



June 21, 2024

David Zapolsky
Senior Vice President and General Counsel
Amazon
410 Terry Avenue North
Seattle, Washington 98109

Dear Mr. Zapolsky,

On behalf of the Plumbing Industry Leadership Coalition (PILC), we are writing to raise an important issue relating to counterfeit, non-compliant, and potentially dangerous products being sold on Amazon.

PILC is an alliance representing the full spectrum of the plumbing industry, including contractors, manufacturers, engineers, distributors, conformity assessment bodies, as well as code and standards developers. The mission of PILC is to advocate for the safety, reliability, and compliance of the plumbing industry to ensure the protection and integrity of our plumbing systems.

We have observed, with growing concern, an increasing trend of non-compliant and counterfeit plumbing products being sold through online retail channels, including Amazon. These illegal products undermine the integrity of the plumbing industry while posing significant risks to consumer health and safety and our infrastructure. It is imperative that e-commerce platforms like Amazon take immediate and decisive action to ensure that the plumbing products sold on your platform adhere to the same rigorous standards required by law and expected of brick-and-mortar retailers.

The influx of potentially inferior – or even harmful – products into the market is alarming. Without third-party testing and certification, plumbing products cannot be shown to meet the established safety standards, or state and federal laws; using noncompliant products can result in severe consequences, including the exposure of consumers to harmful substances.

A particularly distressing example is plumbing materials containing lead and other toxic materials at concentrations exceeding applicable laws and standards, which poses a significant risk when used in public water systems or facilities providing water for human consumption. The detrimental effects of toxic materials in water are well-documented and include a range of health issues, from cognitive impairment to cardiovascular problems.

The responsibility to safeguard consumers from these hazards falls on all participants in the chain of commerce, including online retailers. We believe that Amazon, as a leader in the e-commerce space, is uniquely positioned to set a precedent in this area. By prioritizing the sale of

safe, reliable, and compliant plumbing products, Amazon can play a crucial role in protecting public health and upholding standards to help keep people healthy and safe.

We propose the following measures to address this issue:

1. **Stricter Verification Process:** Implement a more rigorous vetting process for plumbing products, ensuring they meet all legal and safety standards by either requiring certification or at least to verify that certification claims are true.
2. **Transparency:** Provide clear information about the compliance and certification of products, making it easier for consumers to make informed decisions.
3. **Partnership with Industry Experts:** Collaborate with organizations like PILC to identify non-compliant products and take swift action to remove them from your platform.
4. **Consumer Education:** Launch initiatives to educate consumers about the risks associated with non-compliant plumbing products and how to identify them.

PILC is fully committed to supporting Amazon in these efforts. We believe that through collaboration focusing on consumer safety, we can significantly reduce the sale and distribution of these illegal products.

We look forward to discussing this matter further and exploring ways in which we can work together to address this critical issue.

Thank you for considering our concerns and suggestions. We are eager to help ensure that online shopping remains a safe, reliable resource for consumers purchasing plumbing products.

Sincerely,

The Plumbing Industry Leadership Coalition:

- ☐ American Supply Association
- ☐ The American Society of Plumbing Engineers (ASPE)
- ☐ ARCSA International
- ☐ ASSE International
- ☐ Copper Development Association
- ☐ The International Association of Plumbing and Mechanical Officials (The IAPMO Group)
- ☐ The International Code Council (ICC)
- ☐ Mechanical Hub Media
- ☐ NSF
- ☐ Plumbing-Heating-Cooling Contractors—National Association
- ☐ Plumbing & Mechanical, PM Engineer, Radiant Comfort Report, and Supply House Times (BNP Media)
- ☐ Plumbing Manufacturers International (PMI)
- ☐ Radiant Professionals Alliance (RPA)
- ☐ The United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada (UA)
- ☐ Water Quality Association (WQA)