

Guideline for operating plant – LPG delivery networks

An LPG delivery network includes the components relating to the supply of LPG to a consumer or another person in the business of distributing LPG in fuel gas containers (i.e. cylinders and tanks).

The safety matters concerning LPG delivery network operators relate specifically to the equipment, sites and activities you are using or operating to safely manage and run your delivery network.

The network includes any part of the supply or an activity incidental to the supply of LPG that is carried out by the operator, such as:

- all containers at the depot/s
- all containers throughout the network including those in transit to the consumer
- containers at the consumers' premises (supplied by the network either as exchange or in-situ fill)
- filling, storing or delivery of containers of LPG to a consumer or to a distributor
- bulk delivery of LPG to a container.

Obligation holder

The operator of an LPG delivery network is the person responsible for ensuring the effective management of safety under the *Petroleum and Gas (Production and Safety) Act 2004* (the Act).

Safety requirements

All LPG delivery network operators are required to ensure storage and handling of LPG, including installing and handling fuel gas containers, complies with the requirements of AS/NZS 1596:2014 'The storage and handling of LP gas'.

In addition, the Act prescribes safety management system (SMS) requirements for operating plant (including many LPG delivery networks). Once completed, your SMS provides a clear statement of how you intend to manage your business safely to minimise risks to the public and to your employees. The SMS also helps to clearly identify who is responsible for safety.

The SMS requirements differ depending on the total capacity of fuel gas containers in your LPG delivery network (measured in equivalent litres water capacity) and the nature of activities you undertake in running your LPG delivery network.

For example, operators of small LPG delivery networks with a total capacity of below 5,000L are generally not required to have a specific safety management plan (SMP). Operators of large LPG delivery networks with a total capacity greater than 12,000L must make, implement and maintain a SMP that complies with section 675 of the Act.

Operators of small to medium LPG delivery networks with a total capacity of between 5,000L - 12,000L are also required to make, implement and maintain a SMP that complies with section 675 and may adopt a generic SMP available online.

Table 1 lists LPG delivery network categories and their related safety management requirements.

Distribution network examples that may apply to you

Example 1: You are an agent of an LPG product supplier and you handle the containers and receive a handling fee from the supplier (customers are invoiced directly by your supplier). In this instance you are part of the product supplier's LPG delivery network and you will be working under the suppliers SMP. However, your site must adhere to the requirements of AS/NZS 1596:2014.

Example 2: You run your own business and provide LPG fuel gas containers to your own customers and invoice them directly for this service. In that case you are operating and running your own LPG delivery network and you must develop and maintain an SMP related to the total capacity of your LPG delivery network (refer to Table 1).

Table 1: LPG Delivery network capacity/activity and safety requirements

LPG delivery network category (network capacity / network activity)	Related safety requirements
0 - 5,000L capacity	Must comply with AS/NZS1596:2014
0 - 5,000L capacity and includes the filling of LPG containers with a water capacity of more than 30L	Must make SMS complying with section 675 of the Act required (may adopt generic SMS) Must comply with AS/NZS1596:2014
5,000 - 12,000L capacity and may include the filling of LPG containers with a water capacity of more than 30L	Must make SMS complying with section 675 of the Act required (may adopt generic SMS) Must comply with AS/NZS1596:2014
Greater than 12,000L capacity	Must make SMS complying with section 675 of the Act required. Must comply with AS/NZS1596:2014

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