



By Martin Knieps, PMI Board of Directors President, Viega



Martin Knieps

Each Plumbing Manufacturers International member company has its own approach to sustainability, often focused on life cycle assessment, energy savings or carbon output reduction. But right now, new legislation in various states focuses on the concept of extended producer responsibility, particularly regarding packaging and single-use plastics.

Government regulators' stance is that a manufacturer's sustainability responsibility does not end after our products are sold; rather, our responsibility extends to the life of our products, including the life of the product packaging.

Our challenge is that each state developing single-use plastic packaging legislation has a different view of what that should look like. How do you approach this challenge when you're distributing products to 50 states, plus Canada and other nations, and each has a different set of laws to follow? Do you need to create your own recycling program for your customers? Is the best solution to stop using single-use plastics in packaging entirely?

At the state level, single-use plastic packaging seems to be headed down the path we saw with lead reduction a few years ago, when California and Vermont addressed this challenge before lead reduction became a federal issue recently addressed to a certain extent in the bipartisan Infrastructure Investment and Jobs Act signed by President **Joe Biden**.

Manufacturers would much prefer one set of rules to abide by than 50 different ones. That's where PMI adds value for our members, by facilitating discussions and creating a position that our members agree upon. Then, we can carry that message wherever it needs to go, whether that is to potential industry allies in other organizations, to state capitals, or to Capitol Hill in Washington.

As PMI begins to narrow down the meaning of "zero waste" for the organization, discussing and achieving a consensus

about extended producer responsibility in regard to single-use plastic packaging can be a good starting point. We're eager to hear your concerns, as well as your ideas about potential actions we can take as your association.

In the meantime, PMI is assembling thought leadership on this issue. Good places to gain an understanding of what's at stake, both for the industry and the planet, are **Domenic De-Caria's** PMI21 Manufacturing Success Conference presentation, "Industry and Regulatory Trends in Plumbing Plastics" (safeplumbing.org/pmi21) and AMERIPEN's **Dan Felton's** PMI webinar, "Financing Packaging Recycling and Recovery in the U.S. – the Time Has Come" (tinyurl.com/msr7fv2k). The Felton webinar is summarized on page 7, and the DeCaria presentation in last month's Ripple Effect. Both presentations are available on-demand as a PMI member benefit.

To be proactive on these kinds of issues, PMI recently joined AMERIPEN (the American Institute for Packaging and the Environment) to gain additional insight and influence on state and federal bills related to single-use plastic and packaging. In addition, the PMI Board of Directors will continue to work with foresight strategy tools to add context and a framework to PMI's Zero Waste Initiative.

I'm sure we'll see more legislation and regulatory actions relating to waste and sustainability in the future. Through the PMI Zero Waste Initiative, PMI is developing a structure through which to act decisively on these issues for the benefit of our members. Stay tuned!

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Hackers, Crackers and Quackers Pose Serious Threats

By Kerry Stackpole, FASAE, CAE, PMI CEO/Executive Director



Kerry Stackpole

How much time have you spent watching the Star Trek series of television episodes and movie sequels? From early beginnings in 1966 with Captain James Kirk to the il-

luminated intellect of Captain Jean Luc Picard, the Starship Enterprise cruised the galaxy to "go where no man has gone before." When unexpected alien attacks arose, the graviton screens were deployed to protect the ship.

So perhaps, the popularity of Star Trek and its global fan base gave rise to the U.S. Department of Homeland Security (DHS) and Cybersecurity and Infrastructure Security Agency (CISA) using Captain Kirk's shorthand command "Shields Up" to warn of the increasing risks of cyber threats capable of disrupting essential services and impacting public safety. Many of you will recall that PMI secured the CISA designation "essential business" for both plumbing product manufacturing plants and workers to assure the availability of critical plumbing fixtures, fittings and supplies during the early stages of the pandemic. As President John F. Kennedy reminded us, "for of those to whom much is given much is required."

With new and emerging global conflicts, the rise of various forms of cyber threats from usurpers known by cybersecurity experts as hackers, crackers and quackers are on the rise. Plumbing fixture and fitting manufacturers have an important role to play in protecting our essential businesses. CISA's warning is specific and daunting. "The Russian government understands that disabling or destroying critical infrastructure—including power and communications—can augment pressure on a country's government, military, and population..."

