

Feedback Form

Hydrogen Safety Code of Practice Consultation Draft

Petroleum and Gas Inspectorate

May2022

# Hydrogen safety policy proposals for consultation

Please use the template below to provide feedback on the Draft Hydrogen Safety Code of Practice and policy proposals

Please provide feedback to [hydrogensafety@rshq.qld.gov.au](mailto:hydrogensafety@rshq.qld.gov.au) by **24 June 2022**

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| **Feedback form – Draft hydrogen safety code of practice** | | |
| **Company or Entity Name:** | |  |
| **Representative Name/Email:** | |  |
| **Feedback on Policy Proposals**   * If accepted do the proposals enable effective safety regulation for the hydrogen industry? * Are there any unnecessary barriers created by the policy proposals? * Are there any gaps the draft Code has not addressed? | | |
| **PROPOSAL** | | **FEEDBACK** |
| A7.1 Prescribed quality of hydrogen  The prescription of *AS/ISO 14687 Hydrogen fuel quality - Product specification* (AS/ISO 14687) in s72 of the P&G Safety Reg provides a specific and relevant requirement for the quality and composition of hydrogen when supplied as a fuel gas, equivalent to what already applies to Liquid Petroleum and natural gas. | |  |
| A7.2 Hydrogen gas distribution systems  Where the hydrogen component of fuel gas is outside the scope of AS/NZS 4645, the following alternative method of compliance is proposed.  Section 675(1)(e) of the P&G Act provides a method for formal safety assessment which can be applied to a gas distribution system. The chief inspector could receive notification of the formal safety assessment prior to supply commencing.  Where hydrogen is supplied to a gas distribution system, the operators shall ensure that the risks are managed to an acceptable level. This includes ensuring quality is maintained within agreed limits | |  |
| A7.3 Prescribed odour  Section 7 of the Code provides an alternative means of achieving safety outcomes for supply of unodourised hydrogen fuel gas.  An **operator** is able to supply unodourised hydrogen to a consumer, if:   * the supply is to a vehicle or vessel through a dispenser, or * they have obtained a copy of the gas compliance certificate (GCC), and * that GCC shows that the system being supplied to is safe for use with unodourised fuel gas.   Other than for supply to a mobile fuel cell gas system, where a consumer requires fuel gas to be supplied unodourised, the **system owner** must:   * obtain approval for the [gas device](#_Acronyms_and_definitions_1) from an appropriate [GDAA](#_Acronyms_and_definitions_1) * ensure the gas system being supplied to is designed for unodourised fuel gas supply by a suitably qualified engineer * have an [appropriately authorised person](#_Acronyms_and_definitions_1) install the gas system in line with system design and device approval and issue a GCC * operate and maintain the gas system safety in line with the approval requirements including any conditions imposed * retain evidence of the approval and GCC for the operating life of the gas system.   For supply to a mobile gas system the **owner of the vehicle or vessel** must:   * ensure the mobile [fuel cell gas system](#_Acronyms_and_definitions) is certified (approved) to *UN Regulation No. 134 – Hydrogen fuel cell vehicle safety* (UNR 134) or approved by an appropriate GDAA * ensure the fuel cell gas system is installed by an appropriately authorised person (i.e., holder of an appropriate GWA) * retain evidence of the UNR 134 certification or GDAA approval and GCC for the life of the gas system * for commercial vehicles and vessels, retain records of the twelve monthly inspections of the fuel cell gas system. | |  |
| A7.4 Fuel Gas Delivery Network Operating Plant  A proposed future amendment to regulation would define all hydrogen delivery networks as operating plant. | |  |
| A7.5 Gas Device Approval  The code proposes the use of **Reference standard** and the process outlined in [Figure 2](#_Approval_of_gas). | |  |
| A7.6 Gas System Installation  The code proposes the use of **Reference standard** and the process outlined in [Figure 2](#_Approval_of_gas). | |  |
| A7.7 Type B Multiple Device Approval  A provision for a GDAA holder to approve multiple type B devices and on the same approval.  Additionally, the Chief Inspector may issue a blanket approval and publish this on a Queensland Government website (e.g. for a specified model of an imported vehicle certified to UN R134). | |  |
| A7.8 New and Updated Terms  A definition for ***fuel cell gas system*** be included. This will enable specific requirements relevant to be prescribed, e.g., it will ensure the approval process for a hydrogen fuel cell considers the entire system in which it will operate so all operational components which present safety risks, including production and storage, are assessed.  A definition for ***reference standard*** be included. There are a number of Australian and International standards that are relevant for ensuring hydrogen applications operate safety. Initially, it is proposed these hydrogen standards may be used achieve safety outcomes.  ***Gas fuel systems*** are defined as “A gas system that supplies gas as a fuel to an engine”.  It is proposed to amend the definition of a gas fuel system to include fuel gas supplied to a mobile fuel cell. | |  |
| **GENERAL FEEDBACK** | | |
| **CLAUSE #** | **COMMENT (including recommendations)** | |
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