



June 10, 2022

The Honorable Annette Quijano
1120 East Jersey Street
Elizabeth, NJ 07201
aswquijano@njleg.org

The Honorable Linda R. Greenstein
1249 South River Rd., Suite 105
Cranbury, NJ 08512
sengreenstein@njleg.org

RE: SUPPORT for A3949 / S2744 – *Requires institutions of higher education to test for lead in drinking water annually, report test results, and install lead filters or treatment devices*

Dear Assemblymember Quijano & Senator Greenstein,

On behalf of the American Supply Association (ASA), International Association of Plumbing and Mechanical Officials (IAPMO), NSF International (NSF), and the Water Quality Association (WQA), we want to share our support for A3949 / S2744, *Requires institutions of higher education to test for lead in drinking water annually, report test results, and install lead filters or treatment devices*. Your bill will further New Jersey's efforts to make the State's institutions of higher learning safer for everyone.

Lead contamination of drinking water poses known health risks, and even low levels of lead exposure can cause permanent cognitive deficits and behavioral difficulties. 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}

We applaud inclusion of a provision in the legislation requiring filters at every drinking water outlet. However, considering the EPA and CDC's recommendations to use POU, we offer the following modifications to the wording for that requirement to more adequately specify the use of this technology. We believe this addition to the bill will strengthen the level of protection for the citizens and students of New Jersey while avoiding confusion on applicable solutions. Specifically, we recommend that you amend 1.c.(2) as follows:

Each institution shall install a **certified point-of-use** ~~water~~¹ filter ~~or water treatment device certified to remove lead~~ on each drinking water outlet in the identified buildings.

Additionally, we suggest that you define "certified point-of-use filter" as:

"Certified point-of-use filter" shall mean a filter installed at the point where water is dispensed from an outlet and is certified to NSF/ANSI 53 for lead reduction and NSF/ANSI 42 for particulate 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%20%2Fnceh%2Flead%2Ftips%2Fwater.htm



(Class 1) by a certification body accredited by the American National Standards Institute (ANSI) National Accreditation Board (ANAB).

We make this recommendation that the products used in remediation efforts be certified by a third-party Certifying Body (CB) accredited by the American National Standards Institute (ANSI) National Accreditation Board (ANAB) to help ensure that the filters and fittings meet the relevant NSF/ANSI American National Standard for drinking water treatment units for lead reduction and perform as intended.³ This recommendation aligns with federal government agency guidelines to remove lead from drinking water. It also underscores 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. Federal law does not establish any minimum performance requirements for water filters. Referencing industry standards and requiring third-party product certification is essential to building consumer confidence that water filters and filtration 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 to provide this service.

We strongly support the intent of A3949 / S2744 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 surrounding water treatment.

Sincerely yours,

Stephen Rossi, Director of Government Affairs, ASA

Chris DeMarco, Business Development Coordinator, IAPMO

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

Jeremy Pollack, Director of Government Affairs, WQA

About ASA

The American Supply Association is the national industry trade association representing distributors and their manufacturers and manufacturer representative agencies serving the PHCP & PVF channel. Serving wholesale distributors and their supply chain partners in the plumbing-heating-cooling-piping (PHCP) and industrial pipe-valve-fitting (PVF) industry, ASA is a one-stop-shop for legislative and regulatory advocacy, ongoing business intelligence, employee training and education and peer-to-peer networking.

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

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



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 Medical Device Safety. 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 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.