



MINISTRY OF
INDUSTRY AND
TOURISM

REPORT ON THE REGULATORY IMPACT ANALYSIS OF THE
DRAFT ROYAL DECREE APPROVING THE
TECHNICAL REGULATION FOR THE SECURITY OF
FUEL INFRASTRUCTURE AND INSTALLATIONS
GASES AND THEIR TECHNICAL INSTRUCTIONS
COMPLEMENTARY

06 may 2026

TABLE OF CONTENTS

RESUMEN EJECUTIVO.....	2
1. OPORTUNIDAD DE LA NORMA.....	5
1.1. Motivación.....	5
1.2. Objetivos.....	6
1.3. Análisis de alternativas.....	7
1.4. Adecuación a los principios de buena regulación.....	8
1.5. Justificación de la no inclusión en el Plan Anual Normativo.....	8
2. CONTENIDO.....	9
3. ANÁLISIS JURÍDICO.....	23
3.1. Fundamento jurídico.....	23
3.2. Rango normativo.....	23
3.3. Derogación normativa.....	23
3.4. Entrada en vigor.....	24
4. ADECUACIÓN DE LA NORMA AL ORDEN DE DISTRIBUCIÓN DE COMPETENCIAS.....	24
5. DESCRIPCIÓN DE LA TRAMITACIÓN.....	26
5.1. Trámites realizados.....	26
5.2. Próximos pasos en la tramitación.....	27
6. ANÁLISIS DE IMPACTOS.....	29
6.1. Impacto económico general.....	29
6.2. Impacto en la competencia.....	29
6.3. Impacto sobre la Unidad de Mercado.....	29
6.4. Impacto sobre las PYME.....	29
6.5. Impacto presupuestario.....	30
6.6. Impacto de las cargas administrativas.....	30
6.7. Impacto por razón de género.....	33
6.8. Impacto en la infancia y en la adolescencia.....	33
6.9. Impacto en la familia.....	33
6.10. Impacto por razón de cambio climático y la transición energética.....	33
7. EVALUACIÓN “EX POST”.....	33
ANEXO I.....	34
ANEXO II.....	35
ANEXO III.....	272

EXECUTIVE VIEW

Ministry/ proposing body	Ministerio de Industria y Turismo (Ministry of Industry and Tourism)	Date	13/02/2026
Title of the standard	Draft Royal Decree approving the Technical Regulation on the Safety of Infrastructure and Installations for Gaseous Fuels and its Supplementary Technical Instructions.		
Type of report	Normal ☒ Abbreviated ☐		
TIMELINESS OF THE PROPOSAL			
Situation being regulated	The technical conditions and guarantees to be met by infrastructure and installations for the distribution, transport and use of gaseous fuels and appliances burning gaseous fuels.		
Objectives pursued	The purpose of the new technical regulation on the safety of gaseous fuels infrastructure and installations is to lay down the technical conditions and guarantees to be met by infrastructure and installations for the distribution, transport and use of gaseous fuels and appliances burning gaseous fuels, in order to protect the safety of persons, the environment and property. The aim of this Royal Decree is to update the technical regulations so that they are better adapted to the needs, possibilities and technical solutions currently existing for gaseous fuel installations, on the basis of technical developments and experience that have built up with the application of the current Regulation, such as the need to include new gaseous fuels. It is also necessary to carry out a general review of the Regulation in order to clarify certain provisions of the content and thus resolve problems in the application of the Regulation. They are also included in the scope of other types of installations whose regulations have not evolved over time, such as storage, transfer and filling plants for liquefied petroleum gas containers or installations for gaseous fuels by pipeline at a maximum design pressure of more than 16 bar. In this way, the aim is to avoid regulatory dispersion, leaving the safety of gas fuel distribution and transport installations under the same safety regulation. In addition, this draft royal decree updates various national regulations.		
Main alternatives considered	a) Drafting of a new regulation to repeal and replace the previous one. b) Partial amendment of the current regulation. c) Do not amend the current regulation and create supporting documents (guides) with the necessary clarifications and guidance, building on the existing regulation.		

	(d) Do nothing. Of the alternatives studied, option (a) is retained.
CONTENT AND LEGAL ANALYSIS	
Type of regulation	Royal Decree.
Structure of the Norm	The Royal Decree consists of a preamble, a single article, six additional provisions, seven transitional provisions, one repealing provision and seven final provisions. The proposed legislative structure comprises a regulation containing 30 articles containing general provisions and 13 additional technical instructions laying down specific technical requirements.
Reports gathered	In the process of being processed is the following reports are required: - Report of the Office for Coordination and Regulatory Quality (OCCN). - Report of the Technical Secretariat-General of the Ministry of Industry and Tourism. - Report of the Technical Secretariat-General of the Ministry of Transport and Mobility Financing. - Report from the Technical Secretariat-General of the Ministry of Housing and Urban Agenda. - Report from the Technical Secretariat-General of the Ministry of Ecological Transition and the Demographic Challenge. - Report of the Subdirectorate-General for International Relations and Cooperation of the Ministry of Industry and Tourism. - Report from the Ministry of Territorial Policy and Democratic Memory. - Report of the Industrial Safety Coordination Board. - Opinion of the Council of State.
Early consultation	A public consultation was carried out prior to the drafting of the text in accordance with Article 26 (2) of Government Law 50/1997 of 27 November. The deadline for submitting comments ran from 4 March 2021 to 25 March 2021.
Consultation process	A first hearing was held, which ended on 16 May 2025. On the basis of the comments received, it was considered necessary to submit certain aspects of the draft Royal Decree to a second hearing, which ended on 7 December 2025.
IMPACT ANALYSIS	
Matching skills	This Royal Decree is issued pursuant to the provisions of Article 149.1. Article 13 of the Constitution, which confers on the State the power to base and coordinate the general planning of economic activity, without prejudice to the powers of the Autonomous Communities to lay down additional protective rules.

Economic and budgetary impact	Effects on the wider economy.	Not significant.		
	As regards competition	The rule has no significant effect on competition. The regulation has positive effects on competition. The regulation has negative effects on competition.		
	In terms of the administrative burden	It lessens the administrative burden. It adds to the administrative burden. Estimated quantification: EUR 4.413.350 It does not affect administrative burdens.		
	As regards budgets, the regulation Affects State Administration budgets. Affects the budgets of other Territorial Administrations.	It does not entail an increase in expenditure, since it merely regulates certain aspects that already exist. It does not imply an income.		
Gender impact	The impact of the regulation on gender issues is	e Negativ	Null	Positive
Impact on children and adolescents	The standard has an impact on children and adolescents	e Negativ	Null	Positive
Impact on the family	The standard has an impact on the family	e Negativ	Null	Positive
Other impacts considered	The impact on SMEs is considered NULL. The impact on competition is also considered NULL. The impact due to climate change and the energy transition is considered NULL.			
Others considerations	As described in the section on IMPACT ANALYSIS, this PRD tried to identify those aspects in which RD 919/2006 was causing changes that could affect the Unity of the Market, trying to give a consensual interpretation with the different Autonomous Communities that have worked on the text.			

1. TIMELINESS OF THE RULE

1.1. Motivation

The purpose of this Royal Decree is to update the regulatory framework on the safety of installations for gaseous fuels, for which a new Technical Regulation on the safety of gaseous fuels infrastructure and installations is approved, repealing and replacing Royal Decree 919/2006 of 28 July approving the Technical Regulation on the distribution and use of gaseous fuels and its additional technical instructions ICG 01 to 11.

The purpose of Royal Decree 919/2006 of 28 July 2007 is to establish the technical conditions and guarantees that must be met by installations for the distribution and use of gaseous fuels and gas appliances, in order to preserve the safety of persons and goods. Its approval involved unifying in a single text the technical and safety conditions of installations that make it possible to distribute fuel gases to consumption points from transport networks in the case of pipelines or from production or storage sites in other cases. Until the adoption of the aforementioned Royal Decree, these installations were subject to a set of regulations that differed in time, form and technique. Therefore, the Royal Decree contributed to enhancing the safety of the gaseous fuel installations included in its scope. It should also be noted that the standardisation of the sector made it possible to have technical instruments with a high degree of prior consensus, on which the previous regulation relied by using as a reference standards approved by bodies accredited at both national and international level.

However, experience with the application of this Regulation and technical developments make it necessary to review the safety conditions and include other types of installations whose regulations have not evolved over time, such as storage, transfer and filling plants for liquefied petroleum gas containers, hitherto regulated by the Order of 1 December 1964 approving the safety standards for liquefied petroleum gas (LPG) filling and transfer plants or the case of installations for gaseous fuels by pipeline at a maximum pressure of more than 16 bar, hitherto regulated by the Order of 18 November 1974 approving the Regulation on Gaseous Fuel Networks and Attacks. In view of the inclusion of these installations in the scope of the Regulation, it was considered necessary to amend the title of the proposed Regulation.

It is also necessary to carry out a general review of the Regulation in order to clarify certain provisions of the content and thus resolve problems in the application of the Regulation, as well as to include certain security conditions which are laid down in the rules and which have been transferred to the Regulation itself, considering the public administration to be the most appropriate agent for establishing the regulation in certain aspects of security.

It is also necessary to provide for new gaseous fuels, such as those covered by Directive 2014/94/EU of the European Parliament and of the Council of 22 October 2014 on the deployment of alternative fuels infrastructure and its derived regulations, and to open up the regulation to new types of installations that may arise from the widespread use of combustible gases, such as hydrogen.

Finally, the Royal Decree also introduces ad hoc amendments to other regulations, which are explained below.

1.2. Objectives

The aim of this proposal for a Royal Decree is to update the aforementioned technical regulations so that they are better adapted to the needs, possibilities and technical solutions currently available for gaseous fuel installations.

The new Technical Regulation on the Safety of Infrastructure and Installations for Gaseous Fuels maintains an approach similar to the Technical Regulation on the Distribution and Use of Gaseous Fuels and its additional technical instructions ICG 01 to 11 approved by Royal Decree 919/2006 of 28 July, seeking to establish the technical conditions and guarantees that must be met by infrastructure and installations for the distribution, transport and use of gaseous fuels and gas appliances, with the aim of preserving the safety of persons, the environment and goods.

In addition, specific amendments are also made to other regulations, which are detailed below.

Amendments have been made to the Safety Regulation for refrigeration facilities and its additional technical instructions, approved by Royal Decree 552/2019 of 27 September, in order to bring it into line with the provisions of Royal Decree 487/2022 of 21 June establishing the health requirements for the prevention and control of legionellosis, and of Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014, the objective of which is to reduce emissions of hydrofluorocarbons (HFCs).

Similarly, Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 makes it necessary to amend the Regulation on technical conditions and safety guarantees in high-voltage electrical installations and its Supplementary Technical Instructions ITC RAT-01 to 23, approved by Royal Decree 337/2014 of 9 May.

The Regulation on pressure equipment, approved by Royal Decree 809/2021 of 21 September 1997, is amended. This amendment adapts the Regulation and its ITC-EP 6, relating to transportable pressure vessels, to the conditions included in the new ITC-ICG 12 of the proposal for this Royal Decree. It has also been clarified which fluids may generally be used in the hydrostatic test set out in section 2.3 of Annex III to the Regulation on pressure equipment.

A new final provision is included in the second hearing to adapt the Regulation on the Storage of Chemicals, approved by Royal Decree 656/2017 of 23 June, to the new Regulation on Fire Safety in Industrial Establishments, hereinafter RSCIEI, approved by Royal Decree 164/2025 of 4 March. With the same objective, different points have been included in several ITC-ICG for the adaptation of fire protection in installations falling within the scope of the Regulation approving this Royal Decree.

As a result of the comments received, it has become necessary to adapt some of the requirements of the ICG JTIs proposed in this Royal Decree on Fire Protection (PCI), in addition to incorporating into Article 24 the procedure provided for in the RSCIEI for alternative solutions where it is not possible to comply with the regulatory requirements.

1.3. Analysis of alternatives

Four possible alternatives are considered:

- a) Drafting of a new regulation to repeal and replace the previous one.
- b) Partial amendment of the current regulation.
- c) Do not amend the current regulation and create supporting documents (guides) with the necessary clarifications and guidance, building on the existing regulation. (d) Do nothing.

Of the alternatives studied, **option (a) is chosen. A new regulation should be drawn up to repeal and replace the previous** one, for the following reasons:

Regarding option d) *Do nothing*, it is not considered an appropriate option, as different points have been identified where technical progress makes it necessary to make changes to the regulation to avoid it becoming obsolete.

