

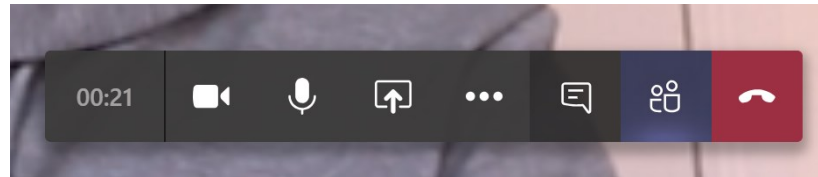
Sanitaryware And Baths & Shower Enclosures Technical Meeting

25th October 2023



HOUSE KEEPING

- Please be aware of background noise.
- Please interrupt if you have comments



- Comments can be sent direct via chat if desired.

538 COMPETITION LAW

- Competition Law Policy – Updated 2021
- To reference Members legal responsibility under (**Competition Act 1998** (as amended) and enforced by The Competition and Markets Authority (CMA)
- BMA meetings are carefully structured and monitored. Agendas for all meetings are prepared, approved by legal advisers and circulated in advance. They are carefully followed at the meeting. Minutes are circulated after each meeting. **Prices, discounts or other terms of sale must never be discussed at BMA meetings.**
- It is important to **all companies** that their representatives at trade association meetings **are aware of their legal obligations** and while Competition law seeks to preserve free and open competition in the United Kingdom and beyond and any activity which may have an appreciable effect on competition, may fall foul of the legislation.

AGENDA



AGENDA

- 537.ATTENDEES/APOLOGIES
- 538.COMPETITION LAW
- 539.MINUTES AND MATTERS ARISING
- 540.STANDARDISATION
- 541.CONSTRUCTION PRODUCTS ASSOCIATION
- 542.COMPLIANCE ISSUES
- 543.SUSTAINABILITY
- 544.UNIFIED WATER LABEL ASSOCIATION
- 545.MATERIALS IN CONTACT WITH DRINKING WATER
- 546.EU EXIT And REGULATION
- 547.PLUMBING TERMINOLOGY
- 548.SCHEDULED MEETINGS & EVENTS
- 549.ANY OTHER BUSINESS
- 550.DATE OF NEXT MEETING

539 MINUTES AND MATTER ARISING



540 STANDARDISATION



540 Standardisation



B503/3 TC163 WG3	Sanitary Wear Appliances: Sanitaryware	
BS EN 14528	Bidets. Functional requirements and test methods	Feedback from HAS has been incorporated into the document has been circulated for comment review at next meeting 9/11
BS EN 14688	Sanitary appliances. Wash basins. Functional requirements and test methods	Comments were feedback on document and these are still in review, next stage to go to Enquiry
BS EN 997	WC pans and WC suites with integral trap	Work is held but Issues still to be addressed are Paper size 6.10 requires approx. 140x100 with 15secs sink not available size is 128x97 and no other papers surveyed matched this discussion is to take place on 18 th Oct Replace potassium permanganate with methylene blue, awaiting standards update.
Toilet Seat Standard	WC Seat Standard	Agnostic Standard to be written this is an ADHOC group and has not progressed.
B503/4 TC163 WG4	Sanitary Wear Appliances: Baths Shower trays and Shower Enclosures	
BS EN 14527	Shower trays for domestic purposes	New Pre Working Instruction to prepare doc for informal assessment Question over type 1 type 2 in line with CPR rules should be NPD Issues around Slipperiness needing to be included. CSTB looking at testing some material samples to determine the repeatability of testing for slipperiness.

EN 14527

- **Revision of EN 14527 - Reduction of testing temperature**
- A change of the testing temperature in EN 14527 under subclause 5.3 “Resistance to temperature changes” was discussed
- Proposal to change the testing temperature from currently $(75 \pm 2) ^\circ\text{C}$ to $(65 \pm 2) ^\circ\text{C}$:
 - “5.3.2 Procedure
 - Position a shower handset 1 m above the floor of the shower tray in such a way that the water spray impinges on the edge of the shower tray and at least half of the shower tray floor, and discharge (90 ± 1) l of water with a temperature of $(65 \pm 2) ^\circ\text{C}$ and a flow rate of $(0,15 \pm 0,015)$ l/s with the waste outlet hole open.”
The secretariat would like to ask members their opinion on this change.
- The $75 ^\circ\text{C}$ test goes well beyond the maximum hot water supply temperature in civil installations, which is $65 ^\circ\text{C}$ and even if the thermostat failed this would still not be subject to 75 degrees.

