK market(**mid 2027**) *in reality major retailers had stopped selling plastic containing wet wipes in **2022***

STAGE 3

3

CONSUMER BEHAVIOUR

What can I flush?



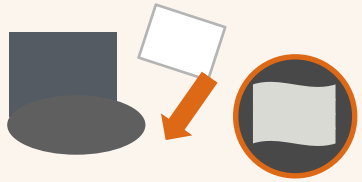
influences

Confusion remains. Some consumers believe "plastic-free" means "OK to flush".

STAGE 4

4

SEWER MISUSE



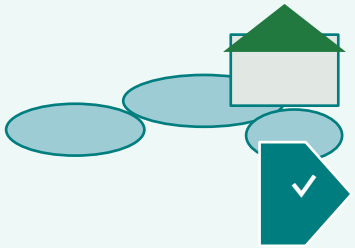
evidence

Wipes – plastic and plastic-free – are flushed. They can potentially cause blockages, pollution and overflows.

STAGE 5

5

INFRASTRUCTURE PROTECTION



Policy focus shifts to protecting wastewater systems and the environment.

The policy question shifts from "What is the wipe made from?" → "What happens when it is flushed?"

DEFRA SEWER MISUSE DISCUSSION FORUM

CONVENED BY DEFRA

Informal multi-stakeholder forum: reducing harm to wastewater systems and the environment from sewer misuse and blockages

Sewerage undertakers • Water-sector trade body • wipe manufacturers & brands • consumer organisations • environmental NGOs

House of Commons | 3 November 2025

Look at the official minutes of the two houses of the UK Government. The House of Commons (03/11/2025) (Excerpts)- **Total Cross party support** across **all four nations**.

(Reference UK Parliament (2025))

"This action is part of a wider commitment to encourage more sustainable behaviours around the consumption of single-use plastic. Ultimately, we want to encourage a shift towards reusable and/or plastic-free alternatives".

"I worked with water companies across the UK so that the campaigning on this issue would be less confusing. It was "fine to flush" in some areas and there were different campaigns by different water companies. Now there is a unified effort by all the water companies together to have the same public messaging(Bin The Wipe). The main message must be: do not flush any wipes. No wipes are fine to flush".

"Scotland has plans to bring this measure in soon, and in November 2024 the Northern Ireland Executive notified the World Trade Organisation of their intent to legislate. We look forward to the Northern Ireland Executive introducing their regulations as soon as possible, so that the whole of the United Kingdom is lined up on this issue".

*"I support the hon. Member for Putney and her injunction that people should stop flushing wet wipes down toilets. Unfortunately, this statutory instrument does not address that. I think the Minister could have taken the opportunity to impress upon the public that they must stop flushing wet wipes down into the sewage system. **They cause incredible blockages**, which cost millions of pounds to clear, put our water bills up, and pollute the environment. **Even if there are no plastics in them, they will continue to cause that nuisance**. We must not let it get into the consumer's mind,). The main message must be: do not flush any wipes. No wipes are fine to flush".*

*"I am extremely pleased to support the draft regulations, but I call on the Government to do more to tackle microplastic pollution in our waterways and **improve labelling to ensure that single-use wet wipes are clearly marked "Do not flush",** as so many hon. Members this evening have highlighted".*



THE DEBATE HAD ALREADY MOVED **BEYOND PLASTIC**.

House of Lords | 10 November 2025

Official minutes — selected excerpts

The House of Lords (10/11/2025)(excerpts). See UK Parliament. House of Lords(2025)

This is part of a wider commitment to encourage more sustainable behaviour around the consumption of single-use plastic. Ultimately, we want to encourage a shift towards reusable and/or plastic-free alternatives.

However, we will consider banning manufacture once the ban on supply and sale has come into force.

I take this opportunity to state that wet wipes should be binned, not flushed, regardless of whether they are plastic or plastic-free. When wrongly flushed, these products contribute to sewer blockages, which cause environmental harm, including pollution incidents and sewer flooding. The Government are supportive of campaigns that encourage the correct disposal of wet wipes, including Water UK's Bin the Wipe campaign, and of industry action and innovation in this space

Manufacturers must be called to account and stop labelling wet wipes as flushable or disposable. They must be improved with clear and precise labelling, because misleading labelling makes misleading claims and causes confusion with the general public—ultimately, we see blockages in sewers, flooding and environmental damage triggering storm overflows, as well as harm to marine and animal health. It is imperative that action is taken to reduce the amount of microplastics entering our waterways and destabilising our marine ecosystems. Labelling is non-negotiable. It has to change, with clear labelling saying: "Do not flush".

I have seen different figures but at least two-thirds—perhaps more—of the wet wipes being sold now do not contain plastic. This is not going to solve the sewage problem; that is terribly clear.

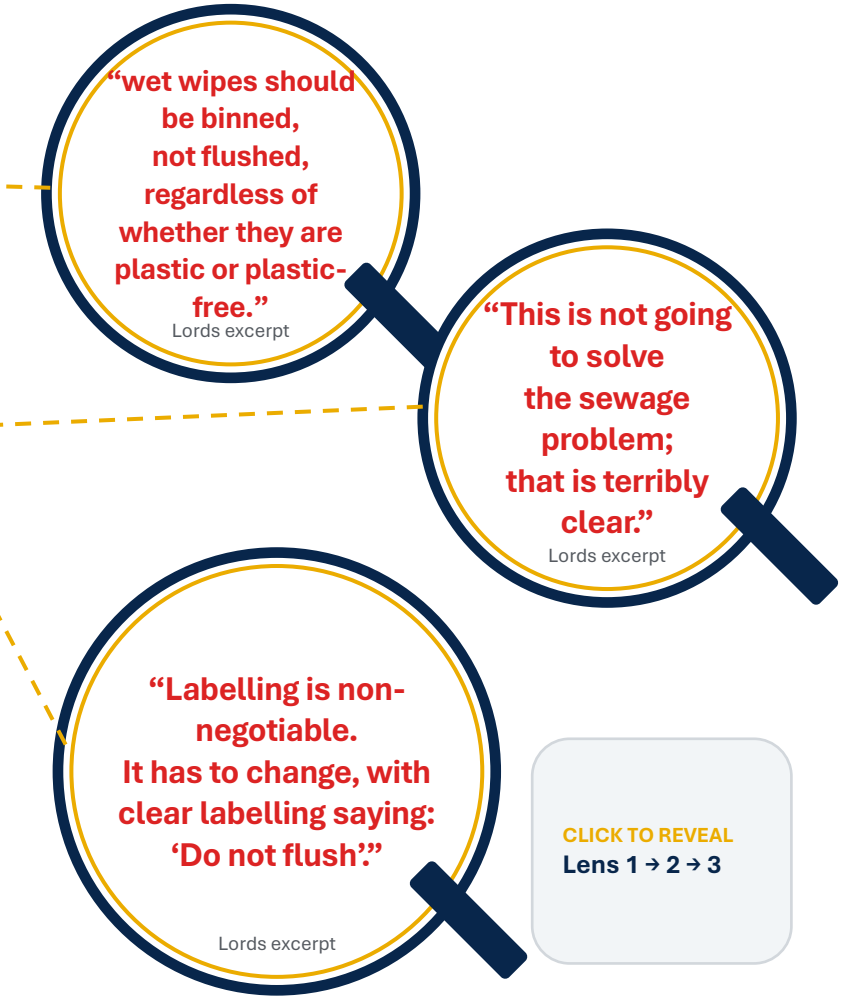
Can the Minister say what further measures the Government are considering? I know that there is a three-year review under this SI, but that is three years more of the kind of damage and human and environmental suffering that I have been talking about The Minister referred to the extended producer responsibility scheme; surely we could include all wet wipes in that now.