What's alarming in all this are the indiscriminate attacks by bad actors on businesses of all sizes and sectors. Large and small companies, hospitals, schools, hotels, and golf courses, as well as county, city and town governments, have been among the organizations victimized in these attacks. Ransomware attacks in the first half of 2021 grew by almost 100%. Reporting suggests that 60% of the attacks were performed by only three ransomware hacking groups.

According to the Identity Theft Resource Center's 2021 Annual Data Breach Report, the overall number of data compromises (1,862) is up more than 68% compared to 2020. The new record number of data compromises is 23% over the previous all-time high (1,506) set in 2017. The number of data events that involved sensitive information increased slightly in 2021 to 83% compared to 80% in 2020. According to ITRC, manufacturing and utilities saw the largest percentage increase in data compromises at 217% over incidents reported in 2020.

With challenges relating to inflation, logistics, trucking, supply chain, workforce development and more facing leaders in today's plumbing manufacturing business, cyber threats are easy to overlook. Our cyber adversaries are counting on those distractions. It's not just IT systems within your walls either. Phishing attacks, misplaced passwords, socially engineered breaches, payment system hacks, and misconfigured cloud servers at leading IT service providers have all resulted in significant data breaches exposing billions of data records.

Corporate leaders and CEOs play an enormously influential role and responsibility in ensuring their organizations adopt a heightened security posture across their entire enterprise. DHS and CISA have solid recommendations for where to start and what to do:

Empower Chief Information Security Officers (CISO): In nearly every organization, security improvements are weighed against cost and operational risks to the business. In this heightened-threat environment, senior management should empower CISOs by including them in the decision-making process for risk to the company, and ensure that the entire organization understands that security investments are a top priority in the immediate term.

Lower Reporting Thresholds:

Every organization should have documented thresholds for reporting potential cyber incidents to senior management and to the U.S. government. In this heightened-threat environment, these thresholds should be significantly lower than normal. Senior management should establish an expectation that any indications of malicious cyber activity, even if blocked by security controls, should be reported, as noted in the Shields-Up website (cisa.gov/ shields-up), to CISA or the FBI. Lowering thresholds will ensure immediate identification of issues and help protect against further attack or victims.

Participate in a Test of Response

Plans: Cyber incident response plans should include not only your security and IT teams, but also senior business leadership and board members. If you haven't already done so, senior management should participate in a tabletop exercise to ensure familiarity with how your organization will manage a major cyber incident, not only to your company but also to companies within your supply chain.

Focus on Continuity: In recognition of finite resources, investments in security and resilience should be focused on those systems supporting critical business functions. Senior management should ensure that such systems have been identified and that continuity tests

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Tackling Sizable Legislative Volume One Bill at a Time

By Judy Wohlt, PMI Communications Team, Valek and Co.

Monitoring legislation that impacts plumbing manufacturers can be unpredictable and intense. Just ask **Kyle Thompson**, PMI's technical director, who noted that between December 24 and January 25, PMI went from tracking 14 bills to almost 100 pieces of legislation.

A robust monitoring system, strong PMI member involvement, and support from PMI's two government relations experts – **Jerry Desmond** and **Stephanie Salmon** – make the job easier to handle, he said.

Guidance PMI and the industry offer – in the form of letters, feedback on bill language and expert testimony in hearings – helps curb the potential impact water-efficiency legislation could have on the performance of plumbing fixtures and fittings PMI members produce. In addition, the regular feedback and discussions often lead to innovative, practical solutions, such as water system leak detectors produced by some PMI members. Those solutions can help deter unnecessary legislation.

"Legislators are trying to do the right thing but don't always see the big picture from our industry's perspective. We're trying to help them do that by sharing our expertise," he said.

Outside groups, software help identify critical issues

Thompson manages a monitoring system that helps him quickly identify the most critical legislation that needs attention. He maintains bi-weekly legislative tracking reports that PMI members can view on PMI's website (tinyurl. com/4psxr9yw).

About 80% of new bills center on singleuse plastics, customer data protection, and authenticating the identity of thirdparty sellers operating in the online marketplace, he explained. The other 20% focus on appliance efficiency and lead. Thompson uses a combination of tracking software and assistance from outside groups, such as the Buy Safe Coalition. PMI joined the coalition in 2021 to support



Kyle Thompson

and advance the Integrity, Notification and Fairness in Online Retail Market-places for Consumers (INFORM) Act, introduced in the United States Senate in March 2021 to protect consumers from counterfeit and stolen products sold online.

