

Nov 6, 2015

The Honourable Bruce McDonald  
Assistant Deputy Minister  
Public Safety Division, Municipal Affairs  
16th fl Commerce Place  
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Edmonton, AB  
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Dear Assistant Deputy Minister McDonald,

On behalf of the Canadian Prairie Chapter of the Irrigation Association, we appreciate your continued efforts regarding public safety and wish to bring a matter, we feel is of utmost importance, to your attention.

The Cities of Calgary and Edmonton, along with other towns such as Okotoks and Airdrie, have municipal codes requiring a testable backflow prevention device (DCVA) on all new construction that has in-ground irrigation.

The applicable provincial code is as follows:

All irrigation systems (including residential systems) installed within Alberta will be subject to the CSA B64.10-07/B64.10.1-07 section and installation of backflow preventers code and Clause 2,6,2,1,(3) in The National Plumbing Code of Canada 2010.

All testable devices will require permits, tests, and inspections for installations. This applies to any new installation. A retrofit with a new testable device will also require permits, test and inspection. Although management of annual testing may vary significantly across municipalities, it is still required as per the National Plumbing Code of Canada.

Connection of Systems The National Plumbing Code of Canada 2010 2.6.2.1

5.8.2 In-ground irrigation systems

Any outlet used to dispense potable water from the water distribution system to supply an in-ground irrigation system shall be protected against backflow caused by back siphoning with the following:

a) for systems without injection of chemicals:

- i. a PVB device installed upstream of the irrigation system shut-off or other control valves and at least 300 mm above the highest point of the irrigation system; or
- ii. a DCVA backflow preventer installed upstream of the irrigation system shut-off or other control valves **{note that this is a change of what is being currently enforced}**; or

b) for systems with injection of chemicals, an RP backflow preventer installed upstream of the irrigation system shut-off valves.

**\*\*ANNUAL TESTING TO BE DONE AS PER THE CSA B64.10-07/B64.10.1-07 AND IS THE RESPONSIBILITY OF THE OWNER. \*\***

New residential construction that has in-ground irrigation since 2012 is required to have a DCVA. New homes without irrigation do not require a testable device.

Irrigation Association certified contractors are not only committed to protecting the health and safety of their customers, they are also committed to the advancement of efficient irrigation through best management practices and continued education. If these contractors do not follow all local, provincial, national laws and regulations, they would lose their certification.

However, we are concerned about some contractors that are installing non-testable backflow devices in residential sites without following Alberta codes. Unfortunately, this penalizes those irrigation contractors who are following the correct procedures and applicable codes.

The Canadian Prairie Chapter of the Irrigation Association looks forward to working with you and your office in advancing public safety and offer the following first steps to ensure that all installed backflow prevention devices are installed to meet the appropriate code:

- We request that the Alberta government and utilities send out notices to all irrigation contractors and customers in Alberta reminding them to follow code when installing or when having an in-ground irrigation system installed by installing and testing a DCVA (Double Check Valve Assembly) upstream of the irrigation shut-off valve. It is important for consumers to understand the public safety ramifications for not installing or improperly installing backflow prevention devices.
- We would like to work with your office in promoting legislation that state clear bylaws regarding backflow devices on all Irrigation systems for all municipalities.
- We request that dual check devices (not an approved backflow prevention device) be restricted from use on new commercial and residential structures within Alberta if connected to in-ground irrigation.
- We request support from the Alberta government on provincial fines, in addition to mandated city bylaws, so that the people of Alberta continue to have safe drinking water.

We look forward to collaborating with you and your office in promoting public safety. The irrigation industry continues to make significant advancements in promoting safe drinking water, water conservation and water-use efficiency. Following codes is one of the ways we do this. It is important to us and the consumer that these codes continue to be followed and respected. For your information, we have also enclosed the Irrigation Association's code of ethics for certified contractors.

If you have any questions or wish to explore this issue further, please contact the Canadian Prairie Chapter of the Irrigation Association at 403.828.5134.

Sincerely,

Shane Williams  
President of the Canadian Prairie Chapter of the Irrigation Association

## IA Code of Ethics:

<https://www.irrigation.org/Certification/COE.aspx>

Certified irrigation professionals agree to:

- Uphold the integrity of the irrigation industry.
- Protect public health and safety.
- **Comply with all local, state, national laws and regulations.**
- Adhere to the concepts of free enterprise.
- Follow fair and honest business practices including legitimate representation of my personal capabilities, experience, certifications and licenses.
- Apply ethical business practices to all contractual and warranty obligations.
- Use responsible procedures in the design, installation, maintenance and management of irrigation systems.
- Promote best management practices for water, soil and energy through efficient and cost-effective irrigation system design, installation, maintenance and management.
- Work to gain respect and recognition for the irrigation industry at the local, regional, national and international level.