

# **Vision for the Regulation of Gas Installers with respect to Safety - Consultation Responses**

## **Summary of Emailed Responses Received**

**CER/07/221i**

**17<sup>th</sup> December, 2007**

### **Introduction**

In August 2007, the Commission set out its proposals for regulating the activities of gas installers with respect to safety under the Framework in the consultation document "*The Regulation of Gas Installers with Respect to Safety – Proposed Vision*" (ref. 07/125). The purpose of that document was to elicit industry and public comment on the Commission's high level vision and proposed approach, prior to its implementation. In addition to the responses to the consultation which are published on the Commission's website, the Commission also received 3 email responses to the Gas Safety Vision Consultation from:

- Irish National Accreditation Body (INAB)
- Midlands Energy Training and Assessment Centre (METAC); and
- Paul Gogarty T.D.

The key excerpts from those responses are outlined below for completeness:

### **A. Irish National Accreditation Body (INAB)**

Please find their comments listed below:

- *Re: Clause 4.3 (Training) -- last paragraph, top of page 14:  
The Commission is absolutely correct in what they say in this clause, and INAB are pleased that they give UKAS equal recognition. However, accreditation is a complex subject, and the clause could be clarified somewhat, to avoid the possibility of misunderstanding. ISO 17024 is the standard used for accreditation of bodies offering certification of persons. There is a huge range of personnel who could be certified by a body who is accredited to ISO 17024, such as welding operatives, oil fitters, etc. Therefore, it is important to make it clear what standard, under ISO 17024, the certification body has been accredited to assess against. In this case it is I.S. 813. Without specifying the standard, a situation could arise where a certification body could claim competence to assess gas installers, when they don't have accreditation to demonstrate this competence;*
- *The Commission mentions that INAB certify when an assessor is compliant and capable of assessing to a set standard" -- this seems to be an ideal*

*place to actually mention I.S. 813. Without this, the Commission run's the risk of people misunderstanding their intent. As an aside, the word 'certify' could be a further cause for confusion, as accreditation is regularly confused for certification. Preferable wording for this sentence could be, "INAB accreditation demonstrates that an assessor is compliant..."*

- *Clause 9.2.2 -- Reference to accreditation here is satisfactory.*
- *Clause 11 -- INAB believe that the wording '... the use of competency assessment bodies who hold the relevant scope of accreditation' would be preferable to the current '...the accreditation of competency assessment bodies'.*
- *Clause 11.3 -- INAB believe that reference should be to ISO 17024, rather than I.S. 17024 (or if you want to give it its complete title, I.S. EN ISO/IEC 17024).*

The Commission accepted all the above comments and updated the decision paper accordingly.

## **B. Midland Energy Training & Assessment Centre (METAC)**

METAC raised an issue relating to the issue of Carbon Dioxide (CO<sub>2</sub>) reduction, which is outside the scope of the regulation of gas installers by the Commission. For completeness, the response is published below:

- *To promote the reduction of Carbon Dioxide emissions in Ireland and the expected levy of carbon tax on users of fossil fuels METAC propose that house holders should be encouraged to reduce carbon emissions by servicing their domestic boilers annually. This could be promoted by offering a reduction on the carbon tax of approximately 50%. If carbon tax was levied at 10% it would relate in a €60 saving to the house holder per annum.*
- *This service should be carried out by a trained and certified service technician with a Gas Domestic Service course of 10 days minimum having completed GIS and GID or equivalent.*
- *The service technician, having finished the service as specified, would supply a certificate of completion with a print out showing figures for CO<sub>2</sub> emissions, Oxygen, Carbon Monoxide, flue gas temperature and efficiency along with the date of service.*
- *The service technician would be required to have a tax clearance or C2, insurance for Public Liability and, if required, employers liability to complete work.*

## **C. Response from Paul Gogarty TD**

The specific comments by Deputy Gogarty are outlined below. The Commission addresses the issue raised by Deputy Gogarty in the Consultation Response Paper (ref. 07/221).

### **Duty of care and safety responsibility of Qualified Gas Installers**

- *Given the new definition and qualifications for a 'Qualified Gas Installer' (QGI), but also given concerns that have arisen in recent years about gas and heating works not carried out to legal safety specifications in housing and apartment developments, the role of a QGI should be expanded to include inspection of all dwellings that are not already listed on the central database as having been inspected in the last 10 years.*

*These duties should include:*

- *Inspection of heating systems for safety as part of the remit and to alert the authority and the homeowner should any problems be spotted*
- *Inspection of the gas pipeline as visible from the meter to the home - notwithstanding who is responsible for maintenance of same - to ensure that it conforms to I.S 813. And if it does not, to alert the authority and the homeowner*
- *Checking of pipe sizing and venting in heating systems linked in to gas network for safety and efficiency*
- *Training for all of the above should be provided, if not already catered for, before allowing a QGI to continue operating on a long term basis.*
- *My reasoning for these additional duties and responsibilities which should not involve more than five minutes additional work and pricing is to ensure that all potential hazards are identified as early as possible in the primary interest of consumer safety.*
- *Checking such systems does not imply liability on the part of CER, the QGI or Bord Gais. But it enhances the role played by inspectors and as such should be added into the reporting system.*