

BRAVOSCAN

INTERPRETATION AND GUIDANCE NOTES

(This document should be read with the How to Use Chapter)

CHAPTER 12: PRODUCTS- Water Heaters

Subchapter: Electrical Certification of Fixed Electric Storage Water Heaters

Sub-Title: Why plumbing work does not authorise electrical disconnection, reconnection or certification

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BravoScan's position: A fixed electric water heater is not itself 'certified' by the electrical registered person. The registered person certifies the affected electrical installation, circuit and fixed connection to such a water heater in order to eliminate any associated risk attributed to the electrical installation or use of electricity. A plumber may lawfully perform the plumbing work, but may not disconnect, reconnect, modify or repair the electrical installation unless the plumber also holds the required electrical registrations and acts within their scope. A plumbing certificate does not replace an electrical Certificate of Compliance.

Purpose and scope

This guidance note explains the legal position why replacement, relocation or electrical repair of a fixed electric storage water heater (commonly called a geyser) must be separated into plumbing work and electrical installation work. It is directed at users, lessors, plumbers, insurers, facility managers, electrical contractors, registered persons and inspectors.

The note addresses conventional fixed electric storage water heaters and comparable fixed water-heating equipment connected to a premises' low-voltage electrical installation. A genuinely plug-connected point-of-use appliance may require a different analysis. The description 'geyser replacement' does not, however, remove the Electrical Installation Regulations where fixed conductors, supply terminals, an isolator, bonding, protective devices or the dedicated circuit are disconnected, connected, altered or repaired.

The essential legal distinction

The law regulates the work actually performed, not the trade label used by the contractor. A person does not acquire authority to perform electrical installation work merely because the electrical disconnection is incidental to plumbing work, because the connection appears simple, or because the water heater is being replaced on a like-for-like basis.

Role or document	What it covers	What it does not authorise or certify
Qualified plumber	The water-side installation: vessel supports, pipework, valves, pressure controls, discharge arrangements and associated plumbing requirements.	Electrical installation work merely because it is convenient or incidental to the plumbing work.

Role or document	What it covers	What it does not authorise or certify
Registered electrical contractor	Undertakes electrical installation work for another person under Electrical Installation Regulation 6 and the general control required by regulation 5(4).	Issuing the electrical CoC unless the issuer is also a registered person acting within the relevant registration scope.
Registered person	Inspects, tests and verifies the electrical installation and issues the CoC and approved test report within the person's registration scope.	The water heater's pressure-vessel design, the plumbing workmanship, or a plumbing certificate.
Electrical CoC	The electrical installation or affected part, including the fixed circuit and connection to the water heater's supply terminals.	The plumbing installation or the product's independent NRCS approval.
Plumbing certificate	The plumbing installation to the extent required by the applicable standard, professional-body rules, contract or municipal requirements.	Compliance with the Electrical Installation Regulations or SANS 10142-1.

Why the fixed connection is electrical installation work

The definitions in regulation 1 of the Electrical Installation Regulations, 2009 must be read together. They create a continuous statutory chain from the point of control to the water heater's supply terminals:

- An '**electrical installation**' includes machinery used for the transmission of electricity from a point of control to a point of consumption, together with articles forming part of the installation.
- A '**point of consumption**' includes the supply terminals of machinery not connected to a point of outlet and which converts electrical energy to another form of energy. A fixed electric water heater converts electrical energy into heat.
- '**Supply terminals**' are the terminals or connection clamps on the complete unit where the external supply conductors are terminated or connected.
- '**Installation work**' expressly includes the installation, extension, modification or repair of an electrical installation and the connection of machinery at its supply terminals.

Accordingly, disconnecting the fixed conductors from a water heater and reconnecting them to a replacement unit is not merely a plumbing convenience. It falls squarely within the statutory definition of installation work. Relocating the heater, extending the cable, replacing an isolator, changing the circuit protection, altering bonding, or changing associated control equipment is even more clearly an addition, alteration or repair of the electrical installation.

