



February 15, 2024

Assistant Commissioner Doug Guthro
Massachusetts Department of Environmental Protection
250 Washington St., 7th Floor,
Boston, MA 02108

RE: Lead in Drinking Water & POU Filter Guidance

Dear Assistant Commissioner Guthro,

On behalf of the Water Quality Association (WQA), NSF, and the International Association of Plumbing and Mechanical Officials (IAPMO), we'd like to emphasize the value and critical importance of third-party certified drinking water treatment systems in supporting water quality. Massachusetts is a leader in addressing drinking water challenges and has already utilized these technologies to address vulnerabilities, particularly concerning lead contamination. We commend the proactive steps taken by the state and want to offer some additional guidance that will benefit the department and the public.

Many water treatment devices including point-of-use (POU) filters, claim to improve drinking water quality. However, it's important that they are third-party certified to better ensure they work as intended. Using a certified 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. Standards such as NSF/ANSI are referenced in the applicable plumbing codes for the state and help verify products are tested and certified to meet mandated requirements; in the case of POU drinking water filters, and more specifically for lead reduction, the appropriate standard is NSF/ANSI 53 *Drinking Water Treatment Units – Health Effects*.

We applaud the state for including [guidance on the use of filters to reduce lead on its website \(https://www.mass.gov/info-details/lead-in-drinking-water\)](https://www.mass.gov/info-details/lead-in-drinking-water), but more can be done to provide information to residents on where to find these products. **Therefore, we strongly recommend that the Department revise communications and guidance on the use of POU filters regarding lead contamination in drinking water to reference WQA, NSF, and IAPMO, instead of limiting options to just one organization.** When navigating the complexities of drinking water challenges, it's paramount to recognize and reference these groups so consumers and government officials can easily find certified drinking water solutions. Products certified by each organization can be found on their respective websites.

- WQA Certified Products: <https://find.wqa.org/find-products#/>
- NSF Certified Drinking Water Systems: <https://info.nsf.org/Certified/PwsComponents/>
- IAPMO Product Listing Directory: <https://pld.iapmo.org/>



Qualified organizations like WQA, NSF, and IAPMO have been accredited under the ANSI National Accreditation Board (ANAB) as a certification body and thereafter certify products to ANSI consensus standards such as NSF/ANSI 53. Moreover, certifications issued by WQA, NSF, IAPMO, and other ANAB-accredited bodies are regarded as equally valid. Sometimes confusion arises because the standards have the standard developer's name in them, such as NSF in "NSF/ANSI 53". However, these certifications hold the same level of credibility, ensuring consumers and industries can trust the conformity assessment process regardless of the certifying entity.

Our organizations are committed to ensuring the highest standards of safety, quality, and performance in the certification of these technologies that help provide healthier and safer drinking water for the Commonwealth. We applaud the DEP and the Bureau of Climate and Environmental Health for their efforts in upholding water quality for its residents and are available to serve as a resource for the state.

Sincerely,

Jeremy Pollack, Director of Government Affairs, WQA
Harold Chase, Director of Government Affairs, NSF
Peter Kelly, Regional Field Director, IAPMO



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.

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 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).