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Contact: Ken Tomihiro
Program Manager
k.tomihiro@ciph.com

CSA Addresses CIPH Member Concerns

CIPH meets with CSA every fall season to review the past year and to discuss new issues that are coming up. Prior to the meeting, CIPH members are asked if they have any certification, standards or service issues that they would like to have addressed and we try to ensure that the right people attend the meeting to respond to those concerns. The following is a summary of the issues raised by CIPH members and the written responses that CSA has provided. CIPH and CSA have a good working relationship and CIPH will continue to work throughout the year to represent its members concerns.

1. Will CSA support the use of NSF 372 as the standard method for confirmation of lead compliance if Health Canada decides to move forward with any regulations?

[NSF 372 is an attempt to put legislative requirements and test methods into a standard. This would help to ensure that these requirements do not become fragmented, and as such CSA supports NSF 372.](#)

2. There is an ongoing problem of tankless hot water heaters being promoted and used as boilers even though they do not have ASME certification as boilers. Such use does not conform to the B214 standard and if they are to be used in these applications, they should be properly certified.

[CSA has agreed to look into this.](#)

3. If test data from a third party lab that is certified to ISO 17025, are there any activities between CBs to recognize such data so that retesting is avoided?

[CSA normally looks at accepting data from other CB's on a case-by-case basis. CSA has had good historical experiences with some external labs and some questionable experiences with other labs. It is also important to understand that by accepting other CB's data, CSA is held responsible by its accreditors \(eg. SCC, ANSI, IAS\) and as such it is important to ensure that product tests have been performed as required. In addition, to accept other CB's data, it is always necessary to adhere to ISO 17025.](#)

4. For WaterSense for Water Closets there is the MaP test which CSA may not yet be accredited to run. Is there any activity to rectify this? Will they support this test being included in the B45 standard?

[The CSA B45 Technical Committee currently has a project open to incorporate the MaP test into the CSA standard. Once the MaP test becomes a requirement in a standard, CSA will begin offering this test as a normal part of its certification program and will incorporate results in its public certification listings.](#)

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295 The West Mall, Suite 330, Toronto, Ontario M9C 4Z4.

info@ciph.com, Fax. 416-695-0450, www.ciph.com, Tel. 1-888-ASK-CIPH (275-2474), 416-695-0447.



5. In our city, the city inspection department has issued a memo to all contractors and builders that their products must have CSA markings on them. I have manufacturers challenging this. What do I do and how do I proceed to advise?

CSA does not dictate this. It is ultimately up to the Authority Having Jurisdiction (AHJ) to decide on what certifications they accept in their jurisdiction.

[\(CIPH NOTE: Use this link to an information bulletin on certification marks accepted in Canada.\)](#)

6. Contrary to some experiences of years past, currently we're actually quite happy with CSA and have a very strong voice with them on their certification and listing programs. In general, however, we do observe they are understaffed and suffer from turnover and this makes it more challenging to get reasonable service levels if you do not have a good relationship with someone who is there for the long haul like we currently do. Furthermore, it appears they have some bureaucratic high-level managers dictating how the technical teams should be doing their work with a miniscule budget and workforce. Meanwhile their fees have increased substantially over the years.

Service delivery is of the utmost importance to CSA and as such CSA has been continuously looking at ways to improve processes and efficiencies. Management has been focusing on resource allocation, and implementing policies so that customers receive a response from CSA no more than 24 hours after an inquiry has been made. To date, delivery times have seen a 30%-40% improvement, and CSA is committed to improving this further.

7. CSA Strategic Steering Committee on Water Management Products, Materials and Systems (SSC) used to be scheduled the day after the CACP meeting. I thought it was a good mix and was sad to find out it was rescheduled this year. I might be wrong but I believe it is not a temporary change. I think PIAC, if the members agree with my position, should put pressure on CSA to have the SSC meeting scheduled back again with the CACP meeting. The main reason is that many of the same people attend the CACP and the SSC so it makes it more convenient to do the traveling only once. Also, together the CACP and the SSC meetings attract many interesting people from the industry but separately, they may not create the same synergy. Please check with CSA about their plans for next year and if you find my fears are real and the other members of the PIAC agree with my position, please relay our position to CSA.

CSA wants to ensure that the Strategic Steering Committee meeting will bring value to both its members as well as CSA. Lately there have not been enough items for discussion to justify a meeting. CSA along with CIPH is looking at the possibility of creating a 'sector advisory council' to be held in conjunction with the CACP meeting. This would replace the CSA Strategic Steering Committee meeting which was normally held the day after the CACP meeting.

8. In Nova Scotia training programs for Building/Plumbing Officials are accredited by the Nova Scotia Building Code Training and Certification Board. I would be curious to know if there is any interest in having the course accredited. It may still be used as a supplemental training whether it's accredited or not. We are always looking to improve our curriculum for plumbing training and would be interested to learn more about the course being offered. We are also currently reviewing options for delivery of building official training.

For the moment CSA and CIPH are focusing on the existing training product geared toward plumbing inspectors in order to ensure that it is successful.





