November 14, 2025

Minnesota Plumbing Board
Karl Abrahamson, Chair
443 Lafayette Rd
St Paul, MN 55155

Dear Mr. Abrahamson and Minnesota Plumbing Board:

The Water Quality Association is a not-for-profit trade association of over 2,500 members including manufacturers, contractors, and dealers that provide water treatment equipment to residential, commercial, and industrial spaces worldwide.

We support bypasses on water softeners, backwashing water filters, and other types of water conditioning equipment and practices. As a national certifier of professionals in water treatment, our training programs reflect this. If this body chooses to add a bypass requirement to the Minnesota State Plumbing Code, then we urge you to keep these two points in mind regarding the purpose of the bypass: (1) isolating the equipment to stop flow and allow service; (2) passing untreated water to distribution when the equipment is isolated. To address these needs, we suggest using the below language previously offered by MN Plumbing Board Member Adam Johnson:

> *Every water conditioning installation shall include the installation of a shut off valve. Equipment serving multiple domestic fixtures shall have a valve appurtenance or a valve system that allows the equipment to be serviced or removed without the need to shut off the water service to distribution.*

The integral or appurtenance bypass, often provided with water treatment equipment, is designed to perform these functions. Equipment manufacturers continually make improvements in bypass devices, and these devices are accepted and certified both nationally and internationally. A plumbing code defining a separate bypass, its location, type of valve, distance from the equipment, height placement, etc., will be restrictive to those doing plumbing work in Minnesota. A requirement of this type would quickly become obsolete, prohibit further innovation, and cause redundancies for integral bypass devices. For example, the Minnesota Code refers to water softeners that are certified and labeled to ANSI/NSF Standard 44 which requires the integral bypass and must be included with the equipment to meet the standard's requirements.

For these reasons, we strongly suggest that the Minnesota Plumbing Board consider using the suggested language above in addressing bypasses with water treatment technology to avoid these concerns.

Thank you for your consideration,

Paige O'Malley
Water Quality Association
Government Affairs Manager