541 CONSTRUCTION PRODUCTS ASSOCIATION



541 Construction Products Association



Commission reverses decision for exclusion of sanitary appliances from CPR recommendations as Amendments to the Construction Products Regulations Adopted - On 11th July, 2023

The 207-page document with the approved amendments is attached to this email.

This Regulation contributes to the efficient functioning of the internal market by ensuring the free movement of safe and sustainable construction products in the Union and to the objectives of a green and digital transition by preventing and reducing the impact that construction products have on the environment and on the health and safety of people.

Particular areas of attention

Amendment 82 – the reversal of the decision on sanitary appliances being removed

541 Construction Products Association

Code for Construction Product Information

- The recent report “Independent Review of the construction Product Testing Regime
- [Report here](#)

“(5) **Product manufacturers.** There are also two significant opportunities for self-regulation on the part of product manufacturers:-

- increased use of voluntary third-party certification schemes (some of which are currently more rigorous than the regulatory process), but with a base standard no lower than the regulatory regime;
- the potential for the Code for Construction Product Information developed by the industry to grow into something equivalent to the Advertising Standards Authority Code, with a view to resolving most low-level infractions without the Regulator needing to intervene.”

541 Construction Products Association

Code for Construction Product Information

- Voluntary verification process independently run by CCPI Ltd
- The CCPI will assure:
 - Independent and robust verification, working to build more confidence with the public and external stakeholders and setting the market for UK construction products ahead of others.
 - Participating companies will benefit fundamentally from organising their systems and processes in relation to product information – supporting compliance with anticipated new regulatory requirements and giving specifiers, clients and more assurance regarding the information provided on the performance and use of the construction products they select.
 - A focus on culture, leadership and ethics, CCPI will build more confidence, and support an environment for healthy challenge within organisations regarding product performance and safety helping to generate product information that is reliable and correctly stated.
- Now open to all manufacturers and product sets.
- First 26 going through the process, at varying stages.

541 Construction Products Association

HOW THE CODE WILL WORK



- 1 Organisations will undertake an online organisation assessment to validate leadership and culture of the organisation and their commitment to the ethos of the CCPI



- 2 Evidence and information to support the organisation's compliance to the eleven clauses of the CCPI will be submitted, assessed and independently verified to establish if they meet the standards of the CCPI



- 3 When the organisation's brand/or product sets successfully completes the verification processes to prove compliance with the CCPI, then a unique numbered, time-limited licenced mark will be awarded to demonstrate that the 'Product Information' provided by that company is compliant with the CCPI



- 4 The initial licenced mark will be valid for two years. If there are changes to how Product Information is managed for verified product sets, and/or actual or potential product safety issues, there will be a requirement to inform the CCPI. Depending on the significance of the change, there may be a need to re-verify the product/set which could result in an additional charge.

541 Construction Products Association

Code for Construction Product Information

- Full presentation at Marketing Committee (26/4) and Webinar (TBC)
- “Eleven robust ways of working and ensuring compliance”
- Voluntary verification process independently run by CCPI Ltd

1. Have in place a documented sign-off process for creating ‘Product Information’.
2. Have in place a formal version control process for all ‘Product Information’.
3. Do not use mis-leading or ambiguous wording, phrasing or imagery and embrace the use of plain English to ensure accurate representation of ‘Product Information’ and performance claims
4. **Provide valid and demonstrable documentation where claiming compliance to, or achievement of, any Certification, Classification or Industry Standard.**
5. Provide specific documentation when making any product performance claims outside of Certification, Classification or Industry Standard tests; which must be made available on request and shared in an appropriate timeframe.
6. **Make available on your website the descriptive and physical characteristics of the ‘Construction Product’**
7. Ensure all changes affecting 'Product Information' resulting from changes to the 'Construction Product' are identified and reflecting in revised 'Product Information’.
8. Publish on your website and make easily accessible, clear information on handling, installation, operation, maintenance and disposal of ‘Construction Products’.
9. For any guarantees/warranties used in ‘Product Information’, your website must state what is: covered, excluded and required to comply with its terms. The guarantee/warranty should be transparent and in a format recognised by the relevant sector of industry.
10. Ensure technical helpline contact details (telephone and/or email) are visible on your website.
11. Have in place a robust training programme (for new and existing personnel) to ensure that anyone conveying ‘Product Information’ is competent to the level of knowledge required for their role.

