



**MEMO**

Date: 08/12/2010  
To: Jared Camacho  
ICCI  
265 Miller Ave.  
Mill Valley, CA 94941  
Subject: Conformance Requirements

In regards to your request for the marking requirements for Stainless Steel Sinks tested to ASME A112.19.3-2008/CSA B45.4-08 Stainless Steel Plumbing Fixtures, the relevant sections of the Uniform Plumbing Code (UPC)®, International Plumbing Code (IPC)®, and National Plumbing Code of Canada (NPC) provide the following requirements for markings:

**UPC® § 301.1.1 Approvals** states *"All pipe, pipe fittings, traps, fixtures, material, and devices shall be listed or labeled (third-party certified) by a listing agency (accredited conformity assessment body) and shall conform to approved applicable recognized standards referenced in this code, and shall be free from defects. Unless otherwise provided for in this code, all materials, fixtures, or devices used or entering into the construction of plumbing systems, or parts thereof, shall be submitted to the Authority Having Jurisdiction for Approval."*

**UPC® § 301.1.2 Marking** states *"Each length of pipe and each pipe fitting, trap, fixture, material, and device used in a plumbing system shall have cast, stamped, or indelibly marked on it the manufacturer's mark or name, which shall readily identify the manufacturer to the end user of the product.....Field Markings shall not be acceptable."*

**IPC® § 303.1 Identification** states *"Each length of pipe and each pipe fitting, trap, fixture, material and device utilized in a plumbing system shall bear the identification of the manufacturer."*

**IPC® § 303.4 Third-part testing and certification** states *"All plumbing products and materials shall comply with the referenced standards, specification and performance criteria of this code and shall be identified in accordance with Section 303.1. When required by table 303.4, plumbing products and materials shall either be tested by an approved third-part testing agency or certified by an approved third-party certification agency."*

**NPC § 2.2.1.3 Identification** states *"1) Every length of pipe and every fitting shall a) have cast, stamped or indelibly marked on it the maker's name or mark and the weight or class or quality of the product, or b) be marked in accordance with the relevant standard. 2) Markings required in Sentence (1) shall be visible after installation."*

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In addition to the relevant marking requirements as stated above, it should also be noted that ASME A112.19.3-2008/CSA B45.4-08 has marking requirements to show compliancy with the standard. The following are the marking requirements for products tested to this standard:

### 6 Markings, packaging, and installation instructions and other literature

#### 6.1 General

##### 6.1.1

Stainless steel plumbing fixtures shall be marked with the manufacturer's name or registered trademark or, in the case of private labeling, the name of the customer for whom the fixture was manufactured. Additional markings shall be in accordance with Clauses 6.2 and 6.3, as applicable.

##### 6.1.2

Markings shall be permanent, legible, and visible after installation.

##### 6.5.2.1

Packaging for stainless steel fixtures shall be marked with the

- (a) manufacturer's name or registered trademark or, in the case of private labeling, the name of the customer for whom the fixture was manufactured; and
- (b) model number.

With reference to these requirements as stated within the applicable codes and standards, it can be accurately stated that any plumbing product that does not bear these required markings is not compliant with the relevant standards and codes. However, it should be noted that SGS recognizes Authorities Having Jurisdiction have the authority to decide what marking requirements, section of codes and standards, exemptions, amendments, or additional requirements to these codes are relevant within their applicable jurisdiction.

Furthermore, it should be noted that any certified product, so certified by an approved third-party certifying agency operating under the auspices of ISO Guide 65 General requirements for bodies operating product certification systems, must bear the certification mark of the approved third-party certifying agency. It is also a requirement that all third-party certifying agencies must publish and make available a listing of certified products. It has become the general norm in the certification industry that these are published and made available via the world-wide web (internet). However, it is allowable to only have a hard copy available. Additionally, a certificate shall be issued to the manufacturer or applicant bearing the qualifications of the certified product.

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