





February 4, 2022

The Honorable Stephen Handy Utah House of Representatives 1355 E 625 N Layton, UT 84040 stevehandy@le.utah.gov The Honorable Jani Iwamoto Utah Senate 4760 S Highland Dr Ste 527 Salt Lake City, UT 8411 jiwamoto@le.utah.gov

## **<u>Position</u>**: SUPPORT for HB 21 – School and Child Care Center Water Testing Requirements

Dear Representative Handy and Senator Iwamoto,

On behalf of the International Association of Plumbing and Mechanical Officials (IAPMO), NSF International (NSF), and the Water Quality Association (WQA), we want to thank you for your sponsorship of HB 21, *School and Child Care Center Water Testing Requirements*. Our organizations support the intent of HB 21 and specifically the statewide rulemaking that would be promulgated by the bill. Testing for elevated lead levels in drinking water, outlining suitable steps for reducing exposure and health risk, and reporting on actions taken to test and remediate are all crucial to protect children's health and well-being.

As the federal government moves to provide assistance to replace residential lead service lines across the country, it is important to also look within buildings and address fittings and fixtures (e.g. taps) that may be contributing to lead levels above five parts per billion. 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.<sup>1,2</sup>

When signed into law, HB 21 will allow the State Water Board and Division of Drinking Water to draft a rule that will guide childcare facilities and schools' actions for testing, remediation, and reporting. We recommend that the rule 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.<sup>3</sup>

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

<sup>&</sup>lt;sup>2</sup>https://www.cdc.gov/nceh/lead/prevention/sources/water.htm?CDC\_AA\_refVal=https%3A%2F%2Fwww.cdc.gov%2 0%2Fnceh%2Flead%2Ftips%2Fwater.htm

<sup>&</sup>lt;sup>3</sup> https://www.epa.gov/sites/default/files/2018-

<sup>12/</sup>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.

Thank you again for your leadership on this important topic. We appreciate the opportunity to collaborate on this vital water quality legislation and subsequent rulemaking. We will be happy to work with you and others to answer questions surrounding 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.