641 Construction Products Association

“How should the UK system for testing the safety of construction products and the use of data from the system be strengthened, to inspire confidence that those products are safe and perform as labelled and marketed when incorporated into construction work?”

We are asked to do this by:

- mapping the system for testing, certifying, marketing, selling, re-testing and recalling construction products;
- assessing what does/could go wrong within this system; and
- recommending how the system should be strengthened.

Government Intent – Building Safety Act

to make sure all construction products made available on the UK market fall under a regulatory regime. The Bill will create powers to make regulations to:

- require construction products to be safe before they can be placed on the UK market
- create a statutory list of ‘**safety critical**’ construction product standards
- We recognise that products which are not identified as safety critical could also have an impact on health and safety. That is why we will require products that are not safety critical to meet a **general safety requirement**.

541 Construction Products Association



Baseline Awareness of Businesses in Relation to Construction Products Regulations: Market Mapping, Scoping, and Survey Design

The Office for Product Safety & Standards (OPSS), a Directorate within the Department for Business and Trade (DBT)

Commissioned a study to develop its evidence base for the regulation of construction products. Members are invited to discuss the ICF research, it has been suggested that a panel interview would be better suited.

Interview with ICF on 22nd September and members views as discussed prior to Interview [here](#)

Report next year will be used to frame product as safe or self regulating.

541 Construction Products Association

UKCA

- The recognition of CE marking has been extended for 2½ years which will take us up to the end summer of June 2025.
- The government intends to introduce legislation to extend recognition of goods that meet EU requirements, including the CE marking, indefinitely, beyond 31 December 2024 for many products
- **End recognition of CE mark 30 June 2025 for Construction Products**
- The plan is to use the period to engage with industry to consider reforms of the construction products sector, but this is at an early stage.

542 COMPLIANCE ISSUES



542 COMPLIANCE ISSUES



Members note that delivery times are too long

Service levels are not satisfactory

Biggest Concern that things don't seem to be improving with Service

Brought in a responsible person for addressing issues. Samantha Duffy

Feedback was undertaken to NSF but no direct response.

542 COMPLIANCE ISSUES

Update to KIWA Certification Scheme

- Scheme has introduced a 1+ level label that demonstrates the audit every year etc as required over level 3
- Increased capacity for BS6920 testing, currently 14-16 week turn around for testing and reporting
- Within the next 12 months Kiwa Watertec will be moving to a new facility
- Expected to increase capacity significantly for product testing, which will reduce testing lead times.
- Adding new testing services to our capabilities, more information will be released over coming weeks.
- With the increase of capacity we will be increasing staff levels which will improve customer communication
- To cope with the current high volumes of testing we are utilizing our labs in the Netherlands,
- Always a note to consider is that if manufacturers are using Kiwa Europe for EN standard product testing we can combine this testing to cover the UK testing for KUKreg4, saving the manufacturer time and money
- Working with specifiers and contractors around Water Regulations 4 compliance is starting to have a real positive impact around awareness. Manufacturers confidence that the KUKreg4 are accepted in the industry as an alternative to WRAS.

