

Requirements & Code of Practice for WRAS Approvals Schemes

Abstract: This clarifies the way the WRAS Product Approval Scheme operates and sets out the Roles and Responsibilities of all parties involved in the WRAS Approvals process. Compliance with this Code of Practice is mandatory and together with the Terms and Conditions of the Approval Scheme form a legally enforceable agreement between WRAS and its Clients (Applicants and Approval Holders). Compliance with this Code of Practice is mandatory and together with the Laboratory Agreement form a legally enforceable agreement between WRAS and its Recognised Test Laboratories.

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Introduction

- The ownership and operation of the Water Industry's approval schemes for Fittings and Materials was transferred to The Water Regulations Advisory Scheme Limited (company number 06663930) on the 1st April 2009. In April 2021, the Water Regulations Advisory Scheme Limited changed its name to Water Regs UK Limited (company number 06663930). Ownership of the established certification schemes for the approval of water products and materials was transferred to Water Regulations Approval Scheme Limited (company number 13032384) (WRAS Approvals, WRAS) on the 1st April 2021.
- 2 WRAS is a wholly owned subsidiary of Water Regs UK Limited.
- WRAS approvals is a voluntary scheme and is one route to demonstrate compliance with Regulation 4(1)(a) of the Water Supply (Water Fittings) Regulations 1999, which require every water fitting to be of 'an appropriate quality and standard'.
- A product only qualifies for approval if WRAS is satisfied that it complies with Regulation 4(1)(a) and the requirements of the Scheme, when installed in accordance with the manufacturer's instructions and any applicable Approval Scheme Installation Requirements and Notes. The requirements of the scheme will take account of the requirements in Regulation 4(3) and Schedule 2 of the Regulations where they relate to the design and manufacture of the material and water fitting.
- An Approval is not a comment on whether a product is 'suitable for the circumstances in which it is used' for the purposes of Regulation 4(1)(b), nor is it a comment on compliance with any requirements of Regulation 4(3) or Schedule 2 of the Regulations relating to the installation of a water fitting. However, WRAS may decline to complete its assessment of a product or to grant an Approval if it appears to WRAS that the Product is unlikely to comply with Regulation 4(1)(b) or Schedule 2 in ordinary use.
- A Material only qualifies for Approval if WRAS is satisfied that the relevant Material complies with Regulation 4(1)(a) and Schedule 2 Paragraph 2 of the Regulations and the requirements of the Scheme when used in accordance with the manufacturer's instructions.
- A decision by WRAS to grant, renew, alter, or withdraw an Approval is based on the information WRAS holds about the Product and the applicable specifications and standards referred to in the Regulation at the time it makes the decision.
- Where a specification or standard referred to in the Regulation is capable of being interpreted in different ways, WRAS will adopt the interpretation that it considers to be the most appropriate based on the information available to WRAS at the relevant time. WRAS may adopt a different interpretation in future if there are changes to the specification or standard or to the information available to WRAS. WRAS cannot guarantee that the courts or anybody involved in enforcing the Regulations will adopt the same interpretation as WRAS.
- Specific WRAS Approvals requirements may also be applicable in addition to those required by the Regulations.
- WRAS product and material approvals schemes are managed following the requirements of ISO 17065 the International Standard for the conformity assessment of bodies certifying products. To ensure that everyone involved in the schemes, including Applicants, Testing Laboratories and Stakeholders, understand the process and their roles in it, and to prevent any overlap or duplication of service, the responsibilities of each contributor are set out below.
- 11 The definitions in document WRAS.Gen-601: "Terms & Definitions" shall apply throughout.

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WRAS Product Approvals Scheme

- WRAS Product Approval will only be granted to production samples.
- WRAS Product Approvals are valid for a five-year "Approval Period" following the date of approval. This may be subject to a self-declaration of continued compliance being completed annually by the Approval Holder and agreement to periodic surveillance by WRAS.
- To extend an Approval beyond the initial five-year term, the product must be re-tested in line with the Scheme Requirements and resubmitted for assessment **before** the expiry of the approval. It is the responsibility of the Approval Holder to maintain a current and valid WRAS Approval.
- A WRAS Product Approval is only valid if the approved Product is manufactured and installed during the Approval Period.
- Only those products described and listed under the heading "Model" in the approval documentation and Directory entry, are approved by WRAS and covered by the scope of the Approval.
- The scope of the Approval does not extend to rebranded products. The Secondary Approval Scheme can be used for rebranded products.
- A WRAS Product Approval is only valid where all components and materials used within the models listed retain individual WRAS Approval.
- Where any modifications are made to the Product, WRAS must be informed by the Approval Holder and the modifications approved in accordance with clause 62 and 63 below.
- An Approval Holder may submit an application to extend the Approval Period up to nine months before the expiry of the Approval Period in accordance with clause 67