I have a specific question. I note that the impact assessment refers to plastic using the UK REACH definition, but the Marine Conservation Society has a specific question about whether lyocell and viscose are recognised as a form of plastic under that definition. The Marine Conservation Society says very clearly that they should be recognised as such because that is how they behave

A ban on plastic in wet wipes is welcome but, in terms of labelling, is it not time for all wet wipes to be classed as unflushable and for that to be said in large lettering on their packages?

Even so-called plastic-free wipes are not a simple solution. Whether they are made from cotton, bamboo or viscose, they remain single-use products with significant environmental footprints and the liquids they contain often include palm oil or chemical preservatives that can damage our rivers.

Lady Bennett, also asked about further action and why we are not going further and banning all wet wipes. Once we have implemented this, we will continue to review the evidence to determine whether we need any further action. The noble Baroness also mentioned extended producer responsibility. As she said, the Independent Water Commission recommended that the Government report on whether an extended producer responsibility scheme would be necessary to fund upgrades to water infrastructure. I reassure her that we are currently considering those recommendations and work is under way to investigate the necessity of an EPR scheme for wastewater in the UK. That work is taking place A number of noble Lords mentioned labelling. Mandatory labelling was not included in the 2023 consultation, and it is therefore not included alongside the ban, but we will consider whether it will be required to prevent wet wipes and other un-flushables being wrongfully flushed. We will also consider whether



The political message is broader than plastics: disposal behaviour, labelling and sewer impacts remain central.



UK GOVERNMENT WATER WHITE PAPER

JANUARY 2026

A blueprint for future water reform legislation

- We want to do better at addressing **the root causes** of pollution head-on. Therefore, **we are proposing a shift in focus towards 'pre-pipe' solutions.**

- To enable this shift, we will ensure **legislation, funding streams**, and **regulatory mechanisms support the delivery of pre-pipe solutions.**

- We will also take stronger action to make sure the public are not inadvertently contributing to this pollution. **We will do this by tackling sewer misuse** to prevent sewer blockages, which will help maximise sewerage capacity, reduce pollution incidents, and sewer flooding.

- We have already introduced legislation to ban wet wipes containing plastic, which will reduce plastic and microplastic pollution in our waters.

Read the full White Paper:

https://www.gov.uk/government/publications/a-new-vision-for-water-white-paper

PRE-PIPE SOLUTIONS TODAY. CLEANER WATER TOMORROW.
TACKLING THE ROOT CAUSES. PROTECTING OUR FUTURE.

GOOGLE ALERT SEARCH TERMS

Four searches used to monitor wet wipes, water companies and environmental coverage

01 **“UK water companies pollution incidents”**

02 **“Water UK / Wet wipes”**

03 **“Wet wipes environmental concerns”**

04 **“Flushing wet wipes”**

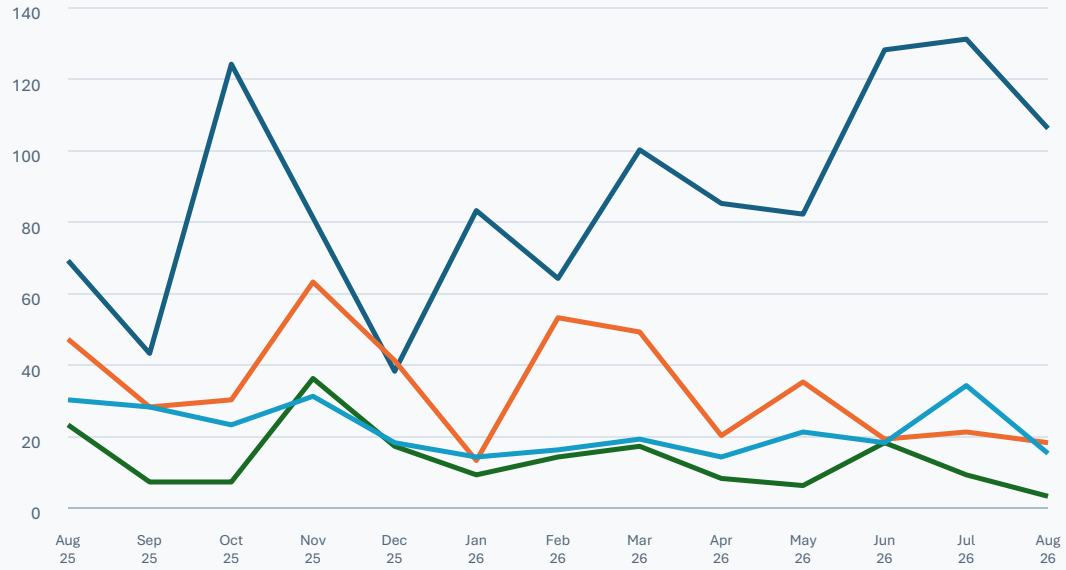
PRACTICAL TIP Use a separate Gmail account because Google Alerts can generate a high volume of email.

GOOGLE ALERT ACTIVITY: VOLUME AND DAILY INTENSITY

Four search terms monitored from August 2025 to August 2026

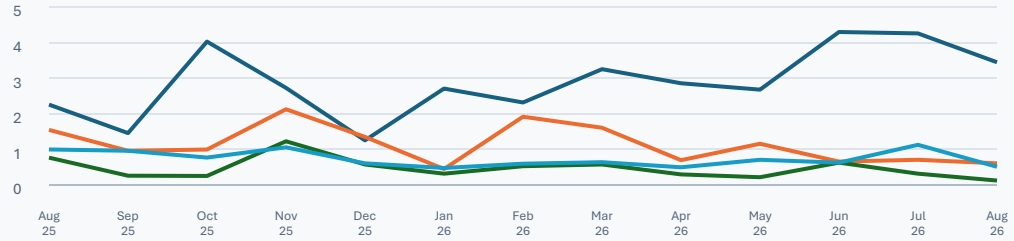
MONTHLY TOTAL

Total alerts recorded each month



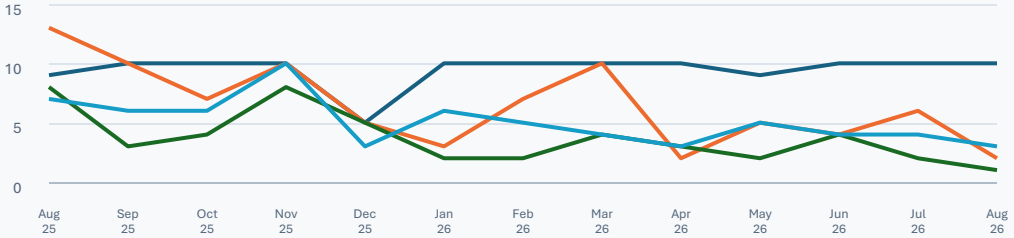
AVERAGE PER DAY

Daily average across each month



MAXIMUM IN ONE DAY

Highest daily count within each month



UK water companies pollution incidents

Water UK / Wet wipes

Wet wipes environmental concerns

Flushing wet wipes

KEY OBSERVATION

‘UK water companies pollution incidents’ generated the strongest and most persistent alert signal.

