



Regulation 4 compliance

For water installations in the UK, the Water Supply (Water Fittings) Regulations 1999 England & Wales, 2009 Northern Ireland and 2014 Byelaws Scotland require to be complied with. In respect of Water fittings and their requirements, reference should be made to Regulation 4, where Regulation 4(1) refers to 'every water fitting should be of an appropriate quality or standard' and also Regulation 4(2) provides the options to demonstrate compliance i.e. CE Marking where applicable, Appropriate British or European standards, and also a specification approved by the regulator.

Historically, the established voluntary practice has been for ISO17025 accredited laboratories to issue test reports against these specifications, and then on behalf of the manufacturer forward a Technical file incorporating these results to WRAS – (Water Regulations Advisory Scheme) to issue a certificate of approval. Please note, **WRAS is not a mandatory requirement**. The legal requirement is for the products and components to comply with Regulation 4. The decision making of WRAS approval also no longer involves the water authorities, so the USP for WRAS no longer exists.

In recent years manufacturers have opted out of getting a WRAS approval, furthermore since the above changes and have asked Kiwa to provide an equivalent declaration of compliance with Regulation 4, which has been done using our Kiwa UK Regulation 4 certificates (KUKreg4). The tests are based on appropriate European standards or the Regulators Specification, performed at the Kiwa ISO17025 laboratories, and the certificate is issued through a system complying with ISO17065

All approvals are listed on our public website www.kiwa.com/gb/en/about-kiwa/water-products which is regularly visited by UK water suppliers for checking product approvals. We are working closely with the water suppliers for a better understanding and visibility of the processes in the joint interest of water quality and safety. We have declarations of acceptance of our KUKreg4 scheme from all the major Water companies.

There are many benefits to the KUKreg4 route to product compliance which include the process being much quicker, you save money on WRAS fees, we take a flexible and consistent approach as the certificate decisions are made internally at Kiwa, we accept test results carried out within other Kiwa laboratories and we offer two levels of compliance (+1 and 3). Further details in our brochure

https://www.kiwa.com/4ac654/globalassets/uk/brochures/kukreg4-brochure_aug-21.pdf

KUKreg4 certificates are widely accepted by the water industry, see below for details on this.



To whom it may concern

RE: Demonstrating compliance with the Water Supply (Water Fittings) Regulations 1999

Keeping consumers safe by upholding regulatory compliance is one of the highest priorities of the Bathroom Manufacturers Association (BMA) and our member companies. The Water Supply (Water Fittings) Regulations are designed to protect water quality by ensuring fittings are of an appropriate quality and standard, and suitable for the circumstances that they're used. Manufacturers must demonstrate that their products comply with these regulations, for fittings to be legally installed.

There is no legal requirement for any approval or certification to prove a product complies with the regulation. Water Regs UK has published guidance on the acceptance principles and information they'd require if inspecting an installation. Despite the option to provide information outside of any approval or certification scheme, the BMA recommends approvals/certification as a more straightforward way to provide assurance of compliance to consumers, installers, and water inspectors alike.

There are currently three relevant approvals/certification schemes operating in the UK for water fittings: KUKreg4, WRAS , NSFreg4. There has been some confusion in the marketplace in recent years with some stakeholders believing that one of these schemes, WRAS approvals, is a de facto mandatory requirement. To seek clarity that this is not the case, and that any of the three approval/certification schemes are acceptable, the BMA wrote to all water companies with an enforcement responsibility. We received replies from the following:

Affinity Water South East Water
Anglian Water Services Ltd Southern Water Services
Dwr Cymru South West Water
Hafren Dyfrdwy Thames Water
Northumbrian Water United Utilities Water
Portsmouth Water plc Wessex Water
Bournemouth Water Ltd Yorkshire Water Services
Severn Trent Water

While the replies vary in their wording, the above water companies are consistent in confirming that inspectors will consider approvals/certification from any of the three current schemes as evidence, or indeed, the alternative evidence outlined in the Water Reg UK guidance may also be considered. While a few water companies are missing from the list above, we have no reason to believe they take a different stance.

The BMA welcomes the constructive responses we have had received from the water industry. We look forward to future collaboration, along with the three approval/certification schemes and other stakeholders to continue to improve the visibility of product compliance in the marketplace.

Regards

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Bathroom Manufacturers Association

