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Water Supplies Department

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Distribution: To all Licensed Plumbers and Authorised Persons

Dear Sirs,

WSD Circular Letter No. 8/2017
Surveillance Programme for
the General Acceptance System

At present, the Water Supplies Department (WSD) has a General Acceptance (GA) system in place to pre-approve plumbing products used in plumbing projects. For a plumbing product to obtain a GA status, the applicant has to submit either test reports of a sample of the product conducted by an approved laboratory¹; or a certificate issued by the BSI Kitemark, or the Water Regulations Advisory Scheme (WRAS) to prove conformity of the product to the statutory standards². If the submission is accepted, the WSD will include the product in its pre-approved list³. Contractors can use the product in plumbing projects before the expiry of the GA validity period of that product.

¹ An approved laboratory is a local laboratory accredited by the HOKLAS under the Category – “Construction Materials” and Sub-category – “Metallic materials”, “Pipes”, “Showers” and “Tapwares and valves”.

² WSD Circular Letter No. 6/2015 – Application for water supply pipes and fittings approval

³ Approved water supply pipes and fittings directory,
<http://www.wsd.gov.hk/en/plumbing-engineering/pipes-and-fittings-to-be-used-in-inside-service-or/index.html>

BS EN ISO/IEC 17067 sets out the key elements of a product certification scheme, which are good pointers for enhancement of the material approval system. Amongst others, surveillance is an element to maintain the validity of the statement of conformity.

To further enhance the conformity of plumbing products with the GA requirements, the WSD will implement a surveillance programme for GA products. In formulating the surveillance programme, we have consulted the Expert Committee on Plumbing Materials (ECPM⁴) and the Technical Committee on Plumbing (TCP). This Circular Letter promulgates the implementation of the Programme with effect from **16 October 2017**. Use of plumbing materials with different surveillance status as revealed under the surveillance programme will be dealt with under a separate circular letter.

The surveillance programme

Under surveillance programme (the Programme), the WSD will randomly take samples of different types of plumbing products with valid GA to test for compliance with the statutory requirements. The samples will be acquired from a number of sources including retailed shops, warehouses and other venues as advised by GA applicants for the WSD's selection. In essence, the Programme comprises three key stages, namely **“Sampling”**, **“Compliance Test”** and **“Reinstatement and Appeal”**. A flowchart of the Programme is at **Appendix A**.

Sampling

The WSD will draw up a monthly surveillance programme based on a risk-based approach⁵ for the GA plumbing products to be tested in each month. The WSD will acquire random samples from the GA applicants. The WSD will be

⁴ The ECPM was established in December 2016 to advise the WSD on strategies and measures in relation to control, standards and testing of plumbing materials. Membership of ECPM comprises academics and experts in plumbing materials.

⁵ Factors such as risks in drinking water safety, previous failure of tested sample in the compliance test, issue of GA suspension notice and GA removal notice and participation in GA+ scheme on quality assurance etc. will be taken into account.

responsible for the cost of the samples.

Compliance Test

While the material standards may have been revised or superseded by other standards over time, the WSD will normally test the sample against the standards stipulated in the Waterworks Regulations at time of approval for the GA product. The sample should pass the compliance parameters, which are chemical composition (metal elements of metallic components in contact with fresh water) and key functionality of the plumbing product, in order to pass the compliance test.

For each GA plumbing product, the WSD will conduct initial compliance test on one sample at its own cost. The WSD will notify the GA applicant of the result of the initial compliance test. If the test result does not comply with the requirement, the WSD will at its discretion either require the GA applicant to agree the WSD to select three additional samples of the same model for further compliance tests or require the GA applicant to conduct at the applicant's own cost such further compliance tests on three samples selected by the WSD within the period stated in the notice. In both cases, the samples shall be ready within 14 calendar days from the date of the notification at the applicant's own cost. If the GA applicant considers that the failure only represents an isolated incident, the applicant may respond to the WSD within these 14 calendar days to provide evidence for the WSD to review.

If no response is received within the aforesaid period or if the evidence submitted is not accepted by the WSD, the WSD will inform the GA applicant that further compliance tests would proceed. If the GA applicant does not agree WSD to carry out further compliance tests, or if the GA applicant does not conduct such further compliance tests as requested by WSD, or if any of the samples fail the further compliance test, the GA product will be considered as failing the compliance test. The WSD will issue a GA suspension notice to the GA applicant to suspend the GA issued. If the GA product has not been reinstated within 6 months after suspension,

the GA product will be removed from the list.

