

# New NSF/ANSI 223 Establishes Minimum Requirements for NSF/ANSI 60 Product Certifiers

By Blake Stark

In recent years, the NSF International Joint Committee on Drinking Water Treatment Chemicals and the NSF Council of Public Health Consultants (CPHC) adopted NSF/ANSI 223: Conformity Assessment Requirements for Certification Bodies that Certify Products Pursuant to NSF/ANSI 60: Drinking Water Treatment Chemicals-Health Effects. This standard establishes minimum requirements for certification organizations to be used in evaluating and certifying products to NSF/ANSI 60.

## Background

The California Code of Regulations (CCR) was updated on March 9, 2008 to require annual recertification of drinking water treatment chemicals to NSF/ANSI 60. This change was prompted by concerns that, while some certification organizations provided annual retesting of treatment chemicals, other organizations allowed for up to five years in between product retests - a period considered too long by public health norms. In 2009, Section 3.8 (Conformity Assessment), which contained minimum product testing and facility inspection requirements, was incorporated into NSF/ANSI 60-2009a. However, it was decided that requirements for the conformity assessment process (e.g. facility inspections, periodic retest requirements) would better serve the public health and industry stakeholders if placed in a separate conformity assessment standard specific to certification agencies. To accomplish this, NSF convened a Conformity Assessment Task Group composed of water utility personnel, drinking water supply regulators, ANSI-accredited NSF/ANSI 60 product certifiers and several manufacturers/distributors of treatment chemicals to develop NSF/ANSI 223.

## Purpose and Scope of NSF/ANSI 223

NSF/ANSI 223 covers the minimum requirements to be used by conformity assessment organizations when testing and certifying products to NSF/ANSI 60. These requirements are supplemental to those contained in ISO/IEC 17065 and do not replace the requirements in the ISO standard. NSF/ANSI 223 requirements include documentation reviews, product testing and facility inspections conducted during surveillance. Minimum facility inspection requirements are defined, as are the conditions under which announced inspections are allowed in lieu of unannounced inspections. In addition, an informative annex has been included to provide examples of conformity

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assessment activities drawn from the experiences of accredited NSF/ANSI 60 product certifiers. Two of the major requirements of NSF/ANSI 223 are with respect to product testing and facility audits:

### **Product Testing (NSF/ANSI 223, Section 4)**

Each chemical product that is certified to NSF/ANSI 60 shall be sampled and tested at least once per calendar year. This includes the chemistry-specific parameters identified in NSF/ANSI 60 and any additional parameters (if applicable) that are assigned during the product's formulation review. Within each chemical family, the product with the highest concentration may be tested as the representative of a series of analogous lower concentration products. Also, for a facility that blends, dilutes, dissolves, repackages or transfers products (where each of the original/incoming source products is certified on its own), a minimum of one product sample per facility shall be tested annually.

### **Facility Audits (NSF/ANSI 223, Section 5)**

NSF/ANSI 223 establishes minimum audit content/scope criteria which include validation of product formulations, review of records related to formulation control and product sampling. The standard also establishes minimum audit frequency criteria for NSF/ANSI 60 certified facilities. Each certified chemical production or distribution facility shall be audited a minimum of once per calendar year. Facilities that have had severe and/or repeated non-compliances related to NSF/ANSI 60 certification shall have a quarterly minimum audit frequency for a time period of no less than 36 months (reference Section 5.2.2 for details). In addition, NSF/ANSI 223 prescribes an increased audit frequency for some international facilities:

- > Facilities located in countries that have a score of less than 50 on the TI CPI, or that lack a score on this index, shall have a minimum audit frequency of twice per calendar year (reference Section 5.2.3 for details). The facility may reduce this to an annual audit frequency if:
  - o The facility has demonstrated and maintained 36 months of continuous freedom from Standard 60-related audit deficiencies; or
  - o The facility is registered to one of the following quality or environmental management standards by a third-party registrar

(that is accredited by an International Accreditation Forum signatory): ISO 9001, ISO 14000/14001, American Chemistry Council's Responsible Care Management System® or the National Association of Chemical Distributors' Code of Management Practice; or

- The facility is part of a wholly-owned global business entity or joint venture where all parties are operating under a quality management plan as described above.
- > Facilities that repackage/distribute material that is supplied by a facility located in a country with a TI CPI score under 50 shall have a minimum audit frequency of twice per calendar year (reference Section 5.2.4 for details). The certification body has the option to reduce the inspection frequency to once per calendar year if the supplying facility meets one of the following criteria:
  - The supplier to the facility receives audits from a certification body that is accredited by an International Accreditation Forum signatory.
  - The chemical repackager/distributor has an alternate method that is acceptable to the certification body, which provides a mechanism to verify that no changes have been made to the supplied product.

For more information, or for a copy of NSF/ANSI 223, contact Blake Stark at [stark@nsf.org](mailto:stark@nsf.org).

## What is the Transparency International Corruption Perceptions Index?

Transparency International's (TI) Corruption Perceptions Index (CPI) is constructed to aid international businesses in understanding the conditions they will face in the different countries in which they do business. The index has been constructed annually since 1995 for TI by Professor Johann Graf Lambsdorff of the University of Passau. The process sources 16 independent surveys of countries, and a country must appear in at least three of these sources in order for a score to be calculated. A score of 50 or lower on the CPI indicates that corruption is a significant factor in doing business in that country. As production moves to a wider variety of source countries and raw material sourcing is further diversified due to cost considerations, a method is needed to differentiate locations where oversight can be relaxed, and where it must be maintained. This external source of such judgments is the method most commonly used worldwide.

