

Submitted via email to [watersense-products@erg.com](mailto:watersense-products@erg.com)

February 21, 2024



WaterSense  
U.S. Environmental Protection Agency  
Office of Wastewater Management (4204M)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

**Re: WaterSense® Draft Specification for Spray Sprinkler Nozzles**

Dear WaterSense Staff:

The Alliance for Water Efficiency (“AWE”) is a stakeholder-based 501(c)(3) organization with more than 500 member organizations dedicated to the efficient and sustainable use of water. AWE provides a forum for collaboration around policy, information sharing, education, and stakeholder engagement. AWE is providing these comments on the Draft Specification for Spray Sprinkler Nozzles (“Draft Specification”). These comments were developed by AWE’s WaterSense-Water Efficient Products Advisory Committee, which is comprised of representatives from AWE member utilities, businesses, and other industry partners; the comments were then approved by a vote of AWE’s Board of Directors. AWE also requests that WaterSense evaluate and respond to the comments of AWE’s irrigation members, including Hunter Industries. Hunter Industries has additional comments like separating out MSMT nozzles that, due to time constraints, were not considered by the AWE advisory committee and board and, therefore, AWE expresses no opinion.

AWE welcomes this opportunity to comment on the Draft Specification, which has the potential to further improve the water efficiency of landscape irrigation systems. This topic is especially important given that watering landscapes is a consumptive use of water, a key contributor to peak water demands, and a high percentage of many utilities’ overall water use.

AWE supports WaterSense finalizing the Draft Specification and labeling spray sprinkler nozzles based on the water savings potential. AWE also encourages WaterSense to explore changes on the following topics to ensure predictable, significant, and cost-effective water savings. Specifically, AWE has the following comments:

**Topic #1: Product Marking and Documentation Requirements**

Comment: Consumers should be advised that landscape irrigation systems consist of many components that need to be designed and operated in an integrated and coordinated fashion. Irrigation professionals can help ensure proper design and operation.

Rationale: Water savings are dependent both on the characteristics of individual components, like spray sprinkler nozzles, and the overall design and operation of a system as a whole. Changing out one component may not result in water savings or otherwise adequately support plant and vegetation health.

Suggested Change (or Language): AWE recommends that Section 4.3 be modified to read as follows with new language shown in red: Product documentation, including online and print specification sheets and sales brochures, as applicable, shall recommend that (a) the nozzle be used in combination with a compatible WaterSense labeled spray sprinkler body for optimal performance and (b) that both the nozzle replacement and overall design and operation of the system be reviewed by a WaterSense certified landscape professional or other professional qualified under any applicable program administered by state or local governments.

## **Topic #2: When Sprinkler Body and Nozzle Packaged Together**

Comment: WaterSense should consider requiring that if manufacturers choose to package nozzles and bodies together, then both must be WaterSense labeled. AWE is not advocating for a requirement that they must be packaged together, and this comment is intended to address only when a manufacturer chooses to package these products together.

Rationale: Consumers may be more likely to be confused by packaging WaterSense labeled nozzles with non-labeled bodies. WaterSense should consider any data it or other stakeholders have available related to the likelihood and frequency of consumer confusion.

Suggested Change (or Language): Section 4.0 of Annex A could be restated as follows: “WaterSense labeled spray sprinkler nozzles may only be packaged together with spray sprinkler bodies if the bodies are also WaterSense labeled.”

**Conclusion**: AWE supports WaterSense finalizing the Draft Specification and labeling spray sprinkler nozzles and encourages WaterSense to consider comments from AWE and other stakeholders that may help ensure predictable, significant, and cost-effective water savings.

Sincerely,

A handwritten signature in blue ink that reads "Ron Burke". The signature is written in a cursive, slightly slanted style.

Ron Burke  
President and CEO  
Alliance for Water Efficiency