October 7 2014

Mr. Matt Sigler  
Plumbing Manufacturers International  
msigler@pmihome.org

Subject: Public Comment on NSF 375 (375i1r2) Sustainability Assessment for Water Contact Products

Dear Mr. Sigler:

Thank you for your public comment on NSF 375 (375i1r2) Sustainability Assessment for Water Contact Products. Below are your comments in *italics* and the response from Bob Powitz, JC chair, in **bold**.

*Submitter Comment: Plumbing Manufacturers International (PMI) would encourage the committee to vote “negative” in regards to NSF 375 for the following reasons:*

1. Sustainability standards are often used as a surrogate for published LCA data in green building rating systems, but each is very different in scope and (especially) management system requirements.

2. With a pass/fail approach, a passing or sustainable product achieves a minimum threshold of points (all prerequisite criteria and 30% of optional). But is this meaningful for our customers and specifiers?
   a) A pass/fail reveals nothing about the product or organizational facts and attributes that support the grade.
   b) Its only meaningful if someone takes the time to read through the entire standard, and even then there is no indication of which optional criteria were met.

3. As with other sustainability standards, this document has many program development and execution requirements, which add substantial administrative burden. The mere existence of these programs does not by itself indicate a more sustainable product. It is more useful for customers and specifiers to see actual results.
   a) One alternative: nutrition label-type statement with multiple attributes that is certified to be accurate. For example, product recycled content (%), regional material sourcing (%), facility waste diversion from landfill (%), etc.
   b) Collect the attributes together that are most meaningful to our products and organizations.
   c) Use standards for creating these statements that already exist, as applicable.

*Response: Thank you for your comments.*

1. This sustainability standard promotes Life Cycle Assessments in addition to the other metrics for sustainability including corporate social responsibility. It is also aligned with life cycle thinking and intended to promote measurement of impacts from manufacturing.
2.a) It is always an option for a manufacturer to list its attributes from the standard in a nutrition-type labeling along with the certification. Perhaps this could be developed to be used by all who certify to the standard.
2.b) What the committee had discussed was the ability of a company to list what optional criteria they had utilized in their listing with the certification body. This could be linked to the certification by QR code and to the company’s website.
3.a,b,c) The transparency of various attributes is a method of reporting the outcome of tracking, monitoring, and improving aspects of a product and its manufacturing. The idea of a nutrition label as mentioned above is meaningful and could be a valuable addition to reporting by companies. This idea will be proposed to the Joint Committee as an informational item to consider adding for those choosing to pursue this method of reporting beyond certification marking.

I hope the above addresses your concerns with this issue. Please respond in writing (electronic is preferred) if you are satisfied with the response by October 21 2014. If we do not hear from you by that date, we will presume your comments have been resolved. If you have additional comments, or wish to discuss these points further, please contact me directly.

Thank you again for your thorough review.

Bob Powitz, Chairperson
Joint Committee on Water Sustainability - Products
C/o Joint Committee Secretariat
NSF International
(734) 827-6819
mcostello@nsf.org