Joint Committee Issue Paper

NSF Standard(s) Impacted: BIFMA e3 2019

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. Reference as appropriate any specific section(s) of the standard(s) that are related to the issue.

Submitted as a result from Interpretation Request

Multiple sections, e.g.,
The applicant shall receive one product point if it demonstrates a 2% reduction of water consumption per product from the gate-to-gate inventory baseline.

For surveillance audits, the applicant shall retain the point by demonstrating water consumption per product are at least 2% below the inventory level.

For recertification, the applicant shall retain the point if water consumption per product is below industry average.

Applicable credits:
6.4.2.4
6.4.4.2
6.6.2.1
6.6.2.2

For surveillance audits that happen AFTER the first recertification, does the manufacturer show a 2% reduction from their inventory (as the language suggests for the first 2 surveillance audits after initial certification), or do they need to continue to be below the industry average (rather than a further reduction from their baseline inventory) as they did for the recertification.

We assume that the manufacturer would need to continue to be below the industry average for subsequent surveillance audits, but that’s not how the language of the credit reads.

Recommendation:
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 or underlining; e.g., reference of the issue to a Task Group for detailed consideration; etc.

The applicant shall receive one product point if it demonstrates a 2% reduction of water consumption per product from the gate-to-gate inventory baseline.

For surveillance audits, the applicant shall retain the point by demonstrating X per product remains at least 2% below the inventory level submitted for the certification period.

For recertification, the applicant shall retain the point if X per product is reduced an additional 2% from the inventory level submitted during the previous certification period or is below the established BIFMA e3 industry average.

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

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Company: 
Telephone Number: E-mail: 
Is this a revision of a previous Issue Paper (if yes put original issue number): 
Submission Date: 6/15/2020

Please submit to: Joint Committee Secretariat, Kianda Franklin at kfranklin@nsf.org

*Type written name will suffice as signature