

GTSC TC 2 Response - Regulation of the Gas Installer Industry with respect to Safety from 2016 – Consultation Paper CER/14/131

Section	Subject	Question	GTSC Comments
3.2	Financial Structure of the Gas SSB	<ul style="list-style-type: none"> Currently the Gas SSB is a not-for-profit organisation. Should the Gas SSB, which is designated commencing January 2016: <ul style="list-style-type: none"> a) continue to operate as a not-for-profit organisation; or b) be allowed to operate as a profit making business? Please provide justification for your preferred option. How should the money which is paid to the CER on termination be used (i.e. do parties agree with the proposal to transfer the reserve to the body which is designated from 2016 onwards)? 	No position on this point.
3.3	Term of Designation	<p>The CER would like to hear views from interested parties on whether the fixed term for the designation period commencing January 2016 should:</p> <ul style="list-style-type: none"> a) move to five years as originally envisaged; or b) remain at seven years mirroring the first term. <p>Respondents should provide justification for either answer provided.</p>	No position on this point.
3.4	Corresponding Terms for both Electrical and Gas SSBs	Comments are sought from interested parties on the possibility of having staggered designation end dates for Electrical and Gas SSBs in order to avoid coinciding termination dates.	No position on this point
3.5	Fees of Registered Individuals	Comments are invited from interested parties on the separation of cost recovery between membership fees and certificates.	Satisfied with current arrangements.
3.6	Permitted Activities	What criteria should be used if prohibiting the Gas SSB which is in place from 2016 onwards from participating in any permitted activities?	Should only be allowed to participate in activities that would enhance the skills of the members and the effectiveness of the scheme
3.7	Regulating the Operation of the	The CER is interested in comments regarding the introduction of any further measures to	Maintain current arrangements.

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	Designated Body	ensure Gas SSB compliance with the Terms and Conditions of Appointment and the Criteria Document.	
3.8	Investigations of Gas Incidents	The CER would like to invite views from interested parties on who is best placed to investigate incidents involving an issue on the customer side of the meter.	<p>The Gas SSB should investigate the incident if there is an indication that the incident may have been caused by unsafe workmanship carried out by an RGI.</p> <p>In addition:</p> <ul style="list-style-type: none"> • If there was an indication that an accident/ incident it may have been caused by work carried out by an unregistered individual. The CER Gas Safety Officer (GSO) should investigate the incident in consultation with the nat. gas network operator or in the case of LPG with the utilities/supplier • Bord Gáis Networks should carry out investigations into specific incidents/accidents involving natural gas and gas utilities should also carry out investigations into specific incidents/accidents involving LPG.
3.9	Gas SSB Inspectors	Comments are invited from interested parties on what qualifications Gas SSB inspectors should be expected to hold?	Maintain current arrangements but also include GDA qualification and a five year re-assessment
4.0	The Criteria Document	<p>The CER request comments from interested parties on the Criteria Document as it currently stands. In particular the CER wishes to receive views on:</p> <ul style="list-style-type: none"> – where any improvements could be made; and – how the CER should communicate any modifications proposed to the Criteria Document to stakeholders prior to making a decision 	<p>a) Criteria document should be reviewed on a yearly basis</p> <p>b) all stakeholders should be included in the review process by using the existing consultation process.</p>
5.0	Technical Standards, Training and Assessments	<p>The CER wishes to invite any comments on the following issues raised in this section:</p> <ul style="list-style-type: none"> – Technical standards to which Gas Works must be carried out; – Training prior to registration; and – Assessments for RGIs. 	<p>a) Satisfied with existing standards</p> <p>b) Satisfied with existing system</p> <p>c) Satisfied with existing system</p>