9. Our main concern is in the geothermal market. We are trying to establish the inclusion of PEX pipe for geothermal systems. This is a very hot topic for us as we are having difficulty penetrating the market.

Currently Geothermal systems are included in the 2009 edition of B137.5 and B137.10. Certification and testing has identified this as an opportunity and is planning on marketing the program.

10. Counterfeit products and use of CSA, UPC markings.

This is something that the new training for Plumbing Inspectors can help with. There is a specific module which focuses on counterfeit product and identifying appropriate markings. CSA and CIPH have recently launched this training product which is designed to help inspectors.

11. Unnecessary provincial codes not consistent with existing/national codes.

A task force was created at the recent CACP meeting that would look at establishing a guideline that would act as a mechanism for CACP to gather information about regulations related to water conservation, water protection and energy efficiency policy that directly affects the plumbing industry. The guideline could act as a best practices guide so that information and experiences could be widely shared with a long-term view towards promoting uniformity across jurisdictional levels.

12. We are going through quite the time here identifying marks, determining what is non-certified or non-complying product, and educating the inspection departments and contractors as to the products out there that are non-certified. The inspectors are not even sure and we have some mixed messages from different bodies. CSA has their story, manufacturers in the U.S. with CUPC or IAPMO have their story, etc. Offshore importers say they are complying and point to their marks. Inspection services here in the city adopted the NBC, so they go to their resource, NRC who says all plumbing products must be CSA.

For the most part, plumbing products must be certified by an SCC accredited certification body to the appropriate CSA Standard so that it can be recognized for use by the local Authority Having Jurisdiction (AHJ). Please also refer to response from comment 10.

13. The only issue for us at the moment is acceptance between CBs. For example CSA and Intertek. Both are SCC accredited yet CSA will not accept certain certifications from Intertek or the reverse. I suspect this could be solved with some form of intergroup insurance scheme perhaps, but CBs really seem to resist this obvious expectation from manufacturers who look at two organizations accredited to the same standards by the same national body.

Refer to response from comment 3.

14. The only thing I could think of is that we should have more of the ASTM standards harmonized/accepted in Canada. This could be more of an issue for the Canadian Standards Council?

In order to remain accredited as a Standards Development Organization, it is necessary to harmonize standards where feasible. Many ASTM standards are referenced as test methods within the CSA Standards (which are geared mainly towards end-product requirements).





15. Inspectors - To my knowledge there is no real inspection at finishing stages to actually look for the product approval; this would help cut down on non-approved products being sold and installed. (Renovation market is probably one of the worst for this, if no permit is pulled nobody would ever know.)

The decision to inspect renovations would be up to the local Authority Having Jurisdiction (AHJ) and not CSA.

16. There are certain dual-flush water closets on the market that we believe are not to U.S. code as they have a double trap that IAPMO refuses to acknowledge. Of course, they write the code. Right now we have an appeal with ANSI, our highest level of certification, on this. I bet if CSA, or someone with Canadian codes, looks at this piece they will agree that it is a dual trap.

CSA has agreed to look into this.

17. WaterSense. Right now WaterSense is invoking a part of their specification which allows them to test our water closets with whatever adjustable flapper they find in the marketplace. Flush volumes go through the roof due to this. Consequently we de-tune our product to get WaterSense listing. You and CSA should probably be aware of this.

CSA has agreed to look into this.

18. I continue to get lesser service from CSA than I do IAPMO. I throw emails "over the wall" and idly wait for someone to get back to me days later. They really need to fix this.

Refer to response from comment 6. In addition, CSA sends out letters to its clients when a project is assigned to a certifier which provides contact information for the assigned certifier as well as their Product Group Manager. We encourage customers to contact their certifier and their Product Group Manager if they have any concerns or questions on the progress of their work. In addition, you can always contact our Client Services Department at 1-866-797-4272 or 416-747-2661.

19. Is there anybody that actually polices the products out there in the market? I know Alberta is one of the provinces that does not allow any non-approved product to be sold, but there are lots of mom and pop shops in our area displaying and selling products that don't have approval. Who do we contact to investigate these places? or is it something that tends to get pushed to the side?

Marketplace enforcement of plumbing products to ensure they comply with applicable codes and standards is the responsibility of the Authority Having Jurisdiction (AHJ). Non-complying products should be reported to the local plumbing authority. CSA works with such AHJs to ensure that CSA certified products are clearly identified through certification marks, and public listings are available on our website: <http://directories.csa-international.org/> for verification purposes.

CSA has also partnered with CIPH to offer training programs for plumbing inspectors to help equip them with the knowledge and access to resources so they can better monitor and enforce the rules in the marketplace.

The Canadian Institute of Plumbing & Heating is a not-for-profit trade association. Founded in 1933, the Institute is a vibrant organization committed to providing members with the tools for success in today's competitive environment. More than 250 companies are members of this influential Canadian industry association. They are the manufacturers, wholesaler distributors, master distributors, manufacturers' agents and allied companies who manufacture and distribute plumbing, hydronic heating, industrial, waterworks and other mechanical products. CIPH wholesalers operate more than 700 warehouses and showrooms across Canada. Total industry sales exceed \$5 billion annually.

