

## **CER /14/131 RESPONSE TO CONSULTATION PAPER, GAS.**

### **Section 3.1.2 Function,**

Monitor, audit,

In relation to inspections I feel that RGII should carry out inspections on a random selection of certificates, for certificates 1 or 2 the inspection should be carried out without the installer, RGII to make contact with customer and carry out the inspection on the full installation, similar to SEAI system and notify the installer of the outcome.

In relation to cert 3 the inspector should carry inspection as above but strip and check the boiler along with emission test and check it against the service person test results.

### **Financial Structure: of Designated Body,**

SSB should remain not for profit.

The money should be transferred to CER holding account at the end of their term and transferred back if successful on a new term.

### **Term of Designation,**

Remain at 7 years to allow them time to enforce new procedures as required.

### **Permitted activities,**

Maintain present criteria as in 3.6.2 to maintain independence.

### **Investigation of incidents,**

My feeling is that the investigation should be carried out by a qualified person working under H.S.A. in order to provide independence.

### **Qualification of Inspectors,**

- Qualified in Plumbing or Fitter.
- Qualified A1 Assessor
- Kept up to date with current regulations and standards by having to sit at least 1 day per year with an outside independent body.
- To initiate the system to undertake at least 5 days training followed by DGA assessment taken independently and be kept in date.

## **Criteria Document**

- Would the supervision of the SSB not be better placed in the hands of HSA as they are on the ground more familiar with day to day operations similar to UK.
- HSA have a very good record in implementing control requirements for example Safe Pass cards and plant and machine operator's tickets with little resistance.
- The document should be changed to reflect the work carried out and safety not safety only.
- The operatives in the Domestic system should be in 2 category's.
  1. Qualified Plumber or Fitter as an installer
  2. Qualified Electrician or other suitable qualification to undertake service only.

## **Technical Standards, Training and Assessment.**

ISO Standards are the recognised standards for all RGIs to work to however the sometimes don't go far enough and can be interpreted differently. To alleviate this there should be a standard training manual established for each criteria which should be used and under the control of the SSB. This with the registration of training providers would give the SSB better control of the training and insure consistency along with the supply of the training manuals, which would supply another income, without providing training and assessment thus keeping independence.

## **Electrical Craft Certificates and Categories of RGIs**

Domestic RGI installers should be Qualified Plumbers or Fitters, with GIS and GID or GSD.

Domestic RGI Service technicians' should be Qualified Electricians, Refrigeration, OFTEC qualified for OIL or suitably qualified, with taken a minimum of GIS and GI3 or equivalent

## **Communication with Stakeholders,**

CER has a system of meetings which represents all including installers I can't see anything wrong with this system.

## **Joint Electrical and Gas SSB,**

I agree that if possible the SSB should supervise both Gas and Electrical, this would cut down the cost of administration and in some cases provide dual inspections to take place subject to qualifications. All of this should be a saving for the operative.