



Proposed Water Supply (Water Fittings) Regulations (Northern Ireland) 2009

Comments by

Northern Ireland Environment Link

7 November 2008

Northern Ireland Environment Link is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 51 Full Members represent over 85,000 individuals, 262 subsidiary groups, have an annual turnover of £100 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments we would be delighted to do so.

Prof Sue Christie, Director
Northern Ireland Environment Link
89 Loopland Drive
Belfast, BT6 9DW
P: 028 9045 5770
E: Sue@nienvironmentlink.org
W: www.nienvironmentlink.org

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Welcome to the Proposed Regulations

Northern Ireland Environment Link (NIEL) welcomes the proposed regulations. NIEL believes that the consultation process should be an important component of policy development and that investment in the consultation process will ultimately improve the final policy.

NIEL believes that the revision of the regulations presents an excellent opportunity to set new standards for water efficiency and to highlight the importance of reducing our water consumption. Individual direct water usage has increased by more than 30% since 1970, with each person in the UK using an average of 150-180 litres of water per day. This compares unfavourably with Germany, where the average citizen uses 125 litres per day.

Most households, 85% of respondents according to recent Consumer Council research, would like more information about how to save water. NI Water should support individuals who want to install water efficiency devices and appliances in their homes. Installing low flush toilets and water efficient taps and showers in the home could reduce household water consumption by 40%. Such schemes should be targeted particularly at low income and high water need households. Water should remain affordable and people must be satisfied that they are getting what they pay for. Regulation must also play its part; NIEL believes that buildings should be designed and fitted with devices to enable people to decrease their water usage and meet targets for reduction. For example, a maximum water use of 100 litres per person per day may be an appropriate target.

There is a perception that there is no shortage of water in Northern Ireland and, therefore, that there is no necessity to reduce demand. However, this view appears to ignore not only the carbon cost of water services but also the potential for future water shortages. In 2004 the Minister of State, John Spellar MP, said: "Demand for water is expected to increase by more than 20% by 2030. Long-term planning is essential if we are to be in a position to meet the needs for this and future generations." The increasing demand could well coincide with decreasing supply according to climate change expert Dr John Sweeney, who has said, "Water Service (NI Water) should act now to prepare for drier summers and lower predictability of supply." We must now address the causes of the problem, i.e. unnecessary and wasteful consumption, in order to avoid more expensive action which could be required in the future. NIEL believes that metering should form a key element of a strategy to minimise water wastage in Northern Ireland.

1. Do you agree that all installers (plumbers) should inform the water undertaker when they intend to carry out the following works?

It is important that the water undertaker is aware of works that may have an impact on local water availability and quality, therefore, NIEL agrees with this point. However, it is also important that the process does not put a disproportionate administrative burden on installers or property owners. In particular, we feel it is important that householders and businesses that are intending to install water saving devices such as greywater and rainwater re-use systems should be encouraged (for example, by providing free expert advice) rather than put-off by administrative hurdles.

2. Do you also agree that the installer should not begin work until NIW has given consent and that any conditions specified by NIW must be followed?

Yes. It is important that the undertaker is able to process the applications within the agreed period of 10 days and that staff processing the applications have the skills to identify works which have the potential to have a significant impact on quality or

availability of supply. NIW staff should also ensure that water consumption will not be excessive or wasteful as a result of the proposed changes.

In order to ensure compliance with the conditions specified, it is important that adequate information is provided and that installers are given the opportunity to learn new techniques and are aware of new technologies. Inspections, measurements and tests should be conducted frequently enough to ensure that standards are being met. Enforcement activity should also ensure that installers take the regulations seriously.

3. Do you agree that installers should provide all occupiers with certificates stating that any work carried out on their behalf meets the requirements of the Regulations?

Yes, as this will provide reassurance and protection to customers and future buyers. The certificates should also include a statement of the impact on water wastage that the works have had. Indeed, such information should be provided in advance of installations as part of quotations to assist owners to decide on the long term costs of their new appliances.

4. Do you agree that an Approved Contractor Scheme should be put in place?

Yes, in particular the academy should be used to share best practice on reducing water consumption and to reinforce the importance of reducing water consumption.

5. Do you agree that it is appropriate to rely on specifications approved under the Water Supply (Water Fittings) Regulations 1999?

Northern Ireland should match or exceed best practice in the rest of the UK and Europe.

6. Do you agree that the proposed Regulations should increase the current level of fine for contravening the water fittings from £400 to £1000?

The threat of a higher fine should improve compliance but only if there is a significant threat of detecting non-compliance. Therefore, inspections, measurements and tests should be conducted frequently enough to ensure that standards are being met. To complement regulation, best practice examples should also be highlighted.

7. Do you agree that NIW should act as the enforcement authority for the proposed Regulations?

Yes, but Building Control inspectors should also assess compliance and report to NIW.

8. Do you agree that the Department should be allowed to relax the requirements of the Regulations on application from NIW?

This should only be allowed in very specific cases. The conditions and scenarios that might necessitate a dispensation should be outlined by the Department. These terms should be consulted upon before becoming guidance.

9. Do you agree that NIW should publish any new method of installation that they approve?

Yes, it is important that the industry is kept up-to-date with best available technologies.

10. Do you agree that Regulations should contain provision for dispute resolution?

Yes.

11. Do you agree that NIW should publish an annual enforcement report?

Yes. This must demonstrate that NIW is taking enforcement seriously and should act as a deterrent to non-compliance. To complement regulation and enforcement best practice examples should also be highlighted.

12. Do you agree that NIW should have the power to recoup any reasonable costs incurred in remedying any contamination incident?

Yes, this follows the polluter pays principle. It is also likely to act as a major deterrent to offenders as the costs involved could be very significant.

13. Do you agree that there is a need for NIW to be able to rate premises by water fluid categories in order to develop a risk management strategy in order to determine where there is a possible high risk of contamination to the public drinking water supply?

Yes

14. Do you agree that new more stringent forms of backflow and backsiphonage prevention should be set out in the Regulations?

Yes

15. Do you agree that the Department should seek to reduce current permissible flush volumes for toilets and cycle volumes for washing machines?

Most households, 85% of respondents according to recent Consumer Council research, would like more information about how to save water. NI Water should support individuals who want to install water efficiency devices and appliances in their homes. Installing low flush toilets and water efficient taps and showers in the home could reduce household water consumption by 40%. Such schemes should be targeted particularly at low income and high water need households. Water should remain affordable and people must be satisfied that they are getting what they pay for. Regulation must also play its part; NIEL believes that buildings should be designed and fitted with devices to enable water use targets to be met: for example, a maximum water use of 100 litres per person per day may be an appropriate target.