



Government of **Western Australia**
Department of **Commerce**
EnergySafety

Discussion Paper

Review of gas compliance badge usage on fixed installations

Gas Utilisation

Closing date for comment 27 June 2016

Reference ES1134/2009/A14245109

EnergySafety Division
Department of Commerce
303 Sevenoaks Street Cannington Western Australia 6107
Locked Bag 14 Cloisters Square WA 6850
Telephone: (08) 6251 1900
Facsimile: (08) 6251 1901
Email: energysafety@commerce.wa.gov.au
Web: www.energysafety.wa.gov.au

Purpose

This discussion paper has been prepared to seek input from a wide range of stakeholders on whether compliance badges should continue to be a mandatory requirement for gas fitters to affix to fixed consumer gas installations.

Note: This discussion paper does not consider or include reference to compliance badges on non-propulsive installations in caravans and boats or compliance plates on mobile engines.

Comments are invited and need to be submitted by 27 June 2016 by either completing the web survey or the attached survey form.

Reference Documents

GSA72	<i>Gas Standards Act 1972</i>
GSR99	Gas Standards (Gasfitting and Consumer Gas Installations) Regulations 1999

Legislation

The requirement of the GSA72 relating to gas fitting on consumer gas installations is implemented by the GSR99.

With the repeal of the previous 1983 regulations on 1 May 1999, the GSR99 contained the requirement for a notice of completion and compliance badge in regulation 28: Obligations on completion of gasfitting work.

The first and second sub-regulations read as follows

1) This regulation applies to a registered gas fitter who does or supervises particular gasfitting work or a particular part of gasfitting work to be done on the whole or part of a gas installation except —

- (a) servicing a consumer's gas installation; or*
- (b) gasfitting work to rectify a defect specified in a notice of defects.*

(2) When the particular gasfitting work is completed the registered gas fitter must attach an approved badge or label in an approved place relative to the part of the gas installation on which the work was done or that is affected by the work.

With the repeal of the previous GSR99 on 30 July 1999 the previous sub regulation (3) was deleted and the following substituted to read as follows:

(3) The registered gas fitter must give a notice of completion of the gasfitting work in accordance with this regulation.

Sub regulations following and up to the fifth relate to the registered gas fitter completing the notice of completion within 48 hours, giving it to relevant parties and certifying compliance.

The sixth sub-regulation reads as follows

(6) The Director may, in a particular case or class of case, exempt a registered gas fitter from sub regulation (2) or (3).

The same regulation was retained in the current version (14 August 2015) of the GSR99.

Background

The Department of Commerce, EnergySafety Division (EnergySafety) predecessor, The Office of Energy, published a special edition of the Energy Bulletin in May 1999. This bulletin introduced the GSR99 in Western Australia (WA) and labels that were to be placed in the front of books of notices of completion.

These new labels were approved and intended for general use in the following:

- Fixed installations, such as: in
 - Class G general installations.
 - Class I industrial and commercial installations.
 - Class P fuel dispensing installations.
- Mobile non-propulsive installations (Class G) such as in caravans, campervans and boats.
- Mobile engines (Class E - LP Gas, compressed natural gas and liquefied natural gas installations) required a different label which was produced as a metal plate.

Prior to the release of these new labels, separate labels had been available.

EnergySafety considered at the time that the compliance badges were necessary as hardcopies of the notices of completion for a gas installation were submitted to gas suppliers and other parties. These were not easily retrievable as the responsibility for storage of the notices of completion lay with the gas supplier or other party.

EnergySafety has, since 1999 continued improving and producing compliance badges for fixed installations. Metallic compliance badges have been available from EnergySafety since August 2003. Figure 1 shows the current approved compliance badge that is used by gas fitters for fixed installations.



 EnergySafety WA  Gas Standards Act 1972 - Compliance Badge	
Gasfitting work: New Connection <input type="checkbox"/> Pipework <input type="checkbox"/> Additional Work <input type="checkbox"/> Appliance Connection <input type="checkbox"/> Repair Work <input type="checkbox"/> Commissioning <input type="checkbox"/>	NOC No.: Variation/ Exemption No.:
Installation address/registration number of mobile for non-propulsive purposes:	
I confirm that this gasfitting work complies with the Gas Standards Act 1972 and its regulations.	Work Completion Date:
Registered Gas Fitter's Name:	Gas Fitter's No.:
<small>ESWA G013 1008</small>	

Figure 1: Current EnergySafety approved compliance badge

The majority of Australian State and Territory gas regulatory authorities such as NSW, Queensland, Tasmania, ACT and Northern Territory require compliance badges whereas the minority such as Victoria and South Australia do not.

