

## Ministerial Decree 663

### Technical provisions governing equipment designed for the treatment of water for human consumption

This proposed decree is the revision of the regulation proposed by the Italian Ministry of Health in 2006, to replace Decree 443 (1991). This latest revision essentially removes direct reference to specific product requirements and identifies the manufacturers' information and the responsibility of local authorities in control of the requirements.

However, the document informs (Article 9) that “an agreement has been reached between the state, the regions and the autonomous provinces of Trento and Bolzano, to adopt not more than 180 days from the entry into effect of this decree, governing the official testing of hygienic/sanitary aspects” and that this agreement “governs the forms of applying procedures for the nationwide testing and monitoring of devices”.

There is no detail or description of the content of this agreement, so it is not possible to identify whether it contains any or all of the previous objections to the proposed revision of 2006. It would therefore seem inappropriate to accept the principle of Decree 663 until the content of the agreement is available.

Furthermore, Article 8, 1 implies mutual acceptance of “devices legally manufactured in another Member State of the European Union.... provided that it guarantees levels of safety, performance and information equivalent to those prescribed by this decree” but these acceptance levels are not specified nor are they justified in accordance with the rules of the Commission on the restriction of the free flow of goods in the European market in 2003/C265/02.

In addition, Article 3, 9 refers to “internationally-recognised guidelines” which are to be published 180 days after the decree comes into effect. It states that these guidelines will contain a description of the drinking water treatment processes, so the details of the equipment and any limitations expressed will not be available until after the decree is in force. Absence of this information makes it difficult to accept the overarching principle of the decree.

Article 4, 4 requires plumbed-in equipment to be fitted with “a system that shuts-off the treated water supply” and bypasses the equipment, if there is an indicator which activates when the life of a component has been reached – this implies **automatic** shutoff and bypass. The proposed decree rightly accepts that a simple label is acceptable, but some devices are fitted with a visual and/or audible alarm which indicates at the end of cartridge or component life, and draws the consumer's attention to the need, or impending need, for maintenance. Article 4, 4 excludes this alarm unless it is fitted with automatic shut-off (and possibly bypass). This automatic feature is irrational, expensive and unnecessary for the vast majority of applications.

In conclusion, acceptance of the latest revision should be conditional upon clarification of the details of the agreement between the state and local authorities, the details of the internationally-accepted guidelines and removal, clarification of Article 4, 4 and Article 8, 1. It should be pointed out that the agreement and the guidelines may not be available until 180 days after entry into force of the decree and compliance by the manufacturers is required by the same deadline (Art. 12, 2).

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