WHAT DOMINATED THE GOOGLE ALERT CONVERSATION?

Most frequent terms linked to ‘Flushing wet wipes’, August 2025 to August 2026

DOMINANT TERM

Sewerage undertakers

>10% of retained term occurrences



The monitoring period focused heavily on water-sector performance, pollution and accountability.

STRONG RECURRING THEMES

Pollution
Environment Agency
Blockages
Plastic ban
Water companies

≤1% >1% to ≤2% >2% to ≤10% >10%

Terms below 0.9% removed

Top 10 Emerging Topics from the Google Alerts — April to September 2026

New subject areas first appearing in the Google Alerts monitoring dataset

RANK	EMERGING SUBJECT	MENTIONS	FIRST APPEARED
1	**Class Action**	3	Jul 2026
2	**Education**	2	May 2026
3	Illegal connections	1	Apr 2026
4	Regenerated Cellulose	1	Apr 2026
5	Water UK	1	Apr 2026
6	Operator Self Monitoring	1	May 2026
7	Citizen Scientists	1	Jun 2026
8	Labelling	1	Jul 2026
9	Misconnections	1	Jul 2026
10	Water Reform Act	1	Jul 2026

Emerging discussion is broadening beyond blockages and pollution towards policy, accountability, behaviour and intervention.

“Sewer Misuse Discussion Forum”.

The discussion forum is **an informal space in which to discuss the joint aim of reducing harm to the wastewater system and environment from sewer misuse and sewer blockages. convened by DEFRA.**

Stakeholders include amongst others: The Sewerage Undertakers, Water company trade body , certain wet wipe manufacturers, certain wet wipe Brands, Consumer organisations for the water industry, Environmental NGO’s .

What is a Ten Minute Rule motion?

A backbench MP asks permission to introduce a Private Member's Bill.



Up to ten minutes to make the case

The proposing MP speaks for up to ten minutes.
An opposing MP may speak for the same time. It was not opposed!
The Commons decides whether to grant leave, with a vote if necessary.

What happens if the motion passes?

The Bill can enter the legislative process.
Further stages and Royal Assent are needed before it becomes law.



UK Parliament: Ten Minute Rule Bills (Standing Order No. 23)

Wet wipe labelling: pressure for legislation

Wet Wipes (Labelling, Sale and Marketing)

David Burton-Sampson MP (Labour) • Ten Minute Rule motion, 14 October 2026

The policy commitment

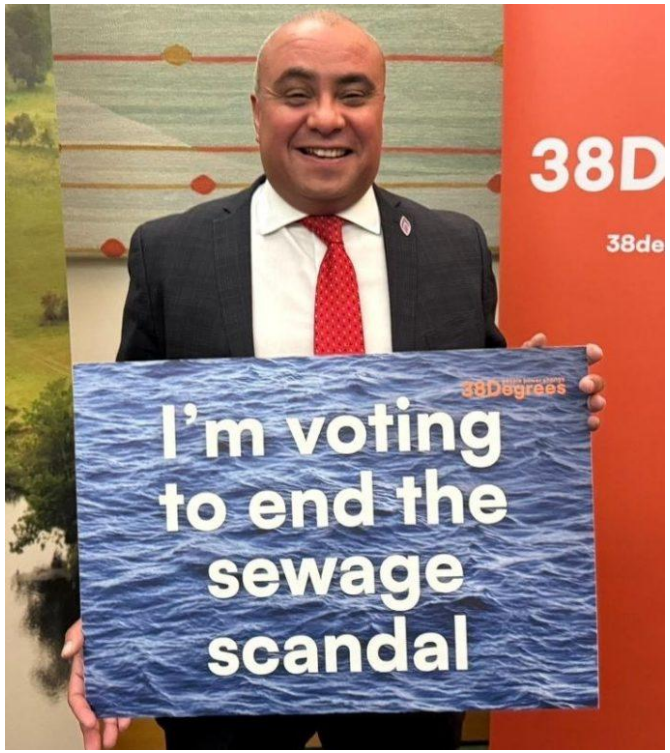
Following Cunliffe, A New Vision for Water commits to **pre-pipe solutions**, including tackling sewer misuse, supported by legislation.

Discussion alongside a parliamentary route

DEFRA's Forum provides a space for stakeholder dialogue.
The Commons granted leave and the Bill received its first reading on 14 October 2026.

Presenter's assessment: keeping pressure on Government

Mandatory disposal labelling should form part of the pre-pipe response. The motion keeps pressure on Government alongside DEFRA's discussions.



Sources: UK Parliament and DEFRA White Paper • Leave granted • First reading • Bill 156 • **Second reading scheduled 13 November**

The motion's **proposals**: labelling and proof

A clear disposal message

Encourage bin disposal and flushing only pee, poo and paper.
Put a visible non-flushable symbol on the front of relevant packs.

A conditional route for "flushable" claims

"Wipes that pass rigorous testing could continue to be labelled as flushable, but the onus should be on the manufacturer to prove that they will break down and cause no damage to the water system or to the plumbing of people's homes. Labelling should also clearly and prominently instruct consumers about restrictions, such as flushing only one wipe at a time".

The ISO technical specification enters the parliamentary debate

Burton-Sampson cited the specification published in August and called for water industry–manufacturer agreement on criteria for flushable moist toilet tissue.

Key question: how will a general "bin it" message align with conditional flushability?

Hansard, 14 October 2026 • Proposals in the speech, subject to the published Bill

ACT V — GLOBAL RIPPLES

Canada, Spain and the European Union explore different standards, labels and policy models.

CANADA: A NATIONAL FLUSHABILITY STANDARD IS NOW PROCEEDING

CWWA (Canadian Water & Wastewater Association)has announced an official project with CSA (Canadian Standards Association) to develop and publish a Canadian national standard for flushable products.

OFFICIAL PROJECT LAUNCHED — **CWWA Board resolution: 30 June 2026 • CSA "seed document" now being prepared**

POTENTIAL SCOPE

1. **Define "flushable"** — Define the qualities and characteristics of products that may be disposed of via the toilet.
2. **Test + pass/fail** — Establish test methods and pass/fail criteria to determine whether products possess those qualities.
3. **Designate a symbol** — Designate a symbol for packaging of products that conform to the standard.
4. **Labelling criteria** — Establish appropriate labelling criteria for products tested under the standard.

