
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

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Any other business

Filling of LPG cylinders by private individuals or enterprises for their own supply

Transmitted by the European Liquefied Petroleum Gas Association (AEGPL)

AEGPL shares fully the concerns of Switzerland as these are expressed in ECE/TRANS/WP.15/AC.1/2018/4.

AEGPL considers that in order to ensure maximum safety, the filling of LPG cylinders should always be carried out by properly trained professionals, in a facility designed and operated specifically for that activity. This recommendation is also fully in line with ADR, which states that *“the filling of pressure receptacles may only be carried out by specially equipped centres, with qualified staff using appropriate procedures”*.

Although the ADR does not formally apply to private individuals carrying dangerous goods for their personal use, it is considered however in this case as a key and authoritative safety guidance across the board.

Good practices in LPG cylinders filling, as defined in EN 1439 “Procedure for checking LPG cylinders before, during and after filling”, which are also mandatory to obtain the licence to operate in many European countries, entail the following actions:

- Inspection of cylinders to detect any defect, corrosion or damage on the cylinder
- Control of the fuel type (butane or propane) to ensure compatibility with intended use: Autogas in Europe is generally a blend of butane and propane, whose exact composition may vary depending on the country and on the period of the year, while butane and propane cylinders require different pressure regulators and are subject to different storage requirements
- Accurate weighing to avoid overfilling
- Checking of mandatory requalification date
- Leak control after filling on both the cylinder and the valve

AEGPL wishes to highlight that those critical safety measures are very unlikely to be properly undertaken when cylinders are filled at Autogas retail outlets by the end-users, even if the cylinder is fitted with an overfill prevention system.

The same holds also when cylinders are filled at any other facility that is not intended and licenced specifically for this purpose.

AEGPL therefore strongly advises against allowing the refill of any type of LPG cylinders at Autogas retail outlets, except those permanently fixed to a mobile-home/caravan and equipped with all safety accessories to avoid overfill during filling.

Allowing cylinder filling at Autogas stations is not only in direct conflict with many national laws across Europe, that explicitly forbid it mainly for safety reasons, but we believe it also represents a risk to negate the significant safety measures developed over years in the European LPG industry, for both customers and employees.

Regarding the specific questions, opinions requested as these as stated in par. 11 of the document, these are to be discussed during the meeting, initial views as below:

(a) How is the filling of portable LPG cylinders at gas stations and other filling facilities regulated in the different countries applying RID/ADR?

AEGPL: Delegates will respond directly but in Italy for example this is forbidden by law and fines from 5000€ to 10000€ are applied to operators who fill LPG cylinders and to the users that request for the filling.

(b) Considering that RID/ADR provides for exemptions (1.1.3.1, 1.1.3.2), is packing instruction P200 applicable to private individuals and enterprises filling portable cylinders for their own supply?

AEGPL: Formally not applicable, however it provides a very strong guidance and deviations from this guidance compromise safety

(c) Is it possible for private individuals and enterprises filling cylinders for their own supply to fill portable cylinders in compliance with the requirements of P200?

AEGPL: Yes, it is possible in theory. However, experience has shown that it is highly unlikely that all the requirements of P200 can be met in practice.

(d) Considering that caravans and motorhomes are travelling throughout Europe, should the filling of portable LPG cylinders at gas stations and other filling facilities be internationally regulated?

AEGPL: As stated above, portable LPG cylinders permanently fixed to a mobile-home/caravan and equipped with all safety accessories to avoid overfill during filling, can be filled at gas stations, even if again this practice does not provide the same safety assurance as filling cylinders at authorised filling facilities in accordance with P200.

This practice could potentially be internationally regulated although very difficult if ever possible, and only for cylinders fixed to mobile homes / caravans as described above. However, amongst others, the lack of common filling/valve connections is a serious obstacle.

(e) Is there a need to adapt the regulations for the transport of dangerous goods?

AEGPL: To be discussed. In any case, the Joint Meeting should clearly express the position that although the scope of ADR does not cover today they activities in question (private individuals etc.), in practice, only the cylinder filling operations that take place in accordance with P200 can provide the high levels of safety required for the transport and the use of LPG cylinders.

(f) Are other measures necessary to ensure safety?

AEGPL: To be discussed.
