

30 December 2011

Mr Cornelis De Groot

Energy Safety - Principal Gas Supply Engineer
Western Australia Government

Sent via Email cornelis.degroot@commerce.wa.gov.au

Dear Cornelis

Re: Tethering of LP Gas Bottles – Domestic Installations

Reference: A. A Shared Responsibility – The Report of Perth Hill Bushfires – February 2011 Review -
(*Keelty Report*)

LPG Australia requests that in relation to the recommendations at Reference A and the matter of '*tethering of LP gas bottles*', the Western Australian Government – Energy Safety and the Gas Technical and Regulatory Committee (GTRC) adopt a broader consultative approach through the medium of the Standards Australia – Standards Review Committee for AS/NZS 5601.1.2010 (5601) *Gas Installations*, prior to the release of any form of regulatory direction or GTRC recommendation to the Standards Review Committee.

Following a review of Reference A and similar findings in the Victoria Bushfire Report, LPG Australia is unable to identify any community safety benefit to installing restraint devices for the purpose of '*tethering of LP gas bottles*'.

LPG Australia offers the following supporting comments:

Comments

LPG Australia accepts in principle the findings of the *Keelty Report*, supported by substantial evidentiary understanding of LPG cylinders and their behaviour in bush fires, and has no objection to the release of a guidance document as an example of good practice - being one method of complying with the relevant sections set out in *AS/NZS 1596:2008; the storage and handling of LP gas (AS1596)*, cognisant of the following considerations:

- a. LPG installations do not cause fires, do not contribute to fires and are designed to survive horrific bushfire scenarios.
- b. Cylinder restraint in bushfire prone areas has not been mandated for all installations. Current practice requires installers to make a considered assessment - in general, history has shown this to be adequate.
- c. Mandatory restraint for all installations is unnecessary and would simply place further and significant costs on the LPG industry for no community net benefit. The cost would ultimately be borne by our consumers.

- d. The requirements set out in AS1596 have proven to be sufficient to cater for most accidental cylinder dislodgement by flooding or seismic activity. Even the most extreme events, as recently experienced in the Queensland floods which destroyed roads and bridges, sweep away entire buildings and Christchurch with its earthquakes, have demonstrated that cylinders which may have been dislodged did not prove to be a threat to the community.

Where a cylinder has ruptured, the Industry is in agreement that this is at the closing stages of the fire (after the fact). At this point any building which collapses where the cylinders become dislodged i.e. tethering having served no purpose, has been totally destroyed and the intensity of such a fire would provide a natural barrier of distance to anyone who may be impacted following the failure.

The *Keelty Report* acknowledged that in the selected examples LPG was not a contributing factor. This is consistent with report findings from other interstate fire disasters. Where 'cause and effect' is considered in the context of the *Keelty Report*, or any other report where LPG cylinders have been involved, LPG cylinder failures are the result of circumstances, never the cause.

The LPG Industry invests significant resources into providing LPG awareness training sessions to all emergency response agencies. Our attitude is that by providing advice and guidance covering emergency scenarios, that this will increase awareness and provides greater confidence and hence community safety in managing situations such as rural bushfires. This strategy should be further enhanced and supported by all State Governments and the GTRC. The *Keelty Report* appears to support his consideration, being highly critical of the poor performance of the emergency response agencies.

The proposed introduction of an *Inter-Agency Emergency Services Act* will be a welcome initiative once implemented.

Cornelis, this letter is not intended to be obstructive. LPG Australia is seeking broader consultation before the Western Australian Government or the GTRC take further action in relation to the *Keelty Report*. The LPG industry would un-reservedly support any improvements, based on evidentiary understanding of LPG cylinders and their behaviour in bush fires, in safe storage at consumer premises. To react where there are significant increases in costs with no improvement in safety serves no valid purpose.

Please do not hesitate to contact Mr. Bruce Pollock Chairman of the LPG Australia Safety Standards and Technical Committee at bpollock@kleenheat.com.au, or myself should you require further information.

Yours sincerely,



Michael Carmody
Chief Executive Officer

Distribution: Mr. Luke Van Baaren. Senior Engineer - Gas Supply – WA Government
Mr Enzo Alfonsetti - Chairman, AS5601 Standards Australia Committee and Manager Type A Gas Appliance Safety – Energy Safe Victoria

For Information:
LPG Australia Safety Standards and Technical Committee
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