PASS / FAIL + PACK LABELS (Binary product architecture)



PASS

ISO 7001 • PI BP 023
"Suitable to flush down a toilet"



FAIL

ISO 7001 • PI BP 022
"Do not flush down a toilet"

The 4 p's (Pee, Poo, Paper & PROOF)

FROM VOLUNTARY STANDARD → ENFORCEABLE RULES ?

Local sewer-use bylaws
Provincial / territorial wastewater legislation
Federal / Competition Bureau recognition of "flushable" claims

2-YEAR DEVELOPMENT PROCESS | **≈ C$250,000 PROJECT FUNDING** | **WASTEWATER + ACADEMIA + MANUFACTURERS** | **NORTH AMERICAN AMBITION ??**

CWWA background / advocacy | ISO PI BP 022 | ISO PI BP 023 | CWWA: "Yes Virginia..."

Where is Europe moving?

A common direction on people, places and the pipes

EUROPE IS BEGINNING TO FOCUS ON

CONSUMER BEHAVIOUR
Information, education and behaviour change

WASTEWATER COSTS
Rising treatment costs borne by water users and taxpayers

EPR
Micropollutants in Urbanwastewater

DNF
Clear labelling and communication: Do Not Flush

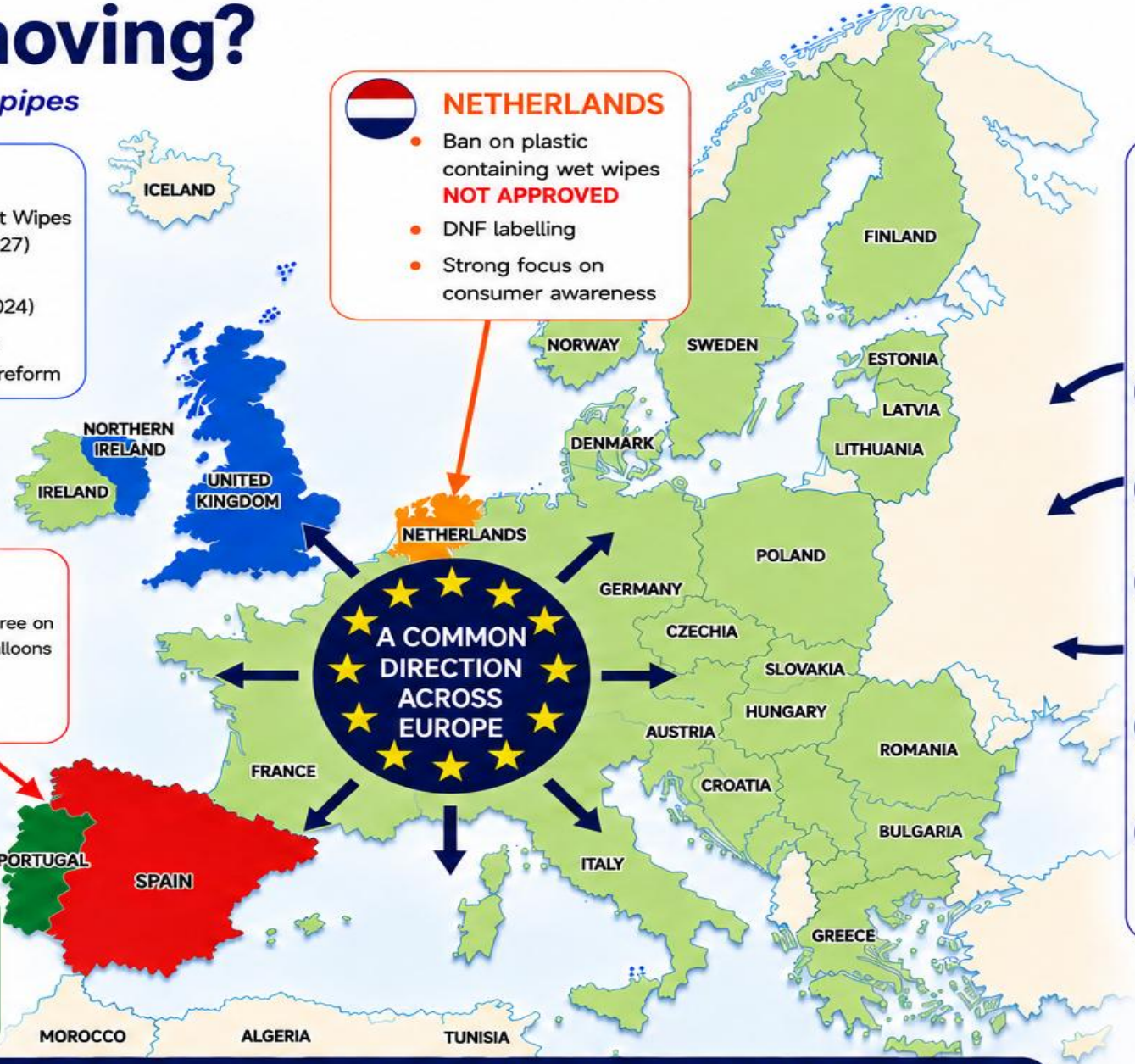
SEWER PERFORMANCE
Reducing blockages, improving resilience and protecting the environment

UK
- Plastics in Wet Wipes Ban (2026/2027)
- Fine to Flush withdrawn (2024)
- DNF labelling
- Water sector reform

NETHERLANDS
- Ban on plastic containing wet wipes **NOT APPROVED**
- DNF labelling
- Strong focus on consumer awareness

SPAIN
- Draft Royal Decree on wet wipes & balloons
- DNF labelling
- EPR in scope

PORTUGAL
- Working towards measures on wet wipes
- DNF labelling
- EPR under discussion



EU SUPD (Directive 2019/904)

- Harmonised approach across the EU
- Polluter Pays Principle
- EPR to cover awareness raising, litter clean up, data gathering & reporting
- DNF as a key tool to change behaviour
- Driving better environmental protection

ONE GOAL: HEALTHIER PEOPLE • CLEANER ENVIRONMENT • SUSTAINABLE SERVICES

Through shared responsibility and smarter policies

Influencing factors | National actions | Converging towards common goals | Different routes – same destination

SUPD(Single use Plastics Directive) EVALUATION — MORE THAN ONE CONSULTATION

The Commission's evidence-gathering extended beyond the PUBLICLY VISIBLE Call for Evidence.



WHY DOES THIS MATTER?

The publicly available Call for Evidence responses are only part of the evidence being considered. The separate Targeted Consultation provided a considerably more detailed route for selected stakeholders and experts to influence the evaluation.

NOT YET PUBLISHED / CONFIRMED

- No Commission synopsis/results of the Targeted Consultation identified
- No published Commission conclusions on the stakeholder evidence
- No evidence yet that the Commission has considered oradopted a particular position on wet-wipe flushability or dispersibility

PUBLIC CONSULTATION ↗

TARGETED CONSULTATION — CLOSED ↗

STAKEHOLDER SUBMISSIONS SHOW WHERE ORGANISATIONS WANT POLICY TO MOVE — NOT YET WHERE THE EUROPEAN COMMISSION INTENDS TO MOVE.

ARE OTHER GEOGRAPHICAL REGIONS STARTING TO THINK DIFFERENTLY?

