

STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. Box 3378
Honolulu, HI 96801-3378
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Testimony COMMENTING on HB0918 HD2
RELATING TO LABELING

SENATOR JOY SAN BUENAVENTURA, CHAIR
SENATE COMMITTEE ON HEALTH AND HUMAN SERVICES
SENATOR MIKE GABBARD, CHAIR
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

Hearing Date, Time, and Room Number: 3/12/25, 1:00 p.m.; Room Number 225

1 **Fiscal Implications:** This measure will impact the priorities identified in the Governor's
2 Executive Budget Request for the Department of Health's ("Department") appropriations and
3 personnel priorities.

4 The Department requests that funding and personnel resources be established to
5 implement this bill.

6 **Department Position:** The Department offers comments on this measure.

7 **Department Testimony:** The Environmental Health Services Division ("EHSD"), Food and Drug
8 Branch ("FDB") provides the following testimony on behalf of the Department:

9 HB0918 HD2 establishes labeling requirements for certain premoistened nonwoven
10 disposable wipes to educate consumers that these wipes should not be flushed down the toilet
11 because they do not break down and may clog wastewater systems.

12 The Department requests the funding and establishment of positions necessary to
13 implement this measure. The Department estimates that a minimum of two full-time
14 equivalent (2.0 FTE) positions should be established: one position to conduct inspections and

1 enforcement actions, and one position to conduct education and outreach activities. This
2 measure impacts a varied group of manufacturers, retailers, other state and county agencies,
3 and the public, and it will be necessary to collaborate with the respective parties to develop
4 effective strategies to implement the measure and prevent impacts to municipal wastewater
5 systems.

6 Alternatively, the Department respectfully requests that this measure be amended to
7 instead establish a Disposable Wipes Working Group (Working Group), because there is a
8 diverse group of parties that are impacted by the improper disposal of these wipes that can
9 collectively identify the issues to develop a more appropriate legislative solution. The
10 Department suggests a Working Group comprised of the Department, the State Department of
11 Agriculture, the four county environmental services programs, the Hawai'i Realtors Association,
12 the Retail Merchants of Hawai'i, a representative of a disposable wipes trade association, and
13 any other participants that the Legislature identifies that may contribute to the success of the
14 Working Group.

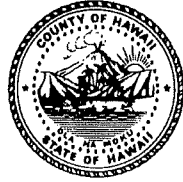
15 If a Working Group is established, the Department requests general revenues of
16 \$100,000 to solicit the professional services of a facilitator to direct the Working Group and
17 assist the Department with developing a report to submit to the Legislature.

18 **Offered Amendments:** None.

19 Thank you for the opportunity to testify on this measure.

C. Kimo Alameda, Ph.D.
Mayor

William V. Brillhante Jr.
Managing Director



Wesley R. Segawa
Director

Craig Kawaguchi
Deputy Director

County of Hawai'i

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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March 11, 2025

COMMITTEE ON HEALTH AND HUMAN SERVICES

Sen. Joy A. San Buenaventura, Chair

Sen. Henry J.C. Aquino, Vice Chair

COMMITTEE ON AGRICULTURE AND ENVIRONMENT

Sen. Mike Gabbard, Chair

Sen. Herbert M. "Tim" Richards, Vice Chair

Hawai'i State Capitol

Honolulu, HI 96813

Re: Testimony in Support of House Bill (HB) 918 HD2 Relating to Labeling, which establishes labeling requirements for certain premoistened nonwoven disposable wipes. Establishes civil penalties.

Dear Chair San Buenaventura, Chair Gabbard and Committee Members,

The County of Hawai'i Department of Environmental Management is pleased to submit testimony in support of **House Bill 918 HD2**, which will establish "do not flush" labeling requirements for premoistened nonwoven disposable wipes and establish civil penalties.

Disposable wipes are a significant and growing problem for wastewater treatment facilities. Unlike toilet paper, which readily breaks down, these wipes do not disintegrate. As a result, they:

- **Clog equipment:** Wipes accumulate in screening equipment, pumps, and conveyance lines, causing significant blockages. This leads to:
 - **Increased maintenance costs:** Frequent repairs and replacements of equipment are necessary, significantly increasing operational expenses.
 - **Reduced system efficiency:** Blockages disrupt the flow of wastewater, impacting the overall treatment process.
 - **Health and safety risks:** Plant operators are often required to manually remove wipes from equipment, posing potential health and safety hazards.


The labeling of disposable wipes will:

- **Raise public awareness:** Clearly inform consumers about the negative impacts of flushing wipes on the wastewater system.
- **Encourage responsible disposal:** Promote proper disposal methods, such as discarding wipes in the trash.
- **Reduce the burden on wastewater treatment facilities:** Minimize the frequency and severity of equipment blockages, leading to cost savings and improved operational efficiency.

