



17 October 2023

## Agenda item 6 - Update to the Risk Review and Assessment Paper (RRAP) - Calor discontinuing small capacity LPG cylinders [Doc E2, BSSAC #114]

Dear BSSAC member,

### 1. Introduction

This is a summary update to the Risk Review carried out in April 2023. A reminder that, the summary concerns the potential consequences of the commercial decision by Calor Gas Ltd to continue to fill and supply those small capacity LPG cylinders that remain serviceable, but ultimately to discontinue its 3.9kg Propane and 4.5kg Butane cylinders.

Doc E4, attached for ease of reference, is the Risk Review and Assessment Paper (RRAP) - Calor discontinuing small capacity LPG cylinders, developed in April.

Concerning Doc E4, the Introduction and Executive Summary, the Pressures for Change and the Existing risk controls remain the same and are not repeated here.

Concerning the section in Doc E4 covering Identification, characterisation and scaling the risk, the picture has altered slightly, and the headlines are provided below in sections 2-5 below.

The overview is that the level of risk remains high and requires continuing mitigation.

Note that points 2c) – g) below cover Calor larger capacity cylinders supply concerns (butane 7kg and 15kg, propane 6kg and 13kg). These new concerns developed over the summer and impacted the risk picture as we approach autumn/winter, in view of the fact that 'liveaboard' boaters use larger sizes of cylinders. This separate supply issue raised significant safety implications and although the supply is rapidly improving in recent weeks, the BSS Office is monitoring this aspect, as well as the small capacity cylinder issue.

### 2. Supply & Demand

- a) Calor say that 'there are currently good stocks of 3.9kg and 4.5kg cylinders at most Calor Distribution Centres although we advise customers to order in advance to avoid disappointment. However, overall stock levels will continue to decline as unserviceable cylinders are withdrawn'. Calor also say, 'this stock is diminishing and may be reaching that point where the overall supply is starting to decline.... Such cylinders in a safe state and that don't require refurb, will continue to be filled'.

- b) Calor advice to boaters remains to call ahead to the caller centres to make sure there is stock and that is available and then that way they won't have a wasted journey. Calor say they have upped the communication to their distribution centres to ensure messages are joined up.
- c) Calor admit to a supply issue in recent months across the range of other LPG cylinder sizes (butane 7kg and 15kg, propane 6kg and 13kg). Calor have a new Chief Exec (as of May 23) who is reported to be determined that the cylinder supply issue is resolved as soon as possible.
- d) Calor say that the supply issue concerning these cylinder sizes is '...in part due to a decentralising process intended to bring the company closer to customers, allowing them to respond more to local needs and to provide more autonomy to the regional centres to improve the onward supply through the resale network. An associated glitch with a new IT system added to the issue'.
- e) Calor distribution centres are currently reporting early signs of improvements. Calor also report '...over 200k additional cylinders across a range of sizes are arriving before the end of this year'. Calor re-iterate that '...many cylinders are sold via independent dealers and we have no control over their stock levels'.
- f) A BSS consultant contacted 6 of the 36 Calor Distribution Centres, 2 in the North (including 1 in Scotland), 2 in the west (including one in Wales, 1 in East Anglia and 1 in London. The information received back confirmed the information contained in this report at 2d) and 2e).
- g) Following reports that the gas cylinder cages at flagship marinas were full of empty cylinders, the BSS engaged with the country's leading leisure group, ABC Leisure Group PLC. According to the MD, 'the Calor situation has improved in recent weeks. During the summer it was hit and miss, and we were just about getting by, although it was a big improvement on the previous year. Deliveries are now coming in and we are getting the cylinders we need'.
- h) Note that the BSS Office has not been contacted at all by boaters on the subject of the lack of supply of Calor cylinders – of any sizes.
- i) Flogas state that earlier in the year demand for 3.9kg butane and 4.5kg propane cylinders surged and that demand drained the Flogas supply. Sales have gone up of the 3.9kg butane and 4.5kg propane cylinders, but from a low base.
- j) Flogas remain committed to supplying the small cylinder market, and have and will continue to refurbish existing cylinders and introduce new cylinders to increase overall capacity.

- k) Gaslow report an increase in the demand for its 2.7kg refillable propane cylinder but not massive. The perception is that the market demand is calming, but they are monitoring the market closely and are developing plans that would add to the supply of available cylinders. There is a possibility of Gaslow developing new products to help meet the demand.
- l) Campingaz report an 86% rise in new customers over the previous year (130% increase over the 5-year average). This they had been planned for and they don't currently see a need for increasing cylinder supply, albeit that they do have flexibility if needed. Campingaz do not know precisely the market sector split but do know that smaller camper vans are the main reason behind the increased sales. Campingaz are certain that the boat market sector has been part of the sales success.

### 3. Owners modifying existing LPG cylinder locker arrangements

- a) The BSS Office has had no contact from owners concerning modifying existing LPG cylinder locker arrangements to allow the storage of larger cylinders and/or differently connected regulators and other components.
- b) British Marine reports that it has had no contact from its member organisations concerning a) above.
- c) BSS Examiners are not reporting that owners have made poor DIY modifications that could be immediately hazardous or non-compliant, and fail rates of relevant BSS Checks remain stable. Some Examiners are reporting good quality modifications allowing the use of larger cylinder sizes.
- d) The BSS Office has no awareness of incidents that can be associated with Calor's commercial decision and any non-BSS compliant modifications made by boat owners. See planned action 5g.