WRAS Materials Approvals Scheme

- To qualify for WRAS Approval, non-metallic materials intended to be in contact with wholesome water must not cause, or be likely to cause, contamination of water.
- A WRAS Materials Approval indicates that the material has satisfied the testing requirements of BS 6920 or equivalent.
- WRAS Materials Approvals are valid for a five-year "Approval Period" following the date of approval. This may be subject to an annual self-declaration by the approval holder of continued compliance with the scheme requirements and agreement to periodic surveillance by WRAS determined by a risked based approach. To extend a WRAS Approval beyond the initial five-year term, the material must be re-tested in line with the scheme requirements and resubmitted for assessment before the expiry of the approval. It is the responsibility of the Approval Holder to maintain a current and valid WRAS Approval.
- Only those specific materials which are listed on the Scheme Directory are WRAS Approved Materials.
- The scope of the Approval does not extend to rebranded materials. A separate secondary process is available for approving rebranded materials.
- Where any modifications are made to the material, WRAS must be informed and the modifications approved in accordance with clause 63 and 64 below.
- An Approval Holder may submit an application to extend the Approval Period up to nine months before the expiry of the Approval Period in accordance with clause 67

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Impartiality

WRAS is committed to ensuring that the Scheme operates in an impartial manner. The WRAS Impartiality Policy (WRAS WRAS.Admin-103) explains what impartiality means in the context of the Scheme, and the practical steps that WRAS takes to promote impartiality. This includes WRAS's procedures for identifying and managing any potential conflicts of interest. WRAS requires its employees, contractors, and committees to adhere to that policy.

Roles and responsibilities of WRAS Approvals

- WRAS Approvals is responsible for administering the WRAS Products and Materials Approvals Schemes. As primary functions for this purpose, it undertakes to:
 - a. Administer the Approval Schemes in accordance with the requirements of ISO/IEC 17065.
 - b. Provide pre-application advice and answer queries relating to all aspects of the WRAS Approvals processes. WRAS will not provide advice or consultancy on the design of water fittings.
 - c. Assess samples for Product Approvals to confirm product identification, description and categorisation detailed in the applications.
 - Where appropriate, recommend the tests required for the Approvals Schemes; to comply with the appropriate Regulations and identify what samples should be provided for such testing in accordance with the WRAS Guidance documentation and communicate this to the customer.
 - e. Evaluate the technical information submitted for WRAS Products and Materials Approval to ensure that the requirements of the Scheme have been met in full.
- For Product Approvals the technical information normally required for the evaluation will include, but is not limited to:
 - a. Completed Application Form
 - b. Schedule of materials, any associated formal confirmations/declarations and BS6920 reports
 - c. Schematics
 - d. Installation guides and manuals where applicable.
 - e. A photograph of the product suitable for inclusion in the on-line Directory.
 - f. Photograph(s) of the product markings suitable for inclusion in the on-line Directory.
 - g. Confirmation of age of test sample (s)
 - h. Test Report(s) when available Note this may be submitted after the application.
- For Material Approval the technical file will contain, but is not limited to:
 - Completed Application Form,
 - b. Test reports covering the appropriate tests required by BS 6920 Note this may be submitted after the application,
 - Instruction and data safety sheets where required.

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- For product approvals, the product description summary sheet provided by the Laboratory, including the draft directory entry of the complete product description, will be reviewed and updated to include the WRAS Approval Assessor's recommendations.
- The decision whether to grant a product approval will be made WRAS Approvals decision maker.
- Following the decision to grant an Approval, prepare the WRAS Approvals Certificate for successful applicants and advise applicants of the decision regarding approval of their product(s). Approvals granted do not indicate endorsement by water companies or any other organisation.
- Liaise with the applicant in cases where applications are deferred. Sometimes the application evaluation process may recommend deferring the approval of an application for WRAS approval pending further clarification or additional information. The issues which lead to the application being deferred will need to be resolved and re-presented before the Approval is granted. Deferrals should be resolved within 6 months of the date deferred.
- 36 Publish WRAS Approvals on the WRAS Directory.
- Review and publish the WRAS Approvals Scheme Guidance documentation and other information relevant to WRAS Approvals.
- Generate, identify and encourage good practice which will support and improve the services offered by the Scheme.

