

Boat Safety Scheme  
First Floor North  
Station House, 500 Elder Gate  
Milton Keynes, MK9 1BB

Telephone 0333 202 1000

Examiner's Email: [BSS.office@boatsafetyscheme.org](mailto:BSS.office@boatsafetyscheme.org)

Examiner's Website: [www.boatsafetyscheme.org/professionals](http://www.boatsafetyscheme.org/professionals)



**31 May 2019**

**Ref: 19-004**

## **BSS EXAMINER NEWS**

**Dear Examiner,**

In this issue we cover:

- allegations that a small minority of Examiners are making up some rules.
- LPG training course update
- a potential risk caused by over-filled LPG cylinders
- a new acceptable CO alarm certification mark (with some important caveats)

### **LPG Bubble Testers – is someone telling the wrong story?**

We covered this story in BSS Examiner News 18-004, but reports are coming to us that could mean a small number of Examiners may be putting their authorisation at risk by not sticking to the guidance.

The allegations are of Examiners telling their liveaboard customers that bubble testers are required under BSS rules - they are not.

Because of the numbers of the reports of such behaviour reaching us, we are very concerned that a formal complaint could only be a matter of time. If this happens and the report stands, an Examiners authorisation could be withdrawn.

Worryingly, we have also heard allegations that one or more non-Gas Safe registered BSS Examiners have fitted bubble testers to boats in scope of GSIUR (Gas Safety [Installation and Use] Regulations) before performing the Examination. If this is true, that would be acting unlawfully.

What's more, we understand in some cases the boat's total LPG appliance load was said to be way above Alde's stipulated 12kW limit; that carries a risk of creating a flow restriction.

This could be a dangerous situation for the people aboard with a potential risk of harm. In these circumstances, if it could be established that an Examiner had unduly influenced the customer to fit the bubble tester, then this could be deemed a criminal act.

We have no specific complaints about individual Examiners currently, but we must react to the anecdotal evidence to help stop any such behaviour immediately.

We want to ensure that:

- a) there is no need to investigate a complaint of the over-application of the BSS requirements;  
**and,**
- b) we help prevent any criminal prosecution by HSE or local Environmental Health enforcers.

We have regularly published reminders about GSIUR and the fact that for boats in scope of GSIUR, Examiners who are not Gas Safe registered can only complete check 7.12.2 by either:

- undertaking a gas tightness test using a bubble tester where fitted and correctly located; or,
- observing the tightness test conducted by a (LPG boats-competent) Gas Safe registered installer.

When discussing the above guidance with their customers, we ask that Examiners only explain the options simply and neutrally without encouraging one compliance option over another.

We have more information about boats in scope of GSIUR and keeping on the right side of the law in this respect, please visit the Examiner Support website, [here](#)

### **LPG Update Course – latest news**

Just to let you know that work is ongoing to bring the course together and that the facility for booking on to the LPG update course should be launched within two weeks or so from now.

As things stand the courses will run from early August until the end of October. The next BSS newsletter will explain all.

### **Be alert to a potential danger - look out for overfilled Calor, Flogas, BP Gas cylinders**

There are reports from various sources that the numbers of boaters refilling 'non-refillable' gas cylinders at Autogas petrol stations may be increasing.

The LPG industry says that this is both dangerous and illegal. Cylinders from Calor, Flogas, BP Gas etc, are only permitted to be filled at filling plants.

As these LPG cylinders do not have 80% stop-fill valves, there is a risk that over-filled cylinders could see a high-pressure liquid gas escape into the low-pressure side of boat's gas systems as the liquefied LPG expands to reach the ambient temperature.

If this happens the lesser effects could be permanent damage to the regulator, damage to low pressure LPG hoses, installation pipework and appliance gas tap seals, but it could also be more serious as it may cause a fire or explosion.

The LPG industry is also worried about potential damage to the cylinder valve when filling adaptors of the incorrect design are used. This could place the cylinder user, Autogas station staff/customers, staff in the filling plant and many others at risk.

