

|                                    |               |                               |            |
|------------------------------------|---------------|-------------------------------|------------|
| <b>Health and Safety Executive</b> |               | <b>Operational Circular</b>   |            |
|                                    |               | <b>OC 440/37</b>              |            |
| <b>Review Date</b>                 | 26/08/2015    | <b>Open Government Status</b> | Fully Open |
| <b>Version No &amp; Date</b>       | 2: 26/08/2005 | <b>Author Unit/Section</b>    | CACTUS     |

Target Audience:  
HSE Inspectors  
Gas Officers

## **GAS SAFETY IN TOURING CARAVANS, MOTOR-CARAVANS, CARAVAN HOLIDAY-HOMES AND RESIDENTIAL PARK-HOMES**

This OC gives provides guidance/information on gas safety in leisure accommodation vehicles and residential park-homes. Unless otherwise specified the term caravan will be used.

### INTRODUCTION

1 CACTUS records show that, between 1/4/1996 and 31/3/2004, eleven people died from carbon monoxide poisoning in 'caravans' from appliances fuelled by liquefied petroleum gas (LPG). It is thought that other cases may have gone unreported.

### WHAT IS A CARAVAN

2 The term caravan covers tourers, motor-caravans and caravan holiday- homes, collectively known as leisure accommodation vehicles, (LAV) and residential park-homes (RPH). They are described in more detail in the following paragraphs together with the **current** applicable standards for construction and gas safety. Note - as standards are regularly updated always check with British Standards on-line <http://www.bsonline.bsi-global.com> for the standard in force at the time the caravan was built or upgraded.

### LEISURE ACCOMMODATION VEHICLES

#### **Tourers**

3 Tourers are those seen on the road being towed by cars. They are built to BS EN 1645 and must meet the requirements for the construction and use of road vehicles.

#### **Motor-caravans**

4 Motor-caravans incorporate the living accommodation similar to that of a touring caravan on to a motor base vehicle and are therefore designed specifically for touring. They are built to BS EN 1646 and must meet the requirements for the construction and use of road vehicles.

#### **Caravan holiday-homes**

5 Caravan holiday-homes are designed specifically for holiday accommodation on licensed caravan holiday parks. Because of their size and weight they are delivered to the park by transporters. They are manufactured with wheels solely to manoeuvre them on site. They are built to BS EN 1647.

### **Current gas safety standards**

6 LPG systems are covered by BS EN 1949.

7 Safety ventilation requirements are covered by BS EN 721.

### **RESIDENTIAL PARK-HOMES**

8 Park-homes are designed for permanent residential accommodation. They are still caravans, even though they have pitched tiled roofs and may appear similar to a brick built bungalow. Because of their size and weight they can only be delivered by transporters, sometimes in two halves which are then bolted and secured together when in situ. They are built to BS 3632.

### **Current gas safety standards**

9 Ventilation is covered by BS 3632.

10 LPG installations are covered by BS 5482-1 and BS 5440-1 and the flues and terminals by BS 715.

11 Natural gas installations are covered by BS 6891 and BS 5440-1 and the flues and terminals by BS 715.

### **LIQUEFIED PETROLEUM GAS**

12 The majority of appliances found in caravans will be fuelled by LPG; the generic name for commercial butane and commercial propane.

13 Butane is not suitable for installations subject to low external temperatures and is therefore mainly used for tourers and motor-caravans. There is no standardised colour for butane cylinders, blue, yellow/ochre, white are common.

14 Propane is ideal for outside storage and therefore used to supply residential park-homes and caravan holiday-homes. Although often supplied in red cylinders it may also be supplied in cylinders of orange or other less common colours. Patio gas propane, an increasing market, is supplied in green cylinders. Bulk storage vessels at the customer's (e.g. caravan park operator) premises are normally coloured white or green.

### **NATURAL GAS**

15 In some caravan sites natural gas is supplied from a gas conveyor's local distribution network. National Grid PLC (formerly TRANSCO) is the largest network owner but there are now a number of other significant operators. Often there is a

bulk meter at the site boundary from which the gas is then conveyed around the site to each caravan in pipes. The pipes on the site could be owned by the gas conveyor or by the park operator.

16 In certain circumstances, the pipes on the site may be part of a network as defined in the Gas Safety (Management) Regulations 1996 (GSMR) and subject to GSMR, including safety case requirements.

17 The end of the network is at the first emergency control valve (as defined by The Gas Safety (Installation and Use) Regulations 1998 (GSIUR) and defines the cut-off point between GSMR and GSIUR. If the pipes are on the network and owned by the upstream gas conveyor, then they should be covered by their safety case. If the park operator owns the pipes then they may be required to produce a GSMR safety case.

18 [OC 440/28](#) provides further guidance on the liaison between HID and FOD on gas safety matters. HID is responsible for GSMR safety case matters.

### ENFORCING AUTHORITY

19 [Appendix 1](#) provides guidance on the appropriate enforcing authority (EA) for complaints relating to gas safety and for fatal and major injuries that are reported to HSE under the RIDDOR Regulations. An incident reportable under RIDDOR does not necessarily attract duties under gas safety legislation e.g. where a dutyholder is not implicated.

### APPLICATION OF THE GAS SAFETY REGULATIONS

20 All references in this OC relate to The Gas Safety (Installation & Use) Regulations 1998, which came into force on 31/10/1998. See [OC 440/33](#) for incidents that predate these Regulations. Guidance on GSIUR is contained in L56. Listed below are some specific references to caravans:

- (1) In Regulation 2(1) the guidance relating to a 'supplier' states that a caravan park operator who provides gas to caravans via a storage vessel becomes the 'supplier.' If the park operator supplies gas in cylinders, they share 'suppliers' responsibilities with the gas company to which they are contracted.
- (2) Privately owned caravans, used for touring, are excluded from the Regulations (Reg 2(5)(e)). Note however that RIDDOR Reg 6(1) incidents occurring in them are reportable to the HSE Incident Contact Centre (ICC). Inspectors coming across such incidents may need to prompt the responsible person to submit a report as they are often unaware that the incident has occurred.
- (3) The situations mentioned below are all subject to GSIUR:

- Touring/motor caravan hired out in the course of a business.
  - Permanently sited caravan (hired out or otherwise) on a holiday-home park, residential park-home or similar site, including a farm.
  - Caravan used as an annex to permanent accommodation e.g. as a granny flat.
  - Caravan used as temporary residential accommodation for workers on, for example, a building site or farm.
  - Caravan used in the course of a commercial undertaking e.g. a roadside café or where serving food through the hatch at a sporting or entertainment venue.
- (4) Regulation 3(8) applies to installation and repair work carried out by caravan manufacturers where it is known that the end use of the caravan is covered by the Regulations e.g. will be hired out in the course of a business;
  - (5) Regulation 7 covers the protection of gas fittings against damage. Fittings in touring caravans need to be securely fitted and supported to avoid damage from movement etc and fittings, service pipework and vessels in caravans sited near the sea may need protection against corrosion from salt spray;
  - (6) Where holiday lets are for less than 28 days the Landlord must display the gas safety record prominently in the caravan – Reg 36(6)(b);
  - (7) Regulation 37(1) covers the duties of a [‘supplier’](#) of LPG in the event of an escape of gas from a storage vessel, service pipework or a gas fitting;
  - (8) Regulations 37(2)&(3) cover the duties of the ‘responsible person’ if they become aware of an escape of gas into a caravan. The responsible person being the occupier or, where the caravan is empty, the caravan owner.

### Portable Appliances

21 GSIUR does not cover the majority of portable appliances but, where mobile space or cabinet heaters are used in caravans, they are subject to the provisions of Regs 3, 35 and 36. However as British Standards for the installation of space heating in LAV’s and RPH’s do not include portable appliances they should not normally be found.

22 In the event of a landlord or installer supplying a portable heating appliance while, for example, the fixed heating system is being repaired, they may be in breach

of HSWA Section 3 or Consumer Safety legislation if the appliance can be shown to be unsuitable for the purpose used. Trading Standards Officers should be consulted with regard to consumer safety issues.

## LIAISON WITH THE INDUSTRY

23 There are a number of organisations providing information to both private owners on safe use and maintenance of gas appliances in their caravans and to caravan owners and park operators regarding their responsibilities as Landlords. Some of the main players are listed below.

### **British Holiday and Home Parks Association (BH&HPA)**

24 BH&HPA [www.bhhpa.org.uk/](http://www.bhhpa.org.uk/) membership is made up of the owners and managers of park-home estates, touring and tenting parks, caravan holiday-home parks, chalet parks and all types of self-catering accommodation.

25 BH&HPA also works closely with the National Caravan Council (NCC) to promote gas safety e.g. they jointly produced with CORGI a booklet entitled 'A practical guide to Gas Safety for Caravan Park Owners and Operators.' The BH&HPA member handbook contains a section on gas safety which emphasises the need to use a CORGI registered installer for gas work.

### **Calor Gas**

26 The Calor Gas website at [www.calor.co.uk](http://www.calor.co.uk) links to Caravanning online which leads to advice on gas safety and the use of LPG.

### **Caravan Industry Training Ltd (CITO)**

27 CITO [www.cito.org.uk](http://www.cito.org.uk) provide ACS training to the standard required for those who need to be CORGI-registered. For Park staff the usual assessment taken is the Core Domestic Gas Safety Assessment LPG (CCLP1) plus the sector assessments for the areas concerned. Sector codes are: LAV for leisure accommodation vehicles and RPH for residential park homes. Four appliance assessments are also usually taken and these are tailored to meet the type of appliance that may be encountered e.g. a closed flue gas fire can only be checked by a person holding HTRLP 2. Other training provided by CITO covers:

- Awareness training/advice on gas safety for park operators to ensure they stay within the law e.g. an operator can replace a hose, connecting a re-fillable container to installation pipework, providing they are 'competent' (Reg 3 (4) refers).
- Approved Code of Practice based training for work that requires competence but is outside the scope of the GSIU Regs such as tourer and motor-home maintenance on non-hired units.

### **Council for Registered Gas Installers (CORGI)**

28 CORGI publish/produce the following in respect of gas safety in caravans:

- Manual entitled 'Liquefied Petroleum Gas including Caravans and Boats (GID 9).
- Form CP2 – Leisure Industry Landlord's Gas Safety Record.

### **Institute of Gas Engineers and Managers**

29 The IGEM publish a booklet entitled 'Gas Installations for caravan holiday homes, residential park homes and permanently moored boats. (IGE/UP/8 Communication 1647).

### **LP GAS Association**

30 Information and advice on a range of LPG issues plus codes of practice and technical memoranda can be found at [www.lpga.co.uk](http://www.lpga.co.uk) and, in particular, under the:

- 'Publications' link, advice to caravan owners and park operators is contained in COP 21 'Guidance for safety checks on LPG appliances in caravans.' Note that access to a PDF version of COP 21 and other COP's is available on the INTRANET at <http://intranet/collections/lpga-codes/index.htm>
- 'Uses' link is LPGA/HSE working in partnership guidance for farmers using LPG in caravans.

### **National Caravan Council**

31 The NCC is a trade body for the UK caravan and motor home industries [www.nationalcaravan.co.uk](http://www.nationalcaravan.co.uk). In respect of gas safety the NCC:

- Provides a 'Stay Safe' leaflet that gives advice on the inspection and testing of gas installations in privately owned caravan holiday-homes.
- Operates a certification scheme that ensures that an example of any leisure accommodation vehicle carrying their badge has been inspected and met all the relevant European/British standards at the time it was inspected.
- Provides a booklet entitled 'A practical guide to Gas Safety for Caravan Park Owners and Operators.'

### **The National Parks Homes Council**

32 The NPHC is a specialist division of the NCC and a trade body for residential park homes. [www.theparkhome.net](http://www.theparkhome.net). It represents the interests of manufacturers, dealers, park owners and suppliers to the industry. In respect of gas safety the NPHC provides the following to park operators and owners:

- Booklet entitled 'A practical guide to Gas Safety for Caravan Park Owners and Operators.'
- 'Stay safe' leaflet that gives advice on Inspection and testing of natural and LP gas installations for residential park homes.
- Operates a self-certification scheme that ensures that each model of any residential park home carrying their badge has been inspected and been self certified by the manufacturer confirming that all the relevant British Standards at the time were met.

#### ENQUIRIES

33 For further help or advice contact CACTUS, Nottingham or Northampton .

#### FURTHER READING

OC 440/30 – Gas Safety Procedure and Enforcement Advice

OC 440/36 - Investigation of RIDDOR 6(1) Domestic Gas Incidents

APPENDIX 1

([Para 19](#))

ENFORCING AUTHORITY GUIDANCE

| <b>Domestic Use</b>   | <b>EA</b> |
|---|-----------|
| Private owner or long-term tenant on a Caravan/Park Home site.  | HSE       |
| Located on a work site and used as sleeping accommodation or for domestic or residential purposes.                                  | HSE       |
| Accommodation provided for workers but located separately to the work site  | LA        |
| <b>Domestic/Holiday Use</b>   |           |
| Domestic or holiday use is minor activity to main HSE enforced business e.g. on a caravan site (not a separate business) on a farm. | HSE       |
| <b>Holiday Use</b>  |           |
| Work carried out by person who does not normally work on the site e.g. independent gas fitter.                                      | HSE       |
| Fitting work carried out by site owner who does not live on the site.   | HSE       |
| Fitting work carried out by site owner who lives on the site.   | LA        |
| Fitting work carried out by a person who normally works on the site.  | LA        |
| Landlord duties only e.g. ensure current gas safety certificate held and gas fittings/appliances maintained.                        | LA        |