



## Newsletter- July 2020

### Resources Safety & Health Queensland

The *Resources Safety and Health Queensland Act 2020* (RSHQ Act) was passed by Parliament in March 2020, establishing an independent statutory body named Resources Safety & Health Queensland (RSHQ). The Petroleum and Gas Inspectorate is part of this new independent statutory body. RSHQ, as the new independent regulator became operational on 1 July 2020.

RSHQ's vision of Zero Serious Harm will be achieved through engagement, regulation, education and assisting industry to meet its obligations to protect and promote safety and health of persons from risks associated with petroleum and gas, as well as other industry sectors regulated by RSHQ.

The Petroleum and Gas Inspectorate will continue to collaborate and support industry to achieve this vision.

For more information, visit the website at [www.rshq.qld.gov.au](http://www.rshq.qld.gov.au)



## Biogas

The Petroleum and Gas Inspectorate regulates safety and health for biogas operating plant. There are over 60 biogas sites in Queensland. The lead inspector for biogas is Principal Inspector Tony O'Connor (Email - [tony.oconnor@rshq.qld.gov.au](mailto:tony.oconnor@rshq.qld.gov.au))

Tony will continue to develop the Petroleum and Gas Inspectorate's approach to regulating safety and health with the key sector. This approach includes the development of:

- Updated guidelines for the production and use of biogas
- Inspection checklists
- Health risk assessment of biogas sites

The Inspectorate recently conducted an engagement with a regional Queensland council. The engagement was conducted onsite at a sewage treatment plant with council employees; including plant operators, engineering staff, gas installers and supervisors.



Council was advised of the requirements for the plant to implement and maintain a Safety Management System that complies with section 675 of the *Petroleum and Gas (Production and Safety) Act 2004* and appointment of staff to the statutory positions.

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## Unauthorised Removal / Temporary Relocation of Gas Meters

COVID-19 has resulted in more people staying home with some undertaking household renovations. In recent months, the Petroleum and Gas Inspectorate has become aware of situations where gas meters and services have been removed or temporarily relocated at domestic residences without engaging a qualified gas fitter or consulting the gas supply company.

Figure 1: Unauthorised temporary meter



The removal or relocation of meters can have serious safety risk implications, as the gas service remains 'live'.

### Gas Work Licence Holder Safety Obligations

If a gas work licence (GWL) holder identifies that the gas supplier's distribution system has been altered, they must advise the homeowner that this work is unauthorised and the gas supplier needs to be alerted to ensure that their system is safe.

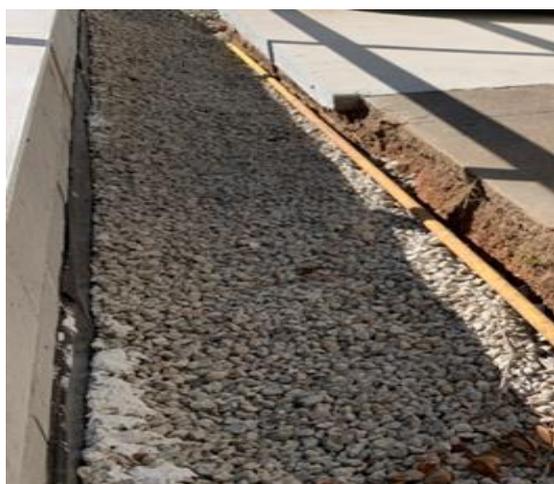


Figure 2: Unauthorised exposure of service line

If a GWL holder has a safety concern relating to a gas system, they must give the owner and the gas supplier notice of the non-compliance or risk (safety concern) in the approved form (defect notice). A defect notice is not required for concerns of the gas supplier's plant.

If a GWL holder believes there is an imminent risk of material harm to persons or property they must also:

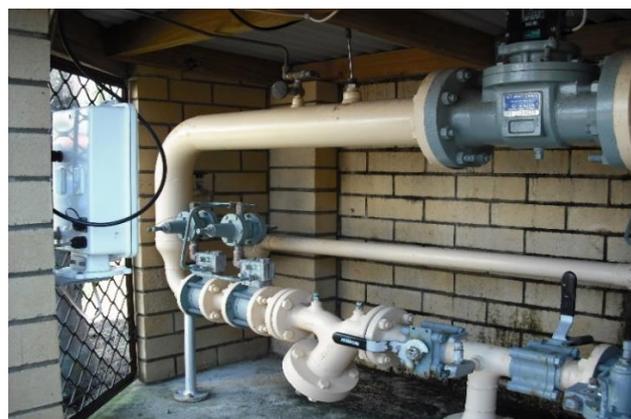
- take appropriate measures to avoid, eliminate or minimise the risk, and
- immediately telephone the gas supplier and the Petroleum and Gas Inspectorate on 1300 910 933 to report the risk and measures taken.
- If a GWL holder needs to contact APA (natural gas supplier) re this issue or submit a compliance certificate they can send this information to [gldapaadmin@apa.com.au](mailto:gldapaadmin@apa.com.au).

