CONSULTATION RESPONSE FORM

Consultation on MCS 025: Competency Standard and Competency Framework

Thank you for taking the time to comment on this consultation. MCS values the input from all interested parties in the development of its Standards as, without you, we would not be able to define and raise the quality of installations. We would be grateful if you could use this form for your response which helps with collation and consideration of responses. The form is in two parts: the first part includes a table where you can make comments on each page/clause of the draft document; the second part includes specific questions that will help arrive at a final published version.

Introduction:
This consultation is to seek feedback on a rewrite of MCS 025 and the competency requirements associated with achieving and maintaining MCS certification.

The Standard update is part of the MCS Standards project review and addresses:

- A modernised document style and update to new MCS standard text
- Introduction of a framework to accommodate the competency criteria applicable to a technology
- Reduction to the previous range of 'Company Roles' referred to in the existing version of the Standard
- Strengthening of the requirements around Nominated Technical Persons (NTP)
- Introduction of the requirement for individual reassessment after 5 years, with the intention of maintaining the sector's competency as technology and working practices change.
- Removal of references made in the existing Standards to a 'Competency Checker Tool'
- Retirement of the 'Experienced Worker Route'

Respondent Name:	Company Name:
Pablo John	Association for Renewable Energy and Clean Technology (REA)

Date	Document
29/3/22	

Page / Clause Number	Comments	Proposed new text

Note: You may add as many additional rows as required to the table above.

- Beyond MCS and even where the installation is point perfect, the reputation of the technology generally suffers from a lack of user competence on smaller systems. Whilst operator competency is often covered off on larger boilers because there may be dedicated maintenance staff, MCS allows the installer to perform perfunctory operator training and then walk away.
- The installer should have an on-going responsibility to the performance of the system just installed for at least a 12 month tail.
- There is no definition of 'material change' but it would make sense to define a material change to an MCS accreditation. MCS should set a standard timescale of 8 weeks within which it must be notified to MCS.
- MCS should ban companies from entering into new MCS contracts if they don't have an NTP to cover that technology. Allowing companies to continue to operate for 6 months without technical oversight seems problematic.

Consultation Questions

In addition to commenting on the content of the draft document detailed above, we have these more general questions:

QUESTION 1: Do you agree with the proposal for reassessment of a Nominated Technical Person's competency every 5 years? If you disagree, please explain why.

Yes, a five-year reassessment ensures all NTPs have sufficient competency without being overly onerous on individuals and companies. Refresher training is always a boost to our industry and as long as this training is accessible, we should be expecting industry professionals to refresh their knowledge as often as possible. However, we should note that training required for these reassessments must be easily accessible and financially achievable for smaller businesses. We should also stress that reassessment should cover new ground and innovations within the industry, as well as recapping basic knowledge engineers are likely to already know, at present MCS courses are 'entry level' and are not appropriate for those working in the sector full time. MCS must also institute a suitable 'experienced worker' route for reassessment and not rely on re-taking exams.

QUESTION 2: Do you agree with the proposal for a MCS Contractor (certified business) needing to identify one or more Nominated Technical Person (NTP) depending upon the volume and complexity of their activity? If you disagree, please explain why.

Agree, but one NTP will be sufficient to cover all activity regardless of volume or complexity. We do not understand what the gain would be to have more than one NTP. Small companies may struggle to cover this requirement if multiple NTPs are needed. MCS must give clear guidance and thresholds on when an NTP would be needed, and if MCS do decide to go ahead with the requirement for multiple NTPs, this threshold must be set at a reasonably high level to prevent small companies needing multiple NTPs, with all the costs that entails.

QUESTION 3: MCS proposes to remove the 'Experienced Worker Route' as an option for assessing individual competency. Do you agree with this proposal and if so, why? If not, what are the advantages offered by an 'Experienced Worker Route'?

We disagree with this proposal.

It would be inappropriate to get rid of the experienced worker route completely, although we would initially support moves to tighten up evidence requirements to demonstrate sufficient experience. As said earlier MCS must provide clear routes to training at an affordable level. Unless there is a very clear minimum training scheme required, without an experienced worker route it could force people out the market. You don't need a formal qualification to know the technology and be competent to sign off small domestic installations, time in the industry and a portfolio must count also towards someone's competence. Much of the knowledge in the industry comes from EWR alongside traditional training, many of the best operators in the field are hugely experienced engineers who have been working on these technologies for decades. Many have few, if any, formal qualifications yet they are responsible for much of the highest quality work in the sector. By removing the EWR MCS may remove the best installers from the domestic installation market.

QUESTION 4: What should MCS consider when approving new training provision that has been assessed as meeting the Scheme's competency requirements?

We believe the following should be considered:

- Difference in skills required to install and maintain different sized boilers
- Accessibility of training, considering financial, time and geographic constraints.
- Relevance to types of boiler as a percentage of boilers in the market, training provisions should be relevant to a majority of NTPs. Is this training appropriate for someone that has been operating in this technical field for years/decades? There are currently no courses that are suitable 'refreshers/updates' for these types of individuals. The only courses available currently are entry level.

Cross cutting training covering environmental sustainability and safety as well as technical aptitude.
We also believe there should be a route for boiler manufacturers to provide training provisions. The manufacturer is the primary competent authority on the equipment. Where a manufacturer provides training and accreditation, this should be enough evidence of competency. No further onerous training or accreditation should be required. Especially outside of the domestic environment, there is enough disparity in systems to need bespoke manufacturer training.

We must once again stress training is made financially accessible for all members of our industry, especially smaller and sole traders who might not have the turnover for regular expensive training.

We strongly believe any training for Industrial Biomass Boilers above 45kw should not be Generic, this should always be, where possible, Manufacturer driven and Boiler specific in terms of Boiler type (Stoker, Walking Floor etc), Fuel type (Woodchip, Pellet, Dust etc), Energy release (MTHW, Steam, Thermal Oil, industrial process heat etc), anything other than this will result in unsafe, inefficient, environmentally damaging and unreliable Biomass Boiler systems. This point must also be made clear as part of the MCS training provision, so that the trainee is fully aware that the training only applies to small scale domestic installations and does not qualify an individual to work on larger industrial boilers.