Update from RGII Gas Safety Manager

Dear RGI,

I hope you and your family are well. There is no doubt that the past two years have been difficult for everyone with the COVID-19 pandemic. In March 2020 all businesses had to change their ways of providing customer service to their clients and RGII was no different. We thank every RGI for their patience throughout the changes of our service provision to RGIs.

I wish to thank all RGIs who have paid their annual subscription and remain committed to providing safe professional services to the public, completing gas works in accordance with the standard. Our customers rely on the RGI Scheme to underpin that commitment to safety and standards. Recent national surveys undertaken through the pandemic show that customers still have high confidence and trust in RGIs, working under the RGI brand, to complete gas works safely and to the strict requirements of the national regulations. This is heartening news indeed.

A key part of the professional service that customers expect from Registered Gas Installers is their ability to design, test and commission gas installations competently and to issue certification as evidence to the customer and any authority, that all safety measurements and checks were performed correctly. This is why RGII inspectors put such an emphasis on installation pipework design, testing, commissioning and provision of certificates to the customer when conducting the National Inspection Program each year. Thank you for playing your part in this by cooperating in making nominated examples of gas works, completed by you available for inspection and audit, when requested.

In this issue we address technical issues we have been alerted to more recently by RGIs regarding flues enclosed by lean-to constructions on dwellings. These types of installations are not installed by RGIs, and we appreciate RGIs raising the issues with their inspectors and IRP panel members. We remind RGIs about the importance of the awareness of the reservoir effect, give guidance on preparation for your annual Inspection & Audit, as well as the change of installer process, we give an update on recent Disciplinary outcomes, and an update on the Public Awareness of the RGI scheme following a survey by Gas Networks Ireland. We point to publicly available information on grants available for RGI customers for home upgrades under The Housing Aid for Older People Scheme where we hope RGIs will direct any vulnerable clients to possible funding for heating system upgrades.

The coming year, 2022, will see a revision of the current edition of IS813, with the new edition published in late 2022. RGII will be keeping RGIs informed of this and will direct RGIs to comment on the draft standard when it is published for public consultation. NSAI GTSC TC2 welcomes all constructive comments on the standard from RGIs.

The gas industry faces many challenges in the years ahead. RGII looks forward to playing its part, and to working with RGIs, in maintaining high safety standards and compliance across gas installations and gas works maintenance in meeting these challenges. 2022 will also see the new Gas Safety Supervisory Body designation awarded from 2023 onwards.

Finally, reducing our carbon footprint and embracing the circular economy whilst ensuring best in class inspection and customer service provisions are key goals for our future. I am confident that the RGI scheme will continue to develop and evolve, with input from all stakeholders, in delivering on these key goals.

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Updated Non-Domestic Gas Regulation Policy

The Commission for Regulation of Utilities (CRU) is responsible for the regulation of safety in domestic Gas Works through the Registered Gas Installer (RGI) scheme. The CRU appoints a Gas Safety Supervisory Body (GSSB) to operate the RGI scheme on its behalf.

In 2015, the CRU decided to also introduce regulation of non-domestic Gas Works however this decision was subsequently postponed in 2020 due to delays resulting from the Covid-19 pandemic. At the time of postponement, the CRU committed to revisit its proposed arrangements for Non-Domestic Gas Works regulation to determine if any enhancements were needed. Throughout 2021, the CRU engaged with key stakeholders with direct involvement in Non-Domestic Gas Works safety related matters to determine the best path forward in terms of introducing regulation in this sector.

Continued overleaf

CRU Non-Domestic policy update contd.

Following this review and through its engagement with stakeholders, the CRU has decided to proceed with the implementation of Non-Domestic Gas Works regulation. The CRU made this decision due to the potential safety regulation gap around current non-domestic installations, and their maintenance and modification. The CRU published a Decision Paper (CRU/22/023) on 25 February 2022 detailing this policy decision.

The CRU has also decided that Non-Domestic Gas Works regulation be folded into the existing RGI scheme without the creation of a new membership category. The CRU has made this decision as the core technical similarities of Domestic and Non-Domestic Gas Works allow for the effective and appropriate regulation through the extension of the current model. This regulation will take effect from July 2023.

The actions that will be required from various cohorts of industry in light of this policy decision, are detailed in Table 1 of the CRU's recent decision paper. Under this policy decision, any current RGI working in the domestic and non-domestic sector will not be required to undertake any actions, to continue carrying out Gas Works, post implementation of this regulation. A Recognition of Prior Learning process will be established to assess on a case-by-case basis, whether non-registered installers, currently working in the Non-Domestic Sector, are eligible to apply to join the scheme post implementation of this regulation.

Further information on this updated policy can be found in the CRU's recently published decision paper (available here).

