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.

Submit to:

NSF International
Attn: Standards Department
789 Dixboro Rd.
Ann Arbor, Michigan 48105

Fax: 734-827-6831
e-mail: standards@nsf.org

Submitter’s contact information:

Name: Richard W. Church
Company: Plastic Pipe and Fittings Association
Mailing Address: 800 Roosevelt Road, Bldg. C, Suite 312
City: Glen Ellyn State: IL Zip Code: 60137
Telephone Number: 630/858-6540 E-mail: dickc@cmservnet.com

I hereby grant NSF International the non-exclusive, royalty free rights, including non-exclusive, royalty free rights in copyright; in this item and I understand that I acquire no rights in any publication of NSF International in which this item in this or another similar or analogous form is used.

Signature of Submitter *Richard W. Church* Date: November 26, 2007

*Type written name will suffice as signature*
Please indicate if you wish the item to be considered as an action item or as an information item.

Action: ☒ Information: ☐

NSF Standard(s) Impacted:
Standard 14

Issue Statement:
Provide a concise statement of the issue, which reference as appropriate any specific section(s) of the standard(s) that are related to the issue.
The issue is mandatory third party certification of the quantity of lead in plumbing products by law in California based on content rather than extraction.

Background:
Provide a brief background statement indicating the cause and nature of concern, the impacts identified relevant to public health, public understanding, etc, and any other reason why the issue should be considered by the Committee.
A California law requires that virtually all components of a plumbing system conveying potable water, including all pipe and fittings, contain no more than 0.25% lead. There is a nearly incomprehensible formula applied to valves and faucets and the like to determine the 0.25%. Most in the plumbing industry agree the legislation was poorly conceived and even more poorly written. It creates a number of problems, especially for faucet manufacturers. A "fix" has been proposed that would require 3rd party certification (by an ANSI-accredited certifier) for any covered product. This would cover plastic pipe and fittings also. You may be aware that extraction tests for heavy metals, including lead, are run on all plastic potable water pipe products against Standard 61 extraction criteria. At one time NSF had a certification policy not allowing the use of lead in any plastic pipe or fittings products used to convey potable water. After careful review, PPFA believes (and requests) that the no lead policy should be reinstated as a requirement under Standard 14. The purpose of this request and the language supplied below is intended to prevent the State of California (or any other jurisdiction copying California's language) from requiring a separate certification program for plastic pipe and fittings with respect to lead content. We are hopeful this action will show regulators there is no lead in plastic pipe and fittings products intended to convey potable water.
Recommendation:
If action by the Joint Committee is being requested, clearly state what action is needed: e.g., recommended changes to the standard(s) including the current text of the relevant section(s) indicating deletions by use of strike-out and additions by highlighting; e.g., reference of the issue to a Task Force for detailed consideration; etc. If recommended text changes are more than a half page, please attach a separate document.

7.3 There shall be no lead as in intentional ingredient in pipe, fittings, materials, ingredients or system components for use in potable water applications.

Exception: Brass or bronze meeting the definition of “lead free” under the specific provisions of the Safe Drinking Water act of the United States, as amended in 1986.

Supplementary Materials (photographs, diagrams, reports, etc.):
If not provided electronically, the submitter will be responsible to have sufficient copies to distribute to committee members.

Submitter: Richard W. Church Date: 11/26/2007