

**Ceardchumann Cónasc**  
6 Gardiner Row, Dublin 1.

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Fax: 01 8747048  
Email: [info@connectunion.ie](mailto:info@connectunion.ie)  
Web: [www.connectunion.ie](http://www.connectunion.ie)

**connect**  
**TRADE UNION**

Paddy Kavanagh *General Secretary/Treasurer*



The Secretariat,  
The Labour Court,  
Lansdowne House,  
Lansdowne Road,  
**Dublin 4.**

***For the attention of Ms. Marian Cassidy.***

30<sup>th</sup> July, 2019.

Dear Secretariat,

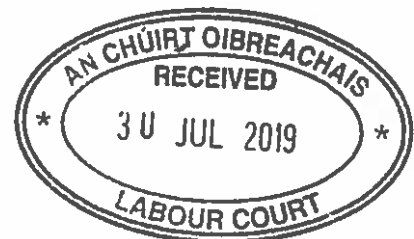
Please find enclosed a joint application seeking an examination of the Mechanical Engineering Building Services Contracting Sector (as defined by S.I. No. 59 of 2018), with a view to securing a variation to the Sectoral Employment Order.

Should you require any further information please do not hesitate to contact the applicant parties.

Regards.

Brian Nolan,  
Assistant General Secretary.  
Connect Trade Union.  
Tel; 01 8719 911

Thomas Fitzgerald,  
Regional Officer,  
Unite the Union.  
Tel; 01 8980912



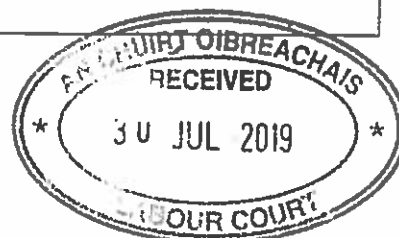


## THE LABOUR COURT

### INDUSTRIAL RELATIONS (AMENDMENT) ACT 2015

#### APPLICATION FOR A REQUEST to EXAMINE THE TERMS AND CONDITIONS OF EMPLOYMENT IN A SECTOR

Name of applicant:	<b>Connect Trade Union &amp; Unite the Union Joint Application</b>
Address:	<b>(Appendix 1.)</b>
Contact Number:	<b>(Appendix 1.)</b>
Email Address:	<b>(Appendix 1.)</b>
Sector:	<b>Mechanical Engineering Building Services Contracting Sector as defined by S.I. No. 59 of 2018 (Appendix 2.)</b>
Class, type or group of workers to which the request relates:  <b>Qualified Plumbers and Registered Apprentice Plumbers (Craftsperson) and Qualified Pipefitters and Registered Apprentice Pipefitters (Craftsperson) working in the Sector as defined in S.I. No. 59 of 2018.</b>	
Please enter details of the arrangements (if any) by which terms and conditions relating to remuneration and any sick pay scheme or pension scheme, of the workers in the sector to which the request relates are determined:  <b>Terms &amp; Conditions of employment within this sector are currently determined by a National Collective Employment Agreement (which is negotiated by the both aforementioned Union and the MEBSCA Employer Group under the auspices of the Workplace Relations Commission) parts of which are protected by S.I. No. 59 of 2018.</b>	
Where the applicant is a trade union of workers, please enter the name and address of any other trade union of workers that is representative of workers in the sector to which the request relates:  <b>The applicants are the trade unions of workers representative of workers in the sector.</b>	
Where the applicant is a trade union of workers, please enter the name and address of any trade union of employers or organisation of employers that is representative of employers in the sector to which the request relates:  <b>MEBSCA (c/o Construction Industry Federation) Construction House Canal Road Dublin 6</b>	

