



31 March 2014

EnergySafety
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Via EnergySafety email: energysafety@commerce.wa.gov.au

See Distribution

GAS ENERGY AUSTRALIA SUBMISSION
ENERGYSAFETY WESTERN AUSTRALIA
AMENDMENTS 2014 GAS STANDARDS
(GASFITTING AND CONSUMER GAS INSTALLATIONS)
REGULATIONS 1999

Dear Sir,

Gas Energy Australia appreciates the opportunity to make a submission to EnergySafety Western Australia on the proposed *Amendments 2014 Gas Standards (Gasfitting and Consumer Gas Installations) Regulations 1999* (GSR 1999).

Gas Energy Australia is the national peak body which represents the bulk of the downstream gaseous fuels industry which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain, including refiners, fuel marketers, equipment manufacturers, vehicle converters, and the providers of services to the industry.

Gas Energy Australia supports the proposed amendments to the GSR 1999 relating to advances in technology and work practices. The implementation of this proposal to include connections from the supply container valve (cylinder) to the first stage regulator, commonly referred to as pig tails, into the Class G permit scope of work, will formalise an industry practice which has been carried out by Class G, base level permit holders since the introduction of LPG cylinders.

Gas Energy Australia views this proposal as a positive move towards achieving improved safety, recognising that any consumer may, and do, procure replacement pigtails and fit these items with no form of authorisation or gasfitting permit.

Gas Energy Australia notes that Western Australia is the only jurisdiction which defines a consumer installation as being from the outlet of the supply cylinder valve. All other jurisdictions align with the Australian Standard AS5601 – Gas Installations, which clearly describes the consumer installation beginning at the outlet of the first stage regulator.

Recommendation

Gas Energy Australia supports the proposed amendments to the GSR 1999 relating to advances in technology and work practices.

Gas Energy Australia further recommends that EnergySafety Western Australia investigate alignment to AS5601 to ensure harmonisation and consistency across Australia, specifically in relation to the definition of the consumer installation.

For your earliest consideration and advice.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Carmody', with a horizontal line underneath.

Mike Carmody
Director and Chief Executive Officer
Gas Energy Australia

Distribution: Gas Energy Australia Standards Management Committee
 Gas Energy Australia Safety Standards and Technical Committee

For information:

Gas Energy Australia State Representatives
Gas Energy Australia Secretariat