

WRAS Annual Report 2011-12



Contents

“ WRAS provides an important role supporting water companies to deliver their water safety plans by promoting the regulations nationally to everyone impacted by them. ”

Stephen Kay, WRAS
Chairman

4	Forward from the Chief Inspector of Drinking Water
5	Chairman’s Report
6	Purpose of WRAS
7	Promotions of the Water Fittings Regulations and Byelaws
8	WRAS Approvals
9	Case Study – Supporting the Olympics
10	Approved Contractors Schemes
11	Case Study – Borehole Cross-Connection
12	Supporting and Representing Water Companies
13	Case Study – Lead Solder
14	The Business Plan and Appointment of the New MD
14	WRAS Governance
14	Financial Summary
15	The Team at WRAS

Forward from the Chief Inspector of Drinking Water

“ A step change in approach to delivery of fittings regulations duties is essential. ”

In 2004, the World Health Organisation (WHO) published the water safety plan approach as the most effective means of securing a sufficient supply of safe, clean drinking water for all.

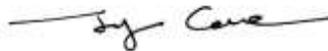
This approach is based on each water supply operator or owner having in place a comprehensive system of risk assessment and risk management from source to tap. This risk based approach has been instrumental in ensuring improvements to drinking water supplies are sustainable.

Water companies have a duty to enforce the Water Fittings Regulations, the purpose of which is to mitigate the risk of contamination of drinking water. There is a history of persistent problems in the maintenance of building water quality and private distribution systems therefore a step change in approach to delivery of fittings regulations duties is essential.

This is particularly the case in relation to public buildings where new powers have been given to the Drinking Water Inspectorate to ensure that water companies or local authorities, as appropriate, initiate enforcement action where necessary to prevent water contamination incidents.

The WHO has recognised the particular risks relating to building water quality systems in its recent publication “Water Safety in Buildings” (2011). This places a strong emphasis on mitigating risks in public buildings, where the public health impact of contamination is greatest.

Against this background it is important for water companies to have in place and publish a comprehensive enforcement policy. WRAS has an important role to play in the development of a national enforcement policy framework and in promoting the competence of people who carry out work on building water systems and plumbing by acting as a single industry voice facilitating consistent, proportionate and risk based regulation through the provision of a common framework, tools and leadership.



Prof. Jeni Colbourne MBE
Chief Inspector of Drinking Water

Chairman's Report

My review reflects a year of transition as we have spent time listening to stakeholders and determining our strategic direction. We are now ready to move forward to make important changes to improve the services we offer.

The WRAS Board of Directors commissioned a market research study covering all sectors, which had an interest in the Scheme's work. The study confirmed some views already held but revealed other insights of how the Scheme is seen and what its customers and supporters desired of it.

Building on this feedback, we developed a draft business plan and to ensure we had got our plans right, we presented this plan to stakeholders at a conference in March 2012.

Stakeholders have told us they want us to do more to promote and communicate the regulations and our approval schemes, to improve the water fittings approval process, to provide additional support to water companies and to develop even stronger relationships with our stakeholders.

Using feedback from the conference we finalised our business plan and we are now moving forward to deliver the business plan.

Enforcement of the water regulations is not only a legal duty of all water undertakers, it is an integral part of water companies' water safety plans – managing risk from source to tap. Although water companies provide excellent water quality up to the boundary of customer properties, water quality can be adversely affected by privately owned plumbing systems in buildings.

While this is the responsibility of the building owner or occupier, Water Supply Companies have a legal duty to enforce the Water Fittings Regulations. Inadequate enforcement of the regulations could lead to regulatory action against a water supply company by the DWI.

WRAS provides an important service supporting water companies to deliver their water safety plans by promoting the regulations nationally to everyone impacted by them, providing approval schemes and guidance which allow compliance to be easily demonstrated, facilitating national approaches and by representing Water Supply Companies. This year saw the highest ever numbers of WRAS approvals for materials and fittings, with a 14 per cent increase over the previous year. With over 6000 current WRAS approved fittings and materials, consumers can be assured that they are buying quality products using appropriate materials.

However, a walk around the shelves of any plumbing supplier will demonstrate that there are a significant amount of products, which don't have this quality mark.

