



March 25, 2024

The Honorable Alexander Lee
California Assembly
1021 O Street
State Capitol, Room 6330
Sacramento, CA 94249

RE: AB 2671 – Filtered Water in Family Daycare Homes

Dear Chair Lee,

On behalf of the American Supply Association (ASA), the International Association of Plumbing and Mechanical Officials (IAPMO), NSF, the Water Quality Association (WQA), and the Pacific Water Quality Association (PWQA), we want to acknowledge your sponsorship of AB 2671 and its importance in addressing lead contamination in childcare facilities. Our organizations aim to provide technical input to refine legislation that addresses water quality issues. With this goal in mind, we respectfully propose a clarifying amendment which we believe will strengthen the impact of the legislation.

First, we want to commend the inclusion of the relevant NSF/American National Standards Institute (NSF/ANSI) standards for drinking water treatment devices. These standards, which undergo regular updates to address emerging threats, are pivotal in verifying that the products work as intended.

However, our industry recommends that this legislation be amended to **require third-party certification of drinking water treatment devices, fixtures or fittings, and components**. Many water filtration systems claim to improve drinking water quality. However, not all products serve the same purpose; some remove only aesthetic impurities while others are certified to reduce the presence of harmful contaminants. Often, manufacturers will include language on the packaging of products asserting that the device is certified to reduce specific 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 noncomplying products.¹ This recommendation is also aligned with the technical guidance issued by the EPA to reduce lead in drinking water in schools.²

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,

¹ https://www.epa.gov/sites/default/files/2018-12/documents/consumer_tool_for_identifying_drinking_water_filters_certified_to_reduce_lead.pdf

² <https://www.epa.gov/system/files/documents/2021-07/epa-3ts-guidance-document-english.pdf>



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. 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#/keyword/?claims=46>
- NSF Certified Drinking Water Systems: <https://info.nsf.org/Certified/DWTU/>
- IAPMO Product Listing Directory: <https://pld.iapmo.org/>

Therefore, we recommend that the following section be amended, and the proposed language included:

Section 1. Section 1597.623 is added to the Health and Safety Code, to read:

1597.623. (a) (1) A family daycare home licensed under this chapter shall only serve water to children, or use water in food preparation for the family daycare home, that has been filtered with a point-of-use water filtration device **that has been third-party certified to meet National Sanitation Foundation of the American National Standards Institute (NSF/ANSI) standards NSF/American National Standards Institute (NSF/ANSI) standards for water safety NSF/ANSI 42, and NSF/ANSI 53, or NSF/ANSI 58, and that is explicitly certified claims to reduce remove** lead.

We appreciate your consideration of these changes. Our organizations welcome the opportunity to collaborate with you on this vital water quality legislation. Please do not hesitate to contact us if you have any questions surrounding water treatment.

Sincerely,

Stephen Rossi, Vice President of Advocacy, ASA
 Christina Kaeini, Director of Government Relations, IAPMO
 Harold Chase, Director of Government Affairs, NSF
 Jordan Kari, Government Affairs Manager, WQA
 Frank DeSilva, President, PWQA



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).

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 2,500 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 Pacific Water Quality Association (PWQA)

PWQA is a California association that strives to provide all consumers equal access to high quality water treatment options for home, business and commercial applications. Our members include retailers, assemblers, manufacturers and suppliers. Our products are backed by trained and certified professionals who understand how to improve the customer's existing water supplies with safe cutting edge technology,