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Certification Requirements

"Results of the 0.75 GPM test will be reported to the Commission to provide performance information at the lower flow rate.

No minimum performance requirements for the 0.75 GPM flow rate standard.â€

The EPA in their WaterSense Certification testing determined that another test was not necessary to certify a pressure-regulated spray body. Why add another level of testing? And who would have access to the reported test data? If there is no pass/fail standard, what is the purpose of reporting the data, which has historically been considered proprietary? Adding another level of testing is time consuming and unnecessary considering the existence and acceptance of the EPA WaterSense Certification standard.

If the intent of having the results reported is for the analysis and creation of a new requirement in the future, then a study should be done to develop that requirement beforehand. Publishing test results would create an uncontrolled expectation based on consumer perception of those results. Additionally, variation in the plastic molding manufacturing process is normal, and these variations do have a slight effect on product performance. Detailed results can vary from test to test, where a pass/fail requirement stabilizes the results while still benefitting the consumer by certifying the product performs as intended.