Who may undertake the electrical work

Electrical Installation Regulation 6(1) provides that no person may do electrical installation work as an electrical contractor unless registered as an electrical contractor. Regulation 5(4) further requires a registered person to exercise general control over all electrical installation work and prohibits any person from allowing that work without such control.

"No person may do electrical installation work as an electrical contractor unless that person has been registered as an electrical contractor in terms of these Regulations."

The legally safe appointment is therefore a registered electrical contractor who either employs a registered person full-time or is themselves both the electrical contractor and a registered person. A

trade qualification alone, the informal description ‘electrician’, or a plumber’s plumbing registration is not the same as registration under the Electrical Installation Regulations.

Dual-qualified persons: A plumber is not disqualified by the title ‘plumber’. If the person or business also holds the required electrical-contractor registration, and the electrical work is carried out under the general control of a registered person acting within scope, that person may perform both disciplines. The authority arises from the electrical registrations—not from the plumbing qualification.

Why a CoC is required:

The user or lessor must hold a valid CoC

Regulation 7(1) places the continuing duty on every user or lessor to have a valid CoC, accompanied by the approved test report, for the electrical installation. Regulation 7(4) requires a CoC for at least any addition or alteration made to an installation for which a CoC was previously issued.

Reconnection is prohibited before inspection, testing and certification

Regulation 8(2) is direct: no person may connect or permit the connection of a completed or partially completed electrical installation to the electricity supply unless it has been inspected and tested by a registered person and a CoC has been issued. The narrow exceptions concerning reconnection after non-payment or a change of tenant do not apply to a geyser replacement.

Only a registered person may issue the CoC

Regulation 9(1) reserves the issuing of a CoC to a registered person. Under regulation 9(2), the registered person must first satisfy themselves by inspection and testing that the applicable regulatory and standard requirements are met. Regulation 9(3) requires the registered person to refuse certification until any detected fault or defect has been rectified. Most importantly, regulation 9(4) requires any person who undertakes electrical installation work to ensure that a valid CoC is issued for that work.

“Any person who undertakes to do electrical installation work shall ensure that a valid certificate of compliance is issued for that work.”

These provisions apply even where the user already holds an older CoC for the premises. The existing certificate does not prospectively certify later work. The appropriate result is ordinarily a supplementary CoC identifying and certifying the affected work or part of the installation, supported by the required test report.

Practical application to common water-heater work

Activity	Legal character	Who may do it	Electrical certification outcome
Pipework, valves, tray, supports and discharge work only; no electrical conductor or terminal touched	Plumbing work	Competent/qualified plumber, subject to plumbing law and standards	No electrical CoC merely for untouched pipework; any separate plumbing certification remains applicable.

Activity	Legal character	Who may do it	Electrical certification outcome
Disconnecting fixed conductors from the old heater and reconnecting them to the replacement heater	Connection of machinery at its supply terminals; installation work	Registered electrical contractor under a registered person's general control	CoC and test report for the affected electrical work/part.
Like-for-like fixed heater replacement	Still ordinarily requires disconnection and reconnection at supply terminals	Plumber for water side; registered electrical contractor for electrical side	The phrase 'like-for-like' does not remove EIR 5(4), 6, 8(2) or 9(4).
Relocation of the heater; extension or rerouting of the circuit	Addition or alteration	Registered electrical contractor under general control	Supplementary CoC for at least the addition or alteration under EIR 7(4).
Replacement of isolator, cable, protective device, bonding or associated timer/controller	Modification or repair of electrical installation	Registered electrical contractor under general control	CoC and test report for the work; verify coordination with the existing installation.
Element or thermostat work involving electrical disconnection, reconnection or rewiring	Electrical repair work and potentially wiring between parts of a fixed appliance	Treat as electrical work unless performed through a demonstrably lawful appliance-servicing regime that does not involve electrical installation work	Where installation work is performed, EIR 9(4) requires a valid CoC for that work.
Plumber isolates only the water supply and leaves the electrical installation untouched	Plumbing work only	Plumber	No electrical CoC triggered by isolation of water alone.

