

CODE OF PRACTICE:

Communicating Disposal Pathways for Single Use Nonwoven Wet Wipes to Protect Wastewater Systems

Third Edition: release date March 2022

Please note legal requirements are taken from the sources referenced in the last section. Legal texts always prevail in case of discrepancies.¹

1. Introduction

INDA² and EDANA³ members supply the majority of nonwovens to the market in North America and EMEA. Wipes producers and the suppliers of wet wipes constructed from nonwoven sheets, represented by EDANA and INDA, are concerned by the serious problem caused by marine litter and are aware that the industry can play a critical role in helping tackle it. To that end the industry is committed to communicating to consumers when the toilet is not an appropriate disposal route for wet wipes. The associations have already developed test methods and “Guidelines for assessing the flushability of disposable nonwoven products”⁴, edition 4, colloquially referred to as “GD4”. This third Edition Code of Practice (CoP) for the nonwoven wet wipes industry provides guidance to manufacturers on the appropriate use of either mandatory or voluntary labels to show consumers the appropriate disposal route for wet wipes.

¹ Please refer to the disclaimer at the end of this document for further detail

² INDA: the Association of the nonwoven fabrics industry based in North America

³ EDANA: the Association for the nonwoven and related industries based in Europe

⁴ See [guidelines-for-assessing-the-flushability-of-disposable-nonwoven-products-ed-4-finalb76f3ccdd5286df88968ff0000bfc5c0.pdf](https://www.edana.org/guidelines-for-assessing-the-flushability-of-disposable-nonwoven-products-ed-4-finalb76f3ccdd5286df88968ff0000bfc5c0.pdf) (edana.org)





Symbol	Label Usage Scenarios
<p>1</p> 	<p>English example of mandatory EU labelling (per the EU Single Use Plastic Directive) legal requirement in the EU and Northern Ireland for wet wipes in scope that contain plastic. Manufacturers in Great Britain may also opt to use this marking.</p>
<p>2</p> 	<p>As per EU industry commitment, the required 'Do not Flush' marking in the EU for wipes that are not flushable and do not contain plastic as defined in guidelines for the EU Single Use Plastic Directive. Manufacturers in the United Kingdom may also opt to use this symbol.</p>
<p>3</p> 	<p>Regulatory label in the State of Washington, for nonflushable wipes</p> <p>Replaced in the EU by labels 1 and 2; replaced in some US states by Label 4.</p> <p>Permitted and recommended 'Do Not Flush' label where Labels 1, 2 or 4 are not used (e.g., in the UK and some US States).</p>
<p>4</p>  <p>DO NOT FLUSH</p>	<p>Label 4 is the regulatory 'Do Not Flush' label for Covered Products in the States of California, Oregon ,Illinois (and further US states as required)</p>

Figure 1: Summary of Symbols for Labeling, for further reference see Appendix B

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Two Appendices related to the decision tree and the description of labels, are available as separate documents.

3. Scope

3.1 Geographical boundaries

This code of practice has been developed for North America and the EMEA region, but its use is encouraged in all other regions as well.

3.2 Type of product

This code of practice applies to Single Use nonwoven wet wipes. Where appropriate, members may use of this code for communicating appropriate disposal pathways for other product types that may be inappropriately flushed due to use in a bathroom setting or contamination with bodily wastes.

There are two main categories of wipes: consumer wet wipes and professional wet wipes. The consumer wipes are further divided into personal care usage and Domestic use wet wipes⁵. Professional wipes are those used in industrial applications and in the medical sector and out of scope of the SUP directive and this CoP, labelling is advised and at the discretion of manufacturers.

