

INTERPRETATION REQUEST

A request for interpretation of a standard may be submitted at any time. A separate request for interpretation form is required for each interpretation submitted. The Secretariat of the appropriate Joint Committee will respond within 30 days of receipt of the interpretation form advising whether the submitted interpretation reflects the intention of the Joint Committee or not. If dissatisfied with the interpretation, the requester may file an Issue Paper for further consideration of the matter by the full Joint Committee.

NSF standard(s) impacted: NSF-61

Section of the standard for interpretation:

Provide the reference for the specific section(s) of the standard(s) for which interpretation is requested.

7.3.2 Regarding Source Traceability (Regarding The Testing and Use Of Post-Consumer Bottle Glass Under the Standard)

Requestor's interpretation of the section:

Provide the proposed interpretation of the section listed above. You may also want to provide an example of the situation in which you are applying this section of the standard.

To: The NSF-Review Board for NSF-61 Standards for potable drinking water.

From: Jason Mart-Nature Works Technologies / North American Business Development Director Re: Formal Request for Interpretation Review of NSF -61 Standard

Nature Works Technologies would like to formally request that an interpretation of the NSF-61 certification testing standards be conducted on two points; first, the Source Traceability requirements for the glass media that may be tested to be used for potable drinking water filtration applications, and secondly, we would like to have interpretation clarification on whether post-consumer recycled bottle glass from dumpsters and recycling centers is an acceptable source material to be tested under the NSF-61 testing standards for filtering drinking water.

Some background for your consideration.

After approximately 8 years of testing by NSF, Ann Arbor, and after investing hundreds of thousands of dollars of process, handling and machinery improvements to reach the high bar of the NSF-61 standard, we finally with great pride, achieved our NSF-61 certification for our Virgin Plate and Flat Glass media in early 2024.

When we began this arduous process, Nature Works had inquired and was specifically told that we could not use as our source, post-consumer glass waste stream source for NSF-61 testing and certification due to serious issues of sanitation of the source material and the impossibility of meeting the source tracing requirements. In reliance on this, Nature Works proceeded with having NSF proceed to test our virgin flat or plate glass product for use in the drinking water sector. (This is a manufacturing by-product of window and door production that is segregated at the production facilities.)



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We have a competitor who has engaged a third-party testing laboratory's branch in Australia to test their bottle glass sourced materials and has seemingly been allowed to utilize the exact same source materials we had been previously told could *not* be utilized.

We next went to our NSF representative (Javier Marin) and requested a ruling from them and they provided a clear written statement that this was not an allowable source stream for drinking water use under the NSF 61 testing standards. Since this is sent on official NSF Stationary it seemed that NSF's position was clear and that the matter had been settled. (See Addenda 1)

At the recent 2024 ACE/AWWA Conference in Anaheim, the matter was discussed with attending NSF Senior Staff and at week end, the clear NSF letter from Mr Marin apparently had no weight or standing and there still remained questions on the interpretation of the standard.

As a result of the apparent confusion (at least Internationally) over these source and traceability standards it seems appropriate as a first step, that an interpretation review be conducted as soon as possible so that there is one source of truth governing all of the third-party NSF testing labs and the protection of the many public health and industry professionals who act in reliance upon this important water safety standard. We would greatly appreciate that this standard be reviewed by NSF and interpreted and clarified for all of the industry stakeholders as soon as possible.

I hereby grant NSF 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 in which this item in this or another similar or analogous form is used.

Name:* Jason Mart

Company: Nature Works Technologies (US Agent)

Telephone: 317-753-3971 Email: sales@clarity-filtration.com

Submission date: 7/8/2024

Please submit to: Joint Committee Secretariat or to standards@nsf.org

Jason Mart

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Is the interpretation consistent with the intent of the Joint Committee?

Yes No

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Explanation of the Interpretation Decision:

Joint Committee Chairs provide an explanation for their decision regarding the Interpretation, which references any specific section(s) of the standard(s) that are related to the issue, as appropriate.

The traceability of the ingredients in a drinking water product is key under standard NSF 61. Specifically, section 3.2 (Information and formulation requirements) of the NSF 61 Standard indicates that the following are required for compliance:

— a complete formulation shall result in the identity by CAS number or chemical name of each component of the formulation including but not limited to the activators, antioxidants, antimicrobials, cosolvents, fillers, initiators, peroxides, pigments, plasticizers, process aids, solvents, stabilizer, surfactants and terminators; and

— percent or parts by weight for each chemical in the formulation or reference to a national or international standardized material specification for metallic materials (e.g., UNS copper alloy specifications).

— the composition of the materials ingredients and their components shall be known to determine the identity of formulation specific analytes;

Post-consumer recycled materials (e.g. plastics, glass) have no traceability to source materials. Due to the nature of recycled materials (i.e., no quality control or control of source material), testing results of a particular sample would be variable, even if obtained from the same supplier or source. Additionally, the absence of formulation information for the recycled materials and any potential contaminants present in those materials prevents the identification of formulation specific analyses needed to conduct comprehensive testing of the product. As such, the batch and material variability do not allow for producing a standardized material that could be demonstrated to be compliant to the standard under normal process/production controls. Since results on any given day is not predictive of compliance of future production batches (i.e. contaminants and levels), the use of post-consumer recycled materials is not currently an acceptable practice under NSF Standard 61.

Joint Committee Chair: France Lemieux Date: 8/6/2024



Eduardo H. Diaz
Nature Works Technologies S.L
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03580 Alicante, Spain

22-04-2024

NSF Standard 61 and traceability requirements

To whom it may concern,

The traceability of the ingredients in a drinking water product is key in the Certification compliance according to standard NSF 61. Specifically, section 3.2 of the NSF 61 Standard, Information and formulation requirements, indicates among other things:

- a complete formulation shall result in the identity by CAS number or chemical name of each component of the formulation including but not limited to the activators, antioxidants, antimicrobials, cosolvents, fillers, initiators, peroxides, pigments, plasticizers, process aids, solvents, stabilizer, surfactants and terminators; and
- percent or parts by weight for each chemical in the formulation or reference to a national or international standardized material specification for metallic materials (e.g., UNS copper alloy specifications).

Post-consumer recycled materials have no traceability to source materials, and testing of a particular sample today cannot predict the contaminants for glass tomorrow.

In the past, NSF has tested many recycled materials for use in food and water contact products and has found high levels of contaminants (lead being the most prominent). For these reasons, the use of post-consumer recycled materials is not acceptable practice currently.

To learn the most up-to-date information about this topic or any NSF Certification related topic, please contact me directly at +34 679 193 453. This letter may be copied and distributed only in its entirety.

Sincerely,

Javier Marin
Senior Account Manager EMEA – Water Systems
M +34 679 193 453 E jmarin@nsf.org

A handwritten signature in black ink, appearing to be "Javier Marin", written over a horizontal line.

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(Addenda 1)