

Water Regulations Approvals Scheme CLARIFICATION DOCUMENT

WC Dual Flush

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Date to be applied to applications: 19/06/2025

Introduction

This document has been developed to clarify the WRAS approach used when assessing applications for WC related products that include a dual flush function.

Relevant Legislation

The Water fittings regulations :

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Schedule 2 Paragraph 25 (g) states “a flushing device designed to give flushes of different volumes –

- i. shall have a readily discernible method of actuating the flush at different volumes; and
- ii. shall have instructions, clearly and permanently marked on the cistern or displayed nearby, for operating it to obtain the different volumes of flush.”

Relevant Tests

Associated Regulator Specification (Test Code Sheet(s):

TCS 1611.15 states “Every dual flush cistern shall have a method of operating the full flush and the dual flush separately.

The acceptance criteria are – The full flush and dual flush shall have a readily discernible method of actuating the flush of different volumes.

WRAS approvals have assumed that the intention of the regulations is to enable users to operate the appropriate flush volume on the cistern without prior knowledge of the cistern reducing the risk of waste of water.

Ambiguity

WRAS Approvals considers that there is ambiguity in the Water Regulations and associated Test Code Sheet for Dual Flush Cisterns for WCs.

- a) *How readily discernible can be tested and measured*
- b) *The requirement for marking in the regulations is not covered in the Test Code Sheet but will have an impact on the appropriate use of the product after installation.*

Approach introduced by WRAS

Scope: WRAS approvals shall apply this WRAS Approvals guidance and conditions to the assessment of all applications for approvals that claim to be capable of providing a dual flush mechanism.

1. Readily Discernible

WRAS Approvals will consider the flushing mechanism to be readily discernible if it meets the following criteria.

- a. The smaller button is used for the reduced flush.
- b. The larger button is at least 1.5 times bigger than the small button.

If the buttons do not meet these criteria IRN 582 will be applied to the approval.

R582

When installed this product must have a readily discernible method of actuating the flush at different volumes.

2. Marking

WRAS Approvals will consider the product as meeting the marking requirements if it is permanently marked with markings that meet the following criteria.

- a. The marking demonstrates a difference between flush volumes based on a number or where the pattern changes by quantity.

Examples (other methods following the same principle will be accepted)

- 4 dots for the reduced flush and 6 dots for the full flush
- 1 droplet of water for the reduced flush and 2 droplets for the full flush.

WRAS Approvals will consider the product as having the potential to meet the marking requirements if provided with labelling and instructions for fitting the label and that the marking meets the criteria in 2 above. And will be subject to the Installation Requirement Note IRN R581

R581

When installed this product must have instructions, clearly and permanently marked on the cistern or displayed nearby.

The Approach has not been endorsed by the water companies or the courts, and they could adopt a different approach to the Ambiguity. For this reason, WRAS cannot guarantee that enforcement action will not be taken by water companies under the water fittings regulations, or that the courts will hold that your product is compliant in this regard. No reliance should be placed on the Approach for the purposes of designing or producing any product, and you should rely on your own legal advice. WRAS, accordingly, accepts no liability for loss of goodwill, business, revenue or profits, anticipated savings or wasted expenditure (whether reasonably foreseeable or not) or indirect or consequential loss arising from or in connection with the Ambiguity or the Approach.

Appendix A: Record of Amendments

Version Control		
Version	Issue Date	Summary of change(s)
WAP-19005	4/01/2022	New Document
WRAS.WCD-1006 Ver 2.0	19/06/2025	First issue (Replaces WAP-19005)