⁵ [Official Journal C 216/2021 \(europa.eu\)](https://eur-lex.europa.eu/eli/dir/2018/853/oj)

Consumer wet wipes		Professional wet wipes	
Personal care wipes	Domestic use wipes	Industrial wipes	Medical wipes
Baby wipes	APC (hard surface cleaning) wipes	Automotive	Hospital and community disinfectant wipes
Facial/Cosmetic wipes	Bathroom cleaning wipes	Electronic and computer industry	Hospital grade disinfectant wipes
Intimate care wipes	Disinfection wipes (domestic use)	Food industry	Patient care wipes
Moist toilet tissue	Floor wipes	Janitorial	
Toddler (toilet) training wipes	Glass/screen cleaning wipes	Manufacturing, Engineering,	
Toddler face cleaning	Kitchen wipes	Maintenance	
Disinfectant wipes for hands	Spectacle cleaning wipes	Optical industries	
	Car wipes for domestic use	Printing	
	Pet wipes for domestic use	Transportation	

Figure 2: Categories of Nonwoven wet wipes on the market.

(Source: [Nonwovens in wipes \(edana.org\)](https://www.edana.org)).

4. Commitments

Applicable to all regions:

This Code of Practice outlines the commitments of the Associations and their member companies to:

- a) Use GD4 for evaluating the flushability of wet wipes prior to making a flushable claim.
- b) Mark wet wipes that are not designed to be or marketed as flushable with an appropriate do not flush label.

Next to these core commitments, the Associations commit to:

- a) Encourage companies who are not members of the Associations to follow this Code of practice.
- b) Encourage retailers to subscribe to this Code of Practice for proper labelling of

wet wipes, particularly when sourcing private-label wet wipes, and where possible, reinforce proper disposal practices with their customers.

- c) Where appropriate, support work at national and local levels to increase public awareness of proper disposal practices; and
- d) Within a selected number of European Union 27 member states, EDANA will commission periodic third-party monitoring of the consumer marking commitment of this voluntary code starting in 2022. The compliance rate will be shared with the EU Commission.

5. Product disposal

There are two primary disposal routes for single use nonwoven wet wipes: (a) via the solid waste stream (trash or rubbish bin) or (b) via wastewater (flushing down the toilet)

Only wet wipes which are designed to come in contact with human wastes (faeces, menses, or urine and/or related germs) while used in a bathroom setting and have been assessed as flushable according to the INDA/EDANA flushability assessment may be appropriately disposed of via the toilet. All other wet wipes should be disposed via the solid waste route.

6. The composition of wet wipes

Wet wipes can be composed of natural fibres, manmade fibres and synthetic fibres or blends of each. The European Commission has provided a definition of Plastic within guideline documentation⁶ that has potential application in 27 EU Member States. According to EU Commission guideline (2021/C216/01) regenerated cellulose in the form of viscose or Lyocell is not considered to be chemically modified and is therefore not a plastic.

Within North America legislation is being drafted at individual state level to identify “covered products” that have a significant potential to be flushed and are composed entirely or in part of petrochemical-derived fibres. Thus, in different geographical regions the definition of plastic is not harmonised.

7. The decision tree

The decision tree in Appendix A provides guidance to manufacturers of wet wipes to identify the appropriate label for their pack. The decision tree takes into account the geographical region, the wipe composition, the use and, optionally, the result of the flushability test.

8. On-pack consumer information

Labelling in accordance with regulations is required. Labelling in all other instances represents the minimum recommended guidelines for INDA and EDANA members. It is at the discretion of each member to comply or not with the guidelines, and/or to provide additional on-pack clarifications, beyond those included here. In no instance is duplication of labelling required or recommended.

Please find specific information about the size, colour, dimensions of the respective labels in Appendix B.

⁶ See: EU commission (2021) [EUR-Lex - C:2021:216:FULL - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/lexuris/ui/#/document/2021/C216/01) at pp.5.

9. Definitions

Covered entity (California bill):

Means the manufacturer of a covered product that is sold in the state or offered for sale in the state. Covered entity includes a wholesaler, supplier, or retailer that is responsible for the labelling or packaging of a covered product.

