



March 16, 2021

The Honorable Stacy Brenner
Senator (D-ME, 30)
Chair of the Joint Committee on Environment and Natural Resources
388 Broadturn Road
Scarborough, ME 04074

**PMI 2021
Board of
Directors**

The Honorable Ralph Tucker
Representative (D-ME, 50)
Chair of the Joint Committee on Environment and Natural Resources
15 McKeen Street
Brunswick, ME 04011

Todd Teter
House of Rohl
President

RE: Maine LD 940 – An Act To Establish Appliance Energy and Water Standards

Martin Knieps
Viega LLC
Vice President

Dear Chair Brenner and Chair Tucker:

Sal Gattone
LIXIL
Secretary-
Treasurer

Plumbing Manufacturers International (PMI) appreciates the opportunity to provide comments regarding Maine LD 940, that the Joint Environment and Natural Resources Committee will be considering in the future, which looks to amend the efficiency standards of plumbing fixtures and fixture fittings that are sold in the state to match those of the State of California.

Joel Smith
Kohler Co.
Immediate
Past President

PMI is an international, U.S.-based trade association representing manufacturers that provide 90% of the plumbing products sold in the United States. PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported the U.S. EPA WaterSense® program since its inception. **In Maine, plumbing manufacturers contribute \$274.3 million to the economy, provide more than 1,860 jobs (direct and indirect) and generate \$85.5 million in wages.**

Fernando
Fernandez
TOTO USA

Regarding the proposed bill, PMI **strongly opposes** the bill and would like to bring to your attention the following comments for your consideration:

Daniel
Gleiberman
Sloan Valve
Co.

- The California Energy Commission is in the process of issuing a final report for their study titled: “Code Changes and Implications of Residential Low Flow Hot Water Fixtures - [PIR-16-020].”¹ As a member of the Technical Advisory Committee for the research project, PMI would like to note the following observations from the study:
 - **Reducing plumbing fixture and fixture fitting flow rates below U.S. EPA WaterSense® program levels without corresponding reduction in pipe sizing does not save water in proportion to the change in flow rate.**
 - **There are unintended consequences to public health that can come from reducing plumbing fixture and fixture fitting flow rates without a corresponding reduction in pipe sizes.**
- Based on the November 2017 white paper titled: “Adapting to Change: Utility Systems and Declining Flows”², where issues with California’s drinking water, wastewater and recycled-water infrastructures have been highlighted due to reductions in indoor water use, the State of Maine should first analyze the

Bob Neff
Delta Faucet
Co.

Chip Way
Lavelle
Industries,
Inc.

¹ “Natural Gas Research and Development Program 2019 Annual Report – Appendices,” Energy Research and Development Division of the California Energy Commission, November 2019, pgs. C-104 and C-105, <https://ww2.energy.ca.gov/2019publications/CEC-500-2019-057/CEC-500-2019-057-AP.pdf>.

² “Adapting to Change: Utility Systems and Declining Flows,” California Association of Sanitation Agencies (CASA), Water Research Foundation (WRF), WaterReuse California, California Water Environment Association (CWEA) and California Water Urban Agencies (CUWA), November 2017, http://www.cuwa.org/pubs/CUWA_DecliningFlowsWhitePaper_11-28-17.pdf.

impact on its infrastructures before lowering the flow rates of plumbing fixtures and fittings to match those of the State of California. **Without such an analysis, there could be risks to public health.**

- The proposed effective sale date of the bill should be based on appliances and products that are **manufactured** on or after January 1, 2023. This will allow for retailers and distributors (including local hardware stores) time to meet the new efficiency standards, without incurring excessive costs or hardship, by being able to sell through existing products on their shelves.

If the State of Maine decides to lower the flow rates of plumbing fixtures (e.g., water closets, urinals) and plumbing fixture fittings (e.g., showerheads, lavatory faucets, kitchen faucets) below current state levels, **the state should adopt maximum flow rates that are consistent with the EPA WaterSense® program.** Such requirements will ensure that plumbing fixtures and fixture fittings are not only 20% more water efficient than federal regulations and what is currently permitted in Maine, but are also required to meet high performance standards.

Thank you for considering our comments. If you have any questions regarding our comments, please do not hesitate to contact me.

Sincerely,



Matt Sigler
Technical Director
Plumbing Manufacturers International
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cc: Joint Committee on Environment and Natural Resources

PMI Members

*Bradley Corporation *Brasscraft Manufacturing Company *CSA Group *Delta Faucet Company *Dornbracht Americas, Inc. *Duravit USA, Inc.
*Fisher Manufacturing Company *Fluidmaster, Inc. *Gerber Plumbing Fixtures, LLC *Hansgrohe, Inc.
*Haws Corporation *IAPMO *International Code Council – Evaluation Service (ICC-ES) *KEROX *Kohler Company *Lavelle Industries, Inc. *LIXIL *Moen Incorporated
*NEOPERL, Inc. *NSF International *Pfister *Reliance Worldwide Corporation *Similor AG *Sloan Valve Company *Speakman Company *Sprite
*Symmons Industries, Inc. *T & S Brass and Bronze Works, Inc. *TOTO USA *UL, LLC *Viega, LLC *Water Pik, Inc. *WCM Industries, Inc.