

Revised January 2008

Re-issued in 2022

Filling of User Owned, Portable Refillable LPG Cylinders at Autogas Refuelling Sites

It is our advice that user owned, portable LPG cylinders should not be refilled at autogas refuelling sites.

- Vessels which are attached to a vehicle for heating or cooking (on camper vans or similar) present similar risks on filling to those for propulsion purposes and may be permitted to be re-filled at autogas refuelling sites provided they:
- remain in-situ for refilling; and
- are fitted with a device to physically prevent filling beyond 80%; and
- are connected to a fixed filling connector which is not part of the vessel.

UK Health and Safety law, particularly the Health and Safety at Work Act, the Dangerous Substances and Explosive Atmospheres Regulations and the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations, impose significant duties on the site operator to ensure safety. Autogas refuelling sites are places of work and their personnel have responsibility for safety to everyone on the site, including the general public. They authorise the flow of gas from the dispenser and they may be considered, in law, the filler.

Safe filling of LPG cylinders requires appropriate expertise and/or equipment. Staff at autogas refuelling sites cannot fulfil statutory obligations as they have neither.

Were there to be any accident the site operator could be liable to prosecution.

This view has been confirmed in the Minutes of the HSE Petroleum Enforcement Liaison Group meeting of 7th July 2005 which states "PLAs should consider issuing a prohibition notice if their inspectors discover a site which allows members of the public to refill gas cylinders".

Liquid Gas UK

Status of Liquid Gas UK Consumer Guidance Sheet (CGS). The Consumer Guidance sheets serve as guidance prepared and issued under the authority of Liquid Gas UK; the contents have the same status as a Code of Practice so members of Liquid Gas UK are expected to conform to the information provided. Liquid Gas UK guidance is sometimes written in collaboration with UK policy makers, therefore regulatory inspectors may choose to use the guidance to establish good practice and compliance.

Disclaimer of liability: Liquid Gas UK shall not be liable for any loss of business or profits, nor any direct, indirect or consequential loss or damage resulting from any such irregularity or inaccuracy for information, or use of the guidance provided by the association.

Editions of LPGA and UKLPG guidance sheets published before 2019, together with any amendments, remain valid until superseded by a new edition.

Copyright © 2019 by LIQUID GAS UK. All rights reserved. No part of this publication may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopy, without permission from the publisher.