EurEau — a trade body for the European water and wastewater industry (**GREATER EUROPE (Including UK)** not just the EU 27)

ANNUAL REPORT 2025

"THE TOILET IS NOT A BIN"

"**We coordinated our members' input to the ISO standardisation work on the flushability of certain products.**

Following our intervention, ISO decided to take up most of our comments and publish their paper as a technical report.**

We held discussions with the wet wipe producer organisation, EDANA, to raise their understanding of the problems their products cause to the sewer infrastructure."

** **EurEau terminology;** ISO subsequently published ISO/TS 18671:2026 as a Technical Specification

Source: **EurEau Annual Report 2025**, p.15 (July 6,2026)

OPEN REPORT ↗

SUPD CALL FOR EVIDENCE

A MORE NUANCED DISTINCTION?

"Typical wet wipes are designed to be robust whether or not they contain plastics.

Moist toilet tissue on the other hand is a different type of wipe, which is designed to behave like toilet paper and break up readily in the sewer."

"We need to go beyond biodegradability and include dispersability in sewer systems and disintegration time. A regulation proposed by the Spanish government establishes strict pass/fail criteria to clearly identify those products that negatively affect the sewer system due to insufficient dispersibility". ***(This is reference to a Draft Spanish Royal decree that further references the Spanish Flushability standard EN140092:2022***

EurEau response — March 2026 (pp.44 of comments)

VIEW FEEDBACK ↗

A POSSIBLE SHIFT? From a simple "do not flush" message towards discussion of dispersibility, disintegration and product differentiation.

Spain Draft Royal Decree on Wet Wipes and Balloons

Implications for Manufacturers & Brand Owners Marketing Wet Wipes in Spain

A shift from plastic content towards sewer-system impacts, consumer behaviour and EPR obligations

KEY REGULATORY CHANGES



1 Scope Extends Beyond Plastic

- ✓ Plastic-containing wipes included
- ✓ Plastic-free wipes (e.g. viscose, lyocell) may also be within scope
- ✓ Compliance can no longer be assessed solely by plastic content



2 Disposal Behaviour Becomes a Regulatory Focus

- ✓ Toilet disposal prohibited for most wet wipes
- ✓ Consumers directed towards residual waste streams
- ✓ Greater emphasis on "Do Not Flush" messaging



3 Extended Producer Responsibility (EPR)

- ✓ Mandatory producer registration
- ✓ Membership of an approved EPR scheme
- ✓ Annual reporting obligations
- ✓ Potential appointment of a Spanish Authorised Representative



4 Wastewater Costs Enter the Equation

Producers may be required to contribute towards:

- Sewer-cleaning costs
- Wastewater infrastructure impacts
- Litter clean-up
- Consumer awareness campaigns

WHAT THIS MEANS FOR INDUSTRY



Product Development

- Dispersibility may become increasingly important
- Plastic-free does not automatically mean compliant
- Future ecodesign requirements are possible



Brand & Marketing

- Claims such as "biodegradable" likely to face greater scrutiny
- Consumer disposal instructions become more important
- Flushability claims may require stronger substantiation



Commercial & Compliance

- Additional EPR costs likely
- Registration and reporting obligations increase
- Wastewater impacts may influence future fee structures

POTENTIAL REGULATORY SHIFT

FROM "Does the wipe contain plastic?"

→

TO "Does the wipe create environmental and wastewater-management impacts?"

Source: Spanish Ministry for Ecological Transition and the Demographic Challenge (MITECO), Draft Royal Decree Regulating the Management of Waste from Wet Wipes and Balloons, Public Consultation Draft, 27 May 2025.
Available at: https://www.miteco.gob.es/content/dam/miteco/es/calidad-y-evaluacion-ambiental/participacion-publica/anexos/sgresiduos/toallitas-y-globos/250527%20Borrador%20Texto%20RD%20Toallitas%20y%20Globos.pdf

DRAFT – For consultation purposes only
Subject to change

One wipe — potentially two EPR regimes

Different legal triggers. Different environmental externalities. The same polluter-pays logic.

***

Future significance: the Directive expressly requires review of a possible EPR system for products generating microplastics in urban wastewater.

DIRECTIVE (EU) 2019/904 — SUPD

Trigger: plastic-containing single-use wet wipe

Pre-wetted personal care + domestic wipes

- Addresses single-use plastic waste and litter
- Wet-wipe EPR covers awareness raising, litter clean-up and data gathering/reporting
- Plastic-free substrate can move a wipe outside this wet-wipe SUPD scope
- But changing the substrate does not necessarily change what enters wastewater

EXTERNALITY: PLASTIC / LITTER

DIRECTIVE (EU) 2024/3019 — UWWTD RECAST

Trigger: Annex III product classification

Currently:Human medicinal products + cosmetic products

- Addresses micropollutants in urban wastewater. Monitoring obligations for microplastics in "Influent" and "Effluent" and in sewage sludge. The **CURRENT** EPR framework **does not cover MICROPLASTICS**
- By 31 Dec 2028, producers fund ≥80% of specified quaternary-treatment and monitoring costs
- A plastic-free cosmetic wipe may still be relevant if its substances/residues generate micropollutants
- Directive also requires consumer information on inappropriate disposal

EXTERNALITY: MICROPOLLUTANTS / WASTEWATER

KEY POINT: Removing plastic may address SUPD exposure — it does not automatically remove Potential future UWWTD EPR exposure.

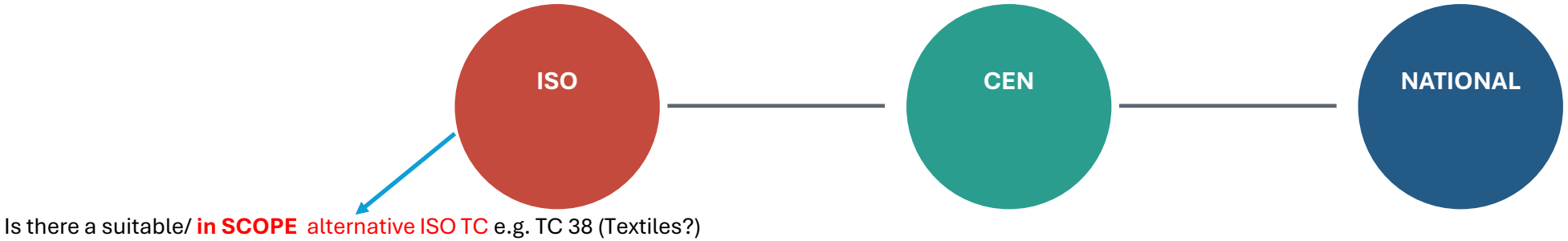
The recast Directive does NOT currently state that Article 9 EPR funds may be used for routine sewer-unblocking costs. Likewise, a shed microfibre is not automatically an Article 9 'micropollutant' cost. These are policy possibilities / future questions, not present Article 9 entitlements.

My reasoned judgement



ACT VI — THE ROUTE DIVERGES

The anticipated ISO proposal via TC 224 may not proceed.
Does standardisation now move from one global route to distinct regional models?