Reinstatement and Appeal

To reinstate a suspended product, the GA applicant is required to conduct an investigation and to rectify the non-conformity and then submit the findings including a product investigation plan together with product test reports⁶, if applicable. The associated cost should be borne by the GA applicant. In case the aforesaid submission is not received by the WSD or if the submission is not accepted by the WSD within 6 months from the date of the GA suspension notice, the WSD will issue a GA removal notice⁷ to the GA applicant to remove the GA issued.

The GA applicant may appeal against the decision on GA removal by the WSD in writing to the Director of Water Supplies (the Director) stating the reason for the appeal within 14 calendar days after the issue of the GA removal notice.

The Director may, by notice to the appellant, require the appellant to attend meeting(s) with him or his representatives to provide documents and give evidence relevant to the appeal. The Director shall notify the appellant of his decision with reasons. The decision shall be final.

Publication of Surveillance Results

The WSD will update the surveillance status of GA products on website⁸ at different junctures of time as follows:

⁶ The WA requires test reports on at least three samples of the product issued by an approved laboratory as a demonstration of the proof of compliance of the GA product with relevant standards. The selection of product samples shall be carried out by the WSD.

⁷ The GA removal notice will state the type of pipe/fitting, model, brand, size (if applicable), previous GA number, date of GA removal and details of the non-compliance.

⁸ The surveillance results will be published in the approved water supply pipes and fittings directory and as an exception report in the WSD website,
<http://www.wsd.gov.hk/en/plumbing-engineering/pipes-and-fittings-to-be-used-in-inside-service-or/index.html>

Surveillance Stage	Results	Surveillance Status shown on website
Upon completion of initial compliance test	Pass	“Pass”
	Fail	“Under Compliance Test”
Upon completion of further compliance test	Pass	“Pass”
	Fail	“GA Suspended”
Upon conclusion of reinstatement assessment	Pass	“ GA Reinstated”
	Fail	“GA Removed”
Suspended for a period over 6 months	-	“GA Removed”
Upon conclusion of the appeal	Allow	“GA Reinstated”
	Dismiss	“GA Removed”

The WSD will post on the WSD website the removal of the GA status after the issue of the GA removal notice to the GA applicant no matter whether the GA applicant has applied for an appeal. The licensed plumbers and authorised persons may check the status of GA products on the WSD website whenever necessary.

Re-application of GA Status

Any GA product with its GA status removed may submit a new GA application after a 3-month period together with a test report issued by an approved laboratory. The 3-month period would be counted from the GA removal date. The validity period of the new GA will be counted from adding three months to the GA removal date or the test completion date, whichever is later.

Enquiry

Should you have any enquiry, please contact our Mechanical Engineer/Material Control at telephone no. 2294 2656.

Yours faithfully,

(Original signed)

(CHAN Chung Kun)
for Water Authority

Encl.

(with Chinese translation)

c.c. Housing Department (Attn: SM/QM)
Buildings Department
Architectural Services Department
Fire Services Department
The Hong Kong Housing Society
The Hong Kong Institute of Architects
The Hong Kong Institution of Engineers
The Hong Kong Institute of Surveyors
The Chartered Institute of Plumbing and Heating Engineering - Hong Kong Council
Hong Kong Plumbing and Sanitary Ware Trade Association Ltd
Hong Kong Licensed Plumbing Professionals Association Ltd
Hong Kong Plumbing General Union
Hong Kong Water Works Professionals Association Ltd
The Hong Kong Institution of Plumbing and Drainage Ltd
Plumbing Technology Student Association
The Association of Registered Fire Service Installation Contractors of Hong Kong Ltd
Real Estate Development Association of Hong Kong
Hong Kong Institute of Vocational Education
Construction Industry Council
Hong Kong Construction Association Ltd
Registered Minor Works Contractor Signatory Association Ltd
Hong Kong Registered Contractors Association Company Ltd
Building Services Operation and Maintenance Executives Society
The Hong Kong Air Conditioning and Refrigeration Association Ltd
Hong Kong General Building Contractors Association Ltd
The Hong Kong Federation of Electrical & Mechanical Contractors Ltd
Contractor's Authorised Signatory Association Ltd
Hong Kong Licensed Plumbers Union Limited
Li Ka Shing Institute of Professional and Continuing Education, The Open University
of Hong Kong
The Association of Electrical and Mechanical Engineering (Hong Kong) Ltd

WSD 3318/15/81

Flowchart for the Surveillance Programme