With regard to option c) *Do not amend the current regulation and create supporting documents*, although this could be sufficient to clarify the interpretation of several points of the current regulation, it is considered insufficient for the objectives to be achieved, and it is therefore necessary to amend the regulation itself.

With regard to option b) *Partial amendment of the current regulation*, it is considered to be an inappropriate option since, due to the number of changes to be made and the technical nature of the regulation itself, making a partial amendment would be complex in both the formal and technical parts.

For all these reasons, it is considered that **the best option** is to completely rewrite the regulation on the basis of the regulation approved by Royal Decree 919/2006 of 28 July 2004 and to carry out a full review of it.

1.4. Alignment with the principles of good regulation

This rule has been drawn up taking into account the principles of good regulation referred to in Article 129 of Law 39/2015 of 1 October 2015 on the Common Administrative Procedure of Public Administrations.

In particular, the principles of necessity and effectiveness are met, as the approval of this Royal Decree is considered to be the necessary instrument to achieve the objective pursued, to contribute to the improvement of the safety of industrial installations within its scope, with the least intervention, as well as to resolve the shortcomings observed in the regulations currently in force and to coordinate the action of the different administrations, as well as to facilitate and coordinate the action of the different actors in the sector.

The principle of proportionality is considered to have been complied with since the Royal Decree contains the rules that are essential to serve its purpose and does not introduce excessive burdens or procedures that are not necessary to achieve its objective.

The principle of legal certainty is guaranteed as this rule is consistent with the rest of the legal system and has been intended to be clear and to facilitate action and decision-making by individuals and businesses, improving clarity by establishing a basic and homogeneous framework throughout the territory.

The principle of transparency, because all the mandatory reports have been requested during the drafting

process and published on the website of the Ministry of Industry and Tourism, in order to enable potential recipients to participate actively in the process. In addition, before this Royal Decree was drawn up, a public consultation was held, as indicated in Article 26 (2) of Government Law 50/1997 of 27 November.

Finally, with regard to the principle of efficiency, although the amendments introduce additional administrative burdens, these are the minimum necessary to ensure both the safety and the knowledge of the administration of certain installations, which, due to their characteristics and associated risks, have been deemed necessary to include.

1.5. Justification for inclusion in the Annual Regulatory Plan

This Royal Decree is included in the Annual Regulatory Plan of the General State Administration for 2026 with the current status of the procedure. The NAP states that the planned date of approval is the first quarter of 2027.

2. CONTENT

The draft Royal Decree consists of a preamble, a single article, six additional provisions, six transitional provisions, one repealing provision and seven final provisions:

- Sole Article *Approval of the Regulation*
- First supplementary provision. *Technical guide*
- Second supplementary provision. *Insurance cover or other equivalent guarantee taken out in another State*
- Third supplementary provision. *Acceptance of documents from other Member States for the purposes of accrediting compliance with requirements*
- Fourth supplementary provision. *Equivalence of requirements.*
- Fifth additional provision *Sworn declaration template*
- Sixth supplementary provision. *Information and complaints obligations.*
- First transitional provision *Inspection bodies authorised before the entry into force of this Royal Decree.*
- Second transitional provision: *Administrative regularisation of installations.*
- Third transitional provision: *Periodic reviews and inspections of existing installations.*
- Fourth transitional provision *Installations in operation on the date of entry into force of the Regulation.*
- Fifth transitional provision *Previously authorised gas installation companies.*
- Sixth Transitional Provision. *Gas-fired appliances.*
- Seventh transitional provision. *Installations affected by the fourth final provision that are in the process of being implemented at the entry into force of this Royal Decree.*
- Sole repeal provision. *Repeal of legislation.*

- First final provision *Amendment of Royal Decree 552/2019 of 27 September approving the Safety Regulation for refrigeration installations and its additional technical instructions.*
- Second final provision *Amendment of the Regulation on pressure equipment and its supplementary technical instruction ITC EP-6 'Transportable pressure vessels', approved by Royal Decree 809/2021 of 21 September.*
- Final provision 3. *Amendment of Royal Decree 337/2014 of 9 May approving the Regulation on technical conditions and safety guarantees in high-voltage electrical installations and its Supplementary Technical Instructions ITC-RAT 01 to 23.*
- Fourth final provision *Amendment of Royal Decree 656/2017 of 23 June approving the Regulation on the storage of chemical products and its Supplementary Technical Instructions MIE APQ 0 to 10.*
- Fifth Final Provision. *Competence.*
- Sixth final provision. *Technical update.*
- Seventh final provision. *Entry into force.*

The proposed regulatory structure comprises a regulation containing general provisions and additional technical instructions, which lay down the specific technical requirements deemed necessary in the light of the state of the art for the safety of persons and property.

Thus, the regulation approved by the sole article of the proposal for a Royal Decree has the following structure:

- Chapter I – General provisions
 - or Article 1. *Subject.*
 - or Article 2. *Scope.*
 - or Article 3. *Definitions.*
 - or** Article 4. *Gas materials, equipment and appliances.*
- Chapter II Commissioning of facilities
 - or Article 5. *General procedure for bringing installations into service.*
 - or Article 6. *Design of facilities.*
 - or Article 7. *Administrative Authorisation.*
 - or Article 8. *Installation work.*
 - or Article 9. *Tests and inspections prior to the commissioning of the facilities.*
 - or Article 10. *Certificates.*
 - or Article **11**. *Communication to the Administration.*
 - or Article 12. *Commissioning.*
 - or Article 13. *Starting of equipment.*
- Chapter III. Regular maintenance and inspections
 - or Article 14. *Information for users and operators of installations.*
 - or Article 15. *Maintenance of installations and equipment.*
 - or Article 16. *Regular inspection of installations.*
 - or Article 17. *Entities involved.*
 - or Article 18. *Inspections carried out by a control body.*

or Article 19. Classification of defects in facilities and inspection certificate.

or Article 20. Notification to the Administration of inspections carried out by a control body.

or Article 21. Administrative control.

- Chapter IV. Other provisions

or Article 22. Qualification to operate in gas installations and appliances.

or Article 23. Compliance with requirements.

or Article 24. Derogations.

or Article 25. Temporary installations.

or Article 26. Reference standards.

or Article 27. Infringements and penalties.

or Article 28. Action in the event of accidents.

or Article 29. Self-protection plan.

or Article 30. Prevention of medical conditions by third parties.

The following additional technical instructions have thus been drawn up:

- ITC ICG-01. Installations of gaseous fuels by pipeline at maximum design pressure of not more than 16 bar
- ITC ICG-02. Storage and distribution centres for liquefied petroleum gas (LPG) containers
- ITC ICG-03. Liquefied petroleum gas (LPG) storage facilities in fixed tanks
- ITC ICG-04. Liquefied natural gas (LNG) satellite plants
- ITC ICG-05. Installations for the supply of gaseous fuels for means of transport
- ITC ICG-06. Storage facilities for liquefied petroleum gas (LPG) containers for own use
- ITC ICG-07. Gaseous fuel receiving installations
- ITC ICG-08. Gas appliances
- ITC ICG-09. Persons and undertakings installing gas
- ITC ICG-10. Liquefied petroleum gas (LPG) installations for domestic use in caravans and motor caravans
- ITC ICG-11. Storage, transfer and filling plants for liquefied petroleum gas (LPG) containers
- ITC ICG-12. Installations for gaseous fuels by pipeline at maximum design pressure exceeding 16 bar
- ITC ICG-13. List of reference standards

The second transitional provision is intended to facilitate the regularisation of possible existing installations with the aim of improving safety and control by the Administration.

An alphanumeric code of normative references has been incorporated throughout the document in order to avoid errors and facilitate understanding of the regulatory text and any amendments to the list of standards that must be made with the improvement of the technique, which may be made by means of a resolution of the management body responsible for industrial safety within the Ministry of Industry and Tourism.

The following points are already highlighted in the enacting terms of the Regulation:

- Article 2 has been amended and adapted, clarifying and ordering the scope of the Regulation.
- Article 3 includes definitions that are deemed necessary for the proper understanding of the Regulation and its alignment with the Hydrocarbons Law.
- Article 11 on communication to the Administration has been amended to standardise the process in the different JTIs and types of installations. A general prior communication is established. It also introduces the obligation for the operator of the installation to keep the documentation in a documentary file, preferably in electronic form, throughout the period of operation of the installation, as well as any other documentation relating to inspections or maintenance of the installations that may be established in each JTI.
- Article 15 lays down the methods by which maintenance actions are to be carried out.
- For all temporary installations falling within the scope of the Regulation, Article 25 regulates how and to what extent communication to the Administration should be carried out.
- Article 24 includes the procedure to be followed for derogations from regulatory compliance in the field of fire protection.
- Article 29 incorporates the self-protection plan that establishments containing facilities falling within the scope of the Regulation must have, with its minimum content.

ITC-ICG 01 PIPELINE GAS FUELS INSTALLATIONS WITH MAXIMUM DESIGN PRESSURE EQUAL TO OR LESS THAN 16 BAR

It establishes the obligation of the operator of the facility to inform the competent body of the Autonomous Community of the tests prior to commissioning and their characteristics and results in certain actions.

The requirement to receive the administrative decision to put the product into service when necessary has also been added.

With regard to the operation of installations, it establishes the obligation to notify changes to the established emergency operation and care procedures and excludes isolated pipelines from the obligation to have an operating centre, which must include in the notification of commissioning an operation and control plan that guarantees an equivalent level of safety.

With regard to leakproofness testing, the use of other proven standards is permitted if they maintain an equivalent level of safety.

With regard to maintenance, the obligation for the operator of the installations to contract a control body authorised to certify a sample of the conservation status of the installations subject to maintenance operations, according to certain percentages, has been added, and the obligation for the operator to communicate a maintenance plan for the installations to be carried out the following year and the result of the previous year's maintenance plan has been established.

ITC ICG-02 LIQUEFIED PETROLEUM GAS (LPG) CONTAINER STORAGE AND DISTRIBUTION CENTRES

A relevant clarification has been introduced to clarify what is considered to be the modification and extension of a storage and distribution centre for LPG containers.

Additional clarifications are also made in the case of storage of packaging in commercial establishments.

There is an obligation to store containers of any type with a safety valve upright.

It also details the technical documentation required by the 4th and 5th category centres and clarifies the documentation required in the communication to the Administration. It also extends to the 1st category centres the possibility of being put into service after the necessary documentation has been submitted to the competent body of the Autonomous Community.

A number of clarifications and modifications are included regarding the design of these facilities, such as the modification of the pavement material of the LPG storage area to A2FL, the establishment of the obligation for centres of 1°, 2°, 3° category to comply with the fire protection obligations in force at the time of putting into service, or the removal in centres of 5° category of the 5 m distancing for storage with the simultaneous presence of different containers.

With regard to the inspection of the centres, the period for inspection by inspection body of the 4th and 5th category centres has been extended from two to five years and the provision on the prohibition on supplying LPG to centres has been clarified in the event that the operator fails to prove to the operator, following an inspection with conditional results, that there are no serious or repeated minor defects or that the period for rectification has not been exceeded.

Finally, it has become necessary to adapt this JTI in the field of fire protection.

ITC ICG-03 LIQUEFIED PETROLEUM GAS (LPG) STORAGE FACILITIES IN FIXED TANKS

Among the most relevant changes to this JTI, we can list the clarification of its scope and what is considered to be a modification of the installation without there being a change of category.

The classification of storage facilities into fixed storage facilities has been developed, differentiating between above-ground and buried storage facilities, on the basis of which minimum safety distances are set which the facilities must comply with in all cases.

With regard to documentation, the provision relating to the LPG storage facility project in non-industrial establishments or buildings has been amended and, in the case of provisional warehouses, it has been established that the necessary commissioning documentation must be submitted to the competent body of the Autonomous Community concerned and that the Autonomous Community must be notified of the connection of these warehouses whenever it occurs, clarifying the information and documentation to be provided.

We have also clarified the prior tests and removed the obligation to provide the installation, inspection and works management certificates to the competent body of the Autonomous Community, maintaining the obligation to provide them to the operator.

An obligation has been added for the company responsible for the first filling to verify that the required installation documentation has been submitted to the competent body.

As regards maintenance, it will be carried out in accordance with the instructions in the maintenance manual that must exist at the installation and with the frequency indicated therein. A list of specific actions to be carried out by the installation company on the basis of the maintenance contract is included. The obligation to have a specific maintenance book has been removed, replacing its references with parts for maintenance intervention.

