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Sent: Thursday, February 07, 2008 12:00 PM
To: Greiner, Pete; Kozanecki, Sarah
Cc: Richard.C.Winton@us.ul.com
Subject: Lead Task Group Information

Hi Pete and Sarah,

I'm writing regarding the request to the task group to identify pros & cons of adding the CA lead content requirements to NSF 61. In general, we don't feel like it is a good idea to add these requirements to NSF 61. This is a major deviation from the approach of the current standard and there are many unanswered questions regarding the requirements. That being said, here are some pros & cons for discussion points in the upcoming task group call:

Points for residing in NSF 61

- Adding these requirements to NSF 61 is an easy way to get the requirements in a standard already recognized in many regulations and codes. If a new standard were developed, it would take years to recognized in all appropriate regulations and codes.
- A prescriptive requirement , in some cases, may be preferred in place of the performance requirements of NSF 61. By having both in the same document, both evaluation scenarios are addressed in one place.
- The prescriptive requirements are viewed by some as insufficient, NSF 61 compliments these requirements adding scientifically backed performance evaluations.

Points for not residing in NSF 61

- This would be adding a prescriptive requirement to a performance based standard.
- Does adding these requirements increase the value of NSF 61? What does meeting the requirement tell you about the product? A product that meets the lead content requirement may not necessarily meet the performance requirements of NSF 61.
- These requirements are not covered by the scope of NSF 61.
- The products that could be evaluated to the lead content requirements of Annex G would be limited to those products covered by NSF 61, since the products must be NSF 61 compliant to be evaluated to the lead content requirements.

- This may result in two markings for NSF 61 compliant products and may add confusion to the market place and field.
- The requirements do not address coatings, plating, lead washing, and liners, which are used in many products covered by NSF 61.

Please let me know if you have any questions.

Kind Regards,

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