The Water Industry Approved Plumbing Scheme had its highest ever membership of 8682, but this represents less than 10 per cent of the number of plumbers estimated to be working nationally.

Unfortunately, experience has shown poor workmanship and poor water fittings can lead to water contamination incidents. The case studies within the report on pages 9, 11 and 13 illustrate that problems can and do happen. While WRAS has made good progress there is still a lot of work to be done by Water Supply Companies and WRAS.

In 2012-13 WRAS will develop and start to implement a robust marketing and communications plan, work with our partners to launch a new national WaterSafe installers schemes, look at ways to improve the water fittings approval process and work with water supply companies to develop a framework for best practice.

For more details, a summary of the business plan can be found on the WRAS website. While we are ambitious, we are also realistic about how quickly the actions within the business plan can be delivered. The business plan covers five years and we are now moving forward on our journey to deliver it and make our contribution to managing risk from source to tap.

This year has seen the retirement of Steve Tuckwell, our first Managing Director. I would like to take this opportunity to express my appreciation and thanks to Steve for the significant contribution he has made to WRAS. I would also like to welcome Julie Spinks, our new Managing Director.



Stephen Kay
Chairman, WRAS Ltd.



Purpose of WRAS

The protection of public health by preventing contamination of public water supplies and to encourage efficient use of water by promoting compliance with the Water Supply (Water Fittings) Regulations and Scottish Water Byelaws

WRAS Ltd. is a subscription membership company working on behalf of UK Water Suppliers. To do this WRAS has four core objectives:

- To raise awareness and understanding of the regulations and byelaws through marketing and communications, advice, consultation, education and professional development.
- To provide approval schemes, processes and guidance to enable organisations and individuals to demonstrate compliance with the appropriate regulations and byelaws.
- To provide cost effective support to water companies by providing guidance to enable consistent interpretation and enforcement of appropriate regulations and byelaws.
- To represent the UK water supply industry as one voice on Water Fittings Regulations* and development of relevant regulation, byelaws, guidance, codes of practice and standards.

WRAS has developed a set of values to guide the operation of the business as well as inform its conduct and relationships with stakeholders.

The values are Customer Focus, Clarity, Fairness and Consistency, Proactive, Expertise and Supportive. Some of these values are aspirational and WRAS needs to change the way it operates in order to live by them.

WRAS currently delivers its purpose and objectives by:

- proactively promoting the regulations and byelaws,
- providing approval schemes and guidance,
- supporting and representing Water Supply Companies.

*Water Fittings Regulations' refers to Water Supply (Water Fittings) Regulations 1999, Water Supply (Water Fittings) Regulations (Northern Ireland) 2009, Scottish Water Byelaws 2004.

Promotion of the Water Fittings Regulations and Byelaws

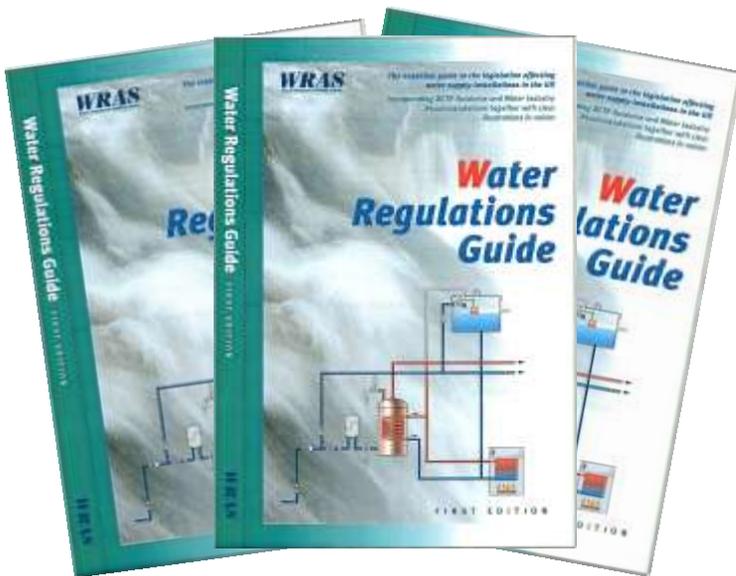
“ Sales of the Water Regulations Guide increased by 27%. ”

WRAS continued to promote the Water Fittings Regulations and Scottish Water Byelaws by publishing information, answering technical queries, giving presentations and by providing articles for magazines and journals of trade and professional associations. During the year existing website publications on selection of pipes for contaminated land, marking of pipes carrying non-wholesome water and on the application of the Water Fittings Regulations to agricultural premises were updated. A newsletter was published and circulated to subscribers and others in August 2011.