This includes the need for a fixed element for safe access to the valves and openings of the tank.

As regards periodic inspections, reference is made to the standard to be followed and the responsibility of the operator to have the installation inspected every five years by an authorised inspection body. Following the inspection, the inspection body must issue the operator with the relevant inspection documentation and comply with Article 20 of the Regulation, and must notify the operator if the conditions of the installation with regard to its putting into service have changed.

With regard to pressure tests, the procedure laid down in the inspection standard shall be considered valid, including the requirement that mechanical resistance tests must be carried out on tanks, vaporisers and pipes which may contain a liquid phase.

The provisions on corrosion protection amend the responsibilities of the installation company, stipulating that checks shall be carried out in accordance with the provisions and periodicity of the installation's maintenance manual. It regulates what to do in the event that the manual does not establish such periodicity and regulates the obligation to keep the documentation of the operator of the installation.

Finally, with regard to the closure and decommissioning of depots and facilities, reference is made to the administrative authorisation as required by Law 34/1998 of 7 October and the consideration of cessation of activity due to five years without maintenance is removed.

It should be noted that during the first public hearing, a number of arguments were received requesting the elimination of the inspections by the CB. Following their examination and evaluation, it was considered necessary and appropriate to maintain them, since all the Autonomous Communities present in the Working Group considered it appropriate due to the high number of shortcomings observed under the system currently in force.

Following the hearing and analysis of the arguments resubmitted by the sector, it was decided to revert to the previous situation in the Regulation currently in force for the batch review of air depots.

ITC ICG-04 LIQUEFIED NATURAL GAS (LNG) SATELLITE PLANTS

The scope of the JTI on LNG satellite plants has been amended from a combined volumetric capacity of up to 1.000 m³ to 450 m³. Installations now outside ITC-ICG 04 nevertheless fall within the scope of standard UNE-EN-1473: 2022.

It has also been clarified what is meant by a change of installation without a change of category.

With regard to the section on the design and execution of installations, the minimum safety distances that the installations must comply with in all cases are laid down.

The documentation to be submitted to the competent body prior to the date of first filling has been established, removing the requirement for safety documentation and emergency plans, replacing it with a report containing several of the points in the previous list.

The obligation for the authorised undertaking IG-A specialising in cryogenicity to issue a certificate for the LNG facility has been established and the obligation for the authorised control body and the project management to provide a copy of their certificates to the competent body of the Autonomous Community has been removed.

It also lays down obligations prior to first filling that must be met by the distribution or marketing company, as applicable.

With regard to maintenance, it has been clarified who is responsible for the maintenance obligation and it has been added that it will be carried out in accordance with the instructions in the maintenance manual that must exist at the installation and with the periodicity indicated therein.

The obligation to have a specific maintenance book has been removed, replacing its references with parts of maintenance intervention. The exemption from having a maintenance contract for operators with the means and capacity to carry out the maintenance of their installations has been removed.

With regard to the periodic inspections, it is added that they must in all cases be carried out by an authorised control body, which will issue the corresponding documentation, lays down the procedure for their subsequent action and removes the possibilities referred to above in relation to the control carried out by a cryogenic specialist and by the user's maintenance service, as well as the obligation for them to demonstrate their capacity.

Finally, with regard to closure and decommissioning, reference is made to the administrative authorisation as required under Law 34/1998 of 7 October 2007, which extends the obligation to carry out inertisation to tanks that do not receive any LNG load for a period of one year, modifies the responsibility for carrying out the process of inertisation and removes the obligation, in the event of cessation of activity by the distributor, to submit to the competent body of the Autonomous Community the decision to withdraw the service, as well as the responsibility for dismantling by the licence holder.

ITC ICG-05 GASEOUS FUEL SUPPLY FACILITIES FOR MEANS OF TRANSPORT

This ITC makes a relevant change to the scope in order to clarify that the instruction applies to stations supplying gaseous fuels for all means of transport, not only vehicles, and removes the limitation in the previous regulation on the supply of fuel exclusively for use as motor fuel, without prejudice to other supply restrictions that may be laid down in the sectoral regulations.

On the other hand, minimum safety distances are established in LPG service stations due to their hazardous nature in terms of the design of the facilities and the timing of the notification to the Administration is amended, prior to the date on which the distribution company carries out the first supply.

As a result of the comments received during the first hearing, a second consultation procedure will be carried out on the content of the ANNEX relating to the minimum internal safety distances in service stations

supplying hydrogen.

The claim received proposes an ANNEX including minimum separation distances in certain facilities for the facility's own elements in relation to storages and distribution systems. These distances are based on the renowned standard NFPA-2: 2023 and proposes to allow for the justification of lower distances by quantitative risk analysis (QRA).

The distances proposed in this annex are tabulated according to the risk of the installation's vulnerable elements to hydrogen.

As established by the NFPA2.2023, these distances have been established on the basis of risk analyses taking into account the probability of occurrence of the different accident scenarios and with the thresholds set out in the standard they have been calculated for a possible hydrogen leak, considering that the characteristics of these leaks depend primarily on the pressure of the storage and the effective diameter of the storage. For safety reasons, it has been considered appropriate to incorporate some distances, for example between the distribution system and other hydrocarbon venting systems. Similarly, a minimum distance to the limits of ownership has been established based on the maximum system pressure that increases that obtained in the tables.

It has been possible to carry out the corresponding risk analysis when it is not possible to maintain safety distances. In this case, a favourable report from the Control Body will be required to validate these. Finally, the need to carry out risk analyses for distances outside those facilities with public competing or vulnerable elements within a radius of 30 m has been clarified.

ITC ICG-06 STORAGE FACILITIES FOR LIQUEFIED PETROLEUM GAS (LPG) CONTAINERS FOR OWN USE

The scope of this ITC includes storage facilities for LPG containers intended to supply gas appliances which are not considered to be reception facilities and which present a level of risk equivalent to those already included above.

As regards the total storage capacity of packaging, it is limited to 150 kg in residential blocks, with the limit of 300 kg remaining in all other cases, and ventilation requirements are added.

There are different changes throughout the JTI on the safety conditions in these storages, including on the location of packaging or limitations on the number of packaging, for example when used in batteries.

The exclusion of the provisions in the section on documentation and commissioning of installations has been amended, as has the obligation to carry out reviews in certain cases.

This ITC has been subject to a second hearing, where a text has been presented that aims to maintain the spirit of the original text (ensuring and increasing the security of these small storages) while seeking greater clarity.

The ban on storage in basements, semi-basements and staircase boxes remains in place.

The main new feature is the possibility of installing detection systems where total storage does not exceed 60 kg and direct outdoor ventilation is not possible.

Similarly, the obligation to have packaging protected in all cases from environmental conditions when placed outside has been qualified and has become a recommendation for good practice.

ITC ICG-07 GASEOUS FUEL RECEIVING INSTALLATIONS

The upper limit of unit load from 15 kg to 35 kg has been extended to include packaging previously excluded from the scope of this ITC. Several clarifications have been made to clarify that this exclusion applies only to industrial systems.

The provisions on commissioning are extended to plants which change fuel, requiring the intervention of an inspection body.

The process is established for the reopening of individual reception facilities with a home supply contract without supply for more than one year and for cessation and deregistration of supply. The scope of the inspections in pressure plants below 5 bar and the procedure for rectifying anomalies are developed and the operator is required to keep the documentation file of the plant, which includes all the documentation for putting into service and all the documentation related to inspections and maintenance of the plant.

On the latter point, the text proposed after the first public hearing has qualified some of the situations in which, retroactively, compliance with more current safety standards may be required, as well as sought to clarify the procedure and certificates required for reopening. For example, reopening is prohibited in case the installation is in basement or semi-basement if safety conditions are not adapted.

An amendment has also been incorporated into the inspection procedure, in an attempt to prevent the situation of lack of protection that sometimes occurs when the operator does not coincide with the user of the installation, establishing an obligation for the distribution company to also inform the latter in cases where the supply address does not match the notification address informed by the operator of the installation.

It should be noted that some of the ANNEXES to this JTI have also been amended.

As a result of the comments received during the second hearing, it was considered necessary to qualify the responsibility of the operator of the installation or the gas-fired appliances for carrying out the periodic checks, in the same way, due to the technical difficulty of cutting off home supplies and the impossibility of controlling access to these containers, it was considered appropriate to remove the ban on supplying LPG containers to the distributor, the operator having to ensure that their installation is safe and properly maintained.

ITC ICG-08 GAS APPLIANCES

As a main novelty, an exemption on unit verification is added for equipment not produced in series.

Provisions previously referred to in standard UNE 60670-6 regarding the connection of gas appliances are

developed and included in the regulatory text, and the obligation is established to maintain the documentation relating to the starting of a gas appliance throughout the lifetime of the appliance, as opposed to the five years of the previous Regulation.

A paragraph on periodic inspections every five years has also been added for equipment subject to Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016 which has been certified by the unit verification procedure.

Documentation has been added to be submitted to the Autonomous Community for the start-up of gas appliances falling within the scope of the ITC that are not manufactured in series, manufactured by type examination or manufactured in series for industrial use with a power greater than 200 kW.

Finally, the provisions relating to equipment information plates in Annex II and Annex IV to the ITC are amended.

ITC ICG-09 PERSONS AND COMPANIES INSTALLING GAS

Two new specialist qualifications are established, with their particularities and minimum training required in the company within category A, to work with hydrogen and LNG.

Specific provisions for IG-A category installation companies regarding the need for a technical manager and extended liability insurance or equivalent guarantee have been added to the requirements for installation companies.

After receiving comments for their removal, and having consulted the working group of the Autonomous Communities, it was decided to maintain the examination by the Autonomous Communities themselves as a form of access to the profession of gas installer.

ITC ICG-10 LIQUEFIED PETROLEUM GAS (LPG) INSTALLATIONS FOR DOMESTIC USE IN CARAVANS AND MOTOR CARAVANS

The exclusion from the scope of the regulation of gas containers and appliances that are independent of and external to the vehicle body has been clarified. The obligation to submit the installation certificate to the competent body of the Autonomous Community has also been removed.

With regard to the maintenance of these installations, the period for carrying out maintenance has been increased from four to five years, and it is mandatory to carry the certificate of the inspection on the vehicle and to check the validity of the stamping date in the case of installations powered by refillable tanks.

ITC ICG-11 LIQUEFIED PETROLEUM GAS (LPG) CONTAINER STORAGE, TRANSFER AND FILLING PLANTS

It has been included in a section on inspections of the installation which, by mistake, had been deleted from the initial document.

Following the comments made during the first hearing, it is considered appropriate to recover part of the text relating to the periodic inspections of this type of facility.

Finally, it has become necessary to adapt this JTI in the field of fire protection.

ITC ICG-12 GASEOUS FUEL INSTALLATIONS UNDER MAXIMUM DESIGN PRESSURE EXCEEDING 16 BAR

It has become necessary to adapt this JTI on fire protection.

Both ITC-ICG 11 and ITC-ICG 12 include new installations that were subject to the specific regulation referred to above with the aim of bringing the regulation of installations for gaseous fuels together into a single body of legislation.

The most significant change following the initial public hearing is the inclusion of paragraph 10. Inspections at ITC-ICG 11

ITC ICG-13 LIST OF REFERENCE STANDARDS

The analogous ITC of the previous Regulation was intended to allow the updating of the list of standards, which were in turn mentioned in other JTIs of the Regulation, although it was assumed that possible changes to the standards were limited to the year of publication, never to their numbering or possible change in their scope. This has shown, throughout the updates made to the list during its period of validity, that there is a real possibility of loss of traceability between standards in cases where one of the above circumstances occurs, leaving the text of the corresponding ITC with the original standard code, without it being possible to find its current equivalence in the table of standards. In this way, this new regulation aims to include a new method of reference to standards through its own alphanumeric code that is not affected by these changes.

It should also be noted that throughout the Regulation and the JTIs it approves, various obligations have been identified and included, or eliminated, for operators in the sector that will entail an economic cost, or savings where appropriate. Due to the fact that these affect the installations put into operation after the approval of this RD and that we do not know the number or even the approximate number of these, it is impossible to quantify the total amount of these installations. In summary, some of them are listed:

ITC-ICG-01

- The obligation for the operator of the facility to inform the competent body of the Autonomous Community of the tests prior to commissioning and their characteristics and results has been introduced.
- The obligation to communicate changes to established emergency operation and care procedures is introduced.