Comité Européen de Normalisation

Scenario

A POTENTIAL NEW WORK ITEM PROPOSAL (NWIP)— WITHOUT UK WIS

Removing UK WIS changes the nature of the apparent UK *disagreement:* less about competing test methods, more about whether wet wipes should enter the sewer at all.

UNLIKELY TO OCCUR

PRESENT DTS

A technical compromise between methodologies

GD4 FAMILY
GD4 / GD4-derived approaches

↔

UK WIS
Alternative UK test methodology

UK WIS provided a technical bridge: different tests, but a **shared premise that sufficiently sewer-compatible wipes could be identified by testing.**

UK WIS REMOVED

POTENTIAL FUTURE INTERNATIONAL STANDARD

A more fundamental divide



GD4 / GD4-DERIVED
IWSFG • Australia/NZ • Belgium • China / Spain

VS

Apparent UK POLICY? (Water Industry)
No wet wipe should be considered flushable

The apparent UK position is no longer another test methodology; it is a policy position about what should enter the sewer in the first place.

IMPLICATION FOR CONSENSUS

Removing the technical bridge may make an International Standard simpler technically — but harder politically.
A lot depends on the views of the 33 other delegations……

FROM EXPECTED VOTE TO **UNCERTAIN NEXT STEP**

WHY THE ISO ROUTE MAY NOW "*PAUSE*"



My reasoned judgement

The Form 4 proposal was prepared—but the conditions needed to carry it forward have changed.

ROLE CHANGE	Current WG10 leadership capacity has shifted (Today lead is Australia, Previously led by Canada)
POLICY DIVERGENCE	The proposal does not align with the direction retained by Australia and New Zealand. (No Positive label)
LEADERSHIP GAP	No successor or project leader is yet identified.
PROJECT CONSEQUENCE	Without renewed leadership and member support, WG10 is unlikely to progress the proposal. I believe the group becomes DORMANT 6 months after deliverable publication ~ February 2027?

THE BARRIER MAY NOW BE THE ABSENCE OF A COALITION TO CARRY THE WORK FORWARD.

IF NOT ISO—COULD CEN PROVIDE A EUROPEAN ROUTE?

My reasoned judgement



Potentially yes—but it would require a defined policy need, suitable committee ownership and active European support.



1

POLICY NEED

EU / UK stakeholders define the purpose and scope

2

PROPOSAL

A CEN national memberr—introduces new work item proposal

3

OWNERSHIP

CEN assigns an existing TC or creates a suitable structure.
Currently 322 Technical committees

4

SUPPORT

National members commit experts and resources

5

DELIVERABLE

EN or CEN/TS is developed and nationally adopted

Likely first discussion point: CEN/TC 165 Wastewater engineering/ CEN 248 – Textiles and textile products .
while recognising that CEN must decide the correct technical home.

CEN COULD CONNECT EU AND UK TECHNICAL PRACTICE—NOT AUTOMATICALLY THEIR LAWS OR LABELLING POLICY.

ONE TEST FRAMEWORK—TWO DIFFERENT POLICY PURPOSES

Technical wastewater-compatibility tests do not determine how passing products may be communicated.

My reasoned judgement

EUROPE + UK

EVIDENCE MODEL

- Demonstrate wastewater compatibility
- Manufacturer retains the test report (the 4th "P" PROOF)
- Evidence may support regulatory assurance and due diligence
- No positive 'flushable' claim or logo envisaged

AUSTRALIA + NEW ZEALAND , CANADA also likely

COMMUNICATION MODEL

- Determine eligibility for flushability claims
- Testing linked to a recognised standard
- Passing products may use approved terminology or a logo
- **Education** distinguishes flushables from non-flushables

THE TESTS MAY BE SIMILAR—BUT THE PURPOSE AND CONSUMER MESSAGE ARE FUNDAMENTALLY DIFFERENT.

WHAT WOULD PASSING THE STANDARD ACTUALLY SHOW?

A wastewater-compatibility result is technical evidence—not automatic legal immunity.

My reasoned judgement

WHAT IT COULD PROVIDE

- Evidence that the product was assessed against defined criteria
- A documented basis for regulatory dialogue
- Support for demonstrating reasonable care or due diligence
- A common technical language for manufacturers and wastewater operators

WHAT IT WOULD NOT AUTOMATICALLY PROVIDE

- Permission to label a product ‘flushable’
- A defence against every blockage claim
- Immunity from enforcement or civil liability
- A guaranteed reduction in any fine or damages



Is consensus finally possible?

OLD DEBATE

- Plastic
- Flushability
- Testing
- Arguments

THE DEBATE HAS SHIFTED TO

SHARED RESPONSIBILITY

NEW DEBATE

- Infrastructure
- Behaviour
- Wastewater
- Labelling
- Producer responsibility

THE CONVERSATION HAS EVOLVED.

FROM PRODUCT FOCUS TO SYSTEM SOLUTIONS.

A COMMON DIRECTION FOR PEOPLE, PLACES AND THE PIPES.

BETTER OUTCOMES TOGETHER | PROTECTING OUR ENVIRONMENT | BUILDING TRUST AND TRANSPARENCY | DELIVERING SUSTAINABLE VALUE

Five Take-Home Messages

From technical specification to the wider policy question

1. **ISO/TS 18671:2026 is an important milestone — not the end of the journey.**
2. The debate is moving beyond plastics towards sewer-system performance.
3. Governments are increasingly regulating disposal behaviour rather than simply product composition.
4. Regional harmonisation of standards remains achievable global harmonisation still has some way to go.
5. **Manufacturers should prepare for a future in which infrastructure protection is as important as material selection.**

Perhaps the biggest shift is not technical.

IT IS POLITICAL.



DAVID E. JAMES CONSULTANCY

THANK YOU !
Any Questions?

- David E. James
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References

Canadian Wastewater Association (2026). Advocacy. Available from: https://cwwa.ca/advocacy/#flushable (Accessed: October,2026)

Directive(EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment(Text with EEA relevance). OJ. L155,12:69019. pp.1-19. Available from: https://eur-lex.Europa.eu/eli/dir/2019/904/oj/eng (Accessed: October,2026).

Directive (EU) 2024/3019 of the European Parliament and of the Council of 27 November 2024 concerning Urban wastewater treatment (recast)(Text with EEA relevance) . OJ.L 2024/3019,12.12.2024. Available from: https://eur-lex.Europa.eu/eli/dir/2024/3019/oj/eng (Accessed: October,2026).

EurEau(2026). Annual Report . Available from: https://eureau.org/publications (Accessed: October,2026).

European Commission(2025).Rules on Single-Use plastic and fishing gear (Evaluation). Call for evidence for an evaluation- Areas(2025) 11556597. Available from: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14422-Rules-on-single-use-plastics-and-fishing-gear-evaluation_en (Accessed: October,2026).

European Commission(2026). Evaluation of the Single-use Plastics Directive (EU) 2019/904 – Targeted Consultation. Available from: https://ec.Europa.eu/eusurvey/runner/806dd425-4243-f303-1888-40e63a75dfcd (Link vaporised June,2026).