Some boaters on social media routinely promote the use of cylinder filler adaptors found on eBay. Because of the potential risk to Examiners, navigation authority workforce and customers, we have been asked to act with Trading Standards to ensure the adverts make it clear that only refillable cylinders such as Gaslow, Gas-It, Prakto and Safefill may be safely refilled at a filling centre or Autogas station that allows the filling of freestanding customer-owned LPG cylinders.

We ask Examiners to be vigilant and not to carry out LPG tightness testing if an over-filled LPG cylinder is suspected. One of the key indicators concerns cylinders that feel significantly too heavy. Another indicator could be that the 'burn-down' process in preparation for removing the LPG test point nipple before conducting a manometer (Appendix C) tightness-test takes a very long time.

**If an overfilled cylinder is suspected, Examiners should abandon the BSS examination, class the boat as 'immediately hazardous' and notify the BSS office.**

Lighting a low-flow burner on a gas hob to establish fluid in a bubble tester could result in a lively flame at the burner. The impact on bubble testers of the initial use of an overfilled cylinder releasing liquid LPG through it is not known at this time but should be regarded as presenting a significant hazard for the Examiner conducting a bubble tester (Appendix D) leak test.

Examiners also need to be cautious if they spot adaptor equipment by Calor, Flogas, BP Gas etc. cylinders.



In these circumstances an examination can continue but a BSS Warning Notice should be issued and recorded on the BSS Database (Salesforce) because of the potential for future over-filling and the potential damage being done to property owned by the LPG supply company. Use 'NS' to record the comment.

Just to stress that Gaslow, Gas-It, Prakto and Safefill cylinders are intended to be refilled using this type of equipment and the practice is fine because the cylinders have valves, float gauges and other devices to allow safe filling that means the cylinder can never be overfilled.

### **A new CO alarm certification mark to look out for**

Announcing that the BSS recognises UL International (UK) Ltd as an accredited certification body in respect of the certification of CO alarms to BS EN 50291.

Enquiries have revealed that UL International (UK) Ltd received their latest United Kingdom Accreditation Service (UKAS) accreditation scope listing on 14 May 2019 and EN 50291 is on the list.

If a UL certified alarm is found there will be a need for Examiners to check for markings on the back of the unit to find the UL EU logo shown below and reference to EN 50291-1: 2010 [see the image below]. With these two criteria met, the alarm passes BSS Check 6.4.3.

The UL EU logo is very important as all CO alarms produced for the US market will likely have a UL marking showing compliance to the American standard UL2034, but models for the UK and EU markets need to be manufactured differently to comply with EN 50291.



*Image of a Nest Protect combined smoke & CO alarm*



*image of the markings on the underside of a Nest Protect combined smoke and CO alarm*

Remember that Examiners should only remove the unit with permission from the owner (or their representative), or better still ask any owner present to remove it for examination.

As far as we are aware, only one EN 50291 CO alarm product currently has the UL EU marking, the Nest Protect that comes as either a mains or a battery-powered combined smoke and CO alarm.

This is a 'smart' wi-fi alarm with app control. The boat market may be very small in view of its near £100 price tag and wi-fi requirement.

Note that as the unit is '-1', we will not be adding the unit to the list of alarms recommended for use on boats, and in the event of any enquiries from boat owners about possibly buying the product, Examiners should promote CO alarms certified to the '-2' standard.

However, in view of the addition to the UKAS listing, we will be adding the UL EU logo to the list of accepted certification marks, with suitable caveats to ensure the necessary reference to EN 50291.

### **A strange anecdote also alleging an Examiner making up the rules**

I've been asked by the BSS Advisory Committee to make clear that there is no BSS policy that BSS examinations can't be conducted unless the boat has a permanent mooring. This follows a representative on the committee reporting that an organisation member had seemingly been refused an examination because he did not have a mooring for his boat. Of course, there is always two sides to every story, but if you know more about this please contact me.

Best regards,

A handwritten signature in black ink that reads "G.A. Watts".

Graham Watts, **BSS Support Executive**