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## Gas Measurement

The measurement of petroleum and fuel gas is a requirement under Chapter 8 of the *Petroleum and Gas (Production and Safety) Act 2004* and places obligations on the controller of the meter to ensure that the measurement device is compliant. The measurement device includes other relevant equipment and not just the meter including gas pressure regulators, pressure and temperature transmitters and any correction device.

Measurement is critical at key points in the gas industry supply chain including all locations where custody transfer occurs and measuring the gas used in compressor station engines and flares. One key element is to achieve an assurance for the end user that the energy they use is accurately measured.



In addition, for petroleum producers, accurate measurement is required to determine the royalty collected by the State. Petroleum and Gas Inspectors have focused their audits and inspections on key industry sectors.

For several years, the Inspectorate's audit focus was on eight distribution companies and more recently, six production companies.

In the coming 12 months the Petroleum and Gas Inspectorate's audit focus will be on transmission pipeline companies.

## Well inspections

Petroleum and Gas Inspectors from the Townsville and Rockhampton offices conducted inspections of plugged and abandoned coal seam gas (CSG) wells in the Mount Saint Martin and Mount Leslie area.

The integrity of coal seam gas well is covered in the *Code of Practice for construction and abandonment of coal seam gas and petroleum wells and associated bores in Queensland*. The inspections were conducted using the requirements of the Code of Practice.



Eight sites were inspected for compliance, including wellhead site safety and security, road access and surface marking of abandoned well. While some minor issues were observed by inspectors and raised with the operator for rectification, the majority of the sites complied with the Code of Practice.

## *Petroleum Well Regulation*

The 2019/2020 petroleum well regulation work focussed on abandonment and well integrity. This proactive work consisted of audits, inspections and engagements.

The work incorporated 12 abandonment audits, which found 91% compliance with mandatory requirements of the Code of Practice. The work, highlighted areas for improvement, both in the data submitted in abandonment reports and the implementation of abandonment work.



This year 250 well inspections were planned and completed despite the impacts of bushfires and COVID-19. As part of the inspection program, approximately 7% of the wells had integrity records verified against legislative requirements and operator's well integrity management systems. The majority of inspected wells had no significant safety concerns.



The main petroleum well regulatory engagement conducted throughout the year was the updated revision of the construction and abandonment code of practice. This process involved consultation with industry and other stakeholders. The main aim of the update was to keep the code accurate and up to date. The new revision was published in December 2019.

For more information, visit the website at [www.rshq.gov.au](http://www.rshq.gov.au)



## *Inspections of gas systems in recreational vehicles*

Gas work licence (GWL) holders play a major role in ensuring gas safety by ensuring gas systems they install, alter or inspect are compliant. Concerns have been raised in relation to the number of gas system defects that are not being identified during inspections of gas systems in recreational vehicles (caravans and boats).

Recreational vehicles with a gas system must be inspected and a gas compliance certificate issued prior to being sold or for change of ownership. Where a non-compliance or safety concern is identified by the GWL holder, a gas system defect notice must be issued and state what work is required to make the system compliant.



Inspections must be conducted to assess the gas system against the requirements of:

- AS5601-2004 'Gas installations - For gas system installations and/or alterations' prior to 31 December 2004; and
- for gas system installations and/or alterations after 31 December 2004 the version of AS/NZS5601.2 'Gas installations Part 2: LP Gas installations in caravans and boats for non-propulsive purposes' prescribed at the date of the gas work (date the gas system was installed); and
- the gas appliance Manufacturer's Installation Instructions. It has been a long-standing requirement in AS5601 for gas appliances to be installed in accordance with the manufacturer's instructions (currently AS/NZS5601.1 clause 6.2.2).

For more information visit the website at [www.rshq.gov.au](http://www.rshq.gov.au) or email [gassafe@rshq.qld.gov.au](mailto:gassafe@rshq.qld.gov.au)

## *Installing gas appliances in accordance with instructions*



Further to the newsletter article in the July 2019 issue, 'Gas fitters need to read the book', a diligent gas work licence (GWL) holder identified a situation that could have ended in disaster.

When removing a gas under-bench oven, the GWL holder was concerned by the scorch marks on the cabinetry base (see photo). After checking the oven manufacturer's installation instructions the GWL holder identified that this appliance requires an opening to be cut in the base panel under the oven burner position.

A Gas System Defect Notice was issued to the homeowner and the Inspectorate was contacted. This situation has now been rectified and a potential house fire was avoided.

It has been a longstanding requirement in AS5601 for gas appliances to be installed in accordance with the manufacturer's instructions (currently AS/NZS5601.1 clause 6.2.2). It is an important safety reminder that AS/NZS5601 provides the minimum requirements, and manufacturer's installation instructions provide requirements specific to the appliance.



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## *Technical information for gas device (type B) approval*

The Petroleum and Gas Inspectorate has identified an inconsistent approach to the content and format of technical information provided for compliance assessment of Type B gas devices.

The document or file that provides this information is commonly referred to as a 'technical submission'. The technical submission can be prepared by the device manufacturer, importer or installer.