WRAS works with the Regulations Managers of the Water Companies through the Technical Support Groups and WRAS Technical Committee to agree interpretations of the regulations on topics. A list of interpretations is available on the WRAS website. This list was updated with twenty new interpretations during the year to include up-to-the minute decisions made on behalf of Water Companies who enforce the regulations.

Sales of the Water Regulations Guide increased to 3427 copies – 27 per cent more than in 2010-11.

Technical presentations of WRAS' work on complying with the regulations were given at conferences and seminars. Parties of visitors representing Water Companies and fittings manufacturers (including representatives from water industries overseas) were received at the WRAS offices to gain understanding of how the Water Fittings Regulations were implemented and enforced and to understand the work of WRAS.



WRAS Approvals

The WRAS Product Approvals process is a straightforward way of demonstrating compliance with Government regulations on water fittings and non-metallic materials in contact with water.

Approvals are assessed against the performance criteria of the Secretary of State's Regulators' Specification.

Approval is voluntary and is sought by manufacturers who pay for independent assessment of their products to demonstrate their compliance with the regulations to gain endorsement by the water companies who enforce the Water Fittings Regulations in England, Wales, Northern Ireland and Scottish Byelaws.

WRAS administer the WRAS Approval scheme on behalf of the water companies. We check the technical details of applications while fittings approvals are granted by the Product Assessment Group (PAG) made up of representatives of the water companies.

PAG members and their employers have traditionally given their time for doing this free of charge. The WRAS Board agreed to recognise this contribution to the water supply industry by reducing the annual WRAS subscription paid from 2012-13 by the water companies who allow their staff to participate.

The reduction in subscription for each of the water companies is proportional to the number of meetings they attend.

Numbers of approvals increased for the third year running, with 1029 fittings approvals and 419 non-metallic material approvals granted – a 14 per cent increase on the previous year.

The trends are shown in the graph below. However, there are still a significant number of water fittings and products which have no WRAS approval.

These unapproved products are likely to be of poor quality and customers who buy them are at risk of unwittingly committing an offence by failing to comply with the Water Fittings Regulations.

The PAG also provides manufacturers of innovative products with an interpretation of the testing requirements and a preliminary opinion on compliance before their products are committed to production.

WRAS Approvals are registered trademarks and WRAS protects the integrity of its use by challenging those without a valid approval who advertise their products in a way which suggests WRAS Approval or whose advertising falsely claims the Approval. During the year we contacted seven businesses. Of these, four companies amended their advertising as a result and a further three cases are on-going. In one particular case, WRAS called in the Advertising Standards Agency.

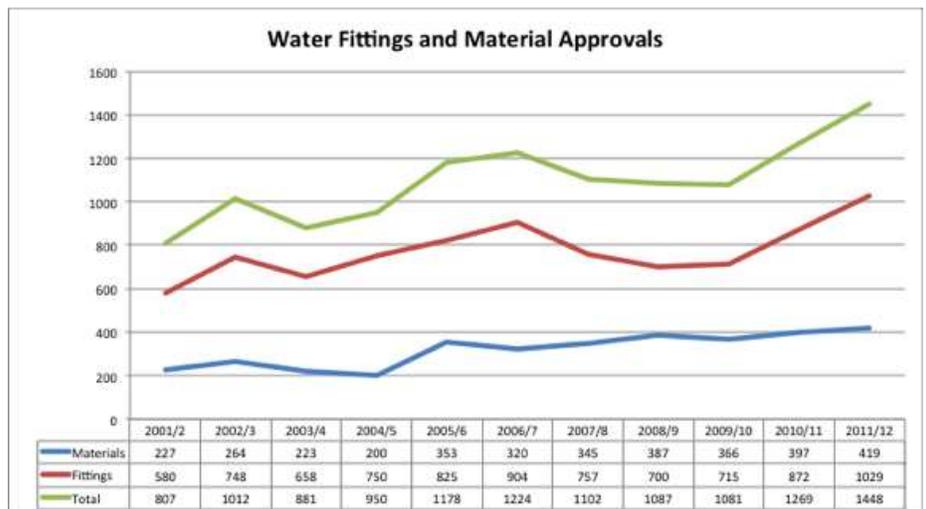
WRAS has been seeking ways to improve the approval process and two changes have been agreed. An additional member of the approvals team was recruited during the year and when trained sufficiently, will assist in running the 'pre-check' service when it commences later in 2012-13.