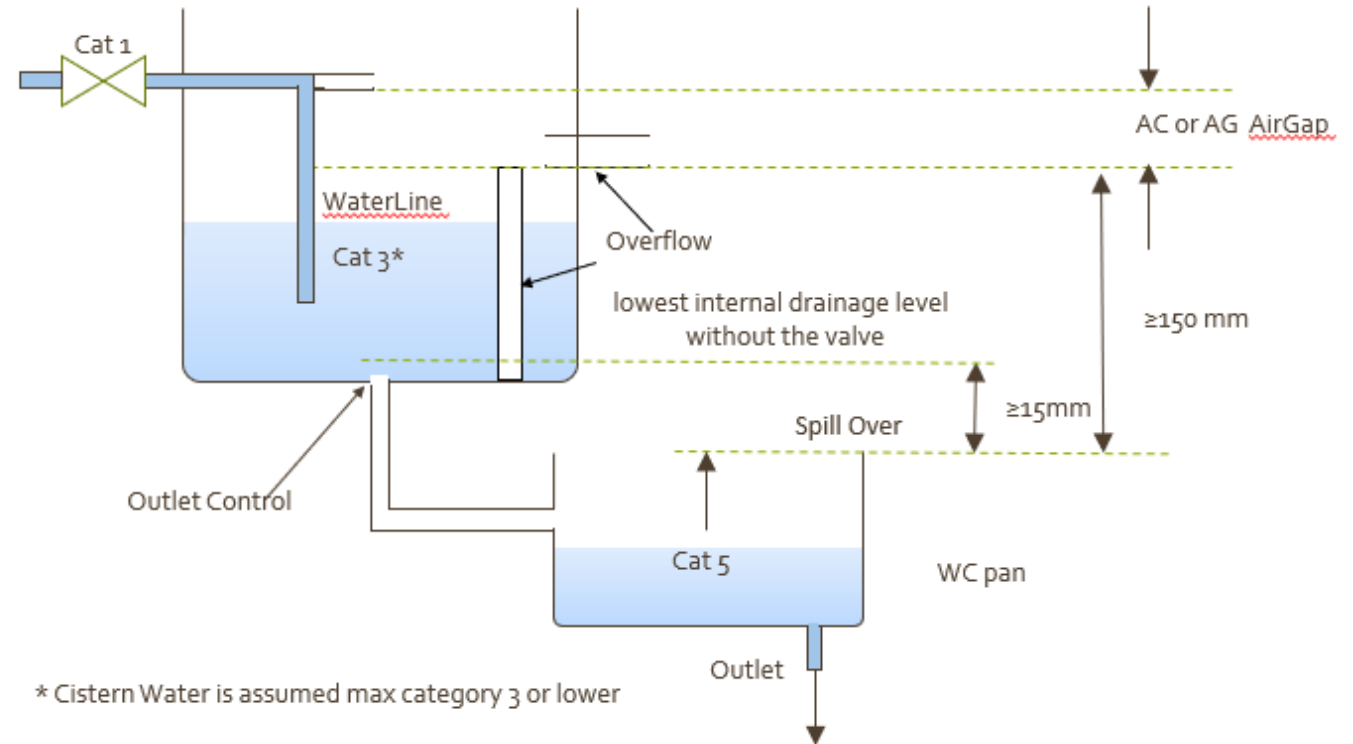


542 COMPLIANCE ISSUES

AUK 4 – Airgap with Interposed Cistern

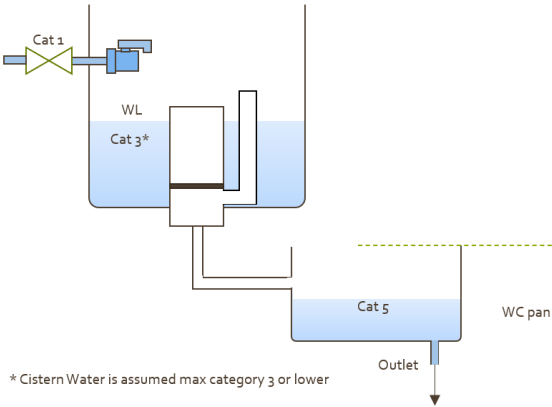
“Type AUKWC - Air gap with interposed flushing cistern” means a non-mechanical backflow prevention arrangement consisting of a flushing cistern feeding by gravity a receiving vessel; the interposed flushing cistern incorporating a Type AG or Type AC air gap; an overflow; the spill-over level of the receiving vessel (e.g. WC pan) being located not less than 150 millimetres below the overflow pipe (or combined warning/overflow pipe), and not less than 15 millimetres below the lowest internal residual fluid level of the interposed flushing cistern with the flushing device completely removed.

