December 11, 2023

The Honorable Devlin J. Robinson
Pennsylvania State Senate
Senate Box 203037
Harrisburg, PA 17120-3037

RE: Senate Bill 986

Dear Senator Robinson,

The International Association of Plumbing and Mechanical Officials (IAPMO), NSF, and the Water Quality Association (WQA) would like to thank you for introducing Senate Bill 986, *An Act amending the act of March 10, 1949 (P.L.30, No.14), known as the Public School Code of 1949, in grounds and buildings, providing for certified point-of-use filter required; establishing the Safe Schools Drinking Water Fund; and making an interfund transfer*. Your bill will further Pennsylvania's efforts to make the state's schools safer for everyone.

We are especially pleased you have included language specific to the type of certifications that point-of-use (POU) filters must hold in order to be recognized by this law, NSF/ANSI 53 and NSF/ANSI 42. However, our associations recommend expanding the bill language to also include NSF/ANSI 58 for Reverse Osmosis (RO) systems, this will allow schools to have additional options to remediate lead and other health-based contaminants. Furthermore, to align the bill language in Section 743(4) related to the lead leaching of drinking water outlets, we recommend revising the language to include the proper reference to the standard to read as NSF/ANSI/CAN 61. Incorporating these revisions to the bill language will help ensure that the bill's intentions align with accurate terminology and what is technologically feasible.

Requiring third-party certification of drinking water treatment devices, fixtures, and components is very important as not all products serve the same purpose; some remove only aesthetic impurities while others are certified to reduce the presence of harmful contaminants. Having an independent third-party certification mark on a product communicates compliance with voluntary and consensus performance standards, improves consumer confidence, and helps eliminate concerns about the purchase and installation of non-complying products.

There are currently no federal regulations establishing minimum requirements for the safety and performance of water filtration systems. However, there are voluntary consensus standards that are continually being updated to address emerging threats. When product requirements related to water treatment technologies or drinking water system components are placed into legislation, referencing the appropriate NSF/ANSI standard(s) and third-party certification requirements is vital in verifying these products work as intended.

We strongly support SB986 and appreciate the opportunity to collaborate on this vital water quality legislation. We are available to work with you and others to answer questions surrounding water treatment.

Sincerely yours,

Jim Scarborough, Director of Government Relations, IAPMO
Harold Chase, Director of Government Affairs, NSF
Jordan Kari, Manager of Government Affairs, WQA

cc: The Honorable David G. Argall, Chair, Senate Education Committee
The Honorable Lindsay M. Williams, Minority Chair, Senate Education Committee

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 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.