Under the pre-check service, at the beginning of the approval process, applications can be submitted directly to the Scheme. They will be checked for completeness saving time on checking when the testing is completed and avoiding last-minute delays.

Discussions also began with some large manufacturers about alternative ways of assessing products to gain WRAS Approval.

Rather than the PAG members exclusively granting of approvals for relatively simple products such as taps and shower fittings, it was also agreed to trial an arrangement where designated senior WRAS staff could carry out this duty, allowing more frequent approval of these products and streamlining the workload at the main PAG meetings. The PAG will audit a proportion of these approvals to ensure consistency.

“ Approved products and materials rose by 14%.”



Case Study – Supporting the Olympics

Supplying water for an Olympic event is always going to be a major task and London 2012 was no different. As the single biggest temporary event ever held in the UK, it naturally threw up some unprecedented issues for regulators in their quest to maintain public health.

The importance of high level engagement was recognised early on with Thames Water taking the lead by setting up a dedicated team providing advice and support at the start of the project. They also liaised with the various parties involved and worked hard with the other water suppliers, particularly Essex & Suffolk Water and Affinity Water (previously Veolia Water) who serviced the majority of the Games.

An approach was subsequently agreed in light of the projects' importance and the value of maintaining a consistent and balanced enforcement stance while maintaining customer service standards. This not only gave confidence to the regulators but also gave a cohesive and unified direction for the Games' organisers (LOCOG) and advisors (EHOs etc.) as well as the developers of Olympic venues in a bid to reduce potential enforcement action later.

With around 180 'Regulation 5' notifications and nearly 90 new water supply connections, in the capital alone, which covered some 45km of new external pipework and over 1,750 temporary structures and commercial units gives some scale of the task. Complexity was added as it was to be the most eco-friendly Games ever, reducing drinking water consumption through the use of harvested rainwater and the less traditional method of using blackwater treated to near-wholesome standards for irrigation and toilet flushing on a scale never seen in the UK before.

While using these new technologies, which created its own challenges, it was the standard plumbing fittings and ancillary equipment – such as water storage and catering equipment – which seemed to cause some unexpected problems. This was due in part to the wide lack of understanding of the regulations in particular compliance with Regulation 4 (fittings fit for purpose).

Despite setting clear guidance some developers and contactors assumed as they were temporary installations there was not a need to comply. Subsequently substantial claims of WRAS Approval were offered, as well a wide lack of appropriate conformance certification and product markings. In one case - illustrated in the picture below – a false approval was easily identified on some PTFE tape which was labelled with a Product Approval mark and not the Approved Material logo affixed to genuine approved tapes. This lack of approval caused substantial additional work which resulted in a rush of last minute testing for equipment and fittings which proved very challenging, not only for the manufacturers, but also for test houses and the WRAS Approval system.

Despite the high level of awareness raised of the Regulations, the flexible and reactive nature of a 'must do' culture which goes with running such a large temporary event only served to highlight how the best plans could turn to disaster. Cross-connections were found between the drinking water and the non-wholesome eco-water systems, as were a range of non-compliant pipe installations and the use of non-compatible fittings to highlight a few.

The lead taken by the three main water suppliers was welcomed by the other companies servicing outlying venues, as it not only reduced their burden with pre-agreed installation and equipment requirements, but also simplified inspections to the extent that some were a more routine check such as the level of compliance.

Despite these difficulties, on the whole most issues did get resolved with the exception of a few pieces of equipment which were allowed to be used following detailed inspection – albeit with strict conditions applied. All this work ensured the Olympics went off without any serious public health incidents.

