

The Inland Waterways Association of Ireland ( IWAI), which represents over 4000 users on the inland waterways ( see [www.iwai.ie](http://www.iwai.ie) ), will make a more extensive response , within the timeframe. But below, we list our strong concerns about the potential inclusion of boats on the Inland waterways.

I refer to

" such as cooking, space heating, and hot water, in privately owned, rented, and/or hired liveboard boats (c. 60) and vessels (c.10,000) navigating the inland Irish waterways. " Section 3.2.1.2 ( The definition of Domestic Customer)

The IWAI would strongly reject the assertion that the scope of LPG regulations should be extended to such boats.

(a) All boats since 1995, have their gas installations, controlled by the the EU Recreational Craft Directives ( RCD), This defines the special installation requirements as pertains to boats, especially in relation to engines rooms, sleeping accommodations, room sealed devices, technical fittings etc. This is very a different and specialised area to domestic systems. The RCD overrides local laws in this regards. Any significant modifications to a boats gas installation would require the installer to certify the works in accordance with the RCD. This requires involvement of specialised European notified and certifying bodies and is a requirement by insurers and the provisions of the RCD.

(b) The expertise and knowlege required to maintain and install such systems to the standard required by the RCD, requires specialised knowledge and access to equipment and practices not normally used in land based domestic installations. ( low voltage shutoffs, 12v sniffer systems, low voltage ignition systems, etc) It would not be within the training or experience of "Domestic" gas installers, to be aware and follow the RCD requirements, not to mention the specialised nature, that is installations on boats. ( including accessing machinery areas etc).

In particular there are very particular and specialised requirements in the RCD directive relating to restrictions on space heating, gas refridgeration, etc that are specific to boats, Land based vehicles are more akin to domestic systems. Boats are not. Installers would have to be trained to understand the implications of the RCD and its particular technical requirements. Such training is specialised and not undertaken lightly.

(c) Mention is made of 10,000 boats, the current Waterways Ireland register of boats suggests 6000 boats, are active on the inland system, many of which would not have any gas installations at all, or would use portable gas systems ( more akin to camping). Few boats use gas for space heating, most use diesel based hot air. The report overstates the size and extent of such gas installations. Any extension of domestic regulations would fail to take into account the specialised systems in use. Installations which would be acceptable for domestic, caravan and leisure vehicles would not be allowed under the RCD for boats.

(d) The irish inland waterways are conncted to the sea at several places and there is a significant flow of vessels from the sea to the inland waterways and vice versa ( via limerick and dublin, and to and from Northern Ireland.)). No mention in the consultation document is made of sea going or coastal craft. It seems very strange that they should be excluded, while the exact same craft on the Shannon are included. How can the situation be controlled where coastal boats travel in and out of the inland waterways. Users would simply have the work done on the coast, would a coastal installation not covered by the scope then become illegal inland. This would lead to an unworkable and undocumentable situation.

It is noticable that you have left out coastal leisure boats, surely the logic applying there also applies to inland boats, since they are the same craft and governed by the same build rules.

Should you have any comments or questions please do not hesitate to contact me, The IWAI would be delighted at any stage to meet the commission to further discuss this issue. my mobile 087 2545650

regards

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