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6.0	Registered Gas Installer Membership	<ul style="list-style-type: none"> Comments are requested regarding whether the level 6 advanced craft certificate in electrical should remain as one of the craft certificates which would satisfy this requirements for entry to the scheme. Should additional categories of registration be introduced into the scheme? In the event that there were additional categories, what should these be and what should be the qualification requirements for each category? 	<p>a) needs considerable review to determine if it is still appropriate.</p> <p>b) No additional categories should be added</p> <p>c) n/a</p> <p>Other level 6 qualifications should also be considered in respect of entry requirements for the training course e.g. pipe fitter and related mechanical trades</p>
7.0	Definition of Gas Work and Certification	<p>Comments are invited regarding the certification system. In particular, comments are sought on the possibility of introducing electronic certification. In this regard, if electronic certification were to be introduced, comments are sought on whether it should be:</p> <p>(a) mandatory for all RGIs but brought in on a phased basis;</p> <p>(b) a dual system should operate whereby RGIs can choose to use the electronic certification system or the paper based system or</p> <p>(c) mandatory for certain groups of installers.</p>	<p>Agree with the introduction of electronic certification system.</p> <p>It should operate as a dual scheme indefinitely.</p>
8.2.2	Detection and Investigation	<p>Comments are invited from interested parties to provide specific suggestions on additional actions that can be taken in detecting unregistered individuals who carry out illegal Gas Works.</p>	<p>Comparison of industry customer lists with RGII Installer list.</p> <p>Stricter controls on the sale of gas parts/appliances by industry. Sell to RGIs only is already being undertaken by some suppliers on a voluntary basis. This should be encouraged</p>
8.2.4	Gas Safety Officers	<p>The CER wishes to invite comments from interested parties on the proposed approach of the CER in appointing a Gas Safety Officer</p>	<p>Agree with the proposed approach. Will allow the money saved to be utilised for improvements to the regulatory scheme.</p>

GTSC TC 2 Response - Regulation of the Gas Installer Industry with respect to Safety from 2016 – Consultation Paper CER/14/131

		from within its own resources rather than from a resource provided by the Gas SSB.	
9.2.6	Communication with parties that make complaints	<p>The CER would like to invite comments from interested parties on whether the interaction with complainants should:</p> <ul style="list-style-type: none"> a) remain as currently outlined in the Criteria Document; or b) be amended to include a requirement to ensure the complainant has more involvement in the process following the initial complaint. 	No position on this point
9.3	Proposed future communication arrangements	<ul style="list-style-type: none"> • Comments are invited from any interested parties as to how the CER may best communicate with stakeholders. • The CER also seeks comments regarding whether gas installers should play a more significant role in the day-to-day governance of the Gas SSB 	<p>a) CER communication with stakeholders; specifically RGI's should be improved.</p> <p>b) Gas installers should be democratically represented (where possible) on the RGII board.</p>
10.3	The RGI Logo	Comments are invited from interested parties as to whether it should be made mandatory for an RGI to display the RGI logo on their vehicle?	No position on this point
10.3	Annual Logo	<p>Comments are invited from interested parties as to:</p> <ul style="list-style-type: none"> • whether references to the year of registration should be included (either as part of or in addition to the logo); • whether the Gas SSB should be required to issue revised stickers each year to the RGI (which included a reference to the year); and, • whether RGIs should be required to update any logo which they display on their vehicle each year with the stickers provided by the Gas SSB and be subject to disciplinary proceedings where they fail to do so? 	<p>a) No position on this point.</p> <p>b) N/A</p> <p>c) N/A</p>
10.3	Unique Identifier	Comments are invited from interested parties as to whether a unique identifier e.g.	Agree that a unique identifier should be utilised.

GTSC TC 2 Response - Regulation of the Gas Installer Industry with respect to Safety from 2016 – Consultation Paper CER/14/131

		RGI number should be included as part of the RGI logo.	
11.2	A Joint SSB for Gas and Electrical	The CER invites comments from interested parties on the option of one process being utilised to designate a single organisation as both the Gas SSB and the Electrical SSB.	No position on this point.