

# SAFETY BULLETIN 1/2022

## Local or International Standards - SABS vs Associations Equipment/Appliance Schemes

### Introduction and scope

There are two schemes regulated by mandate from the Department of Employment and Labour (DEL) verifying appliances and equipment. The LPGSA verifies appliances under the threshold of 500MJ/h, 10Kg/h and 140 kW. SAGA verifies equipment above this threshold. In brief LPGSA verifies domestic and selective commercial appliances while SAGA verifies Industrial and selective commercial equipment. A Memorandum of Understanding (MOU) exists between the two associations to ensure both operate in a same or similar manner. Each association within its mandate needed to ensure policies, processes, procedures, and rules are in place to ensure efficient and effective verification.

The LPGSA, via the local test house, verifies appliances as per SANS 1539 and issues a test report. SAGA adopts international standards and accordingly international certifications. Certifications come from reputable manufacturers with accredited quality management systems and or accredited additional quality assurance processes as per the conformity assessment modules of the PED and SANS 347, including notified bodies being accredited to ILAC. There is an array of standards within the SGES mandate as to certifications and verification of equipment being applications in NG, LPG, LNG, CNG, MRG, Biogas and liquid fuels.

### Verification and Interaction with Stakeholders

Industry stakeholders engage with SAGA prior, during or post equipment importation and apply for equipment permits. SAGA takes guidance from members, international trends, best practices, quality, technical and safety supporting records and based upon conforming to requirements, adopts international standards. Where needed and probably ultimately all standards adopted should be taken through SABS process of direct adoption or customisation to SA conditions, whereupon standards adopted to be the made available to SABS TC 1019 or other TC's for consideration and included in normative references of standards being revised or newly developed. SAGA then includes the newly adopted international standards within its own structure being its policy document aptly referred to as "Rules Governing the Scheme". In parallel SAGA then enacts the process of notifying the Department of Employment and Labour (DEL) as to inclusion of all adopted standards within the schedule of the PER to enable these standards to be regulated through section 44 of the OHS Act as to be deemed regulations.

There is also a hierarchical structure whereby the Safe Gas Equipment Scheme (SGES) engages a committee namely the Safety and Technical Advisory Committee (STAC) being a committee of industry experts covering residential, commercial, industrial and specialised gas equipment in an array of applications within the scope of SAGA operations. Both the SGES and STAC are Board subcommittees each having its own Terms of Reference. The SGES can engage STAC and Board whenever it deems fit to do so seeking advice on technical and safety issues pertaining to relevant equipment. STAC does not have any decision-making authority but rather recommends to the SGES and Board any matters pertaining to technical and safety.

Importers of equipment are regulated by the PER and apply to SAGA for equipment permits via its application process. The application with all required supporting documentation is reviewed and if all applicable check boxes are ticked approve the application and provide an official permit to the Importer for the process of selling or placing the equipment in the marketplace. Should there be any new international standards coming through the application process, it can either be accepted or rejected. If accepted as a reputable standard be included in the SGES structures. One can argue as to how many same or similar standards exist for the same equipment and how many are part of the scheme. Should any standard ensure levels of equivalency or better to an already adopted standards one needs to take cognizance and assess same and decide to be included or not. Taking economy of scale into consideration and importers bringing in equipment from around the world one needs to ensure quality and safety of the product first, then secondly respect importers bringing in equipment due to pricing and competitiveness. A long as quality and safety is not negotiated, one can engage with the manufacturer and or importer and mutually agree to said standards for inclusion within the scheme.

Locally manufactured equipment shall be tested and where such a facility does not exist due to the design and complexity of the equipment or the testing required is outside the capabilities of the testing facility, the manufacturer will need to request an accredited test house internationally to assist.

The adoption of international standards, of which converting some or all to SANS makes technical and economic sense. Retesting imported equipment coming from reputable and accredited sources makes no sense at all other than unnecessary expenditure putting the local importer under enormous additional financial stress especially under the current socio-economic and financial climate. As to last mentioned, this is definitely not the intent of any regulations.

## In summary, some Q&A

**Question 1:** Can SABS Work Group (WG) add local or international equipment standards and inform the Equipment Schemes of the added standards, which does not happen currently and does this mean that any new equipment standards can only be used after 4 years until a new revised standard has been generated?

**Response:** Yes, SABS WG can inform the equipment scheme of new standards and No, permits granted to an existing standard remain valid until permit expiry after 3 years. If the new standard proposed is of an equivalency or higher level then could impact the application or the new standard can be an alternative one or replace existing one. Should a new and possible alternative standard be realised then permit applications set against the new standard will be reviewed at the time and if all conforms a permit granted. Consequently, SAGA's permits that are issued within the 3 years between Standards revisions, are only validated after inclusion in the new standard.

**Question 2:** Is there any equipment that has been approved currently, based on international standards, that has not been adopted in the current SABS standard?

**Response:** Can be but to overcome unbalance, there is consistent and frequent correlation with SABS TC's to ascertain and ultimately adopt, impact, and ensure inclusion in respective SABS standards. In relation to current SANS, the standards could be of an equivalent or higher standard level to be correlated and confirmed by either the manufacturer or importer via the schemes and thereafter recommended to SABS.

**Question 3:** Which organisation would then be responsible to harmonize this list or ensure that it is in the SANS standard.

**Response:** Should there be one single organisation approving, probably, no? Industry Stakeholders can play a collective role in ensuring best practices are implemented including harmonisation of standards. It's believed the SABS WG has a definitive role to play in that additional and or alternative standards can be identified but engaging with the equipment scheme would be insightful as to standards already adopted and then to be used within standards. Nonetheless, vice versa should also be acceptable in that the scheme informs SABS WG on the same. In the end collaboration realizes best practices.

**Question 4:** Can one request the association to provide the SABS with the list of current equipment standards that carries valid permits for SA.

**Response:** Yes, the association can provide the list of all equipment pertaining to the scheme. One can then compare the scheme list to what is currently in the standards and if needed add or replace same. The approved equipment standards are also available on the association's website. There can be more than one standard per equipment type, but one needs to limit the range of standards per equipment type.

**Question 5:** Can the SABS advise the respective association that they do not accept the new standard for whatever reason.

**Response:** For whatever informed and qualified reason, probably yes, but the best practice is to first collaborate and second, ensure accurate and efficient conformity assessment review by all interested and or affected persons or parties prior to acceptance or not. At the time of publication of this bulletin, this collaboration does not currently exist.