



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
WATER

December 2023

Dear Interested Party:

WaterSense® is a voluntary partnership program sponsored by the U.S. Environmental Protection Agency (EPA) that seeks to help consumers and businesses identify water-saving products, programs, services, and homes. Products that earn the WaterSense label are independently certified to use at least 20 percent less water and perform as well or better than standard models.

EPA is pleased to release a draft Version 2.0 of its *WaterSense Specification for Tank-Type Toilets*, which will revise the existing criteria for WaterSense labeled dual-flush tank-type toilets. Currently, the effective flush volume of dual-flush toilets is calculated by averaging two reduced flush volumes and one full flush volume, and this average must not exceed 1.28 gallons per flush (gpf). This effective flush volume calculation relies on the assumption that users will select the reduced-flush mode at least twice as much as the full-flush mode. However, EPA received feedback from program partners indicating that dual-flush toilets are not reaching the expected 2:1 reduced flush to full flush ratio and therefore are not realizing WaterSense's goal of 20 percent water savings. To address this inconsistency between design and reality and enhance the market for more water-efficient tank-type toilets, EPA is revising the WaterSense specification to establish a single maximum flush volume requirement of 1.28 gpf for both single-flush toilets and the full-flush mode of dual-flush toilets. EPA is also updating references to plumbing standards, product marking and documentation requirements, and technical clarifications in Version 2.0.

The purpose of this letter is to request your feedback regarding the draft revisions to the specification for tank-type toilets. EPA will accept written comments and plans to hold a virtual public meeting to discuss the revisions and comments from interested parties.

### **Earning the WaterSense Label for Tank-Type Toilets**

The draft Version 2.0 of *WaterSense Specification for Tank-Type Toilets* provides the proposed updated criteria that a tank-type toilet must meet in order to earn the WaterSense label. The revisions to the specification are designed to ensure both sustainable, efficient water use and a high level of performance and user satisfaction.

EPA is aware that the planned revisions will affect the certification status of some existing WaterSense labeled dual-flush tank-type toilets and includes a timeline for compliance. Otherwise, EPA anticipates that the revisions will not impact the certification status and will not require the retesting or recertification of single-flush toilets or dual-flush toilets that have a full-flush volume less than or equal to 1.28 gpf. Further, the revisions will not impact the current licensing status of certifying bodies, and EPA will not require edits to licensing agreements or licensing agreement amendments currently in effect.

However, EPA still advises existing WaterSense partners that manufacture or distribute tank-type toilets to review the draft revised specification to understand impacts to their certification listings once finalized. Following the close of the comment period on January 26, 2024, EPA will review all comments and provide a consolidated response. EPA will then finalize the specification, establishing an effective date for compliance approximately six months following the final publication of Version 2.0. WaterSense manufacturer partners will need to coordinate with their certifying bodies to update certification listings according to the revised criteria and the timeline for compliance.

### **Providing Input on the Draft Specification**

EPA welcomes input on the draft Version 2.0 of *WaterSense Specification for Tank-Type Toilets*. The release also includes associated supporting materials, including a redline version of the specification showing draft changes between Version 1.2 and Version 2.0 of the specification, the *Summary of Revisions to the WaterSense Specification for Tank-Type Toilets*, and Draft Version 4.0 of the WaterSense Labeled Tank-Type Toilets Product Notification Template.

EPA will hold a virtual public meeting to discuss the specification and stakeholder feedback on Tuesday, January 9, 2024, from 2:00 p.m. to 4:00 p.m. Eastern. Details regarding webinar registration can be found on the [WaterSense website](#).

All interested parties are encouraged to review the draft specification and supporting materials and email their written comments no later than February 23, 2024. Written comments should be directed to [watersense-products@erg.com](mailto:watersense-products@erg.com). All comments, except data claimed as confidential business information (CBI), become a part of the public record. Information that qualifies as CBI can be submitted as such through EPA's contractor, ERG, as described below. Sensitive business information can be claimed confidential under 40 CFR Part 2 Subpart B. ERG has an EPA-approved security plan in place to protect CBI from unauthorized disclosure. All data submitted as confidential will be handled as such. CBI should not be submitted electronically but can be submitted as a hardcopy document or on a CD, DVD or flash drive. Data submitted as CBI will not become a part of the public record unless aggregated and masked to conceal the identity of the submitter.

Data claimed as CBI should be submitted to:

ERG

Attn: WaterSense Helpline

2300 Wilson Boulevard, Suite 350

Arlington, VA 22201

If you have any questions, please contact Stephanie Tanner at (202) 564-2660 or [tanner.stephanie@epa.gov](mailto:tanner.stephanie@epa.gov), or the WaterSense Helpline at (866) 987-7367 or [watersense@epa.gov](mailto:watersense@epa.gov). We look forward to receiving your feedback on the draft specification, as well as your organization's participation with WaterSense.

Sincerely,



Jonah Schein, Acting Branch Chief  
WaterSense Branch