### 4. Owners engaging in the 'illegal refilling' of existing Calor (or Flogas & other non-refillable cylinder makes) cylinders.

- a) The BSS Office through one of its contractors has been monitoring all boater social media posts for any encouragement or evidence of boaters engaging in the illegal refilling of existing Calor (or Flogas & other makes) cylinders. Only one addition to an old YBW-Thames post has been identified in the past six months. No intervention by BSS has been found necessary.
- b) There is no evidence that inland waterway boaters have engaged in self-filling Calor/Flogas cylinders. The likelihood is though, that the practice will be being engaged in by a tiny number of boaters who keep their behaviour to themselves.
- c) Calor say they have engaged with the industry association Liquid Gas UK on the 'illegal filling' subject but at present there is no prospect of an industry-led campaign, apparently because of the complexities associated with cylinders intended to be self-filled i.e. Gaslow.

- d) Calor say that ‘..successful prosecution of unauthorised filling is in practice difficult to achieve as both evidence we own the stolen cylinder and evidence it has been filled by an unauthorised individual is required’.
- e) Calor say that they ‘would be pleased to hear your thoughts on any specific initiatives BSS would think helpful and these will certainly be considered’. The BSS will consider impactful and clear messages to help dissuade boaters from adopting this dangerous practice. Any committee member suggestions in this respect would be welcomed. See action 5d.
- f) In the Practical Boat Owner article in August on the Calor supply issue subject, ‘..more than 11% of 2,000 respondents said they intended to ‘fill their own cylinders’ – which the Boat Safety Scheme has warned is unlawful and highly dangerous’. The Practical Boat Owner magazine appeals to coastal yacht owners in the main.
- g) In a recent email to the BSSTC Chair and the BSS Business & Technical Manager, a representative of a boater groups referred to a boater survey having 2000 responses and stating, ‘a lot are saying they are self-filling’. Anticipate the results of this survey being published shortly. This report is written without any knowledge of the contents of the survey.
- h) Note that Campingaz reported concerns about equipment available on online marketplaces that facilitate the decanting of its gas from its cylinders into its small and non-refillable gas cartridges - as used for example in small picnic stoves. Campingaz are successful in asking the marketplaces to remove such adverts but state that as soon as one is removed another arrives. See planned action 5e and 5f.
- i) The risks associated with illegal refilling remain high. See planned action 5d.

## 5. Summary and Planned BSS Office actions

- a) Concerns about the supply of Calor larger capacity cylinders (butane 7kg and 15kg, propane 6kg and 13kg) are diminishing quickly and the BSS is confident that those who live aboard or who cruise the system over the winter, will find the supplies they need. The matter will continue to be closely monitored.
- b) The BSS Office position remains that owners who previously relied upon Calor 3.9kg Propane and 4.5kg Butane cylinders should plan for alternative arrangements – either LPG cylinders from alternative suppliers or introducing safe and well-fitted adjustments to their gas system by competent marine gas installers.
- c) Concerning boat owners seeking cylinder exchange, they should follow Calor and Flogas advice about seeking out small capacity cylinder replacements:
  - Calor promote customers to call ahead to the distribution centres to make sure there is stock and that is available and then that way they won't have a wasted journey.

- Flogas promote boat owners to continue to use the stockist-finder facility on their website to provide the local suppliers that can be contacted to ask about supply. Flogas continue to recommend that customers call ahead to ensure the specific size required is stocked prior to making a journey.
- d) The BSS Office will continue to closely monitor social media posts and will work with Calor (& through Calor/Flogas, engage with trade association Liquid Gas UK) to develop a series of impactful and clear warnings not to self-fill Calor/Flogas cylinders. BSS stakeholder groups will be encouraged to support this initiative to be driven on social media. BSS Examiners will again be advised to stay vigilant to the practice and report any suspicions. The BSS Office will refresh its Critical Safety Notice positioned under the 'Boats with Gas' sub-section - [Here](#)
- e) Concerning the information from Campingaz about available equipment on online marketplaces intended to self-fill gas cartridges from Campingaz small cylinders; the BSS will find out more about this new potential risk – in the context that gas cartridges, and associated picnic appliances are being found more and more on boats.
- f) In addition to 5e) above, the BSS will also engage with Calor/Flogas etc and Trading Standards, about other marketplace adverts found to use images of their gas cylinders in selling equipment to self-fill cylinders. Note however that such equipment has a valid purpose to enable the self-filling of refillable LPG cylinders, i.e. Gaslow cylinders.
- g) The BSS Office will develop simple diagrammatical guidance to support boat owners who have chosen the solution that involves modifying their existing cylinder storage. The guidance will be promoted the LPG and marine industry to promote. The timescale is to have this completed four-six weeks from now. BSS stakeholder groups will be encouraged to support this initiative.
- h) The guidance will be supported by a social media campaigning, updating boaters as to the current advice re cylinder supply. Examiners will be informed of the initiative and supporting materials.
- i) The BSS will maintain close contact with the LPG cylinder supply companies and will update members concerning the risk picture at their Feb/March 2024 meeting.

Compiled by Graham Watts, BSS Support Executive

17 October 2023