Gobierno De Espana(2025). Draft , Draft Royal decree regulating the management of wet wipes and balloon waste. Available from: https://www.miteco.gob.es/en/Calidad-y-evaluacion-ambiental/participacion-publica/proyecto-de-real-decreto-por-el-que-se-regula-la-gestion-de-los-.html (Accessed: October,2026)

Gov.uk(2025). Independent Report. Independent Water Commission: review of the water sector. Available from: https://www.gov.uk/government/publications/independent-water-commission-review-of-the-water-sector (Accessed: October,2026).

Gov.uk(2026) Policy Paper. A new vision for water: White paper. Available from: https://www.gov.uk/government/publications/a-new-vision-for-water-white-paper (Accessed: October,2026).

References

Hansard(2026). Wet wipes (Labelling, Sale and Marketing). Volume 791: debated on Wednesday 14th October 2026. Available from: https://hansard.parliament.uk/Commons/2026-10-14/debates/5ACE402C-2A2D-4667-BB92-5665C541B772/WetWipes(LabellingSalesAndMarketing) (Accessed: October,2026)

INDA(2018).Guidelines for assessing the flushability of disposable nonwoven products. A process for assessing the compatibility of disposable nonwoven products with plumbing and wastewater infrastructure. pp.32. Available from: https://www.edana.org/how-we-take-action/topics/flushability (Accessed: October,2026)

ISO(2024). ISO/IEC Directives Part 1. Procedures for technical work-Consolidated ISO supplement-procedures specific to ISO. ISO, Geneva, Switzerland. Available from: https://www.iso.org/sites/directives/current/consolidated/index.html (Accessed: October,2026).

ISO(2026(a)).ISO TS18671:2026. Test methodologies for assessing the compatibility of wet wipes and moist toilet tissue with the wastewater collection and treatment system, and appropriate labelling(Edition 1). ISO. Geneva, Switzerland.pp.26.Available from: https://www.iso.org/standard/85341.html (Accessed: October,2026).

ISO(2026(b)). ISO deliverables. The different types of ISO publications. ISO. Geneva, Switzerland. Available from: https://www.iso.org/deliverables-all.html (Accessed: October,2026).

ISO (2026©).ISO7001-PI BP022. Do Not Flush down a toilet symbol. Available from:**https://www.iso.org/obp/ui/en/#iso:grs:7001:PI_BP_022** (Accessed: October,2026).

ISO(2026(d)). ISO7001-PI-BP023.Suitable to flush down a toilet symbol. Available from: **https://www.iso.org/obp/ui/en/#iso:grs:7001:PI_BP_023** (Accessed:October,2026).

ISO /TC224 (2026). Drinking water, wastewater and stormwater systems and services. ISO. Geneva, Switzerland .Available from: https://www.iso.org/committee/299764.html (Accessed: October,2026).

References

Jachimowicz,P.,Oainska,A.,Cuprys,A.,Dimante-Deimantovica,I.,Cydzik-Kwiatkowska,A.,Kolbusz,J.,Vrablova,M.(2026). Wastewater treatment infrastructure in the European Union and micropollutant removal under the recast Urban Wastewater treatment Directive. Emerging Contaminants. Vol 12. 4. pp1-12. Available from: https://doi.org/10.1016/j.emcon.2026.100731 (Accessed: October,2026).

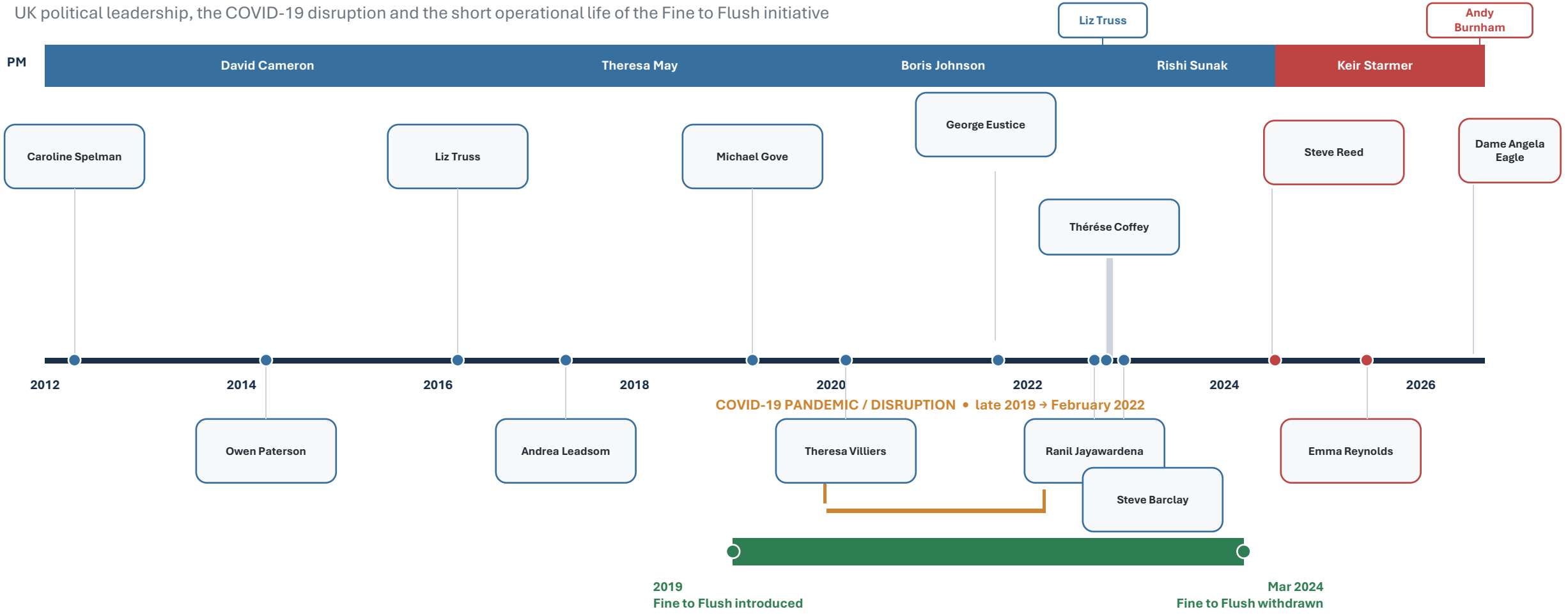
Ware, D. (2026). MP to propose restrictions on “Flushable” wet wipes labelling. Water Magazine. 12th October. Available from : https://www.watermagazine.co.uk/2026/10/12/mp-to-propose-restrictions-on-flushable-wet-wipes-labelling/ (Accessed: October,2026).

Water UK(2019). WIS 4-02-06 Issue 1.2.November 2019.Fine to Flush. Specification for a testing methodology to determine whether a product is suitable for disposal through a drain or sewer system. Water UK.(Status Archived). Available from: https://standards-board.water.org.uk/document/WIS 4-02-06 Issue 1.2 November 2019 Fine to Flush: Specification for a testing methodology to determine whether a product is suitable for disposal through a drain or sewer system | Water UK Standards Board . (Accessed: October,2026)

CARRY OVER SLIDES

Can Long-Term Environmental Policy Survive Short-Term Political Leadership?