The Olympic experience has served to highlight a wide lack of understanding about UK requirements in a number of quarters. The most worrying sector was the mobile and event catering, where, because of the temporary nature of the business, regulation compliance is not widely understood. Also highlighted is a lack of uniformity in relation to European Standards and regulatory requirements between EU countries – something not fully understood by some manufacturers.

False approval logo on PTFE tape



Wholesome water pipe in a surface water drain



Incompatible fitting leaking



Approved Contractors Scheme: WIAPS

Membership continued to grow of the Water Industry Approved Plumbers Scheme, which WRAS administers on behalf of 20 English, and Welsh water suppliers. Categories of membership are for fully approved contractors, ground workers (whose work on installing supply pipes is more restricted than fully approved contractors, but is covered by a specifically defined scope), and installers of catering equipment and of water coolers. This has the highest number of members of the seven approved contractor schemes.

Membership in March 2012 was:

Fully Approved contractors	4063	(8%)
Ground workers	4463	(5%)
Sectors *	156	(68%)

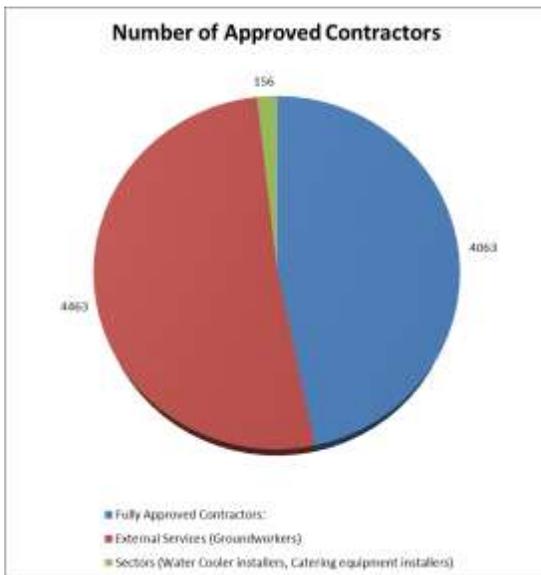
In response to a drinking water contamination incident where cross-connection occurred between rainwater harvesting equipment and mains water due to faulty installation or modification, with the trade associations and other approved contractors schemes WRAS developed additional training for fully approved contractors and ground workers on alternative sources of water. This has been added to the training courses for future applicants and is offered as a continuing professional development module to existing members.

Approved Contractors Scheme: WaterSafe

The idea of a single national accreditation for members of all approved contractors schemes gained support during the year from Water Companies' chief executives and managing directors at Water UK, from government, professional and trade associations, from the national trading standards body and from training organisations. A shadow board was appointed to set up a company to run the scheme with the name WaterSafe, and a marketing and promotional agency was appointed. Work continues to bring proposals to fruition and launch the scheme in 2012.



It has been estimated that the seven existing approved contractor schemes account for approximately 2,000 businesses out of a potential 20,000. This means that less than 10 per cent of plumbing businesses can demonstrate competence in water regulations and there is significant potential for the proliferation of poor installations, which could pose a risk of water contamination.



Case Study – Borehole Cross-Connection

Homeowners in a Staffordshire village called in their local water company after they started to notice their drinking water had a funny taste and was appearing discoloured.

The water company's Distribution Technicians were despatched and worked with the company's Water Quality staff to investigate the problem and determine the cause.

It soon transpired the problem only started after a local haulage company had sunk a new borehole to wash their vehicles. Having experienced similar problems several years earlier, the team knew they needed the Water Regulations Technicians to carry out an immediate inspection of the site to identify potential causes.

The Water Regulations Technicians soon identified the cause of the problem. It turned out to be a direct cross-connection between the new borehole and the incoming drinking water mains.

This was immediately disconnected and as a precautionary measure 17 local properties were issued with 'Do Not Drink' notices, until the water company had completed its investigations and were sure the water supply was safe to drink.

Because of similar cases in the past, the water company was keen to identify and prosecute the groundwork company responsible for the installation as previous attempts to educate local well drillers had failed and offers to talk to the Well Drillers Association came to nothing.

The owner of the well drilling company who installed the borehole claimed that the cross connection was caused through a breakdown in communications between himself and his employee installing it.

The case was put before Sheffield magistrates on 18 September 2012 and the installation company was found guilty of two breaches of the Water Supply (Water Fittings) Regulations 1999 [Regulation 3 (2) (i) and Regulation 7 (1) (a)]. They were fined a total of £15,102.40, including costs.

