

Technical Bulletin 065

Developed with HSE in Great Britain



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

Date issued: 19 August 2010

Note: This version of Technical Bulletin (TB) 065 replaces the version originally published 1 April 2009 which is now withdrawn. This version has been reviewed and where appropriate revised to ensure that it remains both current and relevant.

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 under the primary legislation concerning the safe installation, maintenance and use of gas systems and appliances, (e.g. in Great Britain (GB) – the Gas Safety (Installation and Use) Regulations (GSIUR)), (i.e. servicing) on a liquefied petroleum gas (LPG) mobile cabinet space heater is required to be Gas Safe registered or not.

Note 1: *Similar legislative requirements apply in other geographical areas covered by Gas Safe Register. For details of current gas safety legislation, building legislation and industry standards for the geographical areas covered by Gas Safe Register, see the [Legislative, Normative & Informative Document List \(LNIDL\)](#)⁽¹⁾ at: <https://engineers.gassaferegister.co.uk> - login and visit the Technical Information area.*

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 geographical areas covered by Gas Safe Register, (i.e. GB, Northern Ireland, Isle of Man and Guernsey) 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 in GB 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 in GB 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.

Note 2: *Similar requirements apply to GSIUR which apply in other geographical areas covered by Gas Safe Register; however, in some cases the regulation numbers referred to above may be different.*

After consultation with the Health and Safety Executive (HSE) in GB, 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. Therefore, Gas Safe registered engineers would need to obtain the relevant certificates of competence (ACS, or equivalent).

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 regarded to be **outside** the scope of the GSIUR.

Note 3: *The above clarification on the meaning of 'gas appliance' is supported by all health and safety enforcement authorities in the geographical areas covered by Gas Safe Register.*

Note 4: *For guidance on the legislative/registration/competency requirements for working on leisure accommodation vehicles, residential park homes and holiday accommodation, see TB 063, which can be viewed at: <https://engineers.gassaferegister.co.uk> - login and visit the Technical Information area.*

Note 5: *For general information about the process behind the development of Gas Safe Register Technical Bulletins and the expectations for all Stakeholders, see TB 1000⁽¹⁾ at: <https://engineers.gassaferegister.co.uk> - login and visit the Technical Information area.*

Bibliography

- (1) LNIDL - Gas Safe Register Legislative, Normative & Informative Document List
- (2) TB 1000 – An introduction to Gas Safe Register Technical Bulletins

Note: *Gas Safe Register Technical Bulletins and the Legislative, Normative & Informative Document List can be viewed at: <https://engineers.gassaferegister.co.uk> - login and visit the Technical Information area*

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