



December 3, 2105

The Honorable Nikki Haley
Governor of South Carolina
1205 Pendleton Street
Columbia, South Carolina 29201

Dear Governor Haley:

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South Carolina residents have had access to water-efficient plumbing products – including WaterSense® products meeting EPA criteria – for many years. Yet, most South Carolina homes and businesses still do not have these widely available, high-performing products. As long as these products sit on store shelves, South Carolina is missing opportunities to save significant amounts of water. Plumbing Manufacturers International (PMI) is eager to work with you to provide information and statistics about water-efficient products. PMI urges South Carolina to begin to save more water now by creating rebates and incentives for consumers and businesses to purchase these products. WaterSense products save water while assuring your constituents' satisfaction with water services.

Just this May, *Consumer Reports* encouraged readers to "look for a WaterSense label" when replacing plumbing products. Despite the WaterSense success stories and recommendations – and the need to mitigate water shortages caused by drought – financial incentives to spur purchases of these products are necessary. For example, only 6.3 percent of South Carolina homes and businesses have WaterSense toilets, according to research conducted by GMP Research, Inc., for PMI. The research also found that only 32.1 percent of South Carolina homes have WaterSense residential lavatory faucets and only 36.4 percent have WaterSense showerheads.

Homes and businesses in South Carolina and throughout the nation are saving significant amounts of water with ready-to-use, high-efficiency WaterSense toilets, showerheads, faucets, urinals or pre-rinse spray valves. Meeting EPA criteria, all of these products are 20 percent more water efficient than required by federal standards and meet performance standards assuring consumer satisfaction.

PMI has made the promotion of water efficiency and safety a top priority and included it in its mission statement.¹ PMI's members produce safe, reliable and water-efficient plumbing technologies, support water-efficiency legislation and codes in South Carolina, and participate in the EPA's voluntary WaterSense program.

Reducing flow rates below WaterSense standards may create adverse unintended consequences
Keeping flow rates at WaterSense standards assures that these water-efficient products perform to high consumer satisfaction while saving water. Flow rates lower than WaterSense standards can cause higher water use and dissatisfaction among your constituents because of the time it takes to rinse

¹PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.

shampoo from hair and toothpaste from a toothbrush. Reducing flow rates too much also may create public health and safety hazards such as waterborne pathogen growth and will only delay the replacement of older plumbing fixtures that do not meet federal or WaterSense standards. Developing, testing, certifying and distributing new products that can be used with flow rates below WaterSense standards is a very lengthy process during which millions of gallons of water can be wasted.

Encouraging residents and businesses to purchase WaterSense toilets, faucets, showerheads and urinals now will save substantial amounts of water. For example, for a family of four:

- Replacing a toilet using 7.0 gallons per flush (gpf) saves 42,000 gallons a year. ☐
- Replacing a toilet using 5.0 gpf saves 30,000 gallons a year. ☐
- Replacing a toilet using 3.5 gpf saves 16,000 gallons a year. ☐
- Replacing a toilet using 1.6 gpf saves 2,000 gallons a year.

To earn the WaterSense label, plumbing products are independently tested and certified as using at least 20 percent less water than federal requirements while meeting performance standards. These water-efficient products are available at a wide variety of price points and in a broad range of styles.

Rebates and other incentives spur replacement of older fixtures with water-efficient products

Rebate programs and other incentives can further water savings by encouraging comprehensive and timely replacement of older products in existing buildings. For example, in California, PMI has been providing input to the California Energy Commission, the Department of Water Resources, and the State Water Resources Control Board as they work to fulfill Governor Jerry Brown's executive order to develop a statewide rebate program providing monetary incentives for the purchase of water-efficient products.

In South Carolina, the future is now – a time when steps to sustain an ever-precious resource must be taken. As good stewards of the environment, PMI wants South Carolina residents to know that using WaterSense plumbing products is an immediate action that can be taken to save water. There have been tremendous advancements in the technology and efficacy of plumbing products. Just as you wouldn't use a 20-year-old cell phone, it doesn't make sense to use 20-year-old plumbing technology.

PMI urges South Carolina to develop rebates and incentives and stands ready to respond to any questions you have about WaterSense products. Creating incentives to use WaterSense products is common sense. Start saving more water today.

Sincerely,



Barbara C. Higgins
CEO and Executive Director
Plumbing Manufacturers International