ITC-ICG-03

- The obligation to provide installation, inspection and works management certificates to the competent body of the Autonomous Community has been deleted.
- Inspection by control body added.

ITC-ICG-04

- The obligation for the authorised inspection body and the project management to provide a copy of their certificates to the Autonomous Community has been removed.
- The obligation to submit the withdrawal decision to the Autonomous Community in the event of cessation of the distributor's activity has been removed.

ITC-ICG-07

- The provisions relating to commissioning are extended to installations which switch fuel, which represents an increase in cost compared with the current situation.
- For the reopening of individual reception facilities with a home supply contract without supply for more than one year, the existence of an individual installation verification certificate issued by an installation company shall be checked. This is an increase in cost compared to the current situation.

ITC-ICG-08

- Periodic inspections by inspection bodies are required every five years for appliances covered by Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016, which have been certified by the unit verification procedure and for appliances using gas as fuel, which have been placed on the market, which have obtained their conformity by means of a declaration under Regulation (EU) 2023/1230 and which must be registered with the Administration.
- It lays down the obligation to keep the documentation relating to the starting up of a gas appliance throughout the lifetime of the appliance.
- Documentation has been added to be submitted to the Autonomous Community for the start-up of certain gas appliances falling within the scope of the ITC.

ITC-ICG-10

- The requirement to submit the installation certificate to the competent body of the Autonomous Community has been deleted.

ITC-ICG-11

- A mechanical strength test certified by an inspection body shall be carried out when the tanks are relocated or if a defect or anomaly caused by transport, installation or handling is observed at the discretion of the project management.
- For the commissioning, extension or modification of installations, the operator must submit the documentation to the Autonomous Community.

ITC-ICG-12

- The licence holder is required to inform the Autonomous Community of the date on which the tests will be carried out and to include a favourable document in the project management certificate. The licence holder must also communicate the results of the tests.
- The temporary decommissioning of a pipeline must be notified to the competent body for industrial

safety in the Autonomous Community.

- The licence holders shall make a copy of the procedures of the established emergency operation and care centres available to the ministry and the competent body of the Autonomous Community that issued the administrative authorisation.

Other changes that have been made to the regulation as a whole include: elimination of detected errors, use of inclusive language, updating of repealed regulatory and legislative provisions or adapting and limiting the concept of a competent optional technical person.

3. LEGAL ANALYSIS

3.1. Legal basis

The proposal falls within the scope of Law 21/1992, of 16 July, on Industry, Article 1 of which states that: *'The purpose of this Law is to lay down the bases for regulating the industrial sector and the criteria for coordination between the public administrations, in accordance with the provisions of Article 149 (1). 1 and 13 of the Spanish Constitution.'*

Article 2 further states that: *'The aim set out in the preceding article shall be to achieve the following objectives: (...) 3. Industrial safety and quality (...).'*

3.2. Legislative status

There is no substantive or formal reservation of law in this area requiring that it be regulated by means of a legal provision, and it is sufficient for it to be approved by royal decree.

Furthermore, as the draft contains provisions of a highly technical nature, the law is not the appropriate instrument to regulate it.

Finally, the status of the proposed legislation is equal to or higher than that of the repealed legislation, and a draft regulation with the status of a royal decree is therefore considered to be the appropriate instrument.

3.3. Repeal of regulations

The provisions to be repealed are:

- Royal Decree 919/2006 of 28 July approving the Technical Regulation on the distribution and use of gaseous fuels and its additional technical instructions ICG 01 to 11.
- Order of 1 December 1964 adopting safety standards for the construction, assembly and operation of 'Liquefied petroleum gas filling and transfer plants'.
- First additional provision of Royal Decree 984/2015 of 30 October regulating the organised gas market and third-party access to natural gas system facilities, with the exception of paragraph 7 and Article 8.
- Order of 18 November 1974 approving the Regulation on Gaseous Fuel Networks and Offences, in

so far as it contradicts or conflicts with the provisions of this Royal Decree.

Any provisions of equal or lesser rank that are contrary to the provisions of this Royal Decree shall also be repealed.

3.4. Entry into force

For the purposes of Article 23 of Government Law 50/1997 of 27 November, it should be noted that it has been decided to set the date of entry into force of this Royal Decree at a total of six months from the date of its publication in the Official State Gazette, which is done in order to ensure that there is sufficient time between the time when the Royal Decree is published and the time when it enters into force. This is because, given the technical nature of the content of the Royal Decree, the date of entry into force envisaged is considered appropriate to facilitate adaptation to it.

In addition to the above, for certain specific situations, additional transitional periods are provided for in the transitional provisions, in cases where it is considered appropriate to provide for a different period.

4. ALIGNMENT OF THE RULE TO THE ORDER OF DISTRIBUTION OF COMPETENCES

This Royal Decree is issued pursuant to Article 149 (1). Article 13 of the Spanish Constitution, which confers on the State exclusive competence with regard to the bases and coordination of the general planning of economic activity.

As stated above, in the exercise of its powers, the State issued Law 21/1992 of 16 July 1997 on Industry, Title III of which appears under the heading 'Industrial safety and quality'. Specifically, Article 12 (5) of that law provides: *'The national industrial safety regulations shall be approved by the National Government, without prejudice to the possibility for the Autonomous Communities, with legislative power over industry, to introduce additional requirements on the same matters in the case of installations located in their territory'.*

The central part of the rules contained in the proposed royal decree is transferred, for the purposes of competence, to the area of 'Industry' and, specifically, to that of 'industrial safety'. Although the aforementioned subject 'Industry' is not expressly mentioned in Articles 148 and 149 of the Constitution, the State's powers in this area derive from those generally conferred on the State by Article 149 (1). 13 of the Constitution on the "Basis and coordination of the general planning of economic activity". This is set out in the fifth final provision of the draft Royal Decree, which states that *'This Royal Decree is issued pursuant to Article 149 (1). Article 13 of the Spanish Constitution, which confers on the State exclusive powers on the basis and coordination of the general planning of economic activity.'*

For their part, the Autonomous Communities have regulatory development and enforcement powers in the field of industry, without prejudice to what is determined by State rules for reasons of safety, health or military interest and those related to industries subject to mining, hydrocarbons and nuclear energy legislation.

The Constitutional Court, in STC 203/1992, stated that *'the fundamental core of the subject matter of "industry" includes, inter alia, activities aimed at the planning of industrial sectors, the regulation of industrial or manufacturing processes and, more specifically, in the submatter of industrial safety, activities relating to*

the safety of industrial installations and establishments and to the safety of industrial processes and products manufactured there'.

5. DESCRIPTION OF THE PROCEDURE

5.1. Formalities completed

The following steps have been taken:

1. Initial authorisation of the procedure by the Secretariat-General for Industry and Small and Medium-sized Enterprises, granted on 28 October 2020.
2. A public consultation was carried out prior to the drafting of the text in accordance with Article 26 (2) of Government Law 50/1997 of 27 November.

The content of the consultation set out the background to the rule, the problems it was intended to solve, its necessity, timeliness, objectives and the different alternatives.

The deadline for submitting comments ran from 4 March 2021 to 25 March 2021. All information about the consultation was published on the Ministry's website. The entities that participated are listed in Annex I to this document.

3. The draft text of the draft Royal Decree has been drawn up within a working group in which representatives of the Ministry of Industry and Tourism, as well as of all the Autonomous Communities that have requested it, have participated.
4. A public hearing was held in accordance with Government Law 50/1997 of 27 November 1997.

At this hearing, the original full text of the draft Royal Decree was presented together with the Regulatory Impact Analysis Report.

The deadline for submitting comments was extended from 31 March 2025 to 16 May 2025, however, requests were received to extend this deadline and was finally extended to 30 May 2025.

The starting information of this public hearing was communicated by email to the Autonomous Communities via the Market Unity Working Group and to the main associations and actors in the sector.

All the information on this procedure was published on the website of the Ministry of Industry and Tourism. The entities that participated and a summary table of the comments received are set out in Annex II to this document.

A summary of the comments received is given in Annex II to this document. It should be noted that the comments received were examined and assessed in the working group that MINTUR has with the Autonomous Communities in order to seek the broadest possible consensus on the interpretation of the regulatory text.

5. On the basis of the comments received, it was considered necessary to submit certain aspects

of the draft Royal Decree to a second hearing. This public hearing was conducted in accordance with Government Law 50/1997 of 27 November 1997.

At this hearing, the full text of the draft Royal Decree was presented together with the Regulatory Impact Analysis Report. However, the parties whose arguments were sought are as follows:

- Annex Minimum safety distances at hydrogen filling stations (ITC – ICG 05).
- ITC – ICG 06.
- Paragraph 10. (Inspections) of ITC-ICG 11.
- Final Provision Four and Transitional Provision Seven on the Alignment of the Industrial Fire Protection Regime in the Chemical Storage Regulation.

The deadline to submit comments was extended from 14 November 2025 to 7 December 2025 inclusive.

The starting information of this public hearing was communicated by email to the Autonomous Communities via the Market Unity Working Group and to the main associations and actors in the sector.

All the information on this procedure was published on the website of the Ministry of Industry and Tourism. The entities that participated and a summary table of the comments received are set out in Annex III to this document.

A summary of the comments received is given in Annex III to this document. It should be noted that the comments received were examined and assessed in the working group that MINTUR has with the Autonomous Communities in order to seek the broadest possible consensus on the interpretation of the regulatory text.

5.2. Next steps in processing

Once the public hearing procedure has been completed and the arguments analysed, the regulatory procedure will continue.

The following reports are expected to be requested during processing:

Report from the Office for Coordination and Regulatory Quality (OCCN).

Report from the Technical Secretariat-General of the Ministry of Industry and Tourism.

Report from the Technical Secretariat-General of the Ministry of Transport and Sustainable Mobility.

Report from the Technical Secretariat-General of the Ministry of Housing and Urban Agenda.

Report from the Technical Secretariat-General of the Ministry of Ecological Transition and the Demographic Challenge.

Report of the Subdirector-General for International Relations and Cooperation of the Ministry of

Industry and Tourism.

Report from the Ministry of Territorial Policy and Democratic Memory.

Report of the Industrial Safety Coordination Board.

Opinion of the Council of State.

6. ANALYSIS OF IMPACTS

6.1. Overall economic impact

The purpose of this section is to study the impact on the economic aspects arising from the draft Royal Decree.

This legal provision is of a highly technical nature and the changes made to it compared to the current rules will not have any significant economic impact on the Spanish economy as a whole.

6.2. Effect on competition

This Royal Decree will not have any significant impact on competition, given that it merely updates the current rules on this subject in order to adapt them to technical progress and to bring them more into line with the regulatory framework. There are no plans to introduce restrictions on competition in any of its major manifestations: number of market players, ability and incentives to compete.

6.3. Impact on Market Unity

During the preparation of the project, attempts have been made to identify those aspects that involved different interpretations in the application of the Technical Regulation on the distribution and use of gaseous fuels, approved by Royal Decree 919/2006 of 28 July 2007. These aspects have been clarified in order to improve its application, favouring market unity in this area and compliance with the provisions of Law 20/2013 of 9 December 2013 on market unity.

6.4. Impact on SMEs

The study of the impact that regulation may have on SMEs is particularly important in Spain, where small and medium-sized enterprises make up the vast majority of the Spanish business fabric.

In order to assess the impact of the proposal on SMEs, reference has been made to the guidelines set out in the Methodological Guide for drawing up the report on the regulatory impact analysis, in particular in section 3 a. 'General economic impact'.

In so far as this proposal for a Royal Decree improves the application of the regulation on installations for gaseous fuels, the impact on small and medium-sized enterprises could be considered null and void, so it is understood that the SME Test does not need to be carried out.

In any event, during the public hearing procedure, the main associations in the sector with which this unit is in contact will be expressly informed so that they can assess them and, if they identify impacts that have not been taken into account or possible improvements, assess them.

6.5. Impact on the budget

This measure has no budgetary impact as the project is expected to have no impact on public expenditure and revenue, both non-financial and financial.

6.6. Impact of administrative burdens

The total impact of the identified burdens is EUR 4.413.350. This value is obtained by the difference between charges (EUR 28.808.600) and estimated savings (EUR 24.395.250).

It should be noted in response to some of the comments received during the first hearing that the section on administrative burdens has been revised.