(Table 15.2 previously S6.1)



542 COMPLIANCE ISSUES

AUK 1 Backflow	AUK 4 Backflow
Protection Back Pressure 3	Protection Back Pressure 3
Protection Back siphonage 5	Protection Back siphonage 5
Verification of the air gap as AG	Verification of the air gap. AC or AG
Verification of the 15mm	Verification of the 15mm
Verification of the 300mm	Verification of the 150mm
	Test Method B Verification of overflow preventing contamination



[Latest WTO Submission](#)

542 COMPLIANCE ISSUES

Standards Proposed

[AUK 1 Standard](#)

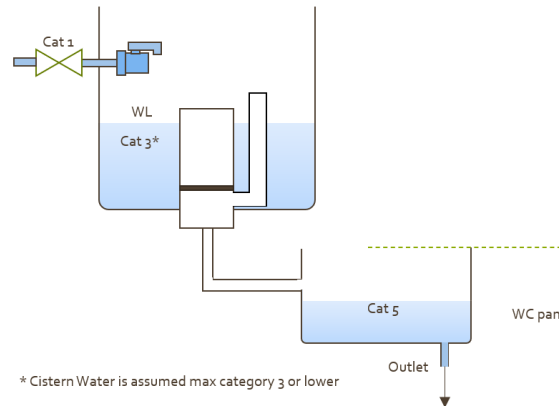
[AUK 4 Standard](#)

[BS 1212 – 4 Update](#)

[EN 13078 \(AC\) Update](#)

[EN 14623 \(AG\) Update](#)

[EN 997 Update](#)



[Latest WTO Submission](#)

542 COMPLIANCE ISSUES

Update by WRAS of referencing National Standards to Regulatory requirements (rather than TCS) –

<https://www.wrasapprovals.co.uk/approvals/testing-requirements/appropriate-standard/>

BS 1212-4:2016

Float operated valves. Specification for compact type float operated valves for WC flushing cisterns (including floats)

The vacuum test for backflow prevention (Test 6.2) is a vacuum test only and not in accordance with paragraph 15(1) of schedule 2 of the regulations. Additional backflow testing is required when installed in a WC Cistern.

