TO: Joint Committee on Drinking Water Additives – Treatment Chemicals

FROM: France Lemieux, Chair of the Joint Committee

DATE: March 4, 2019

SUBJECT: Proposed revision to NSF/ANSI 223 – Conformity Assessment Requirements for Certification Bodies that Certify Products Pursuant to NSF/ANSI/CAN 60: Drinking Water Treatment Chemicals – Health Effects (223i7r1)

Revision 1 of NSF/ANSI 223 issue 7 is being forwarded to the Joint Committee for consideration. Please review the proposal and submit your ballot by March 25, 2020 via the NSF Online Workspace <www.standards.nsf.org>.

Purpose

The proposed revision will remove the word “blend” from chemical distributors with a TI CPI score < 50 under facility audit requirements in section 5.4 of NSF/ANSI 223.

Background

It was reported at the recent 2019 DWA-TC Joint Committee meeting that the original intent for the increased frequency of audits for facilities that are located in a country with a TI CPI score of < 50 was for the complete chemical that was packaged. It was proposed that this did not apply to the blender, unless the blender itself is located in a country with a lower CPI index score. In other cases, blenders receive a technical formulation review. Please see the 2019 DWA-TC JC meeting summary excerpt and the original issue paper (DWA-60-2019-10) under the referenced items for additional information.

If you have any questions about the technical content of the ballot, you may contact me in care of:

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5.2 Facility audits during surveillance

5.2.4 Facilities that blend, dilute, dissolve, relabel, repackage, or transfer noncertified products that are supplied by a facility that is located in a country with a TI CPI < 50 shall have an audit frequency of twice per calendar year. The CB has the option to reduce the inspection frequency to once every 12 months if the supplying facility meets one of the following criteria:

— the supplier to the facility also receives audits from a CB that is accredited by an International Accreditation Forum signatory, according to the requirements of this Standard; or

— the blender, diluter, dissolver, relabeler, repackager, or transfer facility has an alternate method that is acceptable to the CB, which provides a mechanism to verify that no changes have been made to the supplied product and continues to be provided identical product.

Rationale: Removed the word “blend” from distributors with TI < CPI 50 score to reflect the original intention of the JC that only the facilities that are located in a country with the lower TI CPI score would be subject to increased audits. Blenders of those products receive a technical formulation review. (2019 DWA-TC JC meeting discussion, Dec. 4, 2019).