Applicable standards and compulsory product requirements

SANS 10142-1 is incorporated into the Electrical Installation Regulations

Government Notice R.243 of 6 March 2009 incorporates SANS 10142-1, The wiring of premises - Part 1: Low-voltage installations, into the Electrical Installation Regulations. Section 44(3) of OHSA provides that an incorporated health and safety standard is deemed to be a regulation, to the extent that it is not repugnant to the enabling regulation. Section 44(4) generally carries later amendments or substitutions of the incorporated standard into the incorporation unless the notice states otherwise.

SANS 10142-1 addresses fixed appliances and water heaters, including the required means of disconnection, earthing and bonding, earth-leakage protection and dedicated-circuit requirements, as applicable. It also prescribes verification and certification requirements. Compliance cannot be established by visual observation alone; prescribed tests and competent judgment are required.

SANS 10254 expressly refers the electrical installation to SANS 10142-1

SANS 10254, the installation, maintenance, replacement and repair of fixed electric storage water heating systems, governs the water-heating system installation. Clause 4.4 requires the electrical wiring system to comply with SANS 10142-1 and requires the water heater to be connected to the electrical supply in an approved manner. SANS 10254 therefore does not give plumbers an alternative electrical standard or an exemption from the Electrical Installation Regulations; it directs the electrical part back to SANS 10142-1.

Pressure Equipment Regulations and SANS 151

Regulation 2(3)(h) of the Pressure Equipment Regulations, 2009 deals specifically with fixed electric hot-water storage containers of 15 litres to 450 litres operating at a maximum pressure of 600 kPa. Although that category is excluded from the remaining Pressure Equipment Regulations, the exclusion itself requires manufacture to SANS 151 and installation in accordance with SANS 10254. Government Notice R.262 of 24 March 2017 also lists SANS 151 and SANS 10254 among the incorporated South African standards for the Pressure Equipment Regulations.

For domestic hot-water storage tanks, the applicable NRCS compulsory specification, VC 9006, requires fixed electrical storage water heaters to comply with SANS 151 and requires NRCS approval before manufacture, import, sale or supply. Electrical Installation Regulation 5(2) separately prohibits the use of components that do not comply with the relevant standards and requires identifiable proof of compliance or available certification from the manufacturer or supplier.

Two different compliance questions: Product conformity asks whether the water heater itself is an approved, compliant product (for example under VC 9006/SANS 151). Installation conformity asks whether the circuit, protective measures, bonding, isolator and connection comply with the EIR and SANS 10142-1. A compliant product can be installed unlawfully or unsafely; a neat installation cannot cure a non-compliant product.

Occupational Health and Safety Act duties

Section 10: duties of suppliers and installers

Where an article is supplied for use at work, section 10(1) requires a designer, manufacturer, importer, seller or supplier to ensure, as far as reasonably practicable, that the article is safe, without health risk when properly used, and compliant with prescribed requirements. Section 10(2) requires the person who erects or installs the article to ensure, as far as reasonably practicable, that nothing about the manner of installation makes it unsafe or creates a risk to health when properly used.

These duties are especially relevant to workplaces, rental portfolios, commercial premises, facilities and installations used in connection with work. The EIR certification duties remain the direct and independent basis for electrical work in the installations to which the Regulations apply; a contractor cannot avoid them by characterising the premises as domestic or the electrical work as incidental.

Sections 22 and 39(5): sale of prescribed articles and proof

Section 22 prohibits the sale or marketing of an article, plant or machinery where a prescribed requirement or health and safety standard applies, unless the item complies with that requirement. Where a plumber, installer, retailer or contractor supplies the heater or regulated components as part of the job, this provision may be engaged in addition to the EIR and the NRCS regime.