UK political leadership, the COVID-19 disruption and the short operational life of the Fine to Flush initiative



THE QUESTION

Was Fine to Flush ever given a fair chance to establish itself under normal market conditions?

Pandemic effect: exceptional demand and use of single-use disposable cleaning & disinfecting wipes

7 Prime Ministers.
13 Environment Secretaries

Timeline dates: Fine to Flush introduced 2019; certification ended March 2024. England removed remaining domestic COVID legal restrictions on 24 February 2022. Andy Burnham became Prime Minister on 20 July 2026.

RETAILERS HAVE ALREADY CHANGED THE MARKET

Retailers began changing products and purchasing decisions years before legislation came into force.

Retailers are listening to consumers, leading on sustainability and setting new market standards.

TESCO — LEADING THE WAY AND RAISING THE BAR

2020 — Own-brand wet wipes become plastic-free.

FEB 2022 — **28 February 2022**: Tesco announces it will be the first major UK retailer to remove all plastic-containing wet wipes from sale.

MAR 2022 — **14 March 2022**: Plastic-containing wet wipes removed from Tesco stores.

KEY ACTIONS

- Own-brand wet wipes plastic-free since 2020
- Plastic-containing wet wipes removed from stores from 14 March 2022
- Demonstrated retailer-led market transformation
- Influenced suppliers and competing retailers

1

ACTING FAST, DELIVERING CHANGE

March 2022: Aldi announces switch of all own-label wipes to plastic-free and biodegradable materials.

Summer 2022: Own-label wipes converted to 100% biodegradable, plant-based fibres.

KEY ACTIONS

- All own-label wipes now made from plant-based fibres
- 100% biodegradable and free from plastic
- Part of Aldi's commitment to reduce plastic and waste
- Delivered at scale and speed

4

Boots — REMOVING PLASTIC ACROSS THE RANGE

April 2022: Boots announces all plastic-containing wet wipes will be removed from stores and online.

End of 2022: Plastic-containing wet wipes removed from all Boots stores and online.

KEY ACTIONS

- Applies across all Boots own-brand wet wipes
- Removal completed by the end of 2022
- Responded to consumer demand and environmental impact
- Reinforced Boots' leadership in health and sustainability

6

THE IMPACT OF RETAILER LEADERSHIP

- Retailers control shelf space, product ranges and supplier standards.
- They respond to consumer demand for sustainability.
- They drive innovation and scale through their supply chains.
- Their commitments accelerate market transformation beyond regulatory timelines.
- Collaboration across retailers, suppliers and NGOs is raising the bar for the whole industry.

Before UK legislation, major retailers had already changed product specifications, supplier requirements and consumer choice.
Retailers acted as de facto regulators—changing the market years before government legislation arrived.

KEY TAKEAWAY: Retailers are powerful agents of change. They don't wait for regulation—they lead it.

Rank order- Relative Importance in UK Wet Wipes Market e.g. Baby wet wipes.
FYI :Tesco now captures almost one-third of UK grocery spending and approximately £1 in every £10 spent across UK retail

Direct Excerpts from IWC Final Report

"Pre-Pipe solutions"

https://www.gov.uk/government/publications/independent-water-commission-review-of-the-water-sector

10
pp. 447

RECOMMENDATION 10: pp. 447

- Government should consider **legislative changes** to drive a more coherent approach to **'pre-pipe' solutions** to stop pollutants and rainwater entering the system.

> **Paragraph: 217. pp.112 of the main commission report.**
>
> *Both UK and Welsh governments should explore further measures to support* ***CONSUMER BEHAVIOUR CHANGE****,* ***particularly for wet wipes****. The UK Government should legislate swiftly, in line with its commitment, to ban wet wipes containing plastic. The UK government committed to legally banning wet wipes containing plastic and should legislate swiftly to this end; in Wales legislation to ban plastic wet wipes has already been passed by the Senedd.(Nation Cymru,2025) Given the environmental impact of all wet wipes (not just plastic) and other 'unflushables',* ***further work is needed, including on behaviour change campaigns with support from government, the water industry, eNGOs and other relevant bodies.*** (Briain O et al.(2020)).
>
> *The Commission notes that some targeted campaigns have already proven effective, such as the initial roll-out of the 'Bin the Wipe' campaign by Northumbrian Water, estimated to reduce blockages by 52% in targeted areas its first 3 years.*(Northumbrian Water(2023))

Delivery via: Bill and Primary legislation.

Key focus: Legislation and behaviour change to keep pollutants out of the system.

85
pp. 463

RECOMMENDATION 85: pp. 463

- Water companies **should work with Water UK** to disseminate innovation learnings across the water industry in England and Wales.

Delivery via: Industry led initiative.

Key focus: Sharing learning and driving industry-wide improvement.

88

RECOMMENDATION 88:

- *An independent review of the follow up to the Commission's report should be carried out in* ***2 years' time****.*

Delivery via: Government review on implementation.

Key focus: Accountability and monitoring progress.

PRE-PIPE SOLUTIONS require COLLABORATION, LEGISLATION and CONTINUOUS REVIEW
to protect our sewer systems for now and for the future.

Spain Draft Wet Wipes Decree – Key Drivers and Article 8 Implications

Take an interest !

Spain is moving beyond a narrow 'contains plastic / does not contain plastic' distinction and increasingly regulating wipes based on sewer-system impacts and disposal behaviour.

Theme	What the Draft Decree Says	Strategic / Industry Significance
Why the Decree Was Proposed	Addresses sewer blockages, pump failures, wastewater-treatment impacts, marine litter and clean-up costs associated with wet wipes and balloon releases.	Focus is on operational sewer impacts and environmental management costs rather than solely on plastic content.
Article 8 – Disposal Route	Wet wipes and balloons must enter the residual waste stream. Wet wipes must not be disposed of via toilets.	Spain is directly targeting consumer disposal behaviour ('do not flush') rather than relying only on product bans.
UNE 149002:2022 Exception	Wipes meeting the Spanish flushability standard UNE 149002:2022 are treated differently. Flushing is not prohibited in the same way, although avoidance of flushing is still recommended.	Leaves limited regulatory space for 'flushable' wipes, but signals continuing government caution even for technically compliant products.
Beyond Plastic-containing Wipes	Draft definitions extend beyond conventional plastics and can include viscose and lyocell-based wipes.	Potentially significant shift: sewer performance and dispersibility may become more important than whether a wipe contains plastic.
Comparison with UK Approach	Spain focuses on sewer-system impacts, disposal practices, EPR obligations and wastewater costs.	The UK has primarily focused on banning wet wipes containing plastic. Spain's model could influence future EU regulatory direction.

Source: Draft Spanish Royal Decree on Wet Wipes and Balloons (Proyecto de Real Decreto) – MITECO, Spain.

https://www.miteco.gob.es/en/Calidad-y-evaluacion-ambiental/participacion-publica/proyecto-de-real-decreto-por-el-que-se-regula-la-gestion-de-los-.html