Since this court case the Well Drillers Association have contacted the water company and have arranged for members of the Water Regulations team to attend their next meeting to educate their members on the Water Fittings Regulations.

Before – borehole cross-connected to the drinking water supply



After – temporary disconnection of pipework



Supporting Water Companies

Regular meetings of the Technical Support Groups continued to give regulations managers the opportunity to network with each other, to find appropriate solutions to practical problems arising from enforcement in their areas and to develop consistent interpretations of the Water Fittings and Byelaws.

The Groups continued to discuss the implications of the revised Private Water Supplies Regulations and the extension of duties of local authorities to monitor water quality which included 'onward distribution systems' supplied by public water undertakers.

Local authorities are expected by regulators to contact water companies' Water Fittings Regulations managers where infringements of quality standards are found in these systems.

Other topics on which WRAS' expertise was sought included the non-compliance of a water-saving devices distributed free by supermarkets to their customers, enforcement of the Water Fittings Regulations for permanent and temporary facilities for venues used for the Olympic Games, alternative forms of evidence of compliance with Regulation 4 (suitability of water fittings) and a system of voluntary reporting of enforcement activities by Water Companies.

It was agreed that in the latter case, developing a format for reporting should await a broader examination of the principles of enforcement in which the WRAS Board hoped to engage the regulators.

The WRAS Technical Advice service continued to answer daily regulations enquiries from customers of Water Companies, fittings manufacturers, installers and suppliers' regulations staff themselves.

Representing Water Companies

WRAS took part in the development of a safety study into hot water storage above 100°C and related matters. This was co-ordinated by the Department of Communities and Local Government, which is responsible for building regulations relating to the construction and use of water systems in premises. This had relevance to compliance of several types of products already widely used despite being prohibited by the Water Fittings Regulations and Building Regulations 1999.

During the year WRAS took part in the Department of Health Pseudomonas Working Group. This output of this review exercise was the "Report on the review of evidence regarding the contamination of wash-hand basin water taps within augmented care units with pseudomonads" which was published by the DoH on 25 June 2012. This report has informed the development of the DoH action plan and programme of work to address Pseudomonas contamination of water sources and water systems.

WRAS provides a single point of contact between the Water Companies' Water Fittings Regulations departments and government, trade associations and professional bodies related to plumbing matters. The trade and professional associations have extensive networks of businesses or individual members who can be reached with 'Water Fittings Regulations' messages through WRAS.

Regular meetings took place with the Plastic Pipes Group of the British Plastics Federation and the Bathroom Manufacturers Association to bring about closer links and better understanding of common issues. WRAS also met representatives of other trade associations to discuss matters of common interest.

Case Study – Lead Solder

A northern towns Environmental Health team were called in after residents of a newly built luxury apartment block thought that some of their illnesses could have been related to a number of plumbing issues they had been experiencing, some of which included discoloured water and sediment. Results from the local authority's samples indicated high lead levels (cold water <math><0.4-310\text{ ugPb/l}</math>; hot water 0.6g-8300 ugPb/l) among other issues.

These were shared with the local water company whose investigation revealed no associated problems with the incoming supply but confirmed the local authority's suspicion after recording a maximum result of 902 ugPb/l.

In such a new development there was no reason to suspect lead would have been used within the plumbing system, so the company's regulations team were sent to check out the 34 apartments.

The inspections revealed drinking water was being distributed from a ground floor storage cistern to each apartment via a central large bore copper pipe system that used a solder free crimped jointing system. With each apartment's plumbing system made up of plastic pipes, it was difficult to see where any lead could leach from. The source was eventually tracked down to a small section of pipework, with only 5-6 soldered joints, at the point of entry into a utility room in each apartment. The solder on these joints had the same dull grey appearance as those seen on the central heating system.

A 'Lead Check Swab' test kit was used to confirm the inspector's suspicions after it turned pink.

Improvement Notices were subsequently issued to the service agents paying the water bill who promptly challenged the developer to carry out all remedial actions. Due to the number of other contractors involved in the development identifying who carried out the work proved impossible for the water company which has delayed remediation works. Samples of the pipe work were removed by the installer for analysis which proved lead solder was used. Further delays occurred after the intervention of the Resident's Association following boiler breakdowns after some remedial works were carried out. Only 11 apartments have so far been completed because of this, but all soldered joints are being replaced with mechanical joints.

