



April 14, 2025

Representative Jeff Knight
413-A
201 W. Capitol Ave.
Jefferson City, MO 65101

RE: HB 995 – Protection of Children Through the Licensing and Regulation of Child Care Organizations

Dear Representative Knight,

On behalf of the International Association of Plumbing and Mechanical Officials (IAPMO), NSF, and the Water Quality Association (WQA), we want to thank you for your sponsorship of HB 995. This timely bill will greatly assist efforts to get the lead out of Wisconsin schools—protecting children and faculty alike.

When requirements related to onsite water filtration technologies are placed into legislation, our industry supports two important recommendations:

1. Referencing the appropriate NSF/American National Standards Institute (NSF/ANSI) standards; and
2. Requiring accredited third-party certification of drinking water treatment devices, fixtures, and components.

To accomplish the goal set forth in this legislation, we recommend strengthening requirements for water filtration systems to meet the latest version of voluntary consensus standards and to be third-party certified. This will help ensure that water filtration systems used in remediating lead have been verified to do so.

We strongly recommend the following amendment be added to the list of stipulations provide clarification regarding lead remediation and treatment standards and the certification to reduce the concentration of lead in the drinking water to below the action level. The augmentations we are proposing are consistent with guidance from EPA as well as recent legislation at the Federal and state levels. This amended language requires water filtration systems to be independently certified to meet NSF standards for lead reduction by accredited certification bodies. It adds the “latest version” of NSF/ANSI 53 & 42 to ensure the incorporation of the latest advancements of the standard in Wisconsin. Additionally, when applicable, treating the water near the tap through a certified NSF/ANSI 58 RO system would also help mitigate harmful contaminants including lead and allow for more remediation options for schools.

EXPLANATION — Matter enclosed in bold-faced brackets [thus] in the above bill is not enacted and is intended to be omitted from the law. Matter in **red bold-face type** in the above bill is proposed language from the signatories. Matter in **bold-face type** remains unchanged proposed language from the bill’s author.



For simplicity throughout and assist with continuity: “*Third party certification body*” means an independent certification body accredited by the ANSI National Accreditation Board (ANAB), such as the Water Quality Association, NSF International, and IAPMO.

Our organizations support HB 995 with the request that the following sections be amended, to include the proposed language below:

"Remediation", **means utilizing an apparatus that meets all the following requirements:** decreasing the lead concentration in water from a drinking water outlet to less than five parts per billion ~~[without relying solely on flushing practices, or]~~ using 24 methods such as the replacement of lead-containing pipes, solder, fittings, or fixtures with 25 lead-free components **or filtering when the water supply is the source of contamination, install and use a water treatment products certified by third-party certifier**

- i. The flow rate through the station is paired to the specified flow rate of the filter cartridge.**
- ii. Has a light or other device to indicate filter cartridge replacement status.**
- iii. Is designed to fill drinking bottles or other containers for personal water consumption.**
- iv. Includes a drinking fountain with a consumable tap with or a replacement faucet that has been third-party certified to NSF/ANSI/CAN 61 for lead-free compliance and material safety.**
- v. Follow the manufacturer's instructions for the installation, use, and maintenance of drinking water treatment systems.**
- vi. Create and maintain a schedule that identifies the point of contact responsible for the installation and maintenance of drinking water treatment devices**

////////////////////////////////////

Additionally, if drinking fountains or filtered pitchers are utilized in schools, the language below will assist in remediating lead from drinking water:

For drinking fountains:

Drinking fountains with a consumable tap with or a replacement faucet that has been third-party certified to NSF/ANSI/CAN 61 for lead-free compliance and material safety.

EXPLANATION — Matter enclosed in bold-faced brackets [thus] in the above bill is not enacted and is intended to be omitted from the law. Matter in **red bold-face type** in the above bill is proposed language from the signatories. Matter in **bold-face type** remains unchanged proposed language from the bill’s author.





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.

EXPLANATION — Matter enclosed in bold-faced brackets [thus] in the above bill is not enacted and is intended to be omitted from the law. Matter in **red bold-face type** in the above bill is proposed language from the signatories. Matter in **bold-face type** remains unchanged proposed language from the bill's author.