PMI recently joined the American Institute for Packaging and the Environment (AMERIPEN), an organization focused on U.S. public policy for the entire packaging industry. AMERIPEN provides PMI with additional insight and influence on state and federal bills that would limit single-use plastics and establish stewardship recycling plans for product packaging, Thompson added.

Desmond, PMI's California government affairs consultant, and Salmon, PMI's federal government affairs consultant, round out PMI's legislative alert system. Desmond delivers regular updates on California legislation, particularly on the many appliance efficiency bills proposed there. Salmon flags issues at the federal level, paying close attention to legislation and rulings involving the Environmental Protection Agency, Department of Energy, tariffs, consumer protections, competitive issues, and more.

Contributions from PMI members, committees help score wins

Strong PMI member and committee involvement has helped PMI score many legislative wins over the years.

For example, Thompson said PMI's Advocacy/Government Affairs Committee

delivered timely, excellent feedback on a recent letter PMI sent to Utah senators and representatives concerning bills to revise Utah's plumbing code.

The two bills, SB 73 (tinyurl. com/3m7d6ap9) and HB 39 (tinyurl. com/2p8wfzfe), propose amending the efficiency standards of plumbing products installed in the state. PMI supports the bills' proposed efficiency standards that align with the flow rates of the EPA WaterSense program. However, PMI is proposing adding a footnote to tables in both bills stating: "The maximum consumption for dual flush water closets is defined as the composite average flush volume of two reduced flushes and one full flush." The footnote refers to the maximum flow rates for water closets, which will be reduced from 1.6 to 1.28 gallons per flush. While discussions continue on adding PMI's suggested note, one of the senators has indicated that the proposed reduced flow rates for water closets will likely be removed from the bills, Thompson said.

The adage that there's strength in numbers applies, too. That's why Thompson regularly shares the letters he writes to legislators on PMI's behalf with individual PMI members, so they can submit letters separately. A high volume of feedback from multiple sources often delivers the strong influence needed to make appropriate legislative changes, Thompson noted. He appreciates when PMI members offer a heads-up on concerning issues. Those extra eyes and ears have helped PMI get involved early in the legislative process, Thompson added.

"We are having an impact," he said.
"Our calls, letters, input from members, and support from the collective industry are making a difference in the legislative process."

PMI members can view PMI's Advocacy/Government Affairs reports on the PMI website (tinyurl.com/y83mrfva).

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PMI Staff Plunge Into KBIS, IBS 2022

By Judy Wohlt, PMI Communications Team, Valek and Co.

Plumbing Manufacturers International staff plunged into three days of interactions with PMI members and colleagues – including a well-attended PMI Power Break & Briefing – at the 2022 Kitchen & Bath Industry Show (KBIS) and the International Builders' Show (IBS) in February in Orlando, Florida.

They joined 70,000 attendees, according to a KBIS estimate, to experience and learn about many new plumbing designs and innovations, such as toilets with health-monitoring features, lightweight tubs and sinks manufactured from volcanic limestone, and faucets using Internet of Things (IoT) and automated technology.

PMI staff, members and associates attending the shows interacted with each other on the show floors, which contained a combined 1,200 exhibits. PMI members exhibiting at KBIS included BOCCHI; Fortune Brands; House of Rohl; IAPMO; International Code Council and ICC Evaluation Service; Kerox, Ltd.; Kohler Co.; Lavelle Industries; Moen, Inc.; Pfister; and TOTO USA.

"We had some great conversations with our members as we explored their booth displays and during the Power Break," said **Jodi Stuhrberg**, PMI association manager. "It's interesting to see all the new design elements, color choices and finishes for sinks, tubs and faucets that PMI members showcase, too."

PMI Power Break attracts crowd to hear legislative updates

Stephanie Salmon and Jerry Desmond, PMI's government relations consultants, shared a report packed with updates on PMI's federal and California legislative priorities during the PMI Power Break & Briefing. They fielded questions and discussed the complexity and volume of legislation PMI is currently tracking.

"Our Power Break was interactive, lively and full of excellent questions. Jerry and Stephanie provided great insight into what triggers legislation PMI needs to track and the value our partnerships and coalition memberships bring to the process," said PMI CEO and Executive Director **Kerry Stackpole**. "And it was exciting to see some new faces along with long-standing members in attendance."