It should be noted that, in order to obtain this value, we followed the Manual on Administrative Simplification and Burden Reduction for the General State Administration, available at the following link, the equation of which is shown below: [MSARCAGE](#). No errors have been found that would make it necessary to adapt this section.

$$\text{Administrative cost} = \text{Unit cost} \times \text{Frequency} \times \text{Population}$$

The impacts developed throughout this section have also been explained in more detail in Chapter 2. *Content*.

With regard to the amendments made to ITC 01, the following impacts have been identified:

- Quantifiable burdens:
 - o Burden relating to the obligation of the operator of the facilities to contract a control body authorised to certify a sample of the conservation status of the facilities subject to maintenance operations:
 - The frequency is annual and a population of 5 has been assumed, coinciding with the number of gas distribution companies covering the whole territory. Since the unit cost of this type of burden, identified as '*Audit or controls by external organisations or professionals*', is EUR 1.500, the administrative cost of this burden is EUR 7.500.
 - o Burden relating to the obligation of the operator to communicate to the Autonomous Communities a maintenance plan for the installations to be carried out in the following year (last quarter of the year) and the result of the previous year's maintenance plan (first quarter).
 - The frequency is annual, assuming a population of 5. Since the unit cost of this type of charge, identified as '*Obligation to communicate or publish any information*', is EUR 100, the administrative cost of this charge is EUR 500.

With regard to the amendments made to ITC 02, the following impacts have been identified:

- Quantifiable savings:
 - o The inspection period per inspection body for the 4th and 5th category centres has been extended from two to five years.
 - The new frequency is five years and, according to statistical data, a population of 45 has been assumed. Given that the unit cost of this type of burden, identified as '*Audit or controls by external organisations or professionals*', is EUR 1.500, the estimated savings are EUR 20.250.

With regard to the amendments made to ITC 03, the following impacts have been identified:

- Quantifiable burdens:
 - o An obligation has been added in the operator's periodic inspections to have the installation inspected every five years by an authorised inspection body.
 - The frequency is five years and a population of 15.000 has been assumed, based on estimates of the size of the sector and the population of installations in the communities where this information could be obtained. Since the unit cost of this type of burden, identified as '*Audit or controls by external organisations or professionals*', is EUR 1.500, the administrative cost of this burden is EUR 4.500.000.
 - o The obligation for the operator of the installation to keep documentation relating to corrosion protection has been added.
 - The frequency is unique and a population of 15.000 has been assumed. Since the unit cost of this type of burden, identified as '*Obligation to keep documents*', is EUR 20, the administrative cost of this burden is EUR 300.000.
- Neutral impact
 - o In the case of temporary warehouses, the obligation to draw up a project for first use has been removed and the obligation to submit the commissioning documentation to the competent body of the corresponding Autonomous Community and to communicate certain information to the Autonomous Community each time it is connected to a facility has been established.
 - As these are temporary installations, the number of which is unknown, it is not possible to calculate the reduction or increase in the cost associated with the new provision, although this impact has been identified.

With regard to the amendments made to ITC 04, the following impacts have been identified:

- Quantifiable burdens:
 - o With regard to periodic inspections, they must be carried out by an authorised inspection body.
 - The frequency is five years and a population of 1.000 has been assumed, according to information from the sector. Since the unit cost of this type of burden, identified as '*Audit or controls by external organisations or professionals*', is EUR 1500, the administrative cost of this burden is EUR 1.500.000.
- Neutral impact:
 - o The documentation to be submitted to the competent body prior to the date of first filling is established, removing the requirement for safety documentation and emergency plans and replacing it with a memory.
 - As this is both a saving and a requirement for new installations, it is not possible to calculate the cost associated with not knowing how many will be carried out. In any case, it is estimated that the costs would be cancelled when the required documentation is replaced.

With regard to the amendments made to ITC 07, the following impacts have been identified:

- Quantifiable burdens:
 - o The operator is required to keep the documentation file for the facility, which includes the

documentation for commissioning and all documentation relating to inspections and maintenance of the facility.

- The frequency is unique and a population of 8.000.000 has been assumed. Since the unit cost of this type of burden, identified as '*Obligation to keep documents*', is EUR 20, the administrative cost of this burden is EUR 16.000.000.

With regard to the amendments made to ITC 10, the following impacts have been identified:

- Quantifiable savings:
 - o Maintenance period increased from 4 to 5 years
 - The new frequency is five years and a population of 325.000 has been assumed, according to statistical data. Given that the unit cost of this type of burden, identified as '*Audit or controls by external organisations or professionals*', is EUR 1.500, the estimated savings are EUR 24.375.000.
- Quantifiable burdens:
 - o The obligation to carry the revision certificate on the vehicle is laid down
 - The frequency is unique and a population of 325.000 has been assumed, according to statistical data. Since the unit cost of this type of burden, identified as '*Obligation to keep documents*', is EUR 20, the administrative cost of this burden is EUR 6.500.000.

With regard to the amendments made to ITC 11, the following impacts have been identified:

- Quantifiable burdens:
 - o The holder is obliged to hold a copy of the certificate of the last inspection carried out, the document being made available to the competent body of the Autonomous Community.
 - The frequency is unique and a population of 30 has been assumed, according to the information provided by the sector. Since the unit cost of this type of burden, identified as '*Obligation to keep documents*', is EUR 20, the administrative cost of this burden is EUR 600.
- Neutral impact
 - o It has been introduced that the periodic checks and tests that vessels must undergo will be carried out in accordance with the scope of ITC-EP-3 of Royal Decree 809/2021. This is not considered to be an administrative burden since, in general, the population concerned was already acting in accordance with that provision, according to the information provided by the sector.

6.7. Gender impact

In accordance with Article 26 (3) (f) of Government Law 50/1997 of 27 November, we hereby inform you that this Royal Decree does not have, in substance or in form, a gender impact and does not contain any provision that could favour situations of discrimination based on gender. From that point of view, the impact is null and void because it relates exclusively to technical matters and does not have direct legal effects on natural persons.

6.8. Impact on children and adolescents

In accordance with the provisions of Article 22d of Organic Law 1/1996 of 15 January 1996 on the legal

protection of minors, partially amending the Civil Code and the Code of Civil Procedure, as amended by Law 26/2015 of 28 July 2009 amending the system for the protection of children and adolescents, the draft legislation has no impact on children and adolescents, since it deals exclusively with technical matters and does not have direct legal effects on natural persons.

6.9. Impact on the family

In accordance with the tenth additional provision of Law 40/2003, of 18 November, on the protection of large families, introduced by the fifth final provision of Law 26/2015, of 28 July, amending the system of protection for children and adolescents, the draft legislation has no impact on the family, as it deals exclusively with technical matters and does not have direct legal effects on natural persons.

6.10. Climate change impact and energy transition

The fifth final provision of Law 7/2021 of 20 May on climate change and energy transition has introduced this impact and amended Article 26 (3) of Government Law 50/1997 of 27 November.

In this regard, we would point out that the proposed royal decree does not include any significant changes in this matter compared with the legislation previously in force. The planned royal decree has no impact on climate change and the energy transition.

7. EX-POST EVALUATION

There is no need for an ex post evaluation of the effectiveness, sustainability and results of the standard, within the meaning of Article 3.2 of Royal Decree 286/2017, of 24 March, regulating the Annual Regulatory Plan and the Annual Regulatory Evaluation Report of the General State Administration and creating the Regulatory Planning and Evaluation Board.

ANNEX I

Prior Public Consultation

The entities that have responded to the prior public consultation are listed below:

N	PERSON/BODY
1	AFECH, Asociación de Fabricantes Españoles de Chimeneas Metálicas (Association of
2	AINEnergía, Association of Energy Engineers
3	AINGOI, Professional Association of Industrial Organisation Engineers
4	ANDIGAS, National Association of Gas Distributors
5	Ayagaures Environment
6	CNI. National Confederation of Installators
7	COGITI, General Council of Official Associations of Industrial Technical Engineers of Spain
8	CONAIF, National Confederation of Associations of Energy Installation and Maintenance Companies and Fluids
9	DISA
10	EIC, Col·legi Associació d'Enginyers Industrials de Catalunya
11	ENAGES
12	FEDGLP, Spanish Federation of Associations and Distributors of Packaged LPG
13	REPSOL
14	Sedigas, Spanish Gas Association
15	VITOGAS

Three individuals also responded to the prior public consultation.

The individual situation of each of the comments dealt with together is not available, and all of them have been considered for the first drafting steps, as well as for the analysis of the need and the study of the different options available.

ANNEX II

Hearing and public information

The entities that responded to the public hearing are listed below:

N	PERSON/BODY
1	Spanish Climate Change Office OECC
2	AENOR TRUSTS
3	ENI Spain
4	AFME
5	Balearic Islands Region
6	FIDEGAS
7	EXOLUM
8	AFEC
9	FEDLPG
10	PRIMAGAS
11	Regional Government of Valencia
12	Government of Catalonia
13	Canary Islands
14	BEQUINOR
15	Community of Madrid – Hydrocarbons and IT
16	EHIC
17	Community of Madrid – DG PEI
18	Andalusia
19	FEDAOC
20	VITOGAS
21	GREENE
22	CNI

23	NATURAL gas networks
24	Regional Government of Extremadura
25	DISA GAS
26	CONAIF
27	REPSOL
28	GASIB
29	Transport ENAGES
30	Liquefied Gas Association
31	NEDGIA
32	NATURAL gas transport
33	SEDIGAS

In addition, submissions were received from one individual.

The following table provides a summary list of the arguments received during the hearing and public information, including the section of the Royal Decree to which they refer, the entity (or individual) issuing them and the corresponding valuation. The following codes are used to perform the assessment: **Accepted, Partially Accepted or Rejected.**

In the case of submissions sent several times by several entities and those with proposals on the same subject, in order to facilitate the drafting of the document and its reading, these are shown **only once in the table.**

In general, **they are associated with the entity that provided the most content or information**, trying to maintain, where possible, the entity that sent them chronologically first. However, **the valuation included in the table applicable to all of them.**

Furthermore, it should be noted that the references to numbers of articles, paragraphs or tables appearing here correspond to the order contained in the draft Royal Decree at the time of the hearing, which may subsequently have changed in its subsequent versions as a result of the amendments made during the procedure.

Entity	Paragraph	Sub-section	Drafting proposal/comments received	STATE	Answer
Canary Islands	Provisions	DA2	Insurance cover taken out in another State: explicitly leave a letter that must include the Spanish territorial scope It is proposed to indicate that the following should be included in the relevant territorial scope: 'Where the gas installation undertaking which establishes itself or carries on the activity in Spain is already covered by professional indemnity insurance or another guarantee which is essentially equivalent or comparable as regards its purpose and the cover it offers in terms of insured risk, insured sum or guarantee limit in another Member State in which it is already established, including the relevant territorial scope, the requirement laid down in paragraph 3.2 (e) of ITC ICG-09 approved by this royal decree shall be deemed to have been met. If the equivalence with the requirements is only partial, the gas installation undertaking shall extend the insurance or equivalent guarantee until the required conditions are met. In the case of insurance or other guarantees taken out with insurance undertakings and credit institutions authorised in another Member State, certificates issued by those undertakings and credit institutions shall be accepted for accreditation purposes.'	Accepted	The proposed amendment is included.
Natural gas Transportation	Provisions	DD	Apart from excluding from the repeal paragraph 7 of the first additional provision of Royal Decree 984/2015 concerning the definition of management costs and physical inspection, the following other paragraphs of the first additional provision should also be excluded from the repeal: - Paragraph 4, which provides that reports drawn up by installation companies must be communicated electronically. - Paragraph 6, which regulates the communication to the competent body of the Autonomous Community of installations that do not carry out the inspection within the regulated deadlines.	Partially accepted	Section 5.2 (c) and Section 5.2 (d) are amended to include Sections 4 and 6, respectively, of the first additional provision of Royal Decree 984/2015. The repealing provision has been amended to include paragraph 8 in the exemption.