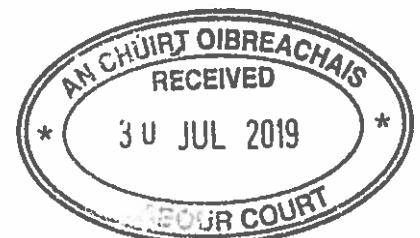


Signature of Applicant: P. Kaveri

Date: 30-7-19

**Appendix 1. Contact details of the applicants.**

<b>Applicant 1</b>	<b>Applicant 2</b>
Connect Trade Union	Unite the Union
6 Gardiner Row	55/56 Middle Abbey Street
Dublin 1	Dublin 1
Republic of Ireland	Republic of Ireland
Tel; 01 8747047	Tel; 01 8980912
Email; construction@connectunion.ie	Email; thomas.fitzgerald@unitetheunion.org




## Appendix 2. Sector Definition

For the purposes of this application the definition of the sector is taken directly from S.I. No. 59 of 2018 and states the following;


For the purposes of this Sectoral Employment Order the Mechanical Engineering Building Services Contracting Sector means the sector of the economy comprising the following economic activity:— *“The installation, alteration, fabrication, fitting, repair, maintenance, commission, removal and demolition in any building or its sites of articles, fittings, pipes, containers, tubes or instruments, storage facilities, etc. (including central heating apparatus, central plant apparatus, machinery and fuel containers connected thereto) for heating, cooling, including domestic hot and cold water systems, medical and process gases, process pipe services, utility pipe services and compressed and vacuum services of such buildings.”*



Statutory Declaration in accordance with the Statutory Declarations Act, 1938

a) Name of Applicant: Connect Trade Union	
b) Position held by the Declarant: General Secretary	
c) Registered Address of the Applicant within the State: Connect Trade Union, Head Office, 6 Gardiner Row, Dublin 1	
d) Number of workers of the class, type or group to which the request relates who are members of the trade union of workers on whose behalf the request is made:  circa 4067	
e) Number of workers of the class, type or group to which the request relates who are normally employed in the sector to which the request relates:  Circa 11,000	
f) The declarant's means of knowledge of the matters referred to at paragraphs (d) and (e):  (d) Refers to the number of workers of the class, type or group who are in membership of the Connect Trade Union. (e) Information supplied by DKM Consultant's Report 2016 (Demand for Skills in Construction 2020) estimated that there was 8,700 workers of the class, type or group to which the request relates in 2015. When we apply the overall construction employment increases from the central Statistics Office (+25.3%) arising from research conducted by the applicant unions, we estimate that current numbers of workers of the class type or group to which the request relates is circa 10,900.	

Signed;

  
Paddy Kavanagh General Secretary

Date: 30/7/19

  
Commissioner for Oaths

Date: 30/7/2019

Sean Kenny  
Practising Solicitor  
81 Eccles Street  
Dublin 7

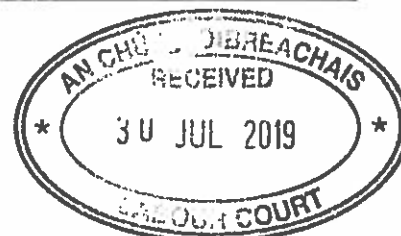


## THE LABOUR COURT

### INDUSTRIAL RELATIONS (AMENDMENT) ACT 2015

#### APPLICATION FOR A REQUEST to EXAMINE THE TERMS AND CONDITIONS OF EMPLOYMENT IN A SECTOR

Name of applicant:	Unite the Union (Connect Trade Union Joint Application)
Address:	(Appendix 1.)
Contact Number:	(Appendix 1.)
Email Address:	(Appendix 1.)
Sector:	Mechanical Engineering Building Services Contracting Sector as defined by S.I. No. 59 of 2018 (Appendix 2.)
Class, type or group of workers to which the request relates:  <b>Qualified Plumbers and Registered Apprentice Plumbers (Craftsperson) and Qualified Pipefitters and Registered Apprentice Pipefitters (Craftsperson) working in the Sector as defined in S.I. No. 59 of 2018.</b>	
Please enter details of the arrangements (if any) by which terms and conditions relating to remuneration and any sick pay scheme or pension scheme, of the workers in the sector to which the request relates are determined:  <b>Terms and conditions of employment within this sector are currently determined by a National Collective Employment Agreement. The terms of this agreement are negotiated by the aforementioned Unions and the MEBSCA Employer Group, directly and under the auspices of the Workplace Relations Commission. Key elements of the collective agreement and other terms and conditions of employment are provided for within S.I. No. 59 of 2018.</b>	
Where the applicant is a trade union of workers, please enter the name and address of any other trade union of workers that is representative of workers in the sector to which the request relates:  <b>Connect Trade Union, 6 Gardiner Row, Dublin 1,</b>	
Where the applicant is a trade union of workers, please enter the name and address of any trade union of employers or organisation of employers that is representative of employers in the sector to which the request relates:  <b>MEBSCA (c/o Construction Industry Federation) Construction House Canal Road Dublin 6</b>	

