

Date: July 12, 2023

To whom it may concern:

Re: California's Premoistened Nonwoven Disposable Wipes "Do Not Flush" Labeling Requirements

After reviewing California Public Resources Code, Division 30, Part 9, Section 49650, Definitions; Texwipe has concluded that our pre-wetted wiper products do not meet the definition of a "Covered product," as stated in this regulation.

A "covered product," must meet these characteristics:

- b) "Covered product" 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 fibers.
 - (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.

(<https://casetext.com/statute/california-codes/california-public-resources-code/division-30-waste-management/part-9-premoistened-nonwoven-disposable-wipes/section-49650-definitions>, accessed July 10, 2023)

Texwipe's pre-wetted wiper products have the following characteristics related to the California regulation:

- They are not intended to be used by the general consumer.
- These products are not marketed as baby wipes or diapering wipes. The solution pre-wetting these wipes contains alcohol, making them not suitable for use as a baby or diapering wipe, since the alcohol is irritating to the eyes and skin.
- They are not likely to be used in a bathroom, since they are marketed to be used in critical, classified, or clean areas in industry.
- These products are classified as hazardous materials and are not likely to be disposed of by flushing.

Because of these characteristics, we have determined that Texwipe's pre-wetted wiper products are not subject to the California "Do Not Flush" labeling requirement for pre-moistened nonwoven disposable wipes.



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Texwipe is committed to producing the highest possible quality products to meet the needs of customers.

Any feedback and suggestions are encouraged and should be forwarded to your Texwipe representative.

Kind regards,

A handwritten signature in black ink that reads "Jay C. Postlewaite".

Jay C. Postlewaite, Ph.D.
Sr. Technical Advisor
Texwipe, An ITW Company