This case study highlights how having a close working relationship between the local authority and its Environmental Health team enabled the water company to act quickly to identify the source of the problem and get remedial action underway. It also shows despite the prohibition of lead for more than 25 years its use has not been eradicated. This case in point clearly demonstrates it only takes relatively few joints to be made with lead solder to cause such a high lead failure. This will be an even greater issue with the future reduction in lead parameter values to 10ug/l in 2013.



Positive lead tests



22mm pipe with lead solder and 15mm pipe with lead free solder



Pipework feeding the apartments installed correctly

The Business Plan and the Appointment of New MD

The Board appointed Julie Spinks as Managing Director when Stephen Tuckwell stepped down in December 2011. He remained as Technical Director until his retirement in March 2012. With her extensive experience of the water industry and her business management skills, one of the first tasks for Julie was the development of the business plan for WRAS for the next five years. Drawing on findings of the market research study covering all sectors which had an interest in the Scheme's work, a draft business plan was presented to delegates representing stakeholders at a conference in March.

Taking account of feedback from the conference, the business plan was approved by the Board and will be implemented in the coming months.

A comparison of the purpose, objectives and vision with current performance highlights seven significant challenges and opportunities that the business plan needs to focus on:

1. To better raise awareness and understanding of WRAS, the regulations and our approval schemes.
2. To improve and better promote the Approved Contractor Schemes
3. To streamline the water fittings approval process and understand future changes of approvals
4. To improve our support for water companies.
5. To further develop pro-active and closer collaboration with stakeholders and to reinforce WRAS' position as a uniform representative of water supply companies on Water Fittings Regulations.
6. To develop a robust performance framework to help us get feedback, track performance and improve.
7. To ensure we have the right competence and resources available to deliver the plan.

The plan describes seven initiatives to deliver a step change in performance and address the significant challenges that WRAS faces.

These are:

- Marketing and communications plan
- Streamlining the Water Fittings Approval Process
- WaterSafe Installers Scheme
- Supporting Water Supply Companies
- Stakeholder Engagement Plan
- Performance framework
- A resource plan

The success of the business plan will be measured against delivery of initiatives, measures and targets within the performance framework.

A summary of the business plan is available on the WRAS website.

WRAS Governance

The Board of Directors provides company governance and directs strategic and financial matters. The Board comprised representatives of two English water service companies, three water supply only companies, water suppliers in Scotland, Wales and Northern Ireland, the Chairman of the Technical Committee and the Managing Director and Company Secretary.

Stephen Kay	Cambridge Water plc - Chairman
Dymphna Gallagher	Northern Ireland Water
James Foster	Anglian Water
Roger Harrington	Semcorp Bournemouth Water plc
Peter D Perry	Dŵr Cymru/Welsh Water
John Rae	Scottish Water
David McMahon	Thames Water Utilities Ltd
Paul Seeley	South East Water Ltd
Julie Spinks	MD Designate (from 1 December 2011). Managing Director and Company Secretary (from 1 January 2012)
Geoffrey Tute	Southern Water (Chairman, Technical Committee)
Stephen Tuckwell	Managing Director and Company Secretary (to 31 December 2011, then Technical Director to 31 March 2012)

Financial Summary

WRAS receives income from subscriptions, approvals fees and sale of publications. The cost of administration of the Water Industry Approved Plumbers Scheme (WIAPS) is accounted for separately in the WRAS Ltd. accounts and is covered by a separate subscription from those Water Companies who support WIAPS.

After negotiations with Her Majesty's Revenue and Customs the Scheme's liability for corporation tax was reduced when it was agreed to categorise as mutual trade those business activities, which took place between WRAS and its members.