			— Paragraph 8, which provides that the customer must pay for the inspection through the trader. The reason for requesting that these other paragraphs also be excluded from such a derogation is that such matters are not regulated in any other provision.		
AFME	Provisions	DF1	No reference is made to chargers with DC output. In Spain, most public chargers are AC and DC chargers. Point (d) is proposed to be amended as follows: 'Publicly accessible recharging points reserved for L-category electric vehicles above 3,7kVA shall be equipped, for interoperability purposes, with at least type 2 plugs or connectors as described in standard UNE-EN 62196-2 or CCS2 as described in standard UNE-EN 62196-3.'	Partially accepted	The claim is partially accepted by deleting the proposed amendment, leaving it for a complete revision of the Royal Decree that is outside the scope of this project.
ENAGAS Transport	Provisions	DF1	The explanatory memorandum to Royal Decree 639/2016 supports the drafting of Royal Decree 639/2016 into Directive 2014/94/EU of 22 October 2014 on the deployment of alternative fuels infrastructure. However, Directive 2014/94/EU is repealed by Regulation (EU) 2023/1804 of the European Parliament and of the Council of 13 September 2023 on the deployment of alternative fuels infrastructure, and repealing Directive 2014/94/EU. It is therefore proposed that the First Final Provision of the Draft Royal Decree approving the Technical Regulation on the Safety of Gas Fuels Infrastructure and Installations carry out a more in-depth update of Royal Decree 639/2016, with the aim of removing any reference to Directive 2014/94/EU, which has already been repealed, and updating it in its entirety taking into account Regulation (EU) 2023/1804.	Partially accepted	We partially accept the claim by deleting the proposed amendment and leaving it for a complete revision of the Royal Decree, which is outside the scope of this project.

ENAGAS Transport	Provisions	DF1	We very much welcome the inclusion of this paragraph, as there are CNG refuelling points for motor vehicles in operation that do not comply with the supply pressure, posing a risk to the safety of persons and installations. However, given that the design, construction, legalisation, maintenance and inspection of this type of gas service station will be carried out in accordance with this technical regulation on the safety of infrastructure and installations for gaseous fuels, we request that these technical specifications for CNG refuelling points for motor vehicles be included in the new technical regulation on the safety of infrastructure and installations for gaseous fuels.	Partially accepted	We do not consider the text to be an argument. However, it is taken into account for the corresponding JT1. We partially accept the claim by deleting the proposed amendment and leaving it for a complete revision of the Royal Decree, which is outside the scope of this project.
OECC	Provisions	DF2	Error in the nomenclature of Regulation (EU) 2024/573. It is most often referred to as Regulation 573/2024.	Accepted	Correcting the nomenclature of Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation (EU) No 517/2014.

Reason: to align with the text of IF-17, to improve the wording and understanding of the text, and to include the term 'apparatus', which is the term used in F-gas: see Article 6. Point 1.

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It is proposed to amend paragraph 4.3 of instruction IF —

06:

Accepted The amendment is included, adapting the text

AFec Provisions DF2

Installations of stationary equipment listed in the part of the proposal. Article 5(2) (a) to (d) of Regulation 2024/573, using fluorinated refrigerants, shall have leakage detection systems in place for each equipment that contains fluorinated greenhouse gases listed in Annex I of Regulation EU 573/2024 of 7 February in quantities of 500 tonnes of CO₂ equivalent or more, or gases listed in Annex II;

			section 1 of Regulation (EU) No 573/2024 of 7 February in quantities of 100 kilograms or more. These leak detection systems shall alert the operator of the installation and, where appropriate, the maintenance company, when a leak is detected. This alarm, and the action taken, shall be recorded in the table of periodic leak checks in the logbook of the refrigeration installation.		
AFEC	Provisions	DF2	Proposal: Replace EN IEC 60335-2-40: 2024 with UNE EN IEC 60335-2-40: 2025 Reason: the UNE reference to the cited standard is already available.	Accepted	The reference EN IEC 60335-2-40: 2024 has been replaced by UNE EN IEC 60335-2-40: 2025.

Community of Provisions DF2 The text is not understood and may lead to a misunderstanding of the Accepted Time The proposed amendment is included.
Madrid – DG
PEI

to interpret the time limits by which the
periodic inspections.

It proposes:

'Eight. The first paragraph of Section 3.1 of Instruction IF-14 is amended to read as follows:

Level 2 refrigeration facilities shall be inspected every ten years.

Independent of the level of installations, systems using refrigerants listed in Annex I and Annex II to Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024 on fluorinated greenhouse gases shall be inspected:

Refrigerants in Annex I:

LOAD

(tonnes of CO2 equivalent) periodicity

$5000 \leq \text{ANNUAL load}$

$500 \leq \text{Load} < 5000$ CADA DOS YEARS

$50 \leq \text{Load} < 500$ CADA 5 YEARS

Annex II refrigerants (doubts exist as to whether this applies to all Annex II gases or only Annex II section 1 gases which are for which F-Gas revisions are defined):

Loading (kg) periodicity

			200 ≤ ANNUAL load 100 ≤ Load < 200 CADA DOS YEARS 10 ≤ Cargo < 100 CADA 5 YEARS'		
Community of Madrid – DG PEI	Provisions	DF2	Second final provision Amendment of Royal Decree 552/2019 of 27 September approving the Safety Regulation for refrigeration installations and its additional technical instructions. Royal Decree 552/2019 of 27 September 2014 approving the Safety Regulation for refrigeration installations and its additional technical instructions is hereby amended as follows: (...) Eleven. Paragraph 2.5.2 of Instruction IF-17 is amended to read as follows: 2.5.2. Programme for the review of refrigeration systems. In accordance with Regulation (EU) 2024/573 of the European Parliament and of the Council of 7 February 2024, the following systems shall be reviewed in accordance with the procedure specified in 2.5.3: Although the table inserted for the frequency of revisions is copied from F-gas, it is proposed that the frequency of the review programme specified in point 2.5.3 be set out in tabular form, as indicated in the previous point, for the sake of clarity.	Accepted	Clarification is sought by means of an amendment to the table.
Andalusia	Provisions	DF2	It seems right to merge the requirements into a single standard, but it should be remembered that Regulation (EU) 2024/573 has already been mandatory since March 2024. Failure to accurately communicate its content may lead to problems of interpretation. In this regard, it should be noted that, with regard to leak alerts, paragraph 4.3 of the proposed IF06 refers to an alert to the operator, paragraph 3.6.11 of the proposed IF01 refers to an alert to the person in charge and Article 6.1 of the current EU Regulation 2024/573 refers to an alert to the operator. This terminology	Accepted	The proposed amendment is included.

Andalusia	Provisions	DF2	Point seven. Amendment of paragraph 4.3 of IF-06. Leakage detection systems for fluorinated refrigerants It would be useful to indicate how this alert is communicated to the operator or maintainer. Clarify who is responsible for alerting. Whether the owner/maintainer alarm system or the operator alarm system and the operator/maintainer alarm system. The same issue as regards the fact that these alarms and the action taken must be recorded in the table of periodic leak checks in the logbook of the refrigeration installation. As it stands, it is not clear who makes the communications and records.	Partially accepted	It has been clarified that it is the leak detection system that must alert the operator when a leak is detected ('operator' is replaced on the basis of another claim) or, in the case of Tier 2 installations, the maintenance company. In the proposal for a Royal Decree, no changes have been made to the current wording of the Regulation as regards the obligation to register alarms and actions adopted in the register, so we do not consider it appropriate to expand on this point.
Canary Islands	Provisions	DF2	It is proposed to change the wording of this paragraph as regards the term "advise", similarly to Article 13(5) of RD 552/2019: 6. Furthermore, in accordance with Article 5 (3) of Royal Decree 487/2022 of 21 June establishing the health requirements for the prevention and control of legionellosis, the installation companies of cooling towers and evaporative capacitors must inform the holder in writing of the obligation to notify the competent health administration of the number and technical characteristics of the commissioning of evaporative towers and capacitors within one month.	Accepted	The proposed amendment is included.
CNI	Provisions	DF2	It is proposed to insert a paragraph in Article 21(6) of the RIS. c) In the case of Br Li- Water absorption installations, the refrigeration installation company must also provide documented proof of the suitability of the solutions adopted from an energy point of view (solution with lower energy costs) and must meet the requirements laid down in the current regulations on pressure equipment as regards the design, manufacture, protection and documentation that must accompany such equipment. For the above systems found		

			charged with refrigerants of group L1 or group A2L, the installation, maintenance, repair and drawing up of the installation certificate may be executed by level 1 installation company. For the other systems subject to this paragraph, such tasks may only be performed by Tier 2 undertakings. “		
Andalusia	Provisions	DF3	Paragraph 2.3 In relation to this point, we consider it appropriate, at least for the specific case of thermosolar plants in all their application strands (electric power generators and heat generators), due to the problems encountered in carrying out the level C inspection and the volume of requests for replacement tests, to approve a procedure such as that being approved in EP-6, enabling it to be carried out with both a fluid considered dangerous under Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 and pneumatic fluid, complying with the requirements set out in this new version of EP-6, namely: a) The operator of the installation shall draw up a test plan which shall include the stages of its development with maintenance times for the pressures during each stage of the test, as well as the other operations to be carried out during the test. This plan must also include the minimum safety distances to be maintained during the test, together with the other safety and security measures to be carried out during the test. The inspection body responsible for carrying out the test must validate the test plan drawn up by the operator of the installation. b) The operator of the installation shall appoint a test coordinator who shall be responsible for the conduct and safety of the test and shall be present throughout the test. c) Before the pneumatic test is carried out, on	Rejected	Not acceptable. The amendment introduced refers to fluids not considered as hazardous according to Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 and not to fluids considered as hazardous according to that Regulation as indicated by the claim.

			a visual inspection of the installation shall be carried out by the inspection body. Proposal for a regulation final text (d) During the test, the area through which the movement of personnel from outside the test is not permitted shall be indicated. Given that these alternative conditions have been generally authorised for thermosolar plants, it seems reasonable to make express provision for them already in the Regulation and therefore not to treat them as extraordinary and subject to prior administrative authorisation.		
Andalusia	Provisions	DF3	Proposal for a new amendment not covered by the draft. Solar thermal plants use solar fields consisting of hundreds of solar collectors (cylindric-parabolic collectors), absorbing tubes and thermal fluid circuits (HTFs). While such equipment can technically be considered as pressure equipment, it has a modular nature, frequent maintenance and a different operating regime than other static or process equipment. In this context, many interventions that would currently be classified as 'major repairs' under ITC EP-2 of RD 809/2021 are in fact routine and foreseeable repairs due to operational wear and tear or thermal degradation failures, without this implying a significant modification of their structural or functional integrity. Solar thermal plants use solar fields consisting of hundreds of solar collectors (cylindric-parabolic collectors), absorbing tubes and thermal fluid circuits (HTFs). This equipment can technically be considered as pressure equipment.	Rejected	Not acceptable. The proposed amendment includes additional elements for the consideration of what is a major repair and at the same time exceptions to it. The additional elements may affect other equipment present in installations affected by IP02.

		they have a modular nature, frequent maintenance and a different operating regime than other static or process equipment. In this context, many interventions that would currently be classified as 'major repairs' under ITC EP-2 of RD 809/2021 are in fact routine and foreseeable repairs due to operational wear and tear or thermal degradation failures, without this implying a significant modification of their structural or functional integrity. Proposed text to be added/amended in JTI EP-2: Amendment to paragraph 3.1 or 8.2 of JTI EP-2 – "Definition of major repair": 'A major repair is any operation involving a significant change in the structure, configuration or design conditions of the pressure equipment, including welding into pressure elements, with the following exceptions: Interventions in pressure equipment located in the solar field of thermosolar power plants, such as absorbing tubes, signs, elbows, etc. with thermal fluid, shall not be considered major repairs for the purposes of this Regulation where they consist of the replacement of components with others with the same technical characteristics and do not alter the design, pressure or operating conditions of the system.'	
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REPSO

Provisions DF3 New ITC ICG-11 already covers Accepted Design Schemes

and inspection equivalent to APQ and partially good industry practices, such as the establishment of an annual maintenance and inspection plan, operations manuals and insurance, among other guarantees of safe operation. The ICG-11 JTI already adopts an inspection regime for its pressure equipment in accordance with Supplementary Technical Instruction ITC EP-3.

Finding accepted. However, as not all LPG filling plants will be governed by the new ITC-ICG 11 (only those where LPG is intended for use as fuel will be governed), the following wording will be included: "(d) Liquefied Petroleum Gas (LPG) container filling plants included in Royal Decree XXX/XXX by

of Regulation (EC) No RD809/2021 on pressure equipment. approving the technical regulation for the
Furthermore, JTI EP-6 considers a basic installation design and a five-year safety of gaseous fuels infrastructure and
pressure test that could be useful in a recharging centre under regulatory installations
and technical development and which is not harmonised with the criteria for
industrially-oriented regulations such as APQ, the new JTI ICG-11 of RD919, JTIs EP3 of the same regulation or even the
body of the Pressure Equipment Regulation.