Role of the PAAG – Product Approvals Advisory Group

- The WRAS Product Approvals Advisory Group (PAAG) is a panel of experienced assessors. The panel do not represent any organisation in undertaking this role.
- The members are appointed by the WRAS Managing Director.
- This group review products for compliance with the requirements and objectives of the Scheme and make recommendations regarding the Approval.
- PAAG The decision whether to grant approval is made by the Approvals Manager, taking into consideration the recommendation of the Approvals Team and the advice of the PAAG.

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Role & Responsibilities of Applicants and Approval Holders

During Application

- Applications for WRAS approval can be made by the manufacturers of product or materials, importers, Factors (e.g. reseller or wholesaler) or their agents.
- The Applicant / Approval Holder undertakes to co-operate fully with WRAS in relation to the approval process. The Applicant shall provide WRAS with any information required. This may include, but is not limited to, samples and evidence of the purchase of components and materials used.
- Applications may be made directly to WRAS Approvals, or be made via WRAS Recognised Test Laboratories.
- The Applicant must provide accurate and contemporaneous information to WRAS in support of the application. This information includes, but may not be limited to:

For Products:

- a. Completed application form (F2)*
- b. Schedule of materials, any associated formal confirmations/declarations and BS 6920 reports***
- c. Product schematics ***
- d. Installation guides and manuals where applicable. **
- e. A photograph of the product suitable for inclusion in the on-line Directory *
- f. Photograph(s) of the product markings suitable for inclusion in the on-line Directory. *

For Materials:

- a. Completed Application form (M2) *
- b. BS 6920 Test reports including declarations of conformity***
- c. Data Safety Sheets, where required**
- d. Chemical formulation***
- e. Details of any biocide used within the material, including chemical composition and supplier**
- f. Instructions for use as supplied to customers. **
- * Items that will be included on the WRAS Directory
- ** Information owned and provided by the Applicant that is already in the Public Domain
- *** Confidential information which will not be published or disclosed, unless required by a Court of Law, or with the permission of the Approval Holder. If such disclosure is required, the client will be informed by WRAS that the information has been provided and the reasons why.
- On request, the applicant shall submit a sample of the product to WRAS to allow the description, category and marking to be confirmed against the submitted information and for review.
- The Applicant shall arrange for the required testing to be performed by a WRAS Recognised Laboratory. In the case of an Independent Test Laboratory, it is recommended that a legally binding contract is in place between the chosen test laboratory and the Applicant to permit the laboratory to submit all reported findings to WRAS on completion of the testing. This includes any failed tests. This reflects the recognised test laboratory obligations to WRAS. In the case of a First Party Test Laboratory the Applicant shall ensure that the laboratory submits all findings related to the application to WRAS, including any failed tests.

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Testing:

- Test results will only be accepted as part of an approval application if the testing has been performed by a Recognised Test Laboratory. The list of current Recognised Laboratories can be found on the WRAS website.
- The tested product sample, on which the approval is based, shall have completed its assembly/manufacture no more than 12 months before the date of its receipt by the Test Facility unless specific requirements to the contrary are specified in the relevant testing standard.
- When a non-metallic material or component requires BS 6920 testing as part of an application for Product Approval, the test samples should be no more than 12 months old on the date of receipt by the laboratory.
- When the application includes a range of similar products, or products manufactured / assembled at more than one site, representative samples from the entire application must be tested. See the Sampling Matrix published on the WRAS website.
- Where alternative materials / finishes are specified in the application, testing of the variants need only be undertaken where they could have an impact upon the conformity testing appropriate to that product.