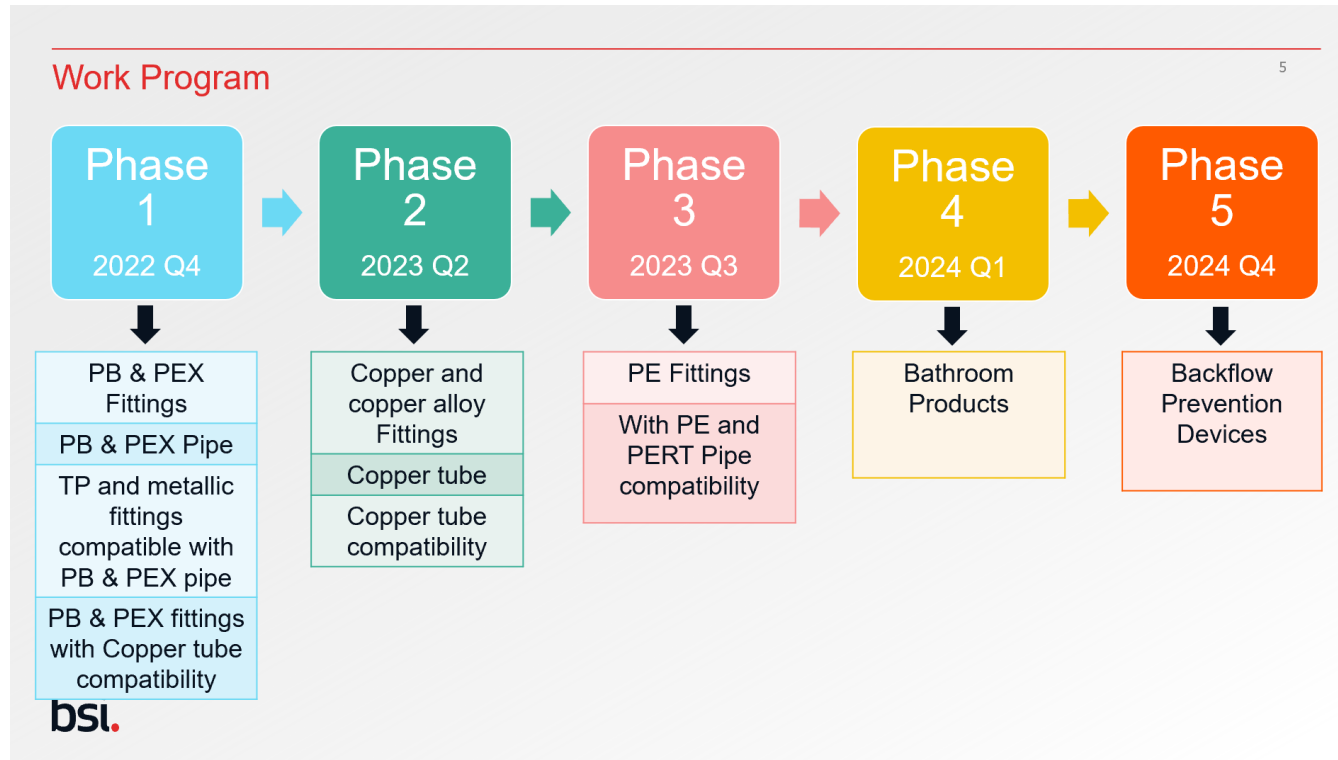
For use in WC's only

Operating pressures of between 0.1 bar and 10 bar – Cold water use only

May be subject to change following the publication of the WC Suite Performance Specification

542 COMPLIANCE ISSUES

- BSI has met with a couple of water companies. Water cos position is that TCS are out of date and not maintained, which is why they want to move to standards. This is BSI's starting point too.
- WRAS reached out to BSI
- They are currently working with a couple of pilot clients, going through process
- large sum of money in test lab kit to be commissioned in February.
- Timescale here



542 COMPLIANCE ISSUES

- BBA The Association have approached BBA British Board of Agreement.
- No feedback or progress to date.



543 SUSTAINABILITY



543 SUSTAINABILITY

Extended Producer Responsibility

Extended Producer Responsibility with the publication of amendments to the Packaging Waste Data Reporting Regulations 2023, a small number of necessary amendments have come to light and these are reflected in the 21 April 2023 update. [Packaging Waste \(Data Reporting\) regulations](#).

EPR Guidance The existing EPR guidance has also been updated.

[Extended Producer Responsibility - who is affected and what to do](#)

[Packaging data: what to collect for extended producer responsibility](#)

We ask that you take the time to familiarise with the guidance

These Regulations will come into force on 30th June 2023, extend to England only and will apply to data reported from the 1 January 2023

As part of the transition between these new regulations and the old regulations, producers and Compliance Schemes will still need to continue to comply with their 2007 obligations

543 SUSTAINABILITY

Ofwat Water Efficiency Fund

Interview with Artesia an independent research company!

This consultation sets out thinking on how to get the best from the £100 million water efficiency fund.

First of a Two-stage consultation process that will also see a more detailed consultation in early 2024 to feed into the approach in 2024 so that it can be active from April 2025.

Water companies are predicting that by 2050 we will need 25% more water demand

Question Sheet [here](#) provided before hand to discuss:

- Water Efficiency Behaviour and what it means to us?
- How we have tackled and successes in the past?
- Collaborations etc.?

Report will be published in January 2024

544 UNIFIED WATER LABEL ASSOCIATION



Shower (smart) toilets

- Appoint Chair – Timo Kopka (Laufen)
- Agree Scope
- Criteria Here [UWLA Spray Seats and WCs](#)

a. Agree preferred functions

Spray

Seat heating

Dryer

Date Gather in progress for power consumption



545 EUROPEAN DRINKING WATER



545 EUROPEAN DRINKING WATER (EDW)

Introduction of Drinking Water Directive

Beginning of January is expected for implementation of delegated acts.

So 2024 Jan first draft with positive material lists.

Then 2 yr period of transition until 2026 but products placed on the market before Jan 26 will be allowed until 2030.