AB-818 Solid waste: premoistened nonwoven disposable wipes.(2021-2022) available from: [Bill Text - AB-818 Solid waste: premoistened nonwoven disposable wipes. \(ca.gov\)](#)

Covered Product (California, Oregon and Illinois):

Means a consumer product sold in the state or offered for sale in the state that is either of the following:

- (1) A premoistened nonwoven disposable wipe marketed as a baby wipe or diapering wipe.
- (2) A premoistened nonwoven disposable wipe that is both of the following:
 - (A) Composed entirely of or in part of petrochemical-derived fibres.
 - (B) Likely to be used in a bathroom and has significant potential to be flushed, including baby wipes, bathroom cleaning wipes, toilet cleaning wipes, hard surface cleaning wipes, disinfecting wipes, hand sanitizing wipes, antibacterial wipes, facial and makeup removal wipes, general purpose cleaning wipes, personal care wipes for use on the body, feminine hygiene wipes, adult incontinence wipes, adult hygiene wipes, and body cleansing wipes.

AB-818 Solid waste: premoistened nonwoven disposable wipes.(2021-2022) available from: [Bill Text - AB-818 Solid waste: premoistened nonwoven disposable wipes. \(ca.gov\)](#)

Covered Product (State of Washington):

A nonflushable nonwoven disposable wipe that is a premoistened wipe constructed from nonwoven sheets and designed and marketed for diapering, personal hygiene, or household hard surface cleaning purposes. A nonflushable nonwoven disposable wipe excludes any wipe product designed or marketed for cleaning or medicating the anorectal or vaginal areas on the human body and labeled "flushable," "sewer safe," "septic safe," or otherwise indicating that the product is appropriate for disposal in a toilet including, but not limited to, premoistened toilet tissue.

Domestic use wet wipe:

Is intended to be used in domestic premises. These include wet wipes intended for household cleaning purposes. e.g., wipes used to clean bathroom and kitchen surfaces, wet wipes used to clean personal vehicles, spectacle cleaning wipes etc. [\(2021/C216/01\): Commission guidelines on single use plastic in accordance with Directive\(EU\) 2019/904](#)

Feminine Hygiene wipe:

A plastic free, personal care, pre wetted wet wipe constructed of nonwoven sheet that has passed the INDA/EDANA flushability assessment that is specifically designed, marketed and used for cleansing female intimate areas that are potentially contaminated with faeces, menses or urine and germs typically associated with such wastes.

Personal care wipe:

Is intended to be used for hygiene purposes. These include cleansing and caring of skin of both human adults and babies. e.g., baby wipes, cosmetic make up removal wipes, intimate care wipes etc. [\(2021/C216/01\): Commission guidelines on single use plastic in accordance with Directive\(EU\) 2019/904](#)

Plastic:

“means a material consisting of a **polymer as defined in point (5) of Article 3 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council**, to which additives or other

substances may have been added, and which **can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified**' (2021/C216/01): [Commission guidelines on single use plastic in accordance with Directive\(EU\) 2019/904](#)

Principle Display Panel:

The side of a product package that is most likely to be displayed, presented, or shown under customary conditions of display for retail sale. The term is further defined as follows:

- (a) In the case of a cylindrical or nearly cylindrical package, the surface area of the principal display panel constitutes forty percent of the product package, as measured by multiplying the height of the container times the circumference.
- (b) In the case of a flexible film package, in which a rectangular prism or nearly rectangular prism stack of wipes is housed within the film, the surface area of the principal display panel constitutes the length times the width of the side of the package when the flexible packaging film is pressed flat against the stack of wipes on all sides of the stack.