Information:

- It is essential that the Applicant provides all relevant information required by the Scheme before being presented for Approval.
- It is important that the Applicant contact is able to provide and discuss technical details about the Product(s) with WRAS. During the application process the applicant must:
 - a. Contact the Scheme with any question relating to WRAS application forms and queries regarding the scope of approvals,
 - b. Be both familiar and fully compliant with the requirements of the Scheme as detailed in the WRAS Guidance documentation and terms and conditions of approval,
 - Submit complete, accurate and up to date applications using the appropriate application form.
 In addition, where appropriate, provide the supporting documentation and information listed in the WRAS Guidance,
 - d. Notify the WRAS Approvals Scheme (and the Test Laboratory where appropriate), immediately, of any changes relating to an application that may occur during the application process. Such changes may include, but not be limited to, the substitution of components or materials, a change to method of manufacture, modification of the intended use and/or the method of installation,
 - e. List all variations or models of products for which approval is being sought in the application,
 - f. List all the installation conditions to be covered by the scope of any Approval granted, for example by specifying which pipe materials the product is to be approved for use with and at what temperature and pressure ratings
 - g. Assist in the resolution of any queries and provide answers or additional information promptly, and recognise that delays in providing requested information will have an impact on the progress of the application. Delays may also result in a failure to satisfy the Scheme's acceptance criteria. In which case, the application will be deemed invalid and will have to be resubmitted as a new application unless previously agreed otherwise.
- WRAS will reject applications which do not comply with the requirements when presented.

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After Approval:

- Following an approval being granted, the Approval Holder shall continue to adhere to these Scheme Requirements and the Standard Terms of Approval in relation to all Approved Products.
- In order to maintain an Approval, the Approval Holder may be required to provide a selfdeclaration of continued compliance on an annual basis. If these requirements are not met sanctions may be applied to the Approval.
- Throughout the period of the Approval, the Approval Holder commits to co-operate with any subsequent surveillance audit that WRAS may consider necessary to confirm the ongoing compliance of the approved product. The Approval Holder shall provide WRAS with all such relevant information (including samples and evidence of the purchase of products and materials such as goods receipts) as WRAS may require for that purpose.
- Approval holders shall notify WRAS of any changes to contact details (including current email addresses), company details or business changes that relate to the Approved Product.
- Approval Holders shall notify WRAS immediately of any changes relating to the Approved Product, its method of manufacture, intended use or method of installation which could affect the compliance of the Product or its Approval by WRAS.
- Approval Holders shall ensure that no changes or modifications to the Approved Product, markings, assembly or range of products/fittings, including changes, substitutions or modification to the materials of construction, components or sub-assemblies are made without the Approval Holder first notifying WRAS. Modifications include but shall not be limited to design changes, changes in materials and/or suppliers of materials, changes to the site of manufacture and changes to marking.
- Approval Holders shall provide WRAS with full details of any proposed modifications and if required, supply Samples for testing and reassessment. Failure to comply with this condition will immediately invalidate a previously granted Approval. WRAS also reserves the right to withdraw an Approval with immediate effect where WRAS considers that the modification may affect the validity of an existing Approval for any reason.
- Approval Holders shall ensure that all products bearing the Certification Mark conform exactly with the Sample in respect of which WRAS Approval has been granted and that each product/unit manufactured by or on behalf of the Approval Holder which is to be attributed with WRAS Approval is capable of satisfying all of the same tests and other criteria applied to the Approved Sample.
- It is the Approval Holder's responsibility to draw the attention of purchasers and installers to any installation requirements or notes that apply to their Approved Products, assemblies or range of products as a condition of Approval and to advise them that failure to install in accordance with these requirements will invalidate their approval and could result in contravention of the Regulations.
- Approval Holders must ensure that individually Approved Products, components and materials incorporated or used in the construction of their Approved Product retain their Approval throughout the Approval Period. Where modifications are required WRAS must be informed and the modifications approved in accordance with clauses 62 and 63 above.
- An Approval Holder may apply to extend the Approval up to nine months before the expiry date of the current approval. Where successful, the extended Approval Period will run for five years from the date of expiry of the existing approval, provided that this does not conflict with the guidelines for processing Applications published in the WRAS Guidance documents.
- Approvals Holders will be required to comply with any relevant changes introduced by WRAS to the Approval Scheme. WRAS will specify a transition period where it considers this

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- appropriate in order to facilitate the implementation of a change. WRAS will always publish details of any changes on the WRAS website. In addition, WRAS will attempt to make an assessment of those approval holders likely to be affected and will notify them of the change. This communication is reliant on the contact details being kept up to date by Approval Holders.
- Approval holders may be asked to participate and assist WRAS (or independent agents appointed by WRAS) in quality control checks of the services provided to applicants for WRAS Products Approval.
- When Approval Holders need to provide a copy of the WRAS Approvals Certificate to a third party, they must provide the Approval Letter in its entirety or direct the third party to the Directory.

