EPA WaterSense

A partnership program of the
U.S. Environmental Protection Agency

April 23, 2010

Dear Interested Party:

Recently, EPA has received questions concerning whether tanks and bowls manufactured and sold by different companies are eligible to be certified in accordance with WaterSense's *High-Efficiency Tank-Type Toilet Specification* (specification) and earn the WaterSense label. With this letter, EPA is providing clarification regarding the circumstances under which these products can be certified and establishing the requirements for effectively communicating that the combination tank and bowl is WaterSense labeled. Specifically, this clarification applies only to wall hung bowls and in-wall carrier systems that are manufactured and sold by different companies.

WaterSense requires every combination tank and bowl to be tested and certified for conformance to the specification in order to ensure that the toilet provides the expected water-efficiency and performance. Wall hung bowls (bowls) and in-wall carrier systems (tanks) manufactured and sold by different companies may earn the WaterSense label, provided the combination unit is tested and certified. However, since these products may not necessarily be sold as a unit, WaterSense is imposing some additional requirements, described below, to ensure that it is clear to the purchaser that the combination is labeled, versus the individual component tank or bowl. Both manufacturers must agree to have their products tested and certified together in order for the tank and bowl combination to receive the WaterSense label.

Certification Listing

In order to control the use of the WaterSense label, EPA is requiring each manufacturer (e.g., the tank manufacturer and the bowl manufacturer) to obtain a certification listing with one of EPA's licensed certifying bodies (http://www.epa.gov/watersense/about_us/index.html) to show that the toilet, formed by the combination tank and bowl, was certified for conformance to the specification. The listings must identify both components along with the respective manufacturers' names, brand names, model names, and model numbers by which the products are identified and sold. Separate listings will allow the certifying body to directly authorize each manufacturer to use the WaterSense label on their tanks or bowls. Note that though a certification listing is required for each manufacturer, WaterSense is not requiring the combination toilet to be tested more than once. The licensed certifying body must ensure that the listing information for both manufacturers is complete prior to issuing the certification and WaterSense label to either manufacturer.

As an alternative to separate listings, and at the discretion of the certifying body, the manufacturer of one of the components (e.g., either the tank or bowl manufacturer) may become listed as an additional company under the certification listing of the manufacturer of the corresponding component (e.g., the bowl or tank). However, both components, along with the

respective manufacturer's names, brand names, model names, and model numbers by which the products are identified and sold, must be identified under both the certification file owner's listing and the additional company's listing. This will ensure that there is no confusion about which products were certified in combination to earn the WaterSense label.

Labeling and Marking

As authorized by the certifying body, the manufacturers of both the tank and bowl may use the WaterSense label to indicate that their product is part of a WaterSense labeled tank-type toilet. Both manufacturers must also indicate on product specification sheets or other product documentation **all** of the specific brand names, model names, and/or model numbers of the counterpart products (e.g., the tank or bowl) that the product may be used with to form a WaterSense labeled tank-type toilet. In addition, the manufacturer of the bowl must also include on product packaging the specific brand names, model names, and/or model numbers of the tank(s) that the product may be used with to form a WaterSense labeled tank-type toilet.

WaterSense recommends using the following language on product packaging and/or documentation:

> "This [insert description of tank or bowl] is WaterSense labeled when used with [list brand names, model names, and/or model numbers of the tank(s) or bowl(s) that the product may be used with to form a WaterSense labeled tank-type toilet]"

WaterSense Product Registry

Each manufacturer must submit to EPA a new certified product notification form (http://www.epa.gov/watersense/partners/manufacturer.html#product_labeled) in order to have their products listed on the WaterSense product registry under their product's brand name. The form must include the appropriate information for **both** components, including the brand name(s), model name(s), and model number(s). WaterSense will verify the information submitted on this notification form with the information contained in the manufacturer's certification listing before adding any product to the WaterSense product registry.

If you have any questions or concerns regarding this issue, please contact me at 202-564-2660 or tanner.stephanie@epa.gov.

Sincerely,

Stephanie Tanner, CEM
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WaterSense Program