

**The Regulation of the Gas Installer Industry with  
Respect to Safety**  
**Proposed Vision**  
***Consultation Paper***  
**CER/07/125**

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**Response from IoPHE, REGII & IHPA    Date: 19<sup>th</sup> September 2007**

**Introduction**

The IoPHE, REGII and the IHPA appreciate and welcome the opportunity to comment on the Commission for Energy Regulations document on the proposed Vision for the Regulation of the Gas Installer Industry with respect to Safety.

We very much welcome this very important initiative that all installers and service agents shall be qualified and licensed to work on natural gas appliances and installations. This will go a long way to improving the safety and indeed the overall delivery of quality and customer service of natural gas installations in Ireland.

Regulation of the natural gas industry and natural gas installers with respect to safety will also ensure that the days are finally over for the rogue elements that have blighted our industry and preyed on unsuspecting customers.

**Key Objectives**

The key objectives for our organisations and members regarding this initiative are as follows:

1. To protect life and property and to minimise the safety risks related to natural gas installations
2. To aggressively promote public awareness for gas safety
3. To educate Customers of the risks of using Non Registered Installers

## **Financial/Funding**

The issue of funding and who pays in the short, medium and long term is a critical issue that needs to be addressed by the CER at the outset. In general when this issue arises you will invariably get responses such as “Installers will have to pay” or “the Customer will have to bear the additional cost”. It is not surprising that the people who give those responses are neither Installers nor Customers. For this process to be successful it is critical that a budget is secured to fund the new regime in the short and medium terms.

It will also be a key objective for our organisations that moving forward any additional costs arising from this process will be paid by the overall gas industry and not just Installers/Service Companies. The CER, Bord Gais Networks, Bord Gais Energy Supply, Manufactures, Training Bodies and indeed the HSE, all whom have a vested interest and will benefit from improved risk based public awareness of gas safety, must contribute to the funding. The issue of voluntary contributions should also be explored.

## **Gas Safety Supervisory Body**

The CER will designate a Gas Safety Supervisory Body to operate the day to day regulation of Registered Gas Installers.

Whilst there is obviously a requirement to go out to tender for the body, the CER must ensure that equal opportunities and support is afforded to all interested parties and in particular to home based organisations and/or individuals.

There is huge knowledge and experience both within and also on the peripheral of the natural gas industry in Ireland to successfully operate the Gas Safety Supervisory Body in the first critical 5 year period of the scheme.

## **Landlords**

The issues around the rented accommodation sector and the absence of responsible landlords continue to be an area of specific concern. This sector throws up a high number of “near misses” and safety instances each year.

The changing dynamics in our society, particularly related to movement of foreign nationals and indeed students has resulted in approximately 80,000 change of occupancy each year. This sector is the most difficult to manage and is also the highest risk category for unsuspecting customers and the general public.

An annual safety check certificate must become mandatory and we could explore a link to the initiative under Energy Performance Building Directive EPBD that every home been sold or rented must have an Energy Certificate (BER). In our opinion it is more critical to ensure the new tenant receives a copy of an up to date safety certificate.

## **Non Registered Installers**

Currently around 80% of Installers in the Republic of Ireland are either not qualified or not registered. This terrible statistic is an indictment on our industry and something none of us can be proud of. Indeed we should be ashamed that customer safety is so much at risk.

We have often been wrongly led to believe that due to the operation of the CORGI scheme in the UK that they do not have a big problem regarding unregistered installers. Whilst there are a lot of positives with the CORGI operation, the issue of non registered installers operating in the marketplace is an area that they have not been able to crack.

Despite the prevalence of illegal activity there have been very few successful prosecutions, much to the frustration of bona fida CORGI Registered Installers. The lack of successful prosecutions and the limited action taken against illegal installers has been seen as an insufficiently effective deterrent.

There won't be any easy “one fix fits all” solution available in Ireland either. There are however a number of “Quick Wins” available to us and we also need to use both the carrot and stick and name and shame approach are also.

## **Registered Installers**

Whilst the registration body must focus on the category of non registered installers there are some concerns regarding the competence of registered installers and inspection levels need to be increased to improve overall standards across the industry. Enforcement and inspections will be the key to success. Long term Customers through education and proper sustained communications will help police the regime.

## Certificates of Conformance

Safety and commissioning certificates must be issued for all gas works carried out i.e. new installations, upgrades, new appliances, servicing and repairs.

Regrettably the certification process operated by Bord Gais for the past twenty years has not been successful for various reasons as follows:

1. Absence of a formal process for return of certs to BGE.
2. BGE only requiring certs for new meter fits
3. Certs been issued by persons who are not competent and accepted by BGE
4. Certs not issued at the time of the tests
5. Commissioning certs issued prior to gas been introduced rendering cert useless
6. Customers not receiving their copy of the cert
7. Certs not viewed as an important and/or valuable document by all parties
8. Installers not retaining their copies of the cert for audit purposes

Some important issues regarding certification that needs to be debated and clarified are as follows:

1. How long a cert is valid for?
2. When issuing a cert for an appliance fit only are you also accepting responsibility for the rest of the existing installation and appliances?
3. When servicing or repairing an appliance you are not responsible for other appliances in that premises that may unknown to you to be unsafe. Yes or No?
4. Is there a requirement to issue a second cert when working on an appliance following a warranty callout? e.g. 15 days after original repair.
5. For operational reasons BGE currently look for certs to be completed and left on site before BGE have introduced gas to the installation. You cannot fully certify and commission an installation/appliance unless gas has been introduced. This serious anomaly needs to be addressed to protect both the Installer and integrity of the certification process.

## Conclusion

The above are our initial comments to the Vision Paper and also to some of problems or issues that our organisations and our colleagues have experienced with the current process operated by BGE.

A word of caution to ensure that we learn from the mistakes and poor errors of judgement made by others particularly our nearest neighbour in the UK. The UK scheme managed and overseen by the HSE and CORGI has been promoted as the model to follow.

However research has identified a disturbingly low (<50%) public awareness of the risks of carbon monoxide poisoning (CO). In addition the very high number of non CORGI registered installers operating in the marketplace has led to a lot of disquiet amongst the registered installers culminating with a current review by the HSE.

This review by the HSE has led to the reforming of the domestic gas safety regime to improve safety standards for gas customers.

With this in mind the current timelines for regulation and the designation of a Gas Safety Supervisory Body appears to be too short.

We look forward to working together with all stakeholders regarding the significant challenges facing our industry and particularly regarding the number one priority for us all to ensure CUSTOMER SAFETY.