



May 25, 2022

The Honorable Helen Gym  
City Councilor  
City Hall, Room 592  
Philadelphia, PA 19107-3290  
[helen.gym@phila.gov](mailto:helen.gym@phila.gov)

**RE: City Council Bill Number 220221**

Dear Councilor Gym,

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 Bill Number 220221, which would amend Title 4 of the Philadelphia Code by adding provisions related to drinking facilities in schools and requiring filtration systems.

Contamination of drinking water by lead and other toxins poses many known health risks. 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 nationally recognized industry standards for lead reduction, specifically NSF/ANSI Standard 53 for lead reduction, and NSF/ANSI Standard 42 for Class 1 particulate reduction.<sup>1 2</sup> Bill 220221 appropriately requires drinking water filters to meet these nationally recognized industry standards for lead reduction. However, we recommend you strengthen the bill by requiring products used in remediation efforts to be certified by a third-party certifying body accredited by the American National Standards Institute (ANSI) National Accreditation Board (ANAB). This clarification will ensure that the filters meet the relevant NSF/ANSI American National Standard for drinking water treatment units for lead reduction and perform as intended.<sup>3</sup>

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

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

<sup>2</sup>[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](https://www.cdc.gov/nceh/lead/prevention/sources/water.htm?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2F%2Fnceh%2Flead%2Ftips%2Fwater.htm)

<sup>3</sup>[https://www.epa.gov/sites/default/files/2018-12/documents/consumer\\_tool\\_for\\_identifying\\_drinking\\_water\\_filters\\_certified\\_to\\_reduce\\_lead.pdf](https://www.epa.gov/sites/default/files/2018-12/documents/consumer_tool_for_identifying_drinking_water_filters_certified_to_reduce_lead.pdf)



by these regulations. Third-party product certification can help the city provide 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 ANSI to provide this service.

Given that the bill also includes the use of lead-free fittings, we suggest including the definition of “lead-free” from the federal lead law.<sup>4</sup> These industry standards are referenced in building and plumbing codes throughout the country and provide uniform and consistent requirements in the marketplace designed to protect public health.

In summary, we strongly support the intent of City Council Bill 220221 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,

Stephen Rossi, Director of Government Affairs, ASA

Jim Scarborough, Director of Government Relations, 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 wholesaler-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 following the criteria of the American National Standards Institute (ANSI) and the International Organization for Standardization (ISO).

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<sup>4</sup> <https://www.epa.gov/sdwa/use-lead-free-pipes-fittings-fixtures-solder-and-flux-drinking-water>



### **About NSF International**

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 2,500 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.