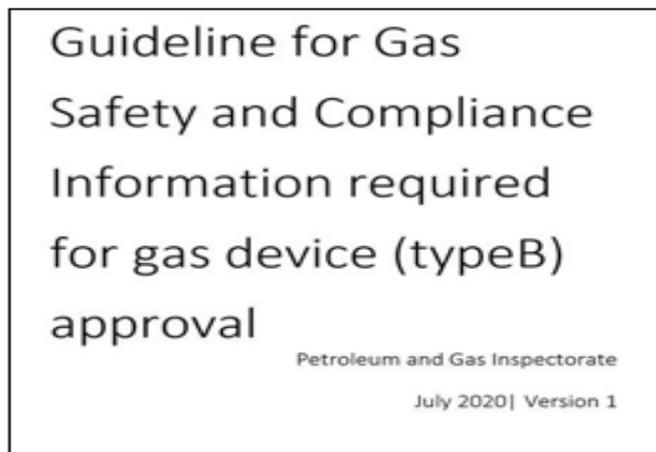
All persons involved in the design, construction and installation of a Type B device will need to contribute to the information required.

When prepared, the technical submission is presented to a Type B Gas Device Approval Authority (GDAA). If the GDAA believes compliance has been demonstrated they issue a Gas Device (Type B) Approval Certificate, allowing the installation and use of the device.

Where the technical submission does not contain adequate information or is not presented in an auditable format, the GDAA

should reject the submission and advise that compliance has not been demonstrated.

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## ***Gas Device Approval Authorities (GDAA) – New approach***

Gas Device Approval Authorities (GDAA) are responsible for approving gas devices, Type A and Type B for supply, installation and use. They form a critical part of ensuring gas safety for the public and gas device users.

The Inspectorate has been undertaking a review of the approval and appointment process for Gas Device Approval Authorities. The purpose of the review is to reflect current practices. Major changes to existing arrangements are not proposed. The review has included amendments to the *Petroleum and Gas (Production and Safety) Act 2004* to create a regulatory framework similar to that for gas work licences and authorisations.

The new regulatory framework will provide transparency for application, appointment and conditioning the approval of a GDAA. The new framework will also improve processes used to approve gas devices in Queensland.

The new framework will be implemented in late 2020.



## Major Consumers

The Petroleum and Gas Inspectorate conducts inspections of major consumers on a regular basis to ensure safety and compliance with the *Petroleum and Gas (Production and Safety) Act 2004* (the Act). Workplace Health and Safety Queensland (WHSQ) and Petroleum and Gas Inspectorate have joint jurisdiction where both legislation requirements apply and major consumers are required to operate under a safety management system.

A place or part of a place, where the total maximum gas consumption capacity of all gas devices at a place is 50 GJ/hour or more is classified as a major consumer.

An inspection conducted by Regional Inspector Mark Henderson and Senior Inspector Grant Owen at the Braemar 2 Power Station provided the opportunity to ensure compliance with the Act for relevant parts of the plant (see image below)



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## LICENSING

The Petroleum and Gas Inspectorate is working on a project to transition from the current compliance books to paperless certificates. Further details on this initiative will be communicated over the coming months.



Key features of the paperless certificate project may include:

- allowing gas work licence holders to complete a certificate using their mobile device
- the ability to email the completed certificate to the owner and network provider
- a transition period where you will be able to use up your current books before progressing to paperless certificates.

A 'Survey Monkey' will be coming to GWL holders in the coming months so you can tell us what you think about this exciting initiative.

## PENALTY INFRINGEMENT NOTICES

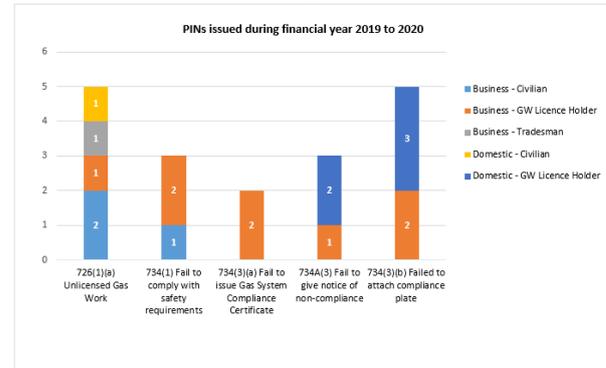
Penalty Infringement Notices (PINs) are an important enforcement tool inspectors use to encourage people to act lawfully and discourage unlicensed or unsafe gas work.

During 2019/2020, the Inspectorate issued 18 PINs to eight persons for gas work offences at domestic and business premises including:

- unlicensed gas work
- failure to comply with safety requirements
- failure to issue a Gas System Compliance Certificate
- failure to give notice of non-compliance
- failing to attach a Gas Compliance Plate.

Of these eight persons:

- four were licensed Gas Work Licence (GWL) holders
- three were civilians
- one was a tradesperson without a GWL



*PINs issued during financial year 2019 to 2020*

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