The implementation of this regulation aligns with the CRU's vision that energy is supplied safely and will provide a better safety outcome in the public interest.

Certification

- As per Irish legislation, the CRU Criteria Document and IS 813, a Declaration of Conformance (DOC) shall be given to the person responsible for the premises and/or the operation of the installation and a copy to the gas supplier if requested to do so.
- This is a requirement for all gas works carried out by an RGI
- Operational Procedure No. 1 of the Criteria Document sets out the procedure for issuing certificates by RGIs
- Green copy DOCs shall be returned to RGII offices within 20 days of issue
- An RGI is only permitted to certify their own work

Website Update

RGII launched its new website in late 2020 with the ability for RGIs to log in, keep up to date with news and technical information, review CRU-IRP meeting minutes as well as purchase certificates and pay subscription fees. We are delighted to announce that almost 25% of cert sale orders are now taken through the website and we encourage RGIs to use the website to purchase certificates. Certs purchased online can be posted or collected from our offices. Our collection times are 9am-10am and 3pm-4pm Monday to Friday. Post orders are fulfilled next working day. For full details of our sales process including order cutoff times and collection points, please click here

We are currently working on providing RGIs further services through the website, including a dashboard with specific RGI details for example;

- Insurance expiry dates with portal to submit updated insurance
- DGA expiry dates with portal to submit updated DGA certification
- Pop-up notifications to the latest safety alerts, technical bulletins, webinars and important news

CIRI Register

On 12th January the government released a statement regarding their plans to legislate for builders to register with the Construction Industry Register of Ireland (CIRI). The draft bill, seen by RGII has an exemption for RGIs carrying out gas works (only) as follows;

Exemptions 4. A person who carries out the following works is not a provider of building works—

(b) gas works, within the meaning of section 9G of the Act of 1999, to a building carried out by a registered gas installer, within the meaning of section 9F(6) of the Act of 1999, in accordance with that Act or regulations made under it.

RGII note that many RGIs are involved in work other than gas works such as plumbing and other building works. RGII regulate gas installers with respect to safety and their compliance with IS813, we do not regulate plumbing or any other building works. We recommend you contact your local IRP representative should you have queries relating to the CIRI register or proposed legislation regarding same.

Click here for IRP Contact information

Preparing for an Inspection & Audit

Many RGIs are well used to the requirements of the National Inspection & Audit Programme, this article has been included to assist you in preparing for the inspection and audit by identifying the necessary checks and observations which RGII are required to complete as the Gas Safety Supervisory Body (GSSB).

In general, the completion of the inspection and audit process with an RGI goes smoothly and RGII appreciate the ongoing co-operation of the RGIs with the regulatory compliance required in Inspection & Audit Programme.

The Inspection element of the engagement on the day requires the RGII Inspector to observe the completion of one of two activities completed on a gas consumers premises by the RGI.

These activities can be either of:

- Gas works on a new or upgraded domestic gas installation
- Full Annex E inspection of an existing gas installation.

The Audit element of the meeting requires the RGII Inspector to visually confirm that the RGI possesses each of the following items on the day of the site meeting, these items are required for carrying out gas works safely:

Audit & Inspection preparation contd.

Equipment	Paperwork
U-Gauge / Digital Manome- ter (Within Calibration Peri- od)	RGI I.D.Card
Flue Gas Analyzer (If required)	Current Edition of I.S.813 (2014 + A1 2017). You can <u>purchase a</u> <u>copy of I.S.813 from the NSAI</u> <u>website here</u> .
Leak Detection Equipment	Declaration of Conformance (appropriate for the work under- taken on the day)
Smoke matches	Non-conformance / Notification of Hazard book
Smoke Pellets	CSST Training Certificate (If required)
Multi-meter (If required)	PE Training Certificate (If required)
Test Tee and Aspirator	Multilayer Pipework Training Certificate (If required)

The above information is supplied to assist you in preparing for the inspection meeting and help you avoid recording any non-conformance points on the day.

Although Covid 19 restrictions have eased, it is essential that you are prepared to observe the advice on safe on-site practices and that the customer has agreed in advance to the arrival of two persons onto their premises. The customer should remain in an alternative room whilst the inspection of the work is taking place, and it's normal to carry out the audit outdoors in these times to minimize the time spent indoors.

Should any COVID-19 related issues arise with you or the proposed customers home we will re-arrange the inspection for a later date on receipt of this information from you.

Thank you for your co-operation in advance of this Inspection & Audit meeting, and if you have any further questions please contact your nominated inspector, or contact RGII at info@rgii.ie if you are not sure who your nominated inspector is.

Safety Alert—'lean to' constructions



RGIs have raised issues with lean-to constructions on side passages and rear entrances to dwellings. This has increased significantly since the COVID-19 pandemic and people spending more time at home, as well as their wish to develop spaces in their houses.