House Bill 2565; State of Washington; 66th Legislature; 2020 Regular Session; AN ACT Relating to the labeling of disposable wipes products, available from: [2565.pdf \(wa.gov\)](#)

Single use:

A product that is not conceived, designed or placed on the market to accomplish within its lifespan, multiple trips or rotations by being returned to a producer for refill or reused for the same purpose for which it was conceived. (2021/C216/01): [Commission guidelines on single use plastic in accordance with Directive\(EU\) 2019/904](#)

10. References

1. **California Legislature. Assembly Bill** No.818.Available from: [Bill Text - AB-818 Solid waste: premoistened nonwoven disposable wipes. \(ca.gov\)](#) (Accessed: 04/08/2021).
2. **EDANA:** The voice of nonwovens. See: [Home \(edana.org\)](#) (Accessed: 05/08/2021)
3. **EU Commission. Commission Implementing** Regulation (EU) 2020/2151 of 17 December 2020 laying down rules on harmonised marking specifications on single-use plastic products listed in Part D of the Annex to Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment . Available from: http://data.europa.eu/eli/reg_impl/2020/2151/oj (Accessed: 03/08/2021)
4. **EU Commission. Notice from European Union Institutions,** bodies, offices and agencies. Commission guidelines on single use plastic products in accordance with Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the Environment (2021/C216/01). OJ. C-216. 07/06/2021 001-0046. Available from: [EUR-Lex - C:2021:216:FULL - EN - EUR-Lex \(europa.eu\)](#) (Accessed:08/2021)
5. EU Commission(2021a). Marking specifications for single use plastic products . Available from : [SUPs marking specifications \(europa.eu\)](#) (Accessed:10/2021).
6. EU Commission (2021b). Rectificatif au règlement d'exécution (UE) 2020/2151 de la Commission du 17 décembre 2020 établissant les règles concernant des spécifications harmonisées relatives au marquage des produits en plastique à usage unique énumérés dans la partie D de l'annexe de la directive (UE) 2019/904 du Parlement européen et du Conseil relative à la réduction de l'incidence de certains produits en plastique sur

l'environnement (« Journal officiel de l'Union européenne » L 428 du 18 décembre 2020. Available from: [EUR-Lex - 32020R2151R\(01\) - EN - EUR-Lex \(europa.eu\)](#) (Accessed:09/2021)

7. **European Parliament and Council Directive** 94/62/EC of 20 December 1994 on packaging and packaging waste. [OJ.L365.31/12/1995.0010-0023](#). Available from: [EUR-Lex - 31994L0062 - EN - EUR-Lex \(europa.eu\)](#) (Accessed:05/08/2021)
 8. **INDA**: Association of the Nonwoven fabrics Industry. See: [Home \(inda.org\)](#) (Accessed:05/08/2021).
 9. **INDA/EDANA** (2018). Guidelines for assessing the flushability of nonwoven disposable products. A process for assessing the compatibility of disposable nonwoven products with plumbing and wastewater infrastructure. Available from: [guidelines-for-assessing-the-flushability-of-disposable-nonwoven-products-ed-4-finalb76f3ccdd5286df88968ff0000bfc5c0.pdf \(edana.org\)](#) (Accessed:09/2021)
 10. **ISO**: ISO/TR 11827:2012(en). Textiles- composition testing-identification of fibres. Ed1.pp.59. Available from: [ISO/TR 11827:2012\(en\), Textiles — Composition testing — Identification of fibres](#) (Accessed:05/08/2021)
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This document contains regulatory and voluntary guidance for communicating the appropriate disposal pathways for single use nonwoven wet wipes. The contents of this document are for general information purposes only. While INDA and EDANA have used reasonable care to ensure the accuracy and completeness of this code of practice, the information contained therein does not constitute professional or legal advice and should not be relied upon as such. To the extent permitted by law, INDA and EDANA do not accept liability (whether pursuant to a claim for contribution or under statute, tort, contract or otherwise) for any loss which may arise from reliance on information contained in this Code of Practice. Any and all information is subject to change without notice. Compliance with this code of practice is voluntary. For avoidance of doubt, INDA and EDANA are not responsible for verifying any product claims of compliance or flushability on any package labelling. That is the separate responsibility of the party making that claim and fully subject to the applicable trade rules and regulations on advertising claims and labelling.