Finally, EP6 introduces the concept of registration of the refill centre for packaging in the corresponding regional authority as a pre-condition for the start up of the facilities. In general, the liquefied petroleum gas (LPG) packaging filling plants, which will be governed by Royal Decree 919/2025 and ITC ICG-11, were already in operation before the publication of this EP6 and because of their generic industrial activity, are already registered in the Integrated Industrial Register regulated in Title IV of Law 21/1992 of 16 July, as provided for in its implementing regulations. However, according to EP6, when applying for this new registration, regional governments apply different criteria, including refusal to issue the registration certificate, in some cases, which creates uncertainty in the sector.

To add a new paragraph (d) to Article 1 (2) of ITC EP-6 transportable pressure vessels of the Pressure Equipment Regulation
Article 1. The scope:

The Regulation on pressure equipment and its supplementary technical instruction ITC EP-6 'Transportable pressure vessels', approved by Royal Decree 809/2021 of 21 September, are amended as follows: Article 1. Scope of paragraph 2, amend to read with the new exclusion (d):

'2. They are exempted from the application of the provisions of the

			this JTI: a) LPG cartridges. b) Fire extinguishers, which shall be governed by Royal Decree 513/2017 of 22 May approving the Regulation on fire protection installations. c) Self-contained respiratory equipment cylinders included in JTI EP-5. d) Liquefied petroleum gas (LPG) container filling plants, which shall be governed by Royal Decree xxx/2025 approving the Technical Regulation on the Safety of Infrastructure and Installations for Gaseous Fuels and, in particular, by its ITC ICG-11'.		
CNI	Provisions	DF5	It should be clarified what kind of provisions are "non-basic" and how they differ from fundamental ones. For example: 'The non-basic provisions included in this Royal Decree, which are those that do not affect the safety of persons, property or the environment, shall not apply in those Autonomous Communities which, in the exercise of their powers to implement the State bases, have approved or approve rules implementing them.'	Rejected	The non-basic provisions are defined in the first paragraph, namely those laid down in Chapter II of the Regulation.
Regional Government of Valencia	Provisions	DT2	We are not in favour of regularisations. This does not penalise those who have failed to comply with the rules in force to date, i.e. those that are illegal. He also tells those who intend to do so in the future, thinking that one day the installation will be regularised. We believe that if regularisation is to be facilitated, they must present what the current regulation establishes, not by means of a procedure that is lighter and less demanding for them.	Rejected	The purpose of this provision is to improve the safety of installations.
Community of Madrid – Hydrocarbons and IT	Provisions	DT2	Gas installations have been regulated since several regulations backwards, but this is not the case for installations subject to more modern regulations without this historic one. In addition, except for a very specific case of installations, distributors, retail sellers of LPG and	Rejected	The purpose of this provision is to improve the safety of installations.

			wholesale operators of bottled LPG have an inventory of the facilities to which they supply. It is therefore relatively straightforward to find documentation of them when necessary. Delete		
CNI	Provisions	DT2	A self-declaration by the operator indicating the year of installation and putting into service, that the installation complies with the applicable legislation and regulations at the time of its implementation and that it has been in continuous operation since being put into service.'	Accepted	The proposed amendment is included.
GASIB	Provisions	DT2	This provision describes the documentation necessary to obtain the re-entry into service of the installations falling within the scope of this Royal Decree, the implementation and subsequent entry into service of which was carried out before its entry into force, but which, for various reasons and since it is compulsory to notify them, does not have a record of the submission of the documentation required for their entry into service to the competent industry body of the respective Autonomous Communities. We understand that the objective of this transitional provision is to make the administrative regularisation of installations as operational as possible and in line with reality by maintaining the level of security required for equipment and installations. This transitional provision may concern very old installations which were put into service in accordance with the regulations in force at the time of their installation and for which, for various reasons, no such documentation is currently available. The files, in many cases on paper, also do not have a copy in the corresponding public administrations. Due to the age of commissioning, we understand that the submission of declarations of conformity and manufacturing documents for the equipment that is part of the installation, in most cases	Partially accepted	The proposal is partially accepted by amending the text.

in such cases it will be impossible (indent 4 of the transitional provision). In addition, the same paragraph describes as an option to the above the submission of documents proving the date of purchase and its launch and, in the same way as the previous point, we understand that in most cases of regularisation of old installations, these documents will be impossible to provide.

Finally, the following is stated: Report by a competent technician on the correct operation and maintenance of the equipment. It is not clear whether this technical report should be provided as an option to the above described or as a complement.

In view of the above, in order to make the Second Transitional Provision for the Administrative Adjustment of Facilities operational, we propose the following wording for the 4th indent of the Second Transitional Provision. Administrative regularisation of installations.

— Declarations of conformity and manufacturing documents for the equipment forming part of the installation or, if not available, documents proving the date of purchase and commissioning. In the case of old installations that cannot provide the documentation described in this section, a report by a competent technician on the correct operation and maintenance of the equipment shall be submitted.

Natural gas
Transportati
on

Provisions

DT2 The following amendments are proposed in order to be accepted as more operational in the procedure and to be able to have a partial longer time to regularise the corresponding documentation in those facilities where administrative regularisation is most difficult, citing as an example those cases where it will be necessary to regularise assets that have been the subject of sale transactions between different companies, where not all of the assets have been properly transferred.

The time available has been increased to 3 years from the entry into force of the regulation.

Natural gas Transportation	Provisions	DT2	their documentation or the corresponding communication by the seller has not been made. We therefore propose the following text: 'As a general rule and if no other provisions are laid down in this regard in the corresponding supplementary technical instructions, the operators of the installations falling within the scope of this Royal Decree, whose implementation and subsequent putting into service took place before its entry into force, but who, for various reasons and for which communication is mandatory, do not have a record of the submission of the documentation required for putting them into service to the competent body for industry in the respective Autonomous Communities, must submit it at the next regulatory inspection or, failing that, have five years from the entry into force of this Royal Decree to submit the following documentation to the competent body of the Autonomous Community in which the installation resides: (...)' In the second section, the documentation to be provided should be defined according to the type of installation: - Specificity of the documentation: Gas receiving installations can vary significantly in their complexity and technical characteristics. Clearly defining the documentation required for each type of installation will ensure that the necessary and relevant data are provided for each case. - Legal compliance: The current legislation sets out different technical and safety requirements for different types of gas receiving installations. Specifying the necessary documentation according to the type of installation will help to ensure that these requirements are met and that the installations are safe and efficient. - Clarity and efficiency: A clear definition of the required documentation will avoid interpretations	Partially accepted	The list in the second transitional provision has been amended to make it clearer and specify the type of documentation to be submitted.
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			erroneous and will facilitate the process of verification and certification of installations. This will contribute to greater efficiency in the management and control of installations, reducing the risk of non-compliance and improving safety.		
Natural gas Transportation	Provisions	DT2	It is proposed that the fourth heading be amended as follows: “- Declarations of conformity and manufacturing documents for the equipment forming part of the installation, or, if not available, documents proving the date of purchase and commissioning or graphic document of the data plate. Report by a competent technician on the correct operation and maintenance of the equipment”.	Partially accepted	The proposal is partially accepted, with the list being amended to provide clarity.
Natural gas Transportation	Provisions	DT2	It is proposed to add the following paragraph at the end of the provision: 'Once the relevant documentation has been submitted to the competent body for industry in the Autonomous Community, the owner shall be given acknowledgement of receipt of the submission of the documentation in accordance with Article 11.'	Rejected	The proposal is rejected as Article 11 on communication to the administration already provides for this.

Community of provisions DT5 ITC ICG-09 sets out in point 3.2 in relation to Accepted. The proposed amendment is included.

Madrid – DG
PEI

requirements for installation companies, a series of requirements to be met by undertakings carrying out activities to operate CNG, LNG and hydrogen facilities, in line with the two new licences established under category A gas installer category for CNG, LNG and hydrogen facilities in paragraph 2.2 of ITC ICG-09.
Therefore, a maximum period should be indicated within which category A companies wishing to do so should adapt to these requirements.
It is proposed to add a second paragraph to the fifth transitional provision:
'Notwithstanding the above, those Category A gas installation undertakings that have previously been authorised and wish to install hydrogen, LNG and/ or CNG installations,

			they shall have a period of XX, from the entry into force of this Royal Decree, to adapt to the new requirements imposed by paragraph 3.2 of supplementary technical instruction ITC ICG-09 and to submit a new self-declaration specifically covering these activities. If such a self-declaration is not submitted within the prescribed period, it shall be understood that these gas installation undertakings are not entitled to carry out their activity in this type of installation.'		
Community of Madrid – Hydrocarbons and IT	Provisions	DT6	Reverse the order in the first paragraph so that it is better understood: Those apparatus [...] must, within 5 years of the entry into force of this Regulation, submit to the corresponding Autonomous Community, together with the periodic inspection, together with either the initial inspection or a simplified design document for the apparatus to be registered, indicating the date on which it was put into operation and the safety conditions of the apparatus, within 5 years for inclusion in the corresponding register of the Autonomous Communities.	Accepted	The proposed amendment is included.
Natural Gas Provisions Transport		DT6	We propose deleting the last two paragraphs, which have already been rejected. The claim is rejected as it is whereas responsibility for those obligations lies with the operator of the installation, which may not result in a control by distributor or installation company, given that the technician of the gas installation company (whether external or subcontracted by the distribution company) carrying out the inspection does not know how the equipment was approved, the date of the last inspection via OCA, etc. In this regard, it does not seem appropriate to assign to a third party other than the owner of the facility the documentary check of equipment with a power > 70 kW when the scope of the inspection ends at the key to the equipment and when the Administration itself establishes legalisation models with a self-declaration, in which the responsibility of the inspector to check the proper registration of all equipment for installation.		

			the licence holder assumes responsibility for compliance with the rules.		
BEQUINOR	Provisions	New	Add an additional provision amending Royal Decree 656/2017 to bring the Chemical Storage Regulation (RAPQ) into line with the new Regulation on Fire Safety in Industrial Establishments (RSCIEI), published in the Official State Gazette (BOE) on 10 April 2025. In order to resolve this dispute and ensure consistent application of the rules, it is essential to amend RD 656/2017 RAPQ.	Accepted	The Fifth Final Provision and the Seventh Transitional Provision have been incorporated.
Natural gas Networks	ITC-ICG-01	Paragraph 1	The new Regulation maintains the confusion as to whether or not it permits the granting of Administrative and Facility Implementation Authorisations for new annual reports submitted. We therefore propose the following new wording: 'The purpose of this Supplementary Technical Instruction (ITC) is to lay down the essential technical requirements and minimum safety measures to be observed when designing, constructing and operating the gaseous fuel installations referred to in Article 2 (1) (a) of the Technical Regulation on the safety of gaseous fuel infrastructure and installations, as well as to regulate the possible annual management of applications for administrative authorisations and the execution of installations, in addition to the provisions of Law 34/1998 of 7 October.'	Rejected	This paragraph refers to general aspects of ITC ICG 01 and not to the authorisation referred to in the following paragraph. Authorisation is governed by sectoral legislation which is not the subject of this Regulation. In addition, the following section on administrative authorisation provides for the authorisation of the extension of networks.
Natural gas Networks	ITC-ICG-01	Paragraph 2	As the territorial competences for gas distribution are provincial in scope, and also paragraph 4.1 (c) refers to "implemented annually at provincial level", it is proposed to nuance the text of this paragraph with the following wording: 'In the case of extensions of existing distribution networks, prior administrative authorisation shall be requested on the basis of a general report at provincial level containing approximate annual forecasts of:	Rejected	The power to authorise is autonomous, not provincial. Article 72 of the LSH provides: 'The distribution of gaseous fuels shall be governed by this Law, its implementing rules and by the legislation issued by the Autonomous Communities within the scope of their competences'. The Autonomous Community body may, where appropriate, accept the processing it considers by means of plans or