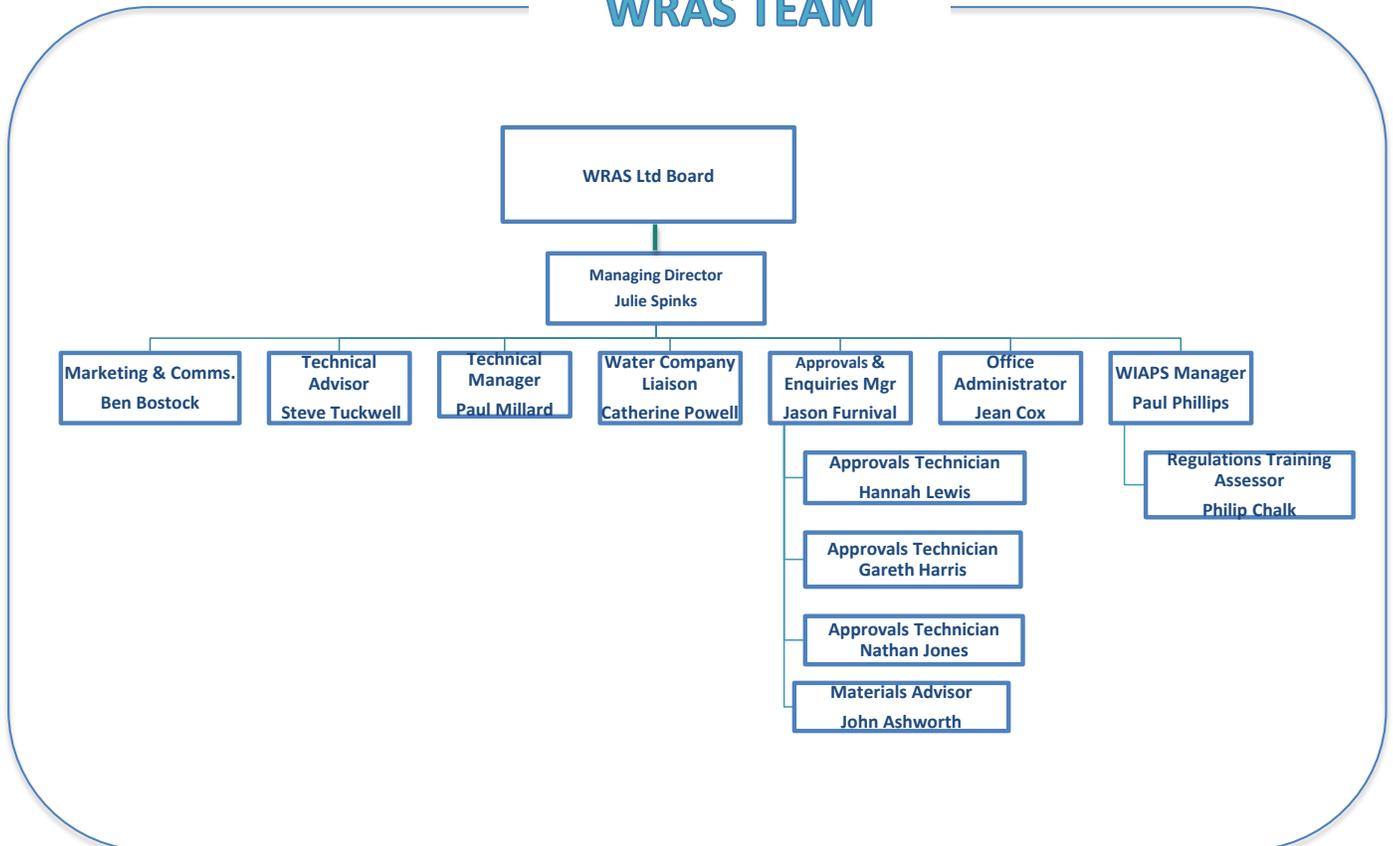
After corporation tax, WRAS Ltd. had a surplus for 2011-12 of £107,929 (subject to audit). Of this, £84,249 is from WRAS advisory activities and £23,680 arose from trading for WIAPS and is for use in the WIAPS Scheme. These surpluses will be used for furthering the respective work of the schemes.

A copy of the audited accounts will be sent to Members when available.

The Team at WRAS



WRAS TEAM





Water Regulations Advisory Scheme Limited

WRAS Ltd is a company registered in England.

Registered office address: 1 Queen Anne's Gate, London SW1H 9BT

Company registration number: 06663930

Contact WRAS on: 01495 248 454 email: info@wras.co.uk www.wras.co.uk