Salmon, PMI's federal government affairs consultant, covered a wide array of federal issues impacting plumbing manufacturers on topics involving the environment, trade, competition and supply chain. Her report highlighted the fluctuating commodity markets, which has prompted Congress to introduce many

recycling-related bills. She addressed a PMI member's question about producer responsibility for plastic packaging and discussed PMI's proactive efforts, which include a recent membership in the American Institute for Packaging and the Environment (AMERIPEN). The institute focuses on U.S. public policy for the packaging industry and delivers to PMI additional insight and influence on state and federal bills that would limit single-use plastics.

She also discussed the America COM-PETES Act of 2022 (HR 4521), which tackles supply chain vulnerabilities as economic and technological competition from China continues to grow. PMI actively supports key pieces of the legislation, which is the House counterpart to the U.S. Innovation and Competition Act (S 1260) passed by the Senate in summer 2021.

Desmond, PMI's California government affairs consultant, shared the latest on California issues of interest to PMI members. Environmental legislation in the state is focused on several issues, such as lead in end-point devices, changes in Proposition 65 warning label requirements, and restrictions on plastic packaging.

Since California leads the nation on protecting personal information,

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PMI Staff Plunge Into KBIS, IBS 2022

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Desmond discussed IoT and the state's consumer privacy laws. He noted that PMI is working within a coalition to pursue extending laws that expire on Jan. 1, 2023, and provide accommodations for using personal information in employer-employee and business-to-business situations.

The full report was emailed to all PMI members.

Crystal Vision Awards recognize PMI members' charitable contributions

As part of Design & Construction Week, PMI sponsored the Annual Crystal Vision Awards Breakfast on Feb. 9 at the Orange County Convention Center in Orlando, where Ann Sacks Tile & Stone, Inc., a member of Kohler's family of businesses, received the 2022 Crystal Vision Award. The award is given to an outstanding donator of building materials to the Storehouse of World Vision. The much-needed supplies help struggling families build, or rebuild, while lifting themselves out of poverty.

Other sponsors of the awards breakfast included PMI members Elkay Manufacturing, Gerber Plumbing Fixtures, Kohler and LIXIL.

The breakfast featured a panel of experts, including **Molly Pajauskas**, vice president of Elkay. They discussed the "New Era Trends Impact of Business and Customer Relationships."

Mason Hall, director of marketing at Moen, discussed "The Invisible Smart Home" and how home water technology can provide alerts when some-

thing goes wrong, monitor usage for planning, and help with conservation measures. **Gray Uhl**, a sales training leader at LIXIL, presented on "Touchless Plumbing for the Home."

PMI members named Best of KBIS finalists, Kohler wins Gold Award

Kudos to Kohler for winning the Gold Award as part of the Best of KBIS 2022 awards.

Kohler's Avoir toilet, an innovative tankless toilet with a modern design, won in the KBIS – Bath Gold category. The awards recognize the most innovative new kitchen and bath products presented at KBIS.

Hats off to PMI members House of Rohl, Moen and TOTO USA, which were recognized along with 32 other companies as Best of KBIS finalists.



EWTS Early-Bird Registration Opens, Runs to March 15

By Judy Wohlt, PMI Communications Team, Valek and Co.

Early-bird registration, which runs until March 15, has opened for the 2022 Emerging Water Technology Symposium (EWTS), to take place May 10–11, in San Antonio, Texas. Several Plumbing Manufacturers International members and PMI's federal government affairs consultant will share updates on the industry's most urgent water and regulatory issues at the symposium.

Packed with presentations covering key topics for plumbing manufacturers, EWTS will explore water-related content in the proposed Build Back Better Act, pathogen control in building water systems, water reuse and recycling implications, performance requirements and a regulatory framework for non-sewered toilets, and more.

The seventh biennial EWTS is coconvened by the Alliance for Water Efficiency (AWE), the American Society of Plumbing Engineers (ASPE), IAPMO and PMI.

PMI members join strong lineup

On May 10, a leader from PMI member organization IAPMO will join a panel of experts from 3:15-4:30 p.m. to discuss current best practices on water system risk management and trends in building with contaminated water systems. The panel, "Effective Risk Management of Building Water Systems for Pathogen Control," will include Christoph Lohr, vice president of strategic projects at IAPMO; Janet Stout, Ph.D., president and director of the Special Pathogens Laboratory and a research associate professor at the University of Pittsburgh Swanson School of Engineering; Julius Ballanco of JB Engineering; and Matt Freije of hcinfo.com.

