



BVC Ref: NCLOG / 01 (OPEN LETTER) V2

23<sup>rd</sup> May 2022

National Contaminated Land Officers Group (NCLOG)

To: Whom it May Concern

Reference: Poor Industry Working Practices

Dear Sir/Madam,

I am writing to you today in my capacity as Chairman of the British Verification Council (BVC). Our members and others working in the gas membrane industry have recently observed poor gas membrane installations that have been verified as acceptable. Although this undoubtedly only involves a small minority of practitioners working in the permanent ground gas/hydrocarbon vapour remediation industry, it is a significant problem.

- The industry now has upskilling courses for installation and verification of gas membranes:
- The British Geomembrane Association (BGA) has developed the NVQ Level 2 qualification for gas membrane installations, and
- The British Verification Council (BVC) developed the NVQ Level 4 for gas mitigation validation.

The CL:AIRE Gas Protection Verification Accreditation Scheme (GPVS) is now also operational, offering TGPV (Technician) and SGPV (Specialist) accreditations. Therefore, there is now ample opportunity in persons receiving training and achieving qualifications and accreditations for ground gas mitigation measures.

In addition to our own observations we were alerted to poor validation practices of completed work that was posted on LinkedIn, which clearly identifies incomplete and poor installation practices, but were validated and signed off as “excellent work.”

We are also aware of certain specialist gas membrane installation companies’ work being validated by companies owned by family members. This is not an independent validation company as recommended in CIRIA C735. Both contract supervisors and managers of the installation company are clearly performing the validation work and signing reports as the validation company. This is a clear conflict of interest as outlined in the CIRIA C735 best practice document and should be stamped out.

As there is currently no overarching body who we can make representations to, we were advised by Nicola Harries of CL:AIRE to contact NCLOG to highlight our observations and see if you can assist in addressing our concerns.

Whilst we are fully aware that NCLOG are not able to assist with individual cases of poor working practices, we would ask your group to consider assisting our industry by requesting qualifications or accreditations within verification reports. We would also ask you to consider recognising the quality of verification reports which



are signed off by a CL:AIRE SGPV accredited persons and declared in the same way you would do for the National Quality Mark Scheme for Land Contamination Management.

We would ask you to closely consider the qualifications and experience of authors of verification reports and reject poor quality reports (I.E not prepared in line with CIRIA C735) and those where adequate competency cannot be demonstrated.

We believe this action may encourage anyone who is currently unqualified to seek the relevant qualifications/accreditations and if there is a lack of knowledge and understanding, the individual may be signposted to upskilling courses to gain the relevant knowledge to improve their working practices.

All of the undersigned (and others) have spent a lot of time and expense in achieving appropriate qualifications and accreditations to demonstrate our competence in installation and validation, however observing poor practices without having any channels to complain leaves us in a difficult position which will only encourage unscrupulous activities, potentially leaving some sites and occupants improperly protected.

We would welcome working with NCLOG on this issue for the benefit of industry/project quality assurance and protection of both buildings and occupants, which is the ultimate reason we are all in this industry together.

Thank you for taking the time to read this open letter and we look forward to positive changes in our industry.

Yours faithfully

For and on behalf of:

Barrie Ackroyd (BVC Chairman and members)

Kevin Mitchell (BGA Chairman and members)

Steve Wilson (EPG Ltd)

Nicola Harries (CL:AIRE)

Neil Salvidge (NSTDA)

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