

MECHANICAL ENGINEERING AND BUILDING SERVICES CONTRACTORS ASSOCIATION

MECHANICAL ENGINEERING & BUILDING SERVICES CONTRACTORS' ASSOCIATION

The logo for the Mechanical Engineering & Building Services Contractors' Association (MEBSCA). It features the acronym "MEBSCA" in large, stylized, purple-outlined letters. A teal-colored line of text, "MECHANICAL ENGINEERING & BUILDING SERVICES CONTRACTORS' ASSOCIATION", is superimposed across the middle of the acronym.

MEBSCA SUBMISSION TO THE COMMISSION OF ENERGY REGULATION

July 2014

The following submission is made on behalf of the Mechanical Engineering & Building Services Contractors Association in response to the publication on the 'Regulation of Gas Installers with respect to Safety from 2016' by the Commission for Energy Regulation (CER) in June 2014.

MEBSCA view

MEBSCA are of the view that there should be only one Body to regulate RGIs.

We favour continuation of the present situation with the Gas SSB operating on a not-for-profit basis. Assuming that the Body is designated from January 2016, any surplus money should be retained by the Body for the continuation of the business.

We are in favour of a seven years term of designation. As we are of the opinion that one organisation be designated for both the electrical and gas safety licences, we are in favour of having the designation at one and the same time.

We are of the view that permitted activities should be authorised only if they do not have a negative impact on public protection or on safety standards. MEBSCA has no objection to permitting activities that do not impinge negatively on safety.

MEBSCA are of the view that the current practice of monitoring the Regulatory Body through the completion of audits and inspections ensures their compliance with the Terms of Appointment and the Criteria Document and as such, we do not find it necessary for further measures to be introduced.

We are in favour of retaining the current system of individual registration. We believe that the industry should have further consultation to determine the most appropriate access routes to registration and CPD requirements for RGIs.

The future review of the registration of gas installers involved in non-domestic works must include full consultation with industry. MEBSCA members are primarily involved in these non-domestic works and agree that the establishment of standards and regulation in this sector is a positive measure however any new registration scheme needs to deal with grandfather and transferability issues.

Insurance must be enshrined as a minimum requirement for registration as an RGI.

The CER should employ a GSO to investigate any complaints. Complaints could be made directly to the CER or Gas SSB by email, website, phone, etc. A public awareness campaign needs to be initiated re illegal works and the potential hidden dangers to consumers.

MEBSCA are in favour of continuing the present scheme where the Gas SSB issues certificates to RGI's. We firmly believe that a move towards an electronic certification process will allow better tracking of certifications and restrict any secondary market in certificates. An electronic system should be more cost effective and easier to monitor than a paper based system. The implementation of an upgraded electronic certification system will facilitate the monitoring of the return of post connection certificates and the blocking of RGIs who do not comply with the regulations. A public awareness campaign will help in educating customers of the need to receive a completion certificate.

MEBSCA supports the continued promotion of the Safe Gas brand by the CER through a variety of national publicity campaigns but do not believe it should be mandatory to display the logos on vehicles. We are of the view that a reference to the year of registration is positive and should be linked to any form of identification/documentation that an RGI must provide. Consumers should be encouraged to use the central website.

MEBSCA would support the option of a single entity operating the Electrical and Gas scheme due to the potential cost reductions, standardised approach, clear benchmarks for performance, traceability and improvements in safety.