Click here to download and read the Safety Notice relating to these types of occurrences and advice from RGII for RGIs.

Reservoir Effect—be aware

It is important to keep reminding ourselves of the dangers of the reservoir effect during testing procedures. Section 12 of I.S.813 is clear in the requirements for let-by testing before completing tests on new or upgraded pipework.

Annex E, and particularly E.3 is also clear on the requirements of soundness testing.

All RGIs should ensure that there is no possibility that a reservoir of gas downstream of the customer isolation valve is masking any potential leak, by reducing the pressure in the tested system before the test is undertaken.

Please Click here to watch an informative video on the reservoir effect.

Housing Grant Aid for Older People Scheme

This article is based on publicly available information to assist Registered Gas Installers (RGIs) informing customers, falling under the scheme, in relation to grants available to them for upgrading Gas Installations.

When will this be relevant to RGIs?

RGIs will encounter existing gas installations that are in need of upgrading based on a safety assessment.

In extreme cases substandard gas installations may require a complete refit.

This could happen when:

- RGIs respond to emergency calls or appliance breakdowns
- RGIs are installing/replacing additional or new appliances in existing properties

Many installations could be occupied by elderly people or people with limited means or no knowledge of building regulations and the legislation. It is difficult then for the RGI to issue a 'Notice of Hazard' which has safety and financial implications, for the client and can be a shock for the client as well.

What can be done to make this easier for both client & RGI?

The following publicly available information regarding available grants might be helpful for RGIs to give to customers who need to upgrade their gas installations based on the safety assessment. This information, along with the Notice of Hazard, following assessment, would be given to the customer. A leaflet with the information and links to the relevant website would be very handy for the customer.

The Housing Aid for Older People Scheme is used to improve the condition of an older person's home. In general, it is aimed at people 66 years of age and older, who are living in poor housing conditions. However, in cases of genuine hardship the local authority may assist people under age 66.

Housing aid for older people contd.

This scheme is administered by the local authority/County Council (look at the Local Authority's website for details)

The type of work that is grant aided can include some or all of the following:

- Structural repairs or improvements
- Dry-lining
- Repair or replacement of windows and doors
- The provision of water, sanitary services and heating
- Cleaning and painting
- Radon remediation
- Re-wiring
- Any other repair or improvement work considered necessary.

Housing Aid for Older People Scheme

Many older people may be eligible for the Housing Aid for Older People Scheme. However, priority will be given to people based on financial need. This is a means tested scheme.

Application forms are available from all local authorities. The work must be authorised by the local authority prior to commencement. Any work completed will not be paid retrospectively.

The maximum grant available under the Housing Aid for Older People Scheme is €8,000, which may cover 95% of the approved cost of works.

Social welfare recipients

Alternatively, those in receipt of a social welfare payment could approach their local Community Welfare Officer for help with any unexpected costs which may arise. This can be done under the Supplementary Welfare Scheme using an application for an Extraordinary Needs Payment.

Registered Gas Installers need to be aware that when replacing any gas appliance, for example a boiler in an existing household, Section 4.5.6. requires that gas pipework shall be sized such that the pressure drop for a natural gas installation is no less than 1mBar and for LPG installation is no less than 3mBar.

For more information on this scheme, please see citizens information here

Disciplinary Outcomes

RGII continue to use the Disciplinary Process function of the Gas Safety Supervisory Body where necessary to address issues found with RGIs in the scheme. This is generally used where serious safety issues or breaches of the Rules of Registration or Criteria Document have been found.

RGII have completed Disciplinary Hearings and several sanctions have been applied to various situations;

Many RGIs have been issued oral and written warnings for installations certified by them that do not meet current standards; RGIs also, in many instances, have been given higher inspection monitoring sanctions at their cost.

An RGI Company engaged in supplying certification for gas works which was completed by an unregistered individual was suspended from the register for 6 weeks and the company had several further inspections at their cost applied to them for this breach of the Rules of Registration and Operational Procedure no. 1.

An RGI who supplied certification for illegal work on behalf of an apprentice who was not registered as an RGI Trainee (illegal gas works) was suspended for one month and the company had several further inspections at their cost applied to them for this breach of the Rules of Registration and Operational Procedure no. 1.

An RGI found to be certifying illegal gas work was suspended for one month and was subject to further inspection at their cost for this breach of the Rules of Registration and Operational Procedure no. 1

Following an investigation into a significant number of sub-standard installations, with a number of dangerous occurrences identified, an RGIs membership was revoked for 6 months following a disciplinary hearing.