These are delegated acts

- 1 IA (legal text & annex) [Search the database - European Commission \(europa.eu\)](#)
- 2 IA (legal text and annex) [Search the database - European Commission \(europa.eu\)](#)
- 3 DA (legal text and annex) [Search the database - European Commission \(europa.eu\)](#)
- 4 IA (legal text and annex) [Search the database - European Commission \(europa.eu\)](#)
- 5 DA (legal text and annex) [Search the database - European Commission \(europa.eu\)](#)
- 6 DA (legal text and annex) [Search the database - European Commission \(europa.eu\)](#)



546 EU EXIT and REGULATION



546 EU EXIT



BREXIT RESOURCE (click image)

DEFRA – Mandatory Labelling

Reducing Domestic Water Consumption Task & Finish Group

Feedback Report from DEFRA [Document](#)

- Defra is intent on introducing regulations for a mandatory scheme for implementation from 2025.
- Toilets, urinals, taps, non-electric showers and, after the consultation, electric showers will be covered by the scheme. Dishwashers, washing machines and washer-dryers will also be covered.
- The labelling scheme will not include energy information, but concentrate on water use alone.
- The Government will to work with an expert stakeholder group to finalise a design for the scheme, and how it is marketed and promoted. Defra has already committed to involve BMA in this group.

546 REGULATION UPDATES

DEFRA – Mandatory Labelling

Reducing Domestic Water Consumption Task & Finish Group

- Defra also recommend that “only the UK mandatory water efficiency label” is displayed.
- Defra intend to develop a database of products once the new regulations are created, which they will administer, again suggesting they DO NOT intend to utilising the existing UWL
- "Moreover, products will need to be compliant with the Fittings and Fixtures Regulations 1999 and evidence of testing by an accredited provider in order to be labelled and this will be made clear in the database.” • BMA will seek clarity from officials on the possible future role for the UWL in the UK.
- Stakeholder meeting in 1st Week of November
- Following the publication of the government response to the water efficiency labelling consultation ([Summary of responses and government response - GOV.UK \(www.gov.uk\)](#)) I'd like to invite you to join a series of meetings to discuss the government response and feed into further policy development

546 COMPLIANCE ISSUES

Review of the Water Supply (Water Fittings) Regulations 1999, the Water Supply (Water Quality) Regulations 2016 and/or any other relevant legislation to address wasteful product issues with toilets and enable new water efficient technologies

Gavin Cooper

In particular 25(2) sets out that:

Every water closet, and every flushing device designed for use with a water closet, shall comply with a specification approved by the regulator for the purposes of this Schedule.



**Department
for Environment
Food & Rural Affairs**

To reduce water closet leakage from valve problems, the following specifications may be relevant:

- The valve should be designed and installed in accordance with the manufacturer's instructions and with the requirements of the regulations.
- The valve should be of good quality, durable, and resistant to corrosion.
- The valve should be capable of providing adequate water flow to the water closet while also maintaining a suitable level of water pressure.
- The valve should be fitted with a suitable non-return valve to prevent backflow.
- The valve should be tested regularly to ensure that it is working correctly and to identify any problems before they lead to leakage.
- The valve should be located in a position that is easily accessible for maintenance and repair.
- Any fittings or components used in connection with the valve should be of good quality and compatible with the valve.

546 COMPLIANCE ISSUES

Change Proposal A: ‘updating regulations to remove valve systems with the worst leakage rates’

Questions to stakeholders –

- **Are these the right codes and specifications?**
- **What changes would you recommend to reduce leakage rates?**
- **Would we need to look at the ‘relaxation requirements of paragraph 11?**
- **What is the likely cost and/or retrofit implications?**



Department
for Environment
Food & Rural Affairs

547 TERMINOLOGY



547 Terminology

- File
 - Industry Plumbing Terminology Comparison.
- Check the listings and the references
- Circulate once updated
- Get ready to upload on website to the Glossary.

548 SCHEDULED EVENTS



448 SCHEDULED MEETINGS & EVENTS

Sanitaryware , Baths & Shower Enc Technical	25/10/23
TC164/14 AHG A Meeting	31/10/23
CPC Peer Support Group	6/11/23
TC 163 AHG Toilet Seats	8/11/23
TC163 Meeting Berlin	9/11/23
CEIR Technical Paris	10/11/23
CEN/TC 164/WG 8/AHG 2	13/10/23
CU Sustainable Construction Working Group	14/11/23
FECS Marketing	15/11/23
BMA/DEFRA Catchup	16/11/23
B504 Meeting TBC	23/11/23
Kiwa Watertec Expert Technical Group	28/11/23
Marketing Committee	6/12/23
KIWA Impatality Meeting	12/12/23



549 AOB



550 DATE OF NEXT MEETING

23rd April 2024 – Teams Meeting
4th September 2024 - Conference

