

Appendix A of Information letter 4-2006

DWQD perspective on the Operational Requirements and Code of Practice for the *in-situ* lining of water mains

Background

1. The *in-situ* lining of water mains is recognised as being an activity which has the potential for significant water quality impacts. As such it is currently managed through the setting of approval conditions by the Committee on Products and Processes for use in Public Supply (CPP).
2. *In-situ* applied lining products approved for use by the Scottish Ministers must be applied in accordance with strict operational requirements as documented in "*In-situ* Epoxy Resin Lining - Operational Requirements and Code of Practice" *or* "*In Situ* Rapid-Setting Polymeric Lining". In Regulation 27 letter (2/2005) the DWQD informed the industry of the updated Operational Requirements (OR) and Code of Practice (CoP) for *in-situ* coatings of water mains. The effect of the communication was that from 1 April 2007 all water utilities should apply coatings in accordance with the OR in order to comply with Regulation 27(10)(b). The following conditions therefore replace the current specific conditions:
 - All water undertakers and contractors must apply the coating in accordance with: "*In-situ* Resin Coating of Water Mains Operational Requirements" currently published by the Drinking Water Inspectorate for use throughout the UK.
 - Coatings must be applied by an approved contractor, listed for the purposes of coating water supply pipes in the Scottish Minister's List of Approved Products and Processes.
 - The approved product must be manufactured and applied under the effective control of a BS: EN ISO9000 Quality System and approved by a third party certification organisation.
3. Currently the DWQD publishes a list of nominated certifying bodies capable of accrediting resin lining contractors and equipment in its annual List of Approved Products and Processes. All contractors and equipment must become accredited by one of these nominated bodies.

Review of DWI role

4. Since the issue of Regulation 27 Letter 2/2005 it has been established that it is inappropriate for DWI to manage nominated bodies to accredit contractors in the UK due to a potential conflict of interest with DWI's enforcement role in England and Wales. In addition, it is considered that the management of the nominated bodies should not be funded by UK tax payers (through DWI).
5. The matter was brought to the attention of the CPP in December 2005 where the issue was discussed. Various options were considered by CPP. In the interim DWI has informally been continuing to manage the nominated bodies, OR and CoP due to the potentially high risk to consumers of a problem arising with the lining process.

6. With effect from 31 December 2006, the DWI will no longer be nominating UK certifying bodies and the OR will be amended to reflect this change. It will be the responsibility of each water utility to ensure that it introduces processes and procedures that will ensure there is no impact upon water quality of *in-situ* lining.
7. The OR and CoP will similarly no longer be the responsibility of the DWI from the same date. A recommendation for approval by the CPP under Regulation 27 will be made on the basis of strict adherence to the Instructions for Use document, which in turn will refer to a specific issue (number and date) of the OR and CoP. Self evidently there will need to be arrangements in place within the industry for maintaining the OR and CoP documents. The CPP would advise DWQD of any concerns resulting from subsequent revision of the OR and CoP and of any need to impose additional conditions of approval, should these be needed as a result of such revisions. The role of DWQR will be the same as for all aspects of the regulations, namely to carry out risk based audit of Scottish Water's operations, in this case relining procedures and processes and to investigate any events.

Other Issues

8. The DWI has also arranged for audits of the nominated certifying bodies in the UK to be conducted to ensure their practices meet with the requirements of the Operational requirements. Two of the nominated bodies were audited in 2004. The two additional nominated bodies who are currently active in providing accreditation are due to be audited in October 2006. The DWI proposes to complete this audit in order to provide confidence that the current organisations are meeting their responsibilities at the time when the arrangements are changed. Should the industry decide to continue using such certified bodies through an alternative nomination and management system this would help provide a platform for their management which would allow transition without compromising quality. DWI auditing will not continue after completion of the October 2006 audits.
9. When the new Operational Requirements were introduced it was agreed with the industry that the document would be 'live' and changes would be made as deemed appropriate. No changes have been made since it was issued, however various suggested changes have been communicated to DWI over the past eighteen months. DWI will provide an updated version of the OR, to reflect its change of role and to deal with the comments and to tidy up inconsistencies in the current version.
10. The system is currently being managed by Nick Hallam (DWI) and Yamide Dagnet (Technical Secretary to the Committee on Products and Processes). This arrangement will continue until the change is made and hand over to the industry complete on 31 December 2006
11. From 1 January 2007 there will be no DWI nominated certifying bodies and therefore accreditation through these bodies will not be acceptable. The industry should therefore ensure that a replacement scheme is in place by this date.
12. Various options have been put forward as to who will manage the system in future. Whilst it is for industry to decide, DWQD consider that management of the system by one of the current nominated bodies would be preferable in the short term at least since this would secure relevant expertise and enable some continuity. At least one such organisation has expressed an interest in this role.

13. For information, the full range of options suggested for future management are:
- Managed by one of the current nominated bodies. One of the nominated bodies would effectively take over DWI's role of management, nomination and auditing of the other nominated bodies. It would cease to be a nominated body itself.
 - Lloyds Registrar or a comparable organisation could take over responsibility for nomination of certifying bodies for lining contractors and equipment.
 - Water UK take on responsibility for future management
 - No centralised management, with each water utility managing its own systems.