Victoria and South Australia do however have in place a means of submitting an electronic notice of completion to the state authority who maintain a database of such notices and the details that are contained therein. On completion of gasfitting work, a gas fitter can complete an electronic copy of the notice of completion which in addition to the state authority, is also provided to the gas supplier and the consumer. It is understood that these details are retrievable on request from interested parties.

In Western Australia EnergySafety is developing an IT facility for electronic lodgement of notices of completion and intends releasing this shortly for general gas fitter usage. This facility will enable EnergySafety and gas suppliers to retrieve details of lodged notices of completion for their customers as necessary.

On an international scale, there were no references found to a requirement for compliance badges to be affixed to gas installations in countries such as:

- United Kingdom;
- New Zealand; and
- Canada.

The case 'for' compliance badges

The case for the affixing of compliance badges includes but is not limited to the following:

1. Most details of the gas installation and the gas fitter are captured on a completed badge, such as in the following:
 - name and gas fitter number;
 - completion date of gasfitting work;
 - the type of work done, for example, new connection or additional work or repair work;
 - the extent of the work done, for example, installation or commissioning or pipework or appliance connection;
 - the number of the Notice of Completion that is associated with the gas installation;
 - any variation/exemption that was applicable to the gas installation;
 - the gas installation address; and
 - a declaration by the gas fitter that the work complies with the *Gas Standards Act 1972* and its regulations.
2. The notice of completion for an installation does not have to be sourced either from EnergySafety or the relevant gas supplier unless a more intensive investigation is to be conducted by an inspector requiring other details that are not on the badge/plate
3. The information inscribed on a compliance badge by a gas fitter must be clear otherwise a notice of defect may be issued by EnergySafety to the gas fitter requiring rectification.
4. The notice of completion and compliance badge contains a declaration by the gas fitter that the installation complies with all statutory requirements. A copy of the notice of completion is given to the consumer by the gas fitter. This protects the consumer if problems arise later as a result of a faulty installation.
5. The compliance badges are approved and easily purchased by the gas fitter at a nominal cost (less than \$4.00 each) from EnergySafety and plumbing suppliers.
6. The compliance badges are a permanent visual record attached to the gas installation for the consumer, gas inspector and gas fitter who may follow.
7. Insurance claims by a consumer may be refused without a copy of a notice of completion or a compliance badge affixed to an installation confirming authorised gasfitting work has occurred.
8. The compliance badge is of metal and affixed permanently to the fixed gas installation.
9. The affixed compliance badge is evidence of the compliance of the fixed gasfitting installation. This is the case even when the copy of the original notice of compliance received from a gas fitter for the gas installation work was lost by the consumer or could not be retrieved from the regulatory gas authority.

The case 'against' compliance badges

The case 'against' the affixing of compliance badges includes but is not limited to the following:

1. The details of the gas installation on the compliance badge are a duplicate of those on the notice of completion.
2. Additional time is required for inscribing the badge and affixing it to the gas installation by the gas fitter.
3. The compliance badge indicates a subset of the information on the notice of completion, the remaining administrative details such as the appliances installed, gas fitter's business address, phone numbers and licensing class of gasfitting are not available.
4. The details on the compliance badge are available from other sources, e.g. consumer's or gas supplier's copy of the notice of completion. Note: for LP Gas installations there are a number of gas suppliers and the original fuel gas source may not be known or have changed.
5. There is a cost to industry with time and money spent in purchasing and maintaining a stock of compliance badges obtained from plumbing suppliers or EnergySafety.
6. The information inscribed on a compliance badge by a gas fitter may not be clear, or be faded or illegible.
7. The compliance badge locations on an installation are sometimes difficult to find for the consumer.
8. One of the most common areas of non-conformance reported by gas suppliers in completed gas installations inspected is that of gas fitters not affixing compliance badges.
9. A recent survey conducted by EnergySafety of northern and southern locality residential gas installations in the Perth metropolitan area found that of the compliance badges examined; 68% were duly completed, 22% had information missing and 10% were illegible. So approximately a third of the compliance badges that were affixed were found unsatisfactory.