We urge the legislature to pass **House Bill 918 HD2** to protect our wastewater infrastructure, safeguard public health, and ensure the long-term sustainability of our communities.

Thank you for your consideration.

Best Regards,


Craig Kawaguchi
DEPUTY DIRECTOR

cc: Mayor Kimo Alameda



**TESTIMONY OF TINA YAMAKI, PRESIDENT
RETAIL MERCHANTS OF HAWAII
MARCH 12, 2025
HB 918 HD2 RELATING TO LABELING.**

Aloha, Chair San Buenaventura, and Chair Gabbard members of the Senate Committee on Health and Human Services and Senate Committee on Agriculture and Environment. I am Tina Yamaki, President of the Retail Merchants of Hawaii and I appreciate this opportunity to testify.

The Retail Merchants of Hawaii was founded in 1901 and is a statewide, not for profit trade organization committed to supporting the growth and development of the retail industry in Hawaii. Our membership includes small mom & pop stores, large box stores, resellers, luxury retail, department stores, shopping malls, on-line sellers, local, national, and international retailers, chains, and everyone in between.

We respectfully oppose HB 918 HD2 that establishes labeling requirements for certain premoistened nonwoven disposable wipes.; and is effective 7/1/3000.(HD2)

Hawaii does **not** manufacture these types of products, and as a small market, requiring specialized labeling is impractical and unrealistic. All such products sold in the state are manufactured elsewhere and subject to federal and industry standards. Imposing a separate labeling requirement for Hawaii would place an undue burden on retailers and distributors, potentially limiting product availability or increasing costs for consumers.

National and international manufacturers are unlikely to adjust packaging exclusively for Hawaii, and manual labeling is not a viable solution. Having labels manually stuck onto each individual product post production is cost prohibitive for many retailers with having to have employees manually stick on labels and there is a human factor of error. We would also like to point out that the majority of retailers are already short-staffed.

This measure could result in manufacturers choosing **not** to sell these essential products in our state altogether if passed and could **severely limit consumer access** to everyday necessities such as **cleaning wipes, baby wipes, and personal hygiene wipes**—items that households, healthcare facilities, and businesses rely on daily. The unintended consequence would be an unnecessary burden on Hawaii's residents, retailers, and supply chains.

Rather than creating a unique requirement for Hawaii, a more effective approach would be public education campaigns to inform consumers about the environmental impacts of improper disposal.

Given that Hawaii is a small market relative to national and global distribution, enforcing a state-specific labeling rule may prove impractical and unnecessary. I urge the committee to reconsider this measure and explore alternative solutions that do not create regulatory burdens on businesses and consumers.

Mahalo for this opportunity to testify.



 808-733-7060

 808-737-4977

 1259 A'ala Street, Suite 300
Honolulu, HI 96817

March 12, 2025

The Honorable Joy A. San Buenaventura, Chair

Senate Committee on Health and Human Services

The Honorable Mike Gabbard, Chair

Senate Committee on Agriculture and Environment
State Capitol, Conference Room 225 & Videoconference

RE: House Bill 918, HD2, Relating to Labeling

HEARING: Wednesday, March 12, 2025, at 1:00 p.m.

Aloha Chair San Buenaventura, Chair Gabbard, and Members of the Joint Committees:

My name is Lyndsey Garcia, Director of Advocacy, testifying on behalf of the Hawai'i Association of REALTORS® ("HAR"), the voice of real estate in Hawaii and its over 10,000 members. HAR **supports** House Bill 918, HD2, which establishes labeling requirements for certain premoistened nonwoven disposable wipes. Effective 7/1/3000.

Despite being labeled as "flushable" or "disposable", many wipe products do not break down as easily as toilet paper. These wipes can lead to clogs and significant damage to plumbing systems or sewer infrastructure. In multi-family buildings like condominiums, plumbing repairs can be very costly and impact multiple units. As such, HAR supports clear labeling to consumers to "Do Not Flush".

Mahalo for the opportunity to provide testimony on this measure.



HB-918-HD-2

Submitted on: 3/11/2025 9:23:24 AM

Testimony for HHS on 3/12/2025 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Christopher Finarelli	Testifying for The Household & Commercial Products Association	Comments	Written Testimony Only

Comments:

Chair San Buenaventura and Members of the Committee on Health and Human Services:

On behalf of the Household & Commercial Products Association (HCPA), I respectfully request HB 918 be amended to align with those of other states as it relates to products regulated by the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). For instance, the bill sets a six-month deadline for products to apply the label after approval by the Department of Agriculture. No other state with "do not flush" rules enforces this deadline, as label approval is required in all 50 states, and by the US EPA, a process that can take several months.

