Joint Committee Issue Document

NOTE: An issue document may be submitted at any time – it comprises two parts: the cover sheet (this page) and a description of the issue to be submitted to the Joint Committee (following page). A separate issue form is required for each issue submitted. Issue papers include proposals for modification of a standard, information reports and (of current research, etc.). An issue paper shall be categorized as being for ACTION or for INFORMATION. Submitters should limit the Issue Paper to 1 or 2 pages – attachments detailing full recommendations or background information may be attached with supplementary information. The Chairperson of the appropriate Joint Committee will respond within 30 days of receipt of the issue document advising what steps will be taken. Any issue document intended for discussion at a Joint Committee meeting must be received at least 21 days prior to the meeting to ensure inclusion in the agenda.

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Signature of Submitter * Rick Andrew Date 10/7/04

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Action  ____X_________  Information  __________________________

NSF Standard(s) Impacted:  NSF/ANSI 53 and 58

Issue Statement:
NSF has allowed manufacturers to use the word “removes” as opposed to “reduces” with respect to claims of cyst reduction, as long as the percentage of removal exceeds 99.95% and has been indicated in the claim statement. For example:

“Removes 99.97% of microbiological cysts”

Manufacturers have expressed interest in including language in the Standards to clarify that usage of the word “removes” along with the percentage of removal is acceptable when describing cyst reduction.

Background:
Addition of specific language would make language requirements clear to all users of the Standard, including manufacturers, regulators, and certification bodies. Without such language, there could be different interpretations that can cause difficulty for manufacturers when obtaining various certifications, and can cause consumer confusion.

There are no public health concerns related to clarifying requirements for use of the word “removes” as an alternative to “reduces” because the necessary performance to make the cyst reduction claim would not be altered.

Recommendation:
NSF recommends that language be added to NSF/ANSI 53 and 58 to clarify that usage of the word “removes” along with the percentage of removal is acceptable when describing the cyst reduction claim. This language would be as follows for NSF/ANSI 53:

8.1.2 Where applicable and appropriate, the following information shall also be included:
- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described as cyst removal.

8.1.3 Where appropriate and applicable, and where product packaging contains information for the prospective purchaser, the following information shall be included on the product packaging in a location visible to the purchaser:
- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described on the packaging as cyst removal.

8.2.2 Where applicable and appropriate, the following information shall also be included:
- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described as cyst removal.

8.3.2 Where applicable, the following information shall also be stated:

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- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described on the replacement element packaging as cyst removal.

8.4.2 Where applicable and appropriate, the following information shall also be included:

- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described as cyst removal.

This language would be as follows for NSF/ANSI 58:

8.1.2 Where applicable and appropriate, the following information shall also be included:

- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described as cyst removal.

8.1.3 Where appropriate and applicable, and where product packaging contains information for the prospective purchaser, the following information shall be included on the product packaging in a location visible to the purchaser:

- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described on the packaging as cyst removal.

8.2.2 Where applicable and appropriate, the following information shall also be included:

- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described as cyst removal.

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- For systems claiming cyst reduction: The percentage of cyst reduction must be included in the claim if the claim is described as cyst removal.

Supplementary Materials (photographs, diagrams, reports, etc.):

Submitter ___Rick Andrew_____________ Date ___10/7/04_________