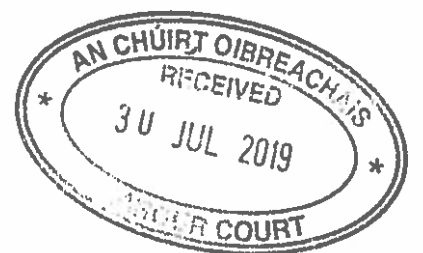


Signature of Applicant:

Thomas Fitzgall

Date:

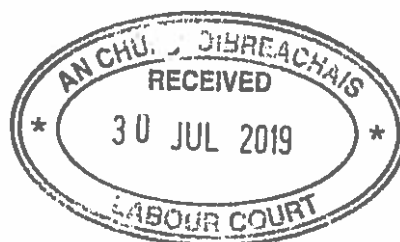
25 / 07 / 2019





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Unite the Union	Connect Trade Union
55/56 Middle Abbey Street	6 Gardiner Row
Dublin 1	Dublin 1
Republic of Ireland	Republic of Ireland
Tel; 01 8980912	Tel; 01 8747047
Email; thomas.fitzgerald@unitetheunion.org	Email; construction@connectunion.ie

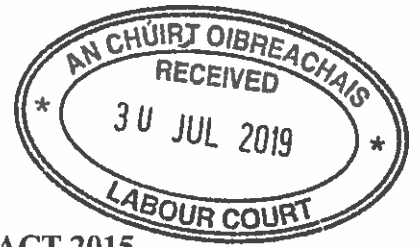


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STATUTORY DECLARATION

THE INDUSTRIAL RELATIONS (AMENDMENT) ACT 2015

I Brendan Ogle , Senior Officer of Unite the Union, whose principle place of business is 55-56 Middle Abbey Street, Dublin 1 aged 18 years and upwards make oath and say as follows:-

1. I say that I am the Senior Officer of Unite the Union in the Republic of Ireland.
2. I further say and believe that Unite the Union holds a negotiating licence.
3. The address of Unite the Union is 55-56 Middle Abbey Street, Dublin 1.
4. The number of workers of the class, type or group to which the agreement relates who members are of Unite the Union is 3,620.
5. I say the total numbers which are members of the class, type or group to which the request relates is approximately 3,620.
6. I say and believe that the DKM Economic consultant's report 2016 (Demand for Skills in Construction 2020) estimates that 8,700 workers of the class, type or group to which the request relates for 2015. When we apply the overall construction employment increases from the Central Statistics Office (+25.3%) arising from research conducted by Unite the Union we estimate that current numbers of workers of the class, type or group to which the request relates is circa is 10,900.
7. I make this declaration from facts within my own knowledge save where otherwise appearing and whereso appearing I believe same to be true and pursuant to the provisions of the Statutory Declarations Act 1938

SWORN by the said **Brendan Ogle**  
on the 24<sup>th</sup> day of July 2019  
at 16 Dame Street Dublin 2  
in the City of Dublin  
before me a Practising Solicitor and I know the  
Deponent/the Deponent was identified to me by

Brendan Ogle  
Senior Officer  
Unite the Union

PRACTISING SOLICITOR

Andrew Turner  
Hamilton Turner Solicitors  
24 JUL 2019  
66 Dame Street  
Dublin 2