Role of the Test Laboratory

When undertaking services relating to the WRAS Approvals Scheme

- In order for Laboratory results to be acceptable as part of a WRAS approval application, the laboratory must be Recognised by WRAS as a competent Test Laboratory and be included on the WRAS List of Recognised Laboratories at the time of testing.
- The Test Laboratory is required to sign a binding agreement with WRAS (WRAS.Cust-404), covering aspects including: eligibility and compliance with Scheme requirements, confidentiality, impartiality and WRAS Recognition. The Laboratory must agree to comply with all WRAS requirements included in these Scheme Requirements and the requirements for gaining WRAS Laboratory Recognition (WRAS-Cust.405).
- The Test Laboratory shall submit all reported findings to WRAS on completion of the testing, where testing is undertaken for the purpose of seeking a WRAS approval. This includes any failed tests. In the case of an Independent Test Laboratory, it is recommended that a legally binding contract is in place between such test laboratory and the Applicant to permit the laboratory to submit all reported findings to WRAS on completion of the testing. In the case of a First Party Test Laboratory the Applicant shall ensure that the laboratory submits all findings related to the application, including any failed tests.
- The Laboratory shall report accurate and complete testing data for all tests required, in an impartial and non-discriminatory manner. All test data provided to WRAS must be included within the Laboratory's ISO 17025 schedule of accreditation, unless WRAS has approved the specific tests within the Recognised Laboratory status.
- The Laboratory must participate in WRAS inspection and surveillance measures including interlaboratory proficiency schemes.

Reporting of Test Results

- Each test report must be typed and include the following information:
 - a. A Title (e.g. Test Report),
 - b. The name and address of the test laboratory, and the location where the tests were carried out, if different from the address of the test laboratory,
 - c. Accreditation body and the Testing Laboratory's Accreditation number, where applicable,

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- d. Unique identification of the test report (such as a sample number), and on each page an identification in order to ensure that the page is recognised as part of the report including page number and total number of pages with a clear identification of the end of the report,
- e. The name and address of the applicant,
- f. The WRAS section and title for the Item tested.
- g. A description of the condition of, and unambiguous identification of the items tested (e.g. model, size, maximum operating pressure and temperature and material of construction where applicable,
- h. Date of receipt of the tested item,
- i. Reference to the sampling plan, including all models covered by the test report, stating the reason why models were not tested (e.g. Tap assembly, same water pathway as model XXXX with different finish/operating member),
- j. A table of the tests performed, including reference to the Test Standards or Test Code Sheet or Test Code Sheet clause used and clearly indicating PASS or FAIL decision (see paragraphs 82 to 88 below,
- k. The body of the report shall include all the information necessary for interpretation of the tests performed e.g. Test Code Sheet number and clause, test specification, maximum operating pressure and temperature, test pressure, raise time and hold time (this list is not exhaustive),
- The results of each test, or series of test shall be reported accurately, clearly, unambiguously and objectively, and in accordance with any specific instructions in the test which includes the test specification and measurement/result to at least one decimal place and the units of measurement.
- m. If the testing was performed at a site visit, the report must include reference to all test equipment used and evidence of its calibration status,
- n. Name, function and signature of the person undertaking the test and authorising person.
- Attention should be given to the layout and presentation of the test data and the clarity of the presentation of the information to assist the understanding by the reader.
- Any amendments to test reports shall be made only in the form of a further document, which includes the statement "Supplement / Amendment to test report XXXX" or equivalent wording.
- When it is necessary to re-issue a complete test report, this shall be uniquely identified and shall contain a clear reference to the original test report it replaces.
- The test report shall, wherever possible, include photographs of the actual product that was tested, including views of all items supplied, significant features of the product and the markings of identification.
- It should be made clear on the report that WRAS is not responsible for the results reported by the laboratory.

