

Technical Bulletin 065

Developed with HSE



Title: LPG cabinet space heaters and the requirements of gas safety legislation

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This Technical Bulletin provides guidance to persons who undertake work in relation to mobile cabinet heaters. It covers both the need for registration with Gas Safe Register and competence requirements

Introduction

There is some confusion as to whether a person who undertakes 'work' as defined in the Gas Safety (Installation and Use) Regulations⁽¹⁾ (GSIUR) (i.e. servicing) on a Liquefied Petroleum Gas (LPG) mobile cabinet space heater is required to be Gas Safe registered or not.

Background

The LPG cabinet space heater can best be described as a heater which is mobile and/or portable, can be manoeuvred from one room to another on casters and typically has a 15kg Butane gas cylinder housed within it. Thousands of these heaters are used throughout the Great Britain to provide extra heating during cold weather. Some appliances will be up to twenty years old and are probably still put into operation each heating season without any thought to their regular maintenance.

Regulations

Regulation 2 of GSIUR gives a general description of 'Work' as:

"work" in relation to a gas fitting includes any of the following activities carried out by any person, whether an employee or not, that is to say -

- (a) installing or re-connecting the fitting;*
- (b) maintaining, servicing, permanently adjusting, disconnecting, repairing, altering or renewing the fitting or purging it of air or gas;*
- (c) where the fitting is not readily movable, changing its position; and*
- (d) removing the fitting.*

but the expression does not include the connection or disconnection of a bayonet fitting or other self-sealing connector."

Regulation 2 of GSIUR gives a general description of 'gas appliance' as:

"Gas appliance means an appliance designed for use by a consumer of gas for heating, lighting, cooking or other purposes for which gas can be used but it does not include a portable or mobile appliance supplied with gas from a cylinder, or the cylinder, pipes and other fittings used for supplying gas to that appliance, save that, for the purposes of regulation 3, 35 and 36 of these Regulations, it does include a portable or mobile space heater supplied with gas from a cylinder, and the cylinder, pipes and other fittings used for supplying gas to that heater;"

The references to the GSIUR made above refer to:

- **Regulation 3** – this covers competence, supervision and whether Gas Safe Registration is required.
- **Regulation 35** – this covers the duties of employers and self-employed persons at their workplace.
- **Regulation 36** – this covers the duties of landlords.

After consultation with the Health and Safety Executive (HSE), clarification on the meaning of 'gas appliance' is given below.

The definition of a 'gas appliance' was designed to exclude some portable/mobile appliances, such as those used in the leisure, camping and outdoor industry i.e. a portable camping gas stove or gas lighting from the scope of the GSIUR. However, mobile space heaters are subject to regulations 3, 35 and 36 of GSIUR. This means that any person who performs 'work' on a mobile cabinet heater at any premises falling within the regulations needs to be registered with Gas Safe Register and be competent to do the work. These requirements apply equally whether the work is carried out as part of a landlord gas safety check, in meeting the requirements of Regulation 36, or is carried out for another reason. It is vital that the person is competent for the work they are undertaking.

Note 1: *Gas Safe registered engineers would therefore need to obtain the relevant ACS certificates of competence.*

However, where the mobile cabinet heater is taken back to a factory for servicing or repair work, i.e. a premises outside the Scope of the GSIUR, then in most instances registration with Gas Safe Register is not required but the person undertaking the work would still be required to prove competence e.g. by successfully completing the relevant ACS assessments or equivalent.

In all cases, the changing of the gas cylinders is **outside** the scope of the GSIUR.

Note 2: *For guidance on the legislative/registration/competency requirements for working on leisure accommodation vehicles, residential park homes and holiday accommodation, see TB 063. TB 063 can be viewed at: <https://engineers.gassaferegister.co.uk> - login and visit the Technical Information area.*

Bibliography

(1) Gas Safety (Installation and Use) Regulations 1998 (GSIUR) www.opsi.gov.uk/si/si1998/19982451.htm

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