It is important to emphasise that, an RGI may be liable to disciplinary action(s) in accordance with Section D of the Criteria Document in any of the following circumstances;

- (i) Furnishing incorrect, misleading or fraudulent information or documentation in an Application for Registration to the Body or at any subsequent renewal application
- (ii) Any material breach of the Rules of Registration or any material breach of this Criteria Document, including, but not limited to, the following:
 - (a) any failure to carry out work in compliance with the requirements of the Criteria Document and specifically the industry standards set out therein
 - (b) any failure to respond adequately to or at all to correspondence or other communications from RGII, the Commission, an Inspector, a Complaints Officer or from any Disciplinary Body, or failure to cooperate fully with any inquiry or investigation being conducted by or on behalf of RGII
 - (c) providing a Completion Certificate in respect of Gas Work that has not been completed by the RGI (except in circumstances so permitted by the Body)
 - (d) failure to meet the Inspection Performance Criteria (as approved by the Commission and as per the arrangements pursuant to Section B 3.4); and
 - (e) failure to provide work for inspection in line with the requirements of the Criteria Document and RGII's Audit and Inspection Procedure

Change of Installer Memo

During recent meetings, the Installer Representative Panel have raised the subject of awareness amongst RGIs of the Change of Installer process.

The Change of Installer process has been in place since the inception of the scheme and is covered under <u>Operational Procedure 4</u> of the Criteria Document. This process may apply to Gas Works completed on a Natural Gas or LPG installation.

RGIs may only certify Gas Works completed by themselves or works completed by a trainee under their supervision. The only other scenario in which an RGI may certify any other person's work is through this Change of Installer Procedure.

The procedure covers situations where a gas installation has been completed or partially completed by an installer but cannot be completed or certified by that installer. Extracts from the procedure are shown below.

The objective in developing this Operational Procedure is to ensure a common and consistent approach is implemented by the Body to enable an RGI to be authorised to carry out Gas Works where the original RGI is unable to do so, thus ensuring that the Customer will receive a Certificate and can be connected/reconnected to the gas network [a gas supply] if required.

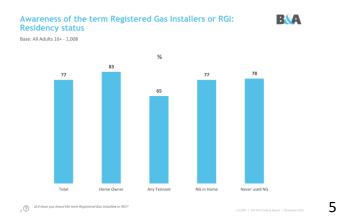
The Change of Installer procedure is the only procedure whereby an RGI may certify Gas Works which were not completed by them, following inspection and approval from RGII.

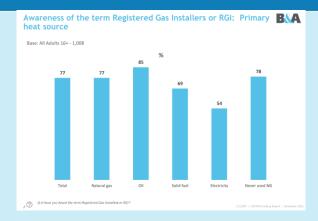
Any customer or RGI requesting a Change of Installer should complete the online form (see here), and is directed to the RGII Procedure for Change of Installer and to the Criteria Document Operational Procedure No. 4 for further information.

RGI Public Awareness

The advertising campaign for the RGI scheme featuring Daniel O'Donnell started in 2016 and is continuing to date. It covers TV, press, radio and digital content. Surveys following the 2021 advertising campaign showed that 77% of the adult population are aware of the scheme, down from 82% in 2020. However, the research was carried out online in 2020 on an exceptional basis due to Covid 19, while in 2021 this returned to face to face. Using this research methodology, the 2021 figure of 77% is up from 67% using the same methodology in 2019.

Awareness of the term Registered Gas Installers differed depending on the primary heat source of the survey respondent. 54% of those who use electricity as their primary heat source are familiar with the term, 77% using natural gas, while 85% of respondents who used oil as their primary heat source are aware of the term.





Gas Networks Ireland update



Reported Gas Escapes. 1800 20 50 50 RGI Direct 1800 211 540 Customer Service 1800 464 464

Safety Advice

- Gas Networks Ireland are advising all RGI's to be very cautious with the removing and replacing of the test point on the meter. The over tightening will cause the test point to break. The test point requires a slight tighten beyond hand tight and then tested with leak detection spray.
- RGI'S must ensure the disk is removed from the meter prior to carrying out a soundness test to be sure the test was carried out correctly where the meter has been safety locked by Gas Networks Ireland.
- If the meter is removed as part of Gas works being carried out it is the responsibility of the RGI to replace the meter washers, refit the meter correctly in the box and located in the shelf.
- All damaged meter boxes or cabinets must be reported to Gas Networks Ireland.

Gas Pressure

When reporting any issue with Gas pressure please include the following information.

- 1. Standing pressure at the meter test point.
- 2. Operating pressure at the meter test point (when the appliance/s are turned on)
- 3. Operating pressure at the appliance.

Gas Network Pressure update (Bray, Co. Wicklow)

The low pressure network in Bray Co. Wicklow currently operating at 35mBar will be increased to 65mBar in September 2022.

There are no plans to alter the district pressure elsewhere on the Low Pressure Network.

General

- The removal of any labels and or notifications is not permitted from meter cabinets or boxes.
- The return of certificates when gas is introduced/restored is essential.