IMPORTANT NEWS FOR SUPPLIERS OF STAINLESS STEEL PRODUCTS FOR THE WATER INDUSTRY

Regulations Affecting Stainless Steel in the Treatment and Provision of Public Water Supplies

Under the Water Industry Acts of 1989 and 1991, the government has power to regulate the substances, products and processes used in the treatment and provision of public water supplies.

Regulation 25 concerns the introduction of substances and products for use. It regulates that part of the water supply system, which runs from extraction from a primary source, such as a river, to the stopcock, which links the public supply system to each domestic or industrial user. It does not therefore cover the domestic supply system or the treatment of waste water; and it is only relevant to products in direct contact with drinking water.

Stainless steel products had already been in use by water companies in regulated applications prior to July 1989. They were therefore exempt from the need to apply for approval on the grounds of traditional use under a concession contained in Regulation 25(1)c. However, notice was given in 1997 that concessions under 25(1)c would be withdrawn, and consequently, from October 2000, no new work could be contracted using stainless steel products without prior approval under Regulation 25(1)a.

There is one relevant exception. Products, which would otherwise be covered by the regulations, but are deemed to have a sufficiently small surface area in contact with drinking water, as to have no adverse effect on the quality, fall within the scope of Regulation 25(1)b, and are exempt from the need for approval. These include such items as valves, pipe fittings, including couplings and gaskets, ladders and pumping installations.

Obtaining Approval for Stainless Steel

The British Stainless Steel Association [BSSA], in conjunction with the Nickel Development Institute [NiDI], the Steel Construction Institute [SCI], AvestaPolarit and other interested parties, undertook the task of applying to the Drinking Water Inspectorate [DWI] for approval of stainless steel as a suitable material suitable for use under Regulation 25(1)a. The process included the creation of a set of operational guidelines and a code of practice [OGCP], and the testing of tube samples in specified grades for leachate determinants according to BS 7766, as modified by DWI.

The DWI’s Committee on Products and Processes has now considered the OGCP and test results and formally agreed that the use of products made from an approved list of stainless steel grades is unobjectionable on health grounds. The DWI has therefore recommended approval for stainless steel products conforming to those grades tested and used in accordance with Operational Guidelines and Code of Practice [OGCP] for Stainless Steel Products in Drinking Water Supply, published by SCI in January 2002.

It is important to note that the legislation does not allow the generic approval of a material, such as stainless steel. However, the way is now open for companies to obtain approval for eligible stainless steel products under their own specific name or identifier; and for water industry companies and contractors to specify such approved products.
The approval notice and arrangements for listing may be found in DWI Regulation 25 Letter 7/2001, dated 18 December 2001.

**The Approval Process for Stainless Steel Products**

All companies intending to supply stainless steel products for use in contact with water for public supply are required to apply to DWI. The applications will be assessed and those that are eligible for approval will be listed under their specific name or identifier.

*Regulation 25 Letter 7/2001*, can be found by accessing the DWI web site at [www.dwi.gov.uk/cpp/index.htm](http://www.dwi.gov.uk/cpp/index.htm), where *A Summary of the Approval Process, Guidance to Applicants* and an *Application Form for Metallic Construction Products (to be used for applications for the approval of metallic products with links to the generic testing and OGCP for the metal)* can also be found and downloaded.

A full list of products exempt from the need for approval under Regulation 25(1)b can be found at the same address under *Guidance on products having a small surface area in contact with water for public supply*.

Alternatively, these documents can be obtained by writing to the Drinking Water Inspectorate, Floor 2/A1, Ashdown House, 123, Victoria House, London SW1E 6DE.

Copies of the *Operational Guidelines and Code of Practice [OGCP] for Stainless Steel Products in Drinking Water Supply* can be found on the BSSA web site at [www.bssa.org.uk/fpauth/services/pubs.htm](http://www.bssa.org.uk/fpauth/services/pubs.htm) under the section entitled ‘Water Industry’.

A list of the stainless steel grades tested and approved for use according to applicable international standards are listed as *Annex 1 of Regulation 25 Letter 7/2001* at the DWI web site (above).

Further information and advice can be obtained by contacting the Stainless Steel Advisory Service Tel 0114 224 2240 Fax 0114 273 0444 e-mail ssas@materials.org.uk

**Further Applications for the Use of Stainless Steel**

While the current regulations and guidelines only apply to the public supply system, the confirmation that the use of stainless steel in contact with drinking water is unobjectionable on health grounds, in conjunction with the provision of operational guidelines and a code of practice for selection and use, will be relevant for the other parts of the supply system. It is anticipated that it will open the door to the increasing use of stainless steel in a wide range of applications. A list of these, together with further guidance on material selection and use can be found in Water Industry Information & Guidance Note IGN 4-25-02, *Applications for Stainless Steel in the Water Industry*, published by WRc.

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