**Joint Committee on Public SERVICE Oversight and Petitions**

**WEDNESDAY 7th OCTOBER 2015**

**OPENING STATEMENT BY MAURICE BUCKLEY, CEO of the NATIONAL STANDARDS AUTHORITY OF IRELAND (NSAI)**

**Petition No. P00040/14**

**Introduction**

I would like to thank the Committee for the invitation to assist in your consideration of the issues raised in the petition regarding the installation of central heating systems and the ongoing standardisation work NSAI is undertaking in the area of plumbing services.

This is my first occasion before the Committee and I am accompanied by Yvonne Wylde, Manager of Standards Technical, and together we will endeavour to address any matters raised by the Committee today.

I am also aware that the Committee will be addressed by officials from the Department of Environment, Communications and Local Government and since that Department and agencies under its auspices have statutory responsibility for Water Services, Water Quality, Building Regulations and building standards generally I will confine my comments to NSAI’s standardisation work.

I am happy to take any questions from members but before doing so I would like to provide the Committee with some background information on the NSAI and its standardisation role with particular reference to the plumbing issue in question.

**Background**

NSAI, as the Irish national standards body, is responsible for developing technical specifications for products, processes and practices in the form of written standards, guides or codes of practice. Whilst there are some differences in the character of each of these documents they are collectively referred to as ‘standards’.

Standards are generally voluntary but can be made legally binding when referenced as mandatory by legislation. Of the 1,500 or so national, European and international standards published annually by NSAI an increasing number are used to support legislation by providing the user with means of demonstrating compliance with legal requirements through using the standard. This type of reference establishes the standard as a preferred route of compliance without it becoming mandatory.

In the absence of any legal reference standards remain voluntary to be used by businesses as a means of demonstrating state of the art or good practice.

**Standards development**

NSAI develops standards through its network of consultative committees. Committee members are drawn from industry, government and societal interest groups to work on matters of common interest.

There are currently two related consultative committees dealing with domestic heating and plumbing.

These are -

* Building Services Consultative Committee (TC 31) developing the Code of Practice for Domestic Hot Water and Heating, and
* Water Supply Standards Consultative Committee (TC 10) developing a similar Code for Domestic Plumbing for Cold Water Systems.

These Committees currently comprise representatives from policy makers/regulators, manufacturers, trade associations, local authorities, academia, insurers, private water suppliers, consultants and installers. The two Committees liaise through nominated members to ensure there is no overlap and the necessary cross-referencing can take place.

There are normally five stages in the standards development process -

* Identifying the needs and benefits of a standard
* Defining the scope (e.g. identify the technical, environmental or safety specifications which need to be set)
* Consultation with a view to achieving a consensus
* Public enquiry
* Publication

As member of the European[[1]](#footnote-1) and international standards organisations[[2]](#footnote-2) NSAI can only undertake national standardisation work in the absence of suitable standards being published by these bodies. Furthermore, in the interests of global and EU trade, NSAI is obliged to adopt such European or international standards as national standards and ensure any existing national publications are compatible with their content.

**European Standards**

In all European member states the regulation of supply of drinking water and the quality of drinking water are matters for the appropriate agencies and bodies charged with those responsibilities.

It is well recognised fundamental design principle when designing, installing or maintaining water supply systems that potable water installations must be protected from contamination, e.g. through backflow from central heating systems. Several Irish standards, developed through the European system, give guidance in relation to this issue and include:

* I.S. EN 806 – 1:2000 - Specifications for installations inside buildings conveying water for human consumption - Part 1: General
* I.S. EN 806 – 2:2005 - Specification for installations inside buildings conveying water for human consumption - Part 2: Design
* I.S. EN 806 – 3: 2006 - Specifications for installations inside buildings conveying water for human consumption - Part 3: Pipe sizing - Simplified method
* I.S. EN 806 – 4:2010 - Specifications for installations inside buildings conveying water for human consumption - Part 4: Installation
* I.S. EN 806 – 5: 2012 - Specifications for installations inside buildings conveying water for human consumption - Part 5: Operation and maintenance
* I.S. EN 12828: 2012+A1:2014 - Heating systems in buildings - Design for water-based heating systems
* I.S. EN 1717:2000+NA:2011 – Protection against pollution of potable water in water installations and general requirements of devices to prevent pollution by backflow

I.S. EN 12828 and I.S. EN 806 (parts 1 to 5) on design of water and central heating systems implicitly recognise that drinking water supplies can become contaminated e.g. by backflow, and the standards specify methods for addressing these risks.

I.S. EN 806-2 recognises the existence of national or local regulations and requirements and the need to prevent the contamination of water.