Having a rigid deadline risks placing manufacturers in a position where they are waiting for registration approval elsewhere but are still required to comply in Hawaii. Imposing a six-month deadline could unnecessarily complicate the existing registration process and potentially create conflicts with other states' timelines. HCPA recommends looking to states like Oregon or California as a model for language related to FIFRA compliance. We appreciate your consideration of our concerns and the opportunity to provide input on this important issue. We look forward to working together to ensure a consistent approach across state jurisdictions.

Sincerely,

Christopher Finarelli

Sr. Director, State Government Relations & Public Policy Household & Commercial Products Association

March 12, 2025

Committee on Health and Human Services
Senator Joy A. San Buenaventura, Chair
Senator Henry J.C. Aquino, Vice Chair
Committee on Agriculture and Environment
Senator Mike Gabbard, Chair
Senator Herbert M. "Tim" Richards, III, Vice Chair
Senate
Hawai'i State Capitol
415 South Beretania St.
Honolulu, HI 96813

RE: Comments by INDA, the Association of the Nonwoven Fabrics Industry Supporting HB 918

Dear Chairs and Committee Members:

On behalf of INDA, the Association of the Nonwoven Fabrics Industry, thank you for the opportunity to provide input on HB 918. We support the committee advancing this legislation, which mirrors legislation passed in seven states to date and addresses the important issue of improper disposal of non-flushable wipes by consumers and is in line with legislation passed into law in California, Illinois, New Jersey, Michigan, Colorado, Washington, and Oregon.

INDA's member companies include almost all wipes fabric makers, wipes manufacturers, and many brand owners operating in North America. INDA and its members recognize that municipal wastewater treatment facilities are having difficulties with consumers flushing certain wipes that were not designed nor labeled to be disposed of in the toilet and we are committed to being a part of the solution to that challenge. Formal [forensic studies of sewer systems](#) in New York City, Jacksonville, Florida, and [California](#) have repeatedly shown that 98-99 percent of the materials clogging such sewer systems are hygiene products not labeled as flushable. As such, we support the objective of addressing wipes that are causing problems in wastewater treatment systems.

Given that the inappropriate consumer disposal of non-flushable wipes is a primary source of sewer system challenges, our industry has made a concerted effort to work cooperatively with wastewater treatment stakeholders throughout the country to jointly develop legislation that focuses on mandating enhanced Do Not Flush labeling of non-flushable wipes to enhance consumer understanding of proper disposal habits.

This industry-wastewater collaboration to date has been productive and has led to the enactment of Do Not Flush labeling laws in the previously mentioned states. These measures have enjoyed such strong support throughout numerous states because they represent the collaboration of and consensus among wastewater and industry stakeholders and are broadly recognized as a common-sense solution to address the problem at hand as documented by these forensic studies.

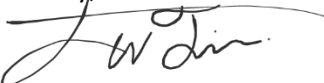
One minor request we would like to highlight is to ensure that the bill aligns with the other states in all respects, including process. For example, the bill currently requires a 6-month deadline for products to apply the label following approval by the Department of Agriculture. No other state with "do not flush" rules

requires this because labels must be approved in all fifty states, in addition to the US EPA, which can take many months. Applying a 6-month deadline will complicate this process unnecessarily and potentially put manufacturers in conflict with other states. If the committee or the author is looking for model legislation, we encourage you to look to [Oregon](#), though there is a great deal of consistency across the states that require these labels. **If the legislature wishes to adopt a deadline related to FIFRA products, we recommend changing the 6-month deadline in the legislation to eighteen (18) months to align with EPA's longstanding 18-month window that mandates usage of a newly approved label after 18 months to allow for the sell-through of existing stock and most state-level approvals.ⁱ**

Our industry is also working with wastewater and environmental stakeholders to support similar federal labeling standards, which has resulted in the introduction of the bipartisan WIPPES Act (Wastewater Infrastructure Pollution Prevention and Environmental Safety Act, S.1350/H.R. 2964) in Congress, which passed out of the U.S. House last year and is awaiting reintroduction in the 119th Congress.

In closing, INDA and the wipes industry support this legislation and we look forward to continuing to work with you on this important issue.

Sincerely,



Wes Fisher
Director of Government Affairs
INDA, Association of the Nonwoven Fabrics Industry
wfisher@inda.org
919-459-3726

ⁱ From the [EPA's Pesticide Labeling Questions & Answers](#): "40 CFR 152.130 and the Existing Stocks Policy (56 FR 29362) create a general 18-month period to distribute or sell products with existing labeling following approval of a voluntarily amended label. Frequently EPA's approval of the voluntarily amended label will direct the registrant to use this newer language at the next production or within 18 months. New production after the 18-month window requires that labels use the newer text."