Decision Rules for Reporting taking into Account Measurement Uncertainty

- Laboratories shall have documented rules which detail how statements of conformity against the criteria specified in Standards will be made.
- Laboratories shall consider all factors effecting the validity of their reported results and calculate the uncertainty of measurement (UoM) for each test.
- Where the applicable Test Standard defines an acceptable tolerance range, the calculated uncertainty must fall within this specified tolerance.

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- Where tolerances are not specified in the relevant Standard, the laboratory calculated uncertainty should be less than 5% of the stated acceptance value, unless justified and accepted by WRAS. Measured test results falling outside the stated acceptance value, that might pass when taking the UoM into account shall be reported as a conditional result.
- The calculated uncertainty values for each test reported to support WRAS applications shall be documented and provided to WRAS before laboratory recognition is granted. If at any point the test method is modified, any change in the UoM will be reported to WRAS.
- Where a test result falls clearly within the acceptance criteria defined in the Test Standard, the UoM does not need to be reported in the test report and the report should be reported as a Pass. However, if this value could fall outside the acceptable criteria when the tests uncertainty of measurement is applied, this shall be indicated on the report, for example as an "conditional" result. In these cases, the UoM shall be reported alongside the result.
- Any measured result that falls outside of the stated acceptable range shall be reported as a Failure. If the result is sufficiently close to the acceptable limit that when taking the laboratory measurement uncertainty into account, the result could potentially fall within the accepted range, this must be indicated on the report, for example as an "conditional-fail" and the UoM shall also be reported.

Test Laboratories Acting on Behalf of WRAS Applicants

- Laboratories which are recognised by WRAS may be contacted by Applicants to advise and assist them in making an application for WRAS Approval. This would include performing the testing of the product and reporting the mechanical test results to WRAS on their behalf.
- The role of the test laboratory when contracted to manage the application is to:
 - a. Check the details provided with the application (product description and photographs) with the actual product received to ensure that the information is correct and satisfies the Scheme's acceptance requirements as detailed in the WRAS Guidance documentation. Record this check on a summary sheet which will create the draft WRAS Approvals Directory Entry.
 - b. Where the supplied information fails to meet these requirements, to advise applicants what further action is necessary and ensure that any additional information is communicated to WRAS.
 - c. Where appropriate to identify or confirm and carry out mechanical performance testing in accordance with the Regulators' Specification, or other recognised equivalent standards and WRAS requirements necessary to satisfy the requirements of the Scheme.
 - d. To submit authorised technical reports to WRAS Approvals at the earliest opportunity after completion.
 - e. To notify WRAS of testing failures and where appropriate to provide applicants with appropriate information to resolve issues relating to their testing results.
 - f. Adhere to the requirements of the WRAS Test Laboratory Agreement when undertaking work on behalf of a WRAS approvals scheme applicant.
 - g. Cooperate with WRAS Approvals to ensure that good practice is adopted in processing applications.

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Appendix A: WRAS Approvals Scheme Requirements and Code of Practice Declaration

The WRAS Approvals Schemes for water fittings and materials operate under the conditions detailed in the ISO/EN 17065 standard for the Conformity Assessments of Certification Bodies. This places great importance on the clarification of responsibilities within the scheme and as such requires that all external parties who contribute to the certification process sign a statement to commit themselves and their organisation to the following:

- Comply with the WRAS Product Approvals Scheme requirements as defined in the Scheme Requirements and Code of Practice (document WRAS-Cust-402)
- Comply with the WRAS Terms and Conditions (WRAS.Cust-401) or the Test Laboratory Agreement (WRAS.Cust-404), whichever agreement is applicable and the rules and policies defined therein, including those relating to the confidentiality of information and independence from commercial and other professional interests.
- Reveal any situation known to them that may present their organisation or WRAS with a conflict of interest.

As a [(delete as appropriate) Applicant, Approval Holder / Test Laboratory] to the WRAS Approvals scheme, I recognise the importance of these requirements in ensuring the proper conduct within the WRAS Products and Materials Approvals Schemes, and I agree to abide by its terms.

Declaration:

I confirm that I have reviewed and understood the above, and on behalf of the organisation stated below, will reveal to WRAS Management any situation which may affect the status of a WRAS Product or Material Approval or that may present WRAS with a conflict of interest in the delivering of WRAS Approval & certification schemes.

Signature
Organisation
Title/Position
Name
Date

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