



February 15, 2022

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Senate Ways and Means Committee
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Position: SUPPORT for SB 3098 – *Emergency Appropriations to Department of Education for Lead Abatement*

Dear Senate Ways and Means Committee Members,

On behalf of the International Association of Plumbing and Mechanical Officials (IAPMO), NSF International (NSF), and the Water Quality Association (WQA), we want to share our support for HB 2130.

Remediation of plumbing fixtures in school facilities are critical to reduce exposure to lead in drinking water. Lead contamination of drinking water poses known health risks, and even low levels of lead exposure can cause permanent cognitive deficits and behavioral difficulties in children. To reduce the presence of lead in drinking water and combat these potential health threats, the United States Environmental Protection Agency (EPA) and Centers for Disease Control and Prevention (CDC) suggest using point of use (POU) filters tested and certified to comply with the U.S. national standard for water filters.^{1, 2}

To ensure public health and safety is maintained, our organizations recommend that the bill include requirements for drinking water filtration systems (components, filters, and fixtures) to meet nationally recognized industry standards for lead reduction, such as NSF/ANSI Standard 53 (for lead reduction), NSF/ANSI Standard 42 (for Class 1 particulate reduction), and NSF/ANSI 61 (“lead-free” fixtures). Additionally we recommend that the products used be independently certified by accredited certification bodies to ensure they perform as intended.³

As such we offer the following language to be included in section 2 after line 5 on page 2:

“plumbing fixtures, including point-of-use filters, shall be certified by a third-party certifying body that is accredited by the American National Standards Institute (ANSI) National Accreditation Board (ANAB) to meet a pertinent NSF/ANSI American National Standard for drinking water treatment units for lead reduction.”

¹ <https://www.epa.gov/system/files/documents/2021-07/epa-3ts-guidance-document-english.pdf>

² https://www.cdc.gov/nceh/lead/prevention/sources/water.htm?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2F20%2Fnceh%2Flead%2Ftips%2Fwater.htm

³ https://www.epa.gov/sites/default/files/2018-12/documents/consumer_tool_for_identifying_drinking_water_filters_certified_to_reduce_lead.pdf



These recommendations align with the federal government agency guidelines to remove lead from drinking water. They also underscore the need for independent product testing and certification as a critical step to ensuring that products meet the performance, health and quality assurance required by these regulations. Third-party product certification can help the state provide consumer confidence that plumbing products and systems will function as they claim, and help eliminate concerns that consumers may purchase and install either non-complying products, or counterfeit products available on the market. It is important to note that there are numerous organizations accredited by the American National Standards Institute (ANSI) to provide this service.

We strongly support SB 3098 and appreciate the opportunity to collaborate on this vital water quality legislation. We will be happy to work with you and others to answer questions regarding water treatment.

Sincerely,

Robyn Fischer, Director of Government Relations, IAPMO

Harold Chase, Director of Legislative & Regulatory Affairs, NSF International

Jeremy Pollack, Director of Government Affairs, WQA

About IAPMO

IAPMO was founded in 1926 by government officials in the US to protect public health and safety by developing the most progressive and technically advanced plumbing, mechanical and water efficiency codes in the world. A large part of IAPMO's work focuses on product testing for the industry. Our research and testing labs are capable of testing products to more than 400 standards and we provide testing to new plumbing products that enter the market every year. These include such devices as shower heads, faucets, and water filters. Our rigorous process includes following the criteria of the American National Standards Institute (ANSI) and the International Organization for Standardization (ISO).

About NSF

NSF is an independent, not-for-profit organization founded in 1944 in Ann Arbor, MI that develops consensus national standards, provides product inspection, testing and certification, auditing, education, and related services in public health and safety. The core purpose of NSF is to "protect and improve human and environmental health." NSF has a long history of working with the EPA, FDA, USDA, CDC, and health related governmental entities at the state and local levels, as well as international bodies. NSF is a Collaborating Centre of the World Health Organization for Food Safety, Water Quality, and Indoor Environment. NSF/ANSI 53 and NSF/ANSI 58, American National Standards developed by NSF, allow for the certification of some point of use and point of entry drinking water treatment units to reduce the levels of specified contaminants in drinking water including lead.

About WQA

WQA is a not-for-profit trade association representing the residential, commercial, and industrial water treatment manufacturers industry with over 2,700 members worldwide. Since its creation in 1974, WQA has worked tirelessly to improve water quality through sustainable technologies and services. Our members are manufacturers, dealers, and distributors who specialize in point-of-use (POU) and point-of-entry (POE) water filtration systems, which treat water at the tap or entry point of a home or building. WQA also operates an American National Standards Institute (ANSI) accredited testing and certification laboratory that certifies water filtration products to nationally accepted industry standards for contaminant removal.