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March 31, 2026

The Honorable Representative David A. Bennett, Chair
House Committee on Environment and Natural Resources
State House
82 Smith St.
Providence, RI 02903

RE: H 7918 – An Act Relating to Waters and Navigation – Public Drinking Water Supply

Dear Chair Bennett:

Please accept this letter of opposition to H 7819, legislation that would amend Section 46-13-22 Cross-connection control of the Rhode Island General Laws in Chapter 46-13 to decrease the frequency of backflow preventer testing from once a year to once every 10 years. Currently, Section 1.9.4(A)(1) of the *Public Drinking Water Regulations* ([216-RICR-50-05-1](#)), requires the installation of backflow preventers at all newly constructed service connections prior to the provision of water service and at all commercial and industrial service connections. The RISBC-3 *Rhode Island Plumbing Code* ([510-RICR-00-00-3](#)) adopts and incorporates the provisions of the International Plumbing Code (IPC), 2021 edition, as published by the International Code Council, Inc. (ICC). Section 312.10.1

Inspections of the 2021 International Plumbing Code require the annual inspection of all backflow prevention assemblies and air gaps to determine whether the assemblies are operable and whether air gaps exist. Likewise, Section 312.10.2 Testing states reduced pressure principle, double check, pressure vacuum breaker, reduced pressure detector fire protection, double check detector fire protection, and spill-resistant vacuum breaker backflow preventer assemblies and hose connection backflow preventers shall be tested at the time of installation, immediately after repairs or relocation, and at least annually. Additionally, Section 1.9.4(E)(1) of the Rhode Island Public Drinking Water Regulations ([216-RICR-50-05-1](#)) requires backflow preventer testing to be completed by a certified backflow preventer tester.

Low-hazard service connections, such as residential homes, make up most service connections for public water supplies and typically have non-testable backflow prevention devices. High-hazard service connections for a public water system, such as commercial and industrial connections, are typically the only service connections with testable backflow prevention devices. Given that backflow prevention testing does not apply to most residential service connections, the reduction in testing primarily benefits the commercial and industrial service connections with the highest contamination potential. As such, decreasing the frequency of backflow preventer testing from once a year to once every 10 years exposes the public water supply and public water system customers to preventable health risks.

H 7918 is in direct contradiction of backflow professionals, plumbing codes, cross-connection control standards and EPA guidance. Plumbing code standards, such as the Uniform Plumbing Code, International Plumbing Code, and the American Water Works M14 manual recommend annual testing of backflow preventers at a minimum. The 2003 EPA Cross-Connection Control Manual recommends annual or semi-annual testing of backflow preventers and has more than 15 well-documented cases where cross-connections have been responsible for the contamination of drinking water and have resulted in the spread of disease. The American Backflow Prevention Association (ABPA) is in opposition to this bill as it is inconsistent with various manufacturers' recommended practices and prevailing Building and Plumbing Codes used in the United States and Canada. Lastly, passing this bill would make Rhode Island an outlier, both regionally and nationally. Most, if not all, states require annual or biennial testing of backflow preventers at a minimum.

Thank you for the opportunity to comment on the proposed legislation which RIDOH opposes.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin" with a long, sweeping horizontal line extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the House Committee on Environment and Natural Resources
The Honorable Stephen M. Casey
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy