

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 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?
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|  **PROPOSAL** | **FEEDBACK**  |
| A7.1 Prescribed quality of hydrogenThe 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 systemsWhere 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.
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| 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 ApprovalThe 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 TermsA 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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