It was established that none of the residential consumers surveyed had referred to the compliance badge for any particular reason.
10. A gas fitter submitting a notice of completion electronically using EnergySafety's online facility would need to generate the notice number for inscribing on the compliance badge by either:
 - Lodging the notice while on site; or
 - Creating a draft notice before going to site.

Conclusion

The discussion paper has outlined the associated purpose, legislation, background and the cases for and against compliance badges continuing to be affixed to fixed consumer gas installations in Western Australia.

Your input is sought on whether this requirement should continue. You are invited to send any comments in the web survey or by submitting a hardcopy of the attached survey.

Your responses will be considered and a recommendation made to the Director of Energy Safety to retain or rescind the requirement to affix compliance badges.

Stakeholder comment

Review of gas compliance badge usage on fixed installations

Please return any comments you may have by the 27 June 2016 by completing the web survey or alternatively completing this form and sending it to:

Principal Engineer Gas Utilisation
email: energysafety@commerce.wa.gov.au
Fax: (08) 6251 1901
Post: EnergySafety
Locked Bag 14
Cloisters Square WA 6850

- 1 Should the compliance badge be retained for;
- Residential gas installations Yes No
 - Commercial gas installations Yes No
 - Industrial gas installations Yes No
 - LP Gas dispensing installations Yes No

Comment _____

- 2 Do you know anything about or have you seen any gas compliance badges that were used in gas installations?
- Quite a lot.
 - A moderate amount.
 - A slight amount.
 - Nothing at all.

Comment _____

- 3 Were you previously aware that the affixing of a compliance badge by a gas fitter after completing gasfitting installation work is mandatory in WA?
- Fully aware.
 - Moderately aware.
 - Slightly aware.
 - Not aware.

Comment _____

- 4 Do you consider a compliance badge on a residential consumer gas installation to be of some use to you or anyone else?
- Extremely likely.
 - Moderately likely.
 - Slightly likely.
 - Not likely.

Comment _____

- 5 Do you consider a compliance badge on an industrial or large commercial appliance gas installation to be of some use to you or anyone else?
- Extremely likely.
 - Moderately likely.
 - Slightly likely.
 - Not likely.

Comment _____

- 6 Do you consider a compliance badge on an LP Gas fuel dispensing installation of a service station to be of some use to you or anyone else?
- Extremely likely.
 - Moderately likely.
 - Slightly likely.
 - Not likely.

Comment _____

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- 7 Have you ever had an insurance claim refused for a gas installation because you could not produce a copy of a notice of completion or an image of an affixed compliance badge?
- Not at all, since no claim in this regard has been made.
 - Only once.
 - A number of times (two or more).

Comment _____

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- 8 Would you keep an electronic copy of a notice of completion for gasfitting work done on your premises if you were given one by a gas fitter?
- Extremely likely.
 - Moderately likely.
 - Slightly likely.
 - Not likely.

Comment _____

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- 9 Would it be a problem for you if you had to find out the details of the fixed gas installation on your premises from a gas supplier or EnergySafety?
- Extremely likely.
 - Moderately likely.
 - Slightly likely.
 - Not likely.

Comment _____

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- 10 Which or the following best describes you?
- Registered gas fitter.
 - Designated gas inspector. Gas supplier or network operator.
 - Gas Industry Reference Group. Training organisation.
 - Owner/operator of industrial or large commercial gas appliances.
 - Owner/occupier of residential premises Plumbing and gas fitting firm. State Government bodies such as the Building Commission, Plumbers Licensing Board, Building Management and Works, Department of Transport and the like.
 - Private organisations.
 - Strata community representative.
 - Building owner/manager.
 - State Government organisation that has premises such as in public housing and the like.
 - Real Estate Institute of Western Australia Master Builders Western Australia Other.

Comment _____

- 11 Would you like to make any other comments about gas compliance badge usage in fixed gas installations in WA?
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Thank you for completing this survey.