

IN CHINA THEY DON'T THINK OF IT AS BREAKING THE RULES. BUT APPARENTLY IN MICHIGAN THEY DO.

The Michigan Construction Code Commission recently voted to deny approval of imported cast iron soil pipe and fittings from China for use on state construction projects in the State of Michigan. In the Michigan case, a U.S. importer, MWI, had requested official approval of the products they were reselling. They were denied approval after Michigan regulators were not satisfied that the products they were outsourcing conformed to applicable standards referenced in the Michigan Plumbing Code.

MWI argued that they were the manufacturer for the purposes of meeting the manufacturing standard, even though they do not own or operate any manufacturing plants. They also argued that the Chinese-made products met the applicable manufacturing standards simply because they were listed with a third party certifier. However, the standard clearly defines the manufacturer as “the entity that cast the pipe and fittings.” Only the foundry that poured the molten iron can verify quality control procedures were followed at the time the material was cast. No third party certifier or reseller can do that after the time of manufacture.

The problem is that most U.S. importers purchase cast iron soil pipe and fittings from multiple foundries in China. The name of the producing foundry frequently is not stenciled on or cannot be readily identified on the pipe being sold (which is required by the standard). This makes it difficult, if not impossible, to identify which foundry produced the material. Also, the pipe sometimes is only marked with the month and the year it was manufactured, not the date of manufacture (which is also a requirement of the standard). These lapses make it impossible for consumers to tie back pipe or fittings to chemical, physical and dimensional testing reports at a given foundry, as required by the

standard. If there was a quality problem, how would the purchaser know what day the material was made, or which foundry made it, so they could ask for test reports that would verify the quality?

Requiring products to conform to applicable manufacturing standards is essential in today's world of global outsourcing. The news headlines demonstrate all too well what can happen if they are not followed. Customers should have the peace of mind of knowing that overseas manufacturers have diligently followed all

the necessary quality control requirements embedded in the standards. ASTM and Cast Iron Soil Pipe Institute (CISPI) standards for pipe and fittings require consistent tensile strength, chemical and dimensional testing and radiation testing of raw materials. These tests must be done during the manufacturing process by the manufacturer to ensure consistent quality and to be in compliance with the standard. Anything less will not adequately protect the customer.



Over and over Michigan regulators requested submittals from MWI in an effort to satisfy themselves that the subject products were acceptable. Over and over, the regulators found deficiencies and unresolved questions. Specifiers examining these same test reports would be left to guess whether the products were manufactured in compliance with the standard. On the other hand, NSF International has approved CISPI's quality control program to ensure that pipe and fittings manufactured in the U.S. and inspected by CISPI and NSF are compliant with the CISPI 301 and ASTM A 74 manufacturing standards. Specifying domestic-made cast iron soil pipe and fittings stamped with CISPI's CI collective trademark assures that products are being produced in accordance with the standards.

Now that's peace of mind, whether you're in Michigan, or any other state for that matter.