Section 39(5)(a) creates an evidential presumption in a prosecution under section 22: once sale or marketing is proved, the article is presumed not to have complied at the time unless the contrary is proved. Section 39(5)(b) allows a certificate or statement purporting to be from an approved inspection authority to be accepted as prima facie proof of the facts stated in it. These provisions make documentary product and inspection evidence materially important.

Section 41: contracts do not override the Act

Under section 41, subject to the limited statutory exceptions, the requirements of OHSA are not displaced by a term in a contract. An insurer, managing agent, consumer or plumber cannot agree that

a plumbing certificate will stand in place of an electrical CoC, or that the user assumes the risk of uncertified electrical work, where the legislation requires otherwise.

Offences and regulatory consequences

Electrical Installation Regulation 15 makes contraventions of, among others, regulations 5, 6(1), 7, 8 and 9 offences, with the penalties stated in that regulation. Registration may also be affected under regulation 12 where the statutory grounds are present. The purpose of certification is therefore not merely contractual or administrative; it forms part of a criminally enforceable safety system.

Comparable Consumer Protection Act duties

Where the transaction falls within the Consumer Protection Act, 2008 (CPA), that Act supplements rather than replaces OHSA, the EIR and the standards. The following provisions are particularly relevant:

- **Section 54 - quality service.** A consumer is entitled to services performed in a manner and quality persons are generally entitled to expect, and to the installation of goods free of defects and of the expected quality. Work performed outside the statutory registration and certification system is difficult to reconcile with that standard. The consumer may require the defect to be remedied or a reasonable portion of the price refunded.
- **Section 55 - safe, good-quality goods.** Goods must be reasonably suitable, of good quality and in working order, durable for a reasonable period, and compliant with applicable standards under the Standards Act or other public regulation.
- **Section 56 - implied warranty of quality.** Producers, importers, distributors and retailers warrant that goods meet section 55. Within the statutory period, the consumer may require repair, replacement or refund for goods that fail the required standards, subject to the Act.
- **Section 57 - repaired goods.** A service provider warrants new or reconditioned parts installed during repair or maintenance, together with the labour to install them, for three months or a longer written period, subject to the statutory exceptions.
- **Section 61 - harm caused by goods.** Producers, importers, distributors and retailers may be liable for harm caused by unsafe goods, product failures, defects, hazards or inadequate warnings, irrespective of negligence, subject to the statutory defences. A service provider who supplies or installs goods while performing services is treated as a supplier of those goods, and multiple liable persons may be jointly and severally liable.

A quotation stating 'electrical connection by client' may allocate who must appoint and pay the electrical contractor, but it does not authorise a plumber to perform the electrical work or permit the heater to be re-energised without the required certification. Likewise, a waiver, disclaimer or consumer instruction cannot convert prohibited work into lawful work.

The proper coordinated workflow

1. Identify the scope before work starts. Determine whether the job is plumbing-only, whether fixed conductors must be disconnected, and whether the heater, circuit, isolator, bonding or controls will be moved or changed.
2. Verify the electrical appointments. Confirm the electrical contractor's current registration and the registered person's category and scope before the fixed electrical connection is opened.

3. Place the electrical work under general control. The registered person must exercise the control required by EIR 5(4); an after-the-fact signature by a person who had no lawful involvement should not be treated as an automatic cure.
4. Verify the product. Keep the make, model, serial number, rating plate details and available NRCS/standards conformity evidence for the heater and relevant components.
5. Complete the plumbing work. The plumber remains responsible for the water-side installation, including SANS 10254 requirements within the plumbing scope and any required plumbing certification or non-compliance notice.
6. Complete and test the electrical work. The registered person must inspect and test the affected installation, including the protective conductor and bonding, polarity, insulation, earth-leakage protection, circuit protection, isolator/disconnection and other applicable SANS 10142-1 requirements.
7. Issue the electrical documentation before energisation. The registered person issues the appropriate CoC and approved test report, accurately describing the affected part and work. If faults or defects are found, EIR 9(3) applies.
8. Hand over both disciplines' records. The user or lessor should receive the electrical CoC/test report and the applicable plumbing documentation, product evidence, warranties and instructions. Neither document substitutes for the other.