Also on May 10, PMI member LIXIL will present with several others an



"Overview of the Performance Requirements and Likely Regulatory Framework for 'Reinvented Toilets." The session will focus on products that meet the ISO 30500 product standard for high performance non-sewered sanitation devices - also known as "reinvented toilets" - to potentially address the needs of rural communities that don't have sewers. Presenters will include C.J. Lagan, leader of product testing & compliance, R&D engineering, fixtures, at LIXIL Americas; Edward Osann, senior policy analyst with the Natural Resources Defense Council; and Clément Cid, Ph.D., senior research engineer with Linde+Robinson Lab.

On May 11 from 3-4 p.m., **Stephanie Salmon**, PMI's federal government affairs consultant, will participate in a panel discussion on "Implications of the Infrastructure Investment and Jobs Act and Build Back Better Legislation on Water Infrastructure and Plumbing." Rounding out the panel will be **Ron Burke**, president and CEO, AWE; **Dain Hansen**, executive vice president, government affairs, IAPMO; Osann; and a speaker from the Environmental Protection Agency.

Robert Puente, president and CEO of the San Antonio Water System, will deliver a keynote address. As chief executive of one of the nation's largest utilities, Puente provides leadership in delivering water and wastewater services to more than 1.7 million consumers, developing new water resources, continuing infrastructure upgrades throughout the community, and building regional partnerships. As one of the policy pioneers of modern water supply management in Texas, Puente has helped shape and steward key landmark

regional water issues.

Other presentations include "Opening the Spigot on NIST's Premise Plumbing Research Activities" led by Andy Persily, chief of the engineering division at the National Institute of Standards and Technology (NIST), and "Predicting Faucet Water Quality, Plumbing Contamination Response and Recovery" led by Andrew Whelton, Ph.D., professor of civil, environmental and ecological engineering at Purdue University. Both men have presented at previous PMI conferences.

See the full symposium schedule on the EWTS website (ewts.org/2022-schedule).

Register early, as seating is limited. The early-bird rate of \$495 ends March 15. For more information and to register for the symposium, visit the EWTS website (ewts.org). For questions, please contact Maria Bazan at 708-995-3000.

View presentations and a series of videos from previous symposiums on the IAPMO Group's YouTube page (tinyurl.com/ss8s6s82).

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New Packaging Laws to Establish Producer Responsibility

By Judy Wohlt, PMI Communications Team, Valek and Co.

New packaging producer responsibility laws in Maine and Oregon are shifting how to fund packaging recycling – placing more responsibility on brand owners. Essentially, any company using product packaging in these states, including plumbing manufacturers, will be affected by the laws, said AMERIP-EN Executive Director **Dan Felton** during the February PMI webinar, "Financing Packaging Recycling and Recovery in the U.S. – The Time Has Come."

In 2019, the American Institute for Packaging and the Environment (AMERIPEN) anticipated that states and perhaps the federal government would begin passing new legislation focused on packaging producer responsibility, Felton explained. As a result, AMERIPEN set up a task force to study all angles of such legislation, including determining who the "producer" is, how producer fees would be set up, and where the funding should best be spent.

"We wanted to shape those programs and influence the dialogue in states proposing that type of legislation," Felton said. Plumbing Manufacturers International recently joined AMERIPEN, and he noted how important PMI member input will be to understanding the ramifications of packaging and recycling policies for plumbing fixtures and fittings.

Packaging producer responsibility policies have existed throughout Europe and Canada for decades under the broader umbrella of extended producer responsibility (EPR), Felton stated. EPR shifts responsibility for financing recycling and safe disposal of products consumers no longer want, including product packaging, from local government and taxpayers to the products' producers. Producers can be brand owners, brand trademark licensees or owners, or first importers into a state, he explained.

The United States has had EPR policies for hard-to-recycle items, such as

paint, carpeting and batteries. However, packaging producer responsibility laws became a new issue in 2021 largely because of the growing volume of state and federal legislation focused on packaging and recycling, Felton reported.

Oregon's clear definition of 'producer' a step in the right direction

Maine was the first state in the U.S. to enact a packaging producer responsibility law. The state signed into law LD 1541, Chapter 455, in July 2021.