HB-918-HD-2

Submitted on: 3/10/2025 2:53:58 PM

Testimony for HHS on 3/12/2025 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Ted Bohlen	Testifying for Hawai'i Reef and Ocean Coalition	Support	Written Testimony Only

Comments:

Hawai'i Reef and Ocean Coalition **STRONGLY SUPPORTS** this bill!

Labelling will help inform the public that premoised nonwoven disposable wipes, even some labelled as "flushable" or "disposable," should never be flushed! Wipes made from synthetic materials do not break down when wet; they

-clog plumbing systems and sewer pipes and pumps,

-increase maintenance costs,

-interfere with treatment processes,

-jeopardize health and safety of workers who have to clear disgusting clogs, and

-cause sewage spills that harm the reefs and ocean.

Please pass this bill (with amendments to be consistent with the other states that require labels) to protect wastewater infrastructure, public health, and the reefs and ocean!

Mahalo!

Hawai'i Reef and Ocean Coalition (by Ted Bohlen



Environmental Caucus of The Democratic Party of Hawai'i

March 8, 2025

Testimony in Support of HB918, HD2 – Relating to Labeling

To: Chairs Joy A. San Buenaventura and Mike Gabbard; Vice Chairs Henry J.C. Aquino and Herbert M. "Tim" Richards, III; and Members of the Committees on Health and Human Services and Agriculture and Environment

From: The Environmental Caucus of the Democratic Party of Hawaii

Date: March 12, 2025, 1:00 p.m.

Location: Conference Room 225 & Videoconference

Re: HB918, HD2 – Relating to Labeling

Dear Chairs San Buenaventura and Gabbard, Vice Chairs Aquino and Richards, and Members of the Committees,

The Environmental Caucus of the Democratic Party of Hawaii strongly supports HB918, HD2, which establishes labeling requirements for certain premoistened nonwoven disposable wipes. This measure is essential to protecting Hawaii's environment, infrastructure, and public health by addressing the significant issues posed by the improper disposal of such products.

Key Points in Support:

1. **Reducing Environmental Impact:** Disposable wipes that are not properly labeled with "Do Not Flush" warnings contribute significantly to sewer blockages, wastewater system failures, and environmental pollution. Clear labeling will help reduce improper disposal, minimizing harm to Hawaii's waterways and ecosystems.
2. **Protecting Wastewater Infrastructure:** Sewer systems and wastewater treatment facilities are not designed to handle disposable wipes, which often cause costly damage and operational disruptions. HB918, HD2 promotes consumer awareness and responsible disposal practices, protecting critical infrastructure and reducing repair costs.
3. **Enhancing Consumer Education:** Requiring clear and conspicuous labeling empowers consumers to make informed choices about disposal practices. Increased awareness can lead to behavioral changes that benefit the environment and public health.
4. **Proactive Environmental Stewardship:** This measure aligns with Hawaii's commitment to sustainability and environmental protection. By addressing a common source of pollution, HB918, HD2 strengthens Hawaii's leadership in promoting responsible consumer behavior and environmental responsibility.

We commend the Legislature for taking action to address this pervasive issue and urge the Committees to pass HB918, HD2. This measure represents a practical and impactful step toward protecting Hawaii's environment and infrastructure while promoting public awareness and sustainable practices.

Thank you for the opportunity to testify in support of this important legislation.

Sincerely,

Melodie Aduja and Alan Burdick

Co-Chairs, Environmental Caucus of the Democratic Party of Hawaii

HB-918-HD-2

Submitted on: 3/9/2025 1:41:48 PM

Testimony for HHS on 3/12/2025 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
robin knox	Individual	Support	Written Testimony Only

Comments:

I support this because wipes can damage our treatment plants and the environment

HB-918-HD-2

Submitted on: 3/10/2025 9:14:07 AM

Testimony for HHS on 3/12/2025 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Michael Becker	Individual	Support	Written Testimony Only

Comments:

I fully support this bill.

HB-918-HD-2

Submitted on: 3/11/2025 11:55:55 AM

Testimony for HHS on 3/12/2025 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Stuart Coleman	Individual	Support	Written Testimony Only

Comments:

Aloha, Chair, Vice Chairs and Committee Members,

My name is Stuart Coleman, and I'm writing in support of HB918. These so-called Flushable materials are definitely not "flushable" and cause huge and expensive blockages in our sewer systems. Mahalo for supporting this cost-cutting measures to improve our sanitation.

Aloha, Stuart Coleman, Hibiscus Place, Hon., HI 96815