



Date 2005-07-04	Reference number ISO/TC 224 N 234
Supersedes document	

This document is still under study and subject to change. It should not be used for reference purposes.

ISO/TC 224

Title: **Service activities relating to drinking water supply systems and wastewater systems**

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REQUESTED ACTION

Circulated to P- and O-members, and to technical committees and organizations in liaison for:

information

discussion at the next ISO/TC 224 meetings in Berlin in October 2005.
[venue/date of meeting]

comments by
[date]

voting (P-members only: ballot form attached) by
[date]

P-members of the technical committee or subcommittee concerned have an obligation to vote.

Title: Position paper from EUREAU regarding ISO/CD 24510, ISO/CD 24511 and ISO/CD 24512 enquiries.

Source:

Project(s):

Status:

Additional information:



EUREAU

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Eureau position on committee drafts for ISO TC 224

EUREAU is the federation of national associations of drinking water suppliers and waste water services which collectively provide vital water and waste water services to 450 millions citizens. Its members reflect the very diverse way in which the European water sector has been organised and represents both private and public operators.

Eureau welcomes the opportunity – being an organisation in A-liaison - to comment on the 3 Committee drafts (CDs) submitted to CD Enquiry in March 2005. EUREAU has expressed an earlier statement at the occasion of the ISO TC 224 plenary meeting in September 2004.

EUREAU appreciates the quality of the 3 CDs, especially CD 24510 (service to users), and the evolution that has taken place since September 2004 in the harmonisation between the 2 CDs 24511 and 24512 focused on the management issues for drinking water and waste water utilities.

Most of EUREAU's comments and recommendations made in the above mentioned statement have been positively taken in account, for which EUREAU thanks the relevant working groups.

Considering the current enquiry, EUREAU will send to TC secretariat detailed comments in ISO templates format, but draws the attention of ISO TC 224 to the following general positions:

General organisation of the texts, and tables of contents

Regarding **CD 24510** (service to users), EUREAU is of the opinion that it should be possible to increase the harmonisation of the table of contents (ToC) with the ToCs of the other CDs. Nevertheless, a new clause on management issues is not required, as CD 24510 is being focused on outputs as perceived by the users (see also comments under the heading “performance indicators (PIs)”)

Regarding **CDs 24511 and 24512**, EUREAU sticks to the opinion that there are fundamental similarities in the management of drinking water and waste water utilities. Therefore it advocates merging these 2 CDs in mid /long term. If this point comes on the table during the next plenary TC meeting, EUREAU will favour a unique standard. In short term, the contents of the annexes should be aligned.

The question of “wording style” (bullets or extended prose) should be examined. This controversy would be resolved if both documents were merged. It would make possible a compromise between 2 objectives: clear legibility, and giving sufficient guidance to the users of the standards, with possible different styles for descriptions and for recommendations.

When considering the possible modifications of ToCs and style, a compromise should be found to meet both an improvement of the quality of the standards and the deadlines fixed by ISO rules for DIS enquiry, in order to avoid a mere cancellation of the considerable amount of works already performed.

Scopes of the standards: the issue of “inside-building” installations

Considering the important issue of the possible adverse impact of the “inside-building” installations on the quantity and quality of supplied water, even if it must be clear that

responsible bodies and operators have no or very little responsibility nor competence, EUREAU draw the attention of the TC that the standards addresses other stakeholders: relevant authorities, users, owners, plumbers, contractors,... who may have responsibilities and means for action. This issue is not sufficiently addressed in the CDs, and a proposal is made for an addition in the common introduction, but TC should also discuss whether and how this point could be mentioned in the body of the CDs.

Assessment issues

EUREAU welcomes the new sub clauses 7.1 and 7.2 in CDs 24511 and 24512, even it proposes some wording changes, for clarifying the fact that assessment does not address the detailed organisation and means, nor the body in charge of. EUREAU favours the introduction of the same provisions in CD 24510, the users being involved in assessment issues.

Performance indicators (PIs)

EUREAU fully supports the principle of dealing with the PIs in detail in informative annexes and of reducing the number of examples of PIs given in the body to one. Consequently EUREAU recommends to transfer the PIs in **CD (24510) “Service to users”** from **the body to a new informative annex**. This is necessary in order to have a consistent standard in line with the overall layout agreement, and it is in fact even more important when other CDs have the PIs in an informative annex. The new wording in the body of CD 24510 should take into account and be consistent with the new provisions introduced on assessment (see above), avoiding redundancies. EUREAU points out that, for meeting the general ISO objective and principle of **global relevance**, the lists of PIs given in the drafts seems too more specific to developed countries and to “piped-networks” systems: attention should be given either (or both) to withdraw too specific terms, or to add examples fitted for developing countries and on-site systems. EUREAU recommends that all the examples of PIs should be carefully scrutinized to check if they are in accordance with the criteria recommended by the standards themselves in the methodology (clause 8), notably about clear definitions, evaluation of uncertainties,... Concerning **CDs 24510 and 24512** (drinking water), EUREAU’s opinion is that the issue of **water losses**, which is of utmost importance for many utilities, has not been sufficiently addressed in the examples. EUREAU favours more developments in the relevant examples, using comments and guidance for helping the stakeholders to chose definitions adapted to their objectives and criteria.

Environmental impacts

Attention of the TC is drawn to the fact that environmental impacts of the water utilities do not concern only water-related issues, but also other issues such as odours, noise, aesthetics, and more generally nuisances and disturbances induced by the permanent or temporary activities of the utilities (e.g. works in the streets, able to cause accidents,...). A suggestion is made for new wording.