Felton said the law is not ideal because producers don't have the ability to influence fee setting and rate making. Producer fees will be determined by the Maine Department of Environmental Protection and producers will pay for 100% of the system as it currently exists. AMERIPEN anticipates that the first producer payments in Maine will begin in fall 2026.

Felton expressed more optimism for SB 582, Chapter 681, Oregon's new packaging producer responsibility law, enacted in August 2021 with an effective date of Jan. 1, 2022.

"The focus in Oregon is to bifurcate the definition of producer – brick and mortar products vs. e-commerce. We like this definition because it makes it clear who's responsible for the fees," he said. Producer fees will be developed by a producer responsibility organization and reviewed and approved by the Oregon Department of Environmental Quality. Felton noted that AMERIPEN will be engaged throughout the entire legislative process in Oregon, including serving on an advisory council and Truth in Labeling Taskforce.

In October 2020, AMERIPEN created a policy endorsed by its members and board of directors that it uses to make recommendations to states considering packaging producer legislation. "We



have a vision about how we'd like a bill to shape up, but we don't have a single model bill yet to point to one state over another," Felton said.

More states proposing producer responsibility, recycling bills in 2022

More states are seeking laws on producer responsibility, recycled content and recycling labeling in 2022. Felton said nearly 40 bills in 16 states were under consideration. AMERIPEN is engaged in discussions in all of those states, he said.

He noted that Maryland is proposing two companion bills. "AMERIPEN is cautiously optimistic that those bills will include solid producer responsibility language, giving producers more influence over establishing and implementing their programs," Felton said.

Felton said AMERIPEN is keeping an eye on two substantial proposed bills, one of which is the Break Free from Plastic Pollution Act of 2021 – a voluminous bill encompassing scores of recycling initiatives, including producer responsibility and product recycling label language. In addition, the Federal Trade Commission will likely conduct a 10-year review of its Green Guides, which help marketers avoid making environmental claims that mislead consumers, he said.

AMERIPEN is keeping an eye on the Environmental Protection Agency's national recycling strategy and how it may affect producer and packaging responsibility laws, too, he said.

PMI members who missed the live webinar can watch it on demand (safeplumbing.org/members/webinars-videos).

Survey Finds 25% Decrease in Handwashing

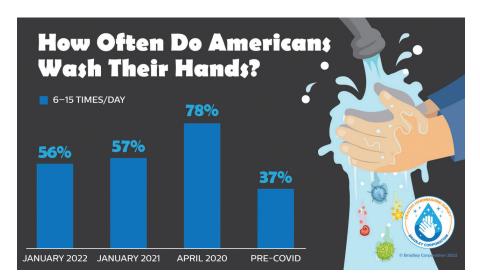
The Healthy Handwashing Survey from Plumbing Manufacturers International member Bradley Corporation has found a handwashing frequency decrease of 25% among adults compared to when the coronavirus first hit.

In the spring of 2020, Americans were washing their hands an average of 10.5 times per day. In January 2022, that number dropped by one-fourth to 7.8 times per day.

While the adult population may be shortchanging their handwashing routines, the survey found that 79% of parents take some sort of action to encourage their children to suds up. 44% say they regularly ask their young ones to wash their hands, 26% have added it to their children's routine, and 25% buy fun soaps to make handwashing more interesting.

Since 2009 and throughout the pandemic, Bradley Corp. has conducted its Healthy Handwashing Survey to take a closer look at the state of hand hygiene in America and, most recently, the impact of the coronavirus. The survey queried 1,035 American adults Jan. 10-21, 2022, about their handwashing habits, concerns about the coronavirus and flu, and their use of public restrooms. Participants were from around the country and were fairly evenly split between men (46%) and women (54%).

For more information, visit bradleycorp.com/handwashing.



Hackers, Crackers and Quackers (Contd.)

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have been conducted to ensure that critical business functions can remain available after a cyber intrusion.

Plan for the Worst: While the U.S. government does not have credible information regarding specific threats to the U.S. homeland, organizations should plan for a worst-case scenario. Senior management should ensure that exigent measures can be taken to protect your organization's most critical assets in case of an intrusion, including disconnecting high-impact parts of the network if necessary.

The many pandemic induced uncertainties of the past 24 months have surely honed your resiliency, brought sharpened focus to all your efforts, and undoubtedly accelerated your sense of urgency. Your energies and the collective perseverance of your teams will make the difference. Let's get to work.

2022 PMI LEADERSHIP

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