Guidance for users, insurers and facility managers

- Do not accept 'the plumber connected it' as evidence of electrical compliance.
- Do not treat the property's pre-existing CoC as certification of later water-heater work.
- Require the electrical contractor registration details and the registered person's details in the job pack.
- Require the supplementary electrical CoC and approved test report before final payment or re-energisation of the heater.
- Require product details and available NRCS conformity evidence, particularly where the heater is supplied by the contractor.
- Keep the plumbing and electrical scopes separate in quotations, work orders, SLAs and insurance authorisations.

Guidance for inspectors

When a fixed water heater has been replaced, relocated or electrically repaired, inspectors should establish who disconnected and reconnected the supply, whether the work was under a registered person's general control, whether a valid CoC and approved test report were issued, and whether the document accurately identifies the affected work. A plumbing certificate, invoice or statement that the replacement was 'like-for-like' is not proof of compliance with the EIR.

Where product conformity cannot be verified, Electrical Installation Regulation 5(2) must be considered. Where a fault or defect is detected, the inspector should apply the applicable inspection procedure and statutory reporting obligations, taking account of immediate danger, the user's continuing responsibilities, and the limits of the inspector's accredited scope.

Industry alignment

The joint statement issued by the Electrical Contractors Association of South Africa and the Institute of Plumbing South Africa on 28 August 2024 adopts the same functional division: plumbers should not

perform the electrical disconnection or reconnection of a fixed water heater unless properly qualified and registered for that work, and electrical work associated with replacement or relocation requires appropriate electrical certification. That statement is persuasive industry guidance; the legal duties arise from OHSA, the EIR and the incorporated standards.

Conclusion

A fixed electric storage water heater sits at the meeting point of two regulated disciplines. The plumber is responsible for the water-side installation. The registered electrical contractor and registered person are responsible for the electrical installation work, inspection, testing and electrical CoC. The fact that the electrical task may involve only a few conductors does not remove its statutory character or the electrical risks of shock, electrocution, fire, ineffective bonding or failed protective disconnection.

The compliant industry outcome is coordinated work and dual documentation where both disciplines are involved. No person should reconnect and energise a fixed water heater after electrical installation work unless the affected installation has been inspected and tested by a registered person and the required CoC has been issued.

Layperson summary: Your plumber may install the pipes, valves and geyser. The plumber may not connect the fixed electrical wires unless also properly registered for electrical contracting work. The electrical connection must be inspected and tested by a registered person, and an electrical CoC with a test report must be issued for the work. A plumbing certificate and an old house CoC are not substitutes.

Primary legal and technical sources

- Occupational Health and Safety Act 85 of 1993, especially sections 10, 22, 38, 39(5), 41 and 44. [Source](#)
- Electrical Installation Regulations, 2009, GN R.242, Government Gazette 31975 of 6 March 2009. [Source](#)
- Incorporation of Safety Standards into the Electrical Installation Regulations, 2009, GN R.243. [Source](#)
- Pressure Equipment Regulations, 2009, especially regulation 2(3)(h) and the definition of SANS 10254. [Source](#)
- Incorporation of health and safety standards into the Pressure Equipment Regulations, GN R.262, Government Gazette 40713 of 24 March 2017. [Source](#)
- Compulsory Specification for Hot Water Storage Tanks for Domestic Use (VC 9006), GN R.362, Government Gazette 37631 of 16 May 2014. [Source](#)
- SANS 10254: The installation, maintenance, replacement and repair of fixed electric storage water heating systems, including clause 4.4. [Source](#)
- SANS 10142-1: The wiring of premises - Part 1: Low-voltage installations, applicable current edition. [Source](#)
- Consumer Protection Act 68 of 2008, especially sections 53-57 and 61. [Source](#)
- ECA/IOPSA Joint Statement: Ensuring Safe and Compliant Plumbing and Electrical Installations, 28 August 2024. [Source](#)

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