

Comments re CER/09/032 – Jim Bell, European Registration Scheme for Personnel Competence.  
The CER document ref CER/09/032 dated 19<sup>th</sup> February 2009 states -

#### “5.2 Draft Decisions

5.2.1 Installers carrying out Domestic Gas Works The Commission proposes that Regulations will be drafted and enacted on 26th June 2009, which will designate those works related to the installation, removal, repair or replacement of natural gas fittings used or designed to be used by Domestic gas customers regardless of whether they are used by a Domestic, Commercial or an Industrial customer, as defined in Section 4.2, as a class of gas works and provide for the inclusion of such works in the regulatory system.

Therefore post 26th June 2009, it will be an offence for a person to carry out Domestic Gas Works unless he/she is registered with the RGII.”

***I would agree with the Commissions proposal (5.2.1) that Regulations be drafted and enacted on 26th June 2009 which will designate those works related to the installation, removal, repair or replacement of natural gas fittings used or designed to be used by Domestic gas customers regardless of whether they are used by a Domestic, Commercial or an Industrial customer, as defined in Section 4.2, as a class of gas works and provide for the inclusion of such works in the regulatory system and that post 26th June 2009, it will be an offence for a person to carry out Domestic Gas Works unless he/she is registered with the RGII.***

The CER document ref CER/09/032 also states -

#### "4.2.3 Industrial Gas Customers

‘Industrial gas customers’ are defined as those end users who use gas for primarily industrial business purposes. Examples of these purposes include power generation, chemical processing, glass-making etc. utilising purpose designed industrial gas-burning equipment and processes. There are approximately 240 of these industrial customers within Ireland.

In the industrial customer category the relevant classes of gas works would relate to work on natural gas fittings used or designed to be used within the industrial sector. For example in the industrial customer category the class of gas work would relate to all works on natural gas appliances and associated gas pipework and flueing such as natural gas catering equipment, space and water heating appliances. In addition there will be specifically designed plant, purpose built for production purposes. In these cases the installation, commissioning and servicing work is undertaken by bespoke trained operatives generally associated with the appliance/equipment manufacturer."

Also;

#### “5.2.2 Commercial Gas Installers

Therefore the Commission deems it a prudent proposal to extend the regulatory model and designate those works on natural gas fittings used or designed to be used by Commercial gas customers (i.e. Option B: Intermediate Scope of Gas Works) as gas works in the medium term (i.e. post 2010), when the following conditions exist:

- a. the new regulatory system has operated successfully in the domestic sphere for a reasonable period of time;
- b. appropriate training course/courses and award(s) which relate directly to commercial gas works is/are widely available in the ‘non-domestic’ arena for a reasonable period of time; and
- c. A competency assessment process is in place which enables the competence of an individual to be formally assessed against the provisions of the standard applicable to the commercial gas work (I.S. 820).

and

Therefore, the Commission proposes not extending the regulatory model and the definition of gas works to include those works on natural gas fittings used or designed to be used by Industrial Gas Customers (e.g. Option C: Maximum Scope of Gas Works) at this stage given that:

- The Health and Safety Authority already has an enforcement role in this area; and
- The generic regulatory model, implicit under the 2006 Act, is not appropriate to address the safety risks associated with the industrial area given the unique and specialised nature of industrial processes.

*I believe that the same principal should be adopted within the non-domestic sector, that the designation of gas works for the Commercial and Industrial gas customers be treated in the same manner as domestic gas works insofar that Irish Standard IS 820 clearly identifies appliances as those being used to supply heating and hot water purposes irrespective of the premises they are being used. These categories would be recognised as;*

*(i) Commercial Catering Equipment.*

*(ii) Commercial Laundry Equipment.*

*(iii) Appliances designed to provide heating and hot water (using various technologies).*

*I agree that within the Industrial sector 'Process Plant' be excluded from the 'General' register, however they should be registered as being "Competent" by the manufacturer to work on their type of equipment. However this should not relate to all 'gas works' such as catering equipment, space and water heating appliances as this type of equipment normally installed and maintained by independent companies contracted in and not 'in house' operatives.*