The National Annex (NA) to I.S. EN 1717 provides guidance regarding backflow prevention in Ireland, taking account of the low pressure ventilated mains water system. The guidance notes the practice of having an unrestricted air gap, to protect the incoming water supply against backflow, unless otherwise expressly permitted in writing by the appropriate responsible water authority. In other cases it recommends that a risk assessment be carried out in accordance with the standard.

**National Work**

In 2006 the need for an Irish Code of Practice for plumbers was identified to complement the then existing European standards, with the project beginning in earnest in 2008. This project was aimed at developing a best practice guide for use by the trade by drawing together the references to relevant standards with useful explanations in an easily readable form.

The project was supported by key stakeholders the Dept. of Environment Communications and Local Government and the Sustainable Energy Authority of Ireland (SEAI) committed to fund the necessary work.

A first draft Code of Practice was published in 2010 for public comment. This consultation was met with great interest resulting in over 200 observations being submitted to NSAI.

**2010 Draft and Backflow requirements**

The public enquiry draft (2010), took account of relevant local authority Bye Laws available at that time. Those local authorities, in general, required that water systems contain an adequate device or devices to prevent the occurrence of backflow.

The draft Code of Practice drew together these requirements as best practice.

**Review and progress**

Following the 2010 public enquiry and further consideration it was decided to split the document into two parts to enable work to proceed more efficiently. These two parts, as previously identified, are titled SR 50-1 relating to Domestic Hot Water and Heating, and SR 50-3 relating to Domestic Plumbing for Cold Water Systems.

Due to prioritisation of other critical projects and availability of key stakeholder input, work on the project was put on hold until being reactivated earlier this year.

The most recent review has identified a need for further work to address technical developments, changes in building practices, availability of updated European standards and related matters raised by harmonised standards under the EU Construction Products Regulation. Irish Water, which was established in the interim, is also now engaged as a key stakeholder.

The projects are progressing well and it is expected that drafts of both documents will be issued for public enquiry during 2016.

**Implementation**

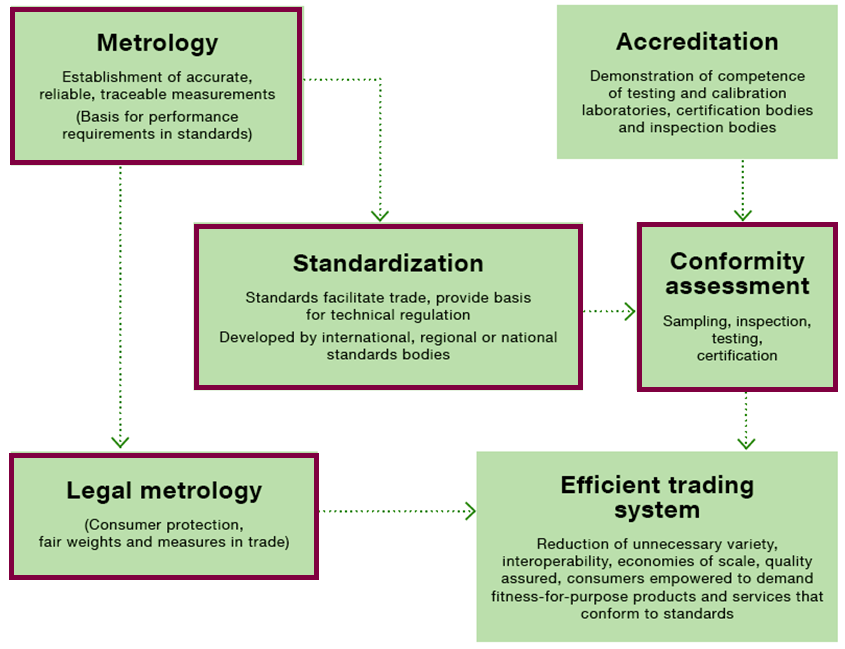
As previously stated standards are voluntary documents unless referenced as mandatory or as conferring a presumption of compliance through legislation.

When the Code of Practice documents are published by NSAI the relevant Authorities may choose to reference them in whatever way they consider appropriate.

**Annex (for information)**

**NSAI Role and Remit**

**NSAI was established under the National Standards Authority of Ireland (NSAI) Act 1996. Since establishment the National Metrology Laboratory and the Legal Metrology Service were merged into the organisation.** NSAI now hosts four (i.e. Standardization; Metrology; Legal Metrology and Conformity Assessment) of the five primary technical pillars identified by UNIDO as prerequisites for an efficient trading economy.



Management of these policy instruments ensures confidence in the foundation of Ireland’s trade infrastructure.

The issue currently under consideration by the Committee today relates specifically to Standardization.

1. CEN, CENELEC and ETSI [↑](#footnote-ref-1)
2. ISO, IEC [↑](#footnote-ref-2)