Natural gas Networks	ITC-ICG-01	Paragraph 3	The following new wording is proposed: 'Installations for the distribution of gaseous fuels by piping shall be designed and tested in accordance with the requirements set out in references GAS_003, GAS_004, GAS_017, GAS_019, GAS_039 and GAS_050, as appropriate, of the table of standards, and in any other standard applicable to them depending on the design pressure or the nature of the gas.' First, it is proposed to add "and tested" because standard UNE-EN 12327, the reference of which is contained in reference GAS_019, relates to tests, not to design. Second, we believe that, in order to cover possible injection modules that may fall within the scope of this ITC-ICG 01, reference should be made to standard GAS_039 (UNE-EN 17928), as is done in Chapter 3 of ITC-ICG 12.	Partially accepted	All the references have been amended, replacing the paragraph covered by claim GAS_019 with GAS_039 and citing the first of the standards in section 4.
Natural gas Networks	ITC-ICG-01	Paragraph 4.1	We believe that it should not apply to all installations associated with extensions that are covered by the annual report system (section 2 of this ITC). This obligation should be limited to the sample referred to in paragraph 4.1 (a), (b) and (c). We assume that the spirit of this rule may go in this direction, but it should be stated more clearly, as it may lead to different interpretations by different parties to the proceedings. We therefore propose the following wording: "... The operator of the installations shall communicate both the aforementioned time of execution and the results of the tests to the said competent body only in the following cases: a) New networks, in any case. b) Extensions of existing networks and ancillary installations with MOP > 5 bar, in any case. c) Extensions of existing networks and ancillary installations	Rejected	Prior communication of the evidence to the competent body has been deemed necessary in all cases in order to ensure adequate follow-up by the competent administrations. With regard to the carcass, the Autonomous Communities are responsible for determining the official channels for submitting documentation to the Administration and do not fall within the scope of the Royal Decree regulating this matter.

construction of distribution facilities.'

annual extension reports, at the territorial level determined by it (municipal, district, provincial or other).

			with $MOP \leq 5$ bar (...)" In addition, the channel to be used (mailbox, portal or online register) should be specified, both for the Autonomous Communities that will define it and for those that do not proactively do so and that is homogeneous for all the Autonomous Communities.		
Natural gas Networks	ITC-ICG-01	Paragraph 4.1	From the fourth paragraph: "(...) (a) New networks, in any event. (...)" As a result, we consider it necessary to include in Article 3 (Definitions) of the Regulation a precise definition of the term 'New Networks', in order to avoid different interpretations by different actors. We propose the following: 'XX. New networks: Networks which are included in a specific project submitted to the body responsible for obtaining authorisation to carry out installations.'	Partially accepted	The definition of a new network is included, amending the proposal submitted.
Natural gas Networks	ITC-ICG-01	Paragraph 4.2	We believe that the first paragraph should not apply to all installations associated with extensions that are covered by the annual storage system (section 2 of this ITC), as it would disable the agility of the process that makes it possible to respond to demand from supply seekers with the same security guarantees and with the same agility and without overwhelming the body responsible for industry. We assume that the spirit of this provision may go in this direction, but we believe that it should be indicated more clearly as it may lead to different interpretations by different parties to the proceedings.	Partially accepted	The text is partially amended as proposed.
Natural gas Networks	ITC-ICG-01	Paragraph 5	The following new wording is proposed: 'The companies distributing piped gas and the owners of the injection lines and isolated pipelines for gaseous fuels shall make available to the management body responsible for industrial safety of the Ministry of Industry and Tourism and to the competent body of the Autonomous Community that issued the administrative authorisation for the distribution facility a copy of	Rejected	It is proposed to add "distribution" after "administrative authorisation of the installation", which was already included in the proposed text.

			the procedures for the operation and control of the operational and emergency response centres actually established, and any changes must be notified.' The reason is that not all the facilities considered in this ITC-ICG 01 are, strictly speaking, distribution facilities.		
ENAGAS Transport	ITC-ICG-01	Paragraph 5.1	As currently the European implementing rules do not define the need or conditions for odourisation for hydrogen, the following wording is proposed: 'The main functions of operating centres shall be at least the following: - Monitoring of the network and follow-up of actions in the field. Operating centres shall establish the necessary mechanisms to monitor and maintain within adequate margins the quality parameters of the supply, which shall be at least the pressure in the installations and the concentration of odouriser, where appropriate, in the gas. (...) - Analysis of the quality of supply. They shall produce on a monthly basis a quality report on the gas supplied, summarising the results of the measurements made and the data provided by the transport undertakings for odourisation levels, where applicable, and the average gross calorific value (HCV) of the gas circulating on their networks. To this end, the Technical System Manager shall provide the piped gas distribution company with the PCS values of the gas delivered by the transport company on an hourly basis.'	Accepted	The proposed amendment is included.
Natural gas Networks	ITC-ICG-01	Paragraph 5.1	We understand that, for safety reasons in the deployment of this type of facility, the exclusion in the second paragraph should not apply to isolated pipelines. We therefore propose to remove these facilities from the exclusion, leaving the paragraph as follows: 'Distributions are excluded from this requirement.	Rejected	The rationale for this exclusion is that isolated pipelines of renewable gases will be similar in size to LPG and therefore there is no need for a hub which is designed to operate large grids. On the other hand, the

			fuelled by LPG tanks, as well as lines for the injection of gaseous fuels, which, depending on their size, must include in the notification of commissioning to the competent body of the Autonomous Community an operating and control plan ensuring an equivalent level of safety.'		requiring this would make isolated pipelines of renewable gases unviable.
VITOGAS	ITC-ICG-01	Paragraph 5.2	That paragraph provides: 'In order to deal with possible safety incidents, such as scent of gas, fire or explosion in the reception facilities of users, undertakings distributing piped gas must have their own or contracted emergency response system. Companies distributing piped gas shall pass on to users the costs arising from the permanent availability of this emergency care service, as established by regulation by the competent body of the Autonomous Community where they provide the emergency care service.' It has been noted that in this section it has been specified that the Autonomous Communities will be responsible for determining this amount. Since 2006, there has been a clear legal vacuum in this area. For this reason, and given, moreover, that the supplier has the power to pass on the amount of this emergency care service to the user, it is requested that, at the latest, the Autonomous Communities legislate on this matter in 2026 and that these regulations include the updating of this amount in accordance with the CPI.	Rejected	The operating and maintenance costs of gas companies are regulated on a sectoral basis through the development of the LSH. These costs are already included in the remuneration for the activity of natural gas distributors (tolls); therefore, only a specific regulatory development that would fall outside the legal framework of this legislation would make sense, as the development of distributors' activities falls within the remit of the regulator (CNMC) under the LSH. Furthermore, this regulation is based on the Industry Law and the purpose of this regulation is the safety of installations and not the economic regulation of activities related to the distribution of gas.
Natural gas Networks	ITC-ICG-01	Paragraph 5.2	Third indent: To emphasise that this obligation will also apply to owners of isolated pipelines, we propose to include this term explicitly in line with the comments made in the previous claim: 'In order to deal with possible incidents in their distribution network, undertakings distributing piped gas and isolated pipelines for gaseous fuels	Accepted	The proposed amendment is included.

			they shall ensure that a 24/7 telephone and field assistance service is in place.'		
Natural gas Networks	ITC-ICG-01	Paragraph 5.2	Fifth indent: The following amendment is proposed: 'The companies distributing piped gas shall pass on to users, through the consumption bill, the costs arising from the permanent availability of this emergency service, as laid down by regulation by the competent body of the Autonomous Community in which the emergency service is provided.' In addition, it would be useful to incorporate into the regulation a transitional/additional provision stipulating that, as long as the Autonomous Communities do not implement it by regulation, a provisional amount is set, since in practice it is difficult for the Autonomous Communities to do so.	Rejected	The proposal to pass on the cost 'through the consumption bill' and to set a provisional amount goes beyond the scope of a Supplementary Technical Instruction to the Royal Decree, aimed at the industrial safety of installations. Invoicing and the economic aspects of gas supply are included in the national sectoral scheme of Law 34/1998, as well as the content of invoices provided for in Royal Decree 1434/2002 (Articles 52 to 54). In addition, the operating and maintenance costs of gas companies are regulated on a sectoral basis through the development of the LSH. These costs are already included in the remuneration for the activity of natural gas distributors (tolls); therefore, only a specific regulatory development that would fall outside the legal framework of this legislation would make sense, as the development of distributors' activities falls within the remit of the regulator (CNMC) under the LSH. On the other hand, this regulation is based on the Industry Act and the purpose of this regulation is the safety of installations and not the economic regulation of activities related to the distribution of gas.
NEDGIA	ITC-ICG-01	Paragraph 5.3	It is proposed to replace the references to "operator of the network" by "operator of the network or pipeline".	Partially accepted	The proposed amendment has been included, with a different wording.
DISA GAS	ITC-ICG-01	Paragraph 5.4	In accordance with the current Regulation RD 919/2006, this five-yearly official review has been carried out by the Gas Installation Company responsible for the maintenance of the	Rejected	Experience has shown that it is necessary to amend the inspection regime for these facilities.

			installation with a beneficial impact on the activity and customers themselves, without this approach having an impact on the safety and operability of the installations, as it was carried out by qualified staff with extensive experience in these installations. We therefore propose that this requirement be removed. Delete: The operator of the installations must contract the services of an inspection body authorised to certify a sample of the state of conservation of the installations subject to maintenance operations, in accordance with the following percentages...		
GASIB	ITC-ICG-01	Paragraph 5.4	Based on experience as a wholesale LPG operator and as the entity responsible for carrying out inspections at many of the facilities it operates, we wish to point out that, since the publication of Royal Decree 919/2006 of 28 July approving the technical regulation on the distribution and use of gaseous fuels and its additional technical instructions ICG 01 to 11, which dates from 2006 (19 years ago) to the present day, there have been no accidents in the facilities affected by ITC ICG-01. Inspections have been carried out by authorised installers in a highly specialised sector and these inspections have always been available to the administration when required. In no case has the safety of the facilities been affected by the absence of a control body in the periodic inspection process. The current inspection procedure is well established and no gaps in the safety of the installations resulting from it have been detected at any time. Similarly, based on the experience gained in the Basque Country, where the inspection model with control bodies is applied, we would like to highlight the organisational complexity that the inclusion of a	Rejected	Experience has shown that it is necessary to amend the inspection regime for these facilities.

			new actor in the conduct of these inspections. In many cases, it is now difficult to arrange the inspection visit between the installer and the operator of the installation (second homes, for example...). By including the Control Body in the inspections, it is difficult for them to operate, especially in a market which, moreover, is very dispersed geographically. As described above, it may lead to delays in the implementation of inspections and, as a result of these delays, the inspections may expire. It is forbidden to supply facilities whose inspections have expired. This model will therefore result in a worse service to our customers. The current inspection procedure is well-established, carried out by authorised installers and, most importantly, no gaps in the safety of the installations resulting from it have been detected in the 19 years of application of the current Regulation. In view of the above, given the operational shortcomings already known in the application of the model with the control body, we would ask for this paragraph to be deleted and for the current inspection table to be maintained.		
Natural gas Networks	ITC-ICG-01	Paragraph 5.4	We propose to remove this requirement as discriminatory, as this measure does not apply to other facilities (MOP networks > 16 bar, LPG storage and plants, LNG plants, LPG packaging, gas plants). If the deletion of this requirement is not accepted, we would ask that this requirement be excluded in so far as the company that owns the installations has an audited and certified management and quality system (ISO 9001 or similar) that explicitly covers the maintenance of gas infrastructure or has an integrity management system as indicated in ITC ICG-12, CHAPTER II, paragraph 4.5. Integrity management. In addition, it would be necessary to limit the scope to preventive regulatory maintenance operations.	Partially accepted	Several of the proposals made are not considered necessary. Clarification of the scope of the certifications to be carried out on the sample.

			It would in any case be necessary to clarify and detail the criteria for certifying conservation status. We also consider that a standard of asset maintenance inspection criteria would not be defined in order to be able to assess whether something is done well or badly. Without it, this verification by OCA does not make sense. Thus, if the deletion of this requirement is not accepted, this alternative wording is proposed: 'If the operator of the installations does not have a certified management system with an explicit scope of the maintenance activity, it must contract the services of a control body authorised to certify a sample of the installations subject to annual preventive regulatory maintenance carried out on the installations, according to the following percentages: a) Companies with facilities to which more than 10.000 in-service supply points are connected in the corresponding Autonomous Community: a sample of 1 % of the maintenance operations carried out in the year at provincial level in each Autonomous Community. b) Other companies: a sample of 3 % of the maintenance operations carried out in the year at provincial level in each Autonomous Community.'		
NEDGIA	ITC-ICG-01	Paragraph 5.5	The reference to 'commissioning' should be replaced by the reference to 'putting into service'.	Accepted	The proposed amendment is included.
Natural gas Transportation	ITC-ICG-01	General	This ITC-ICG 01 refers to the term "injection lines". It is proposed to use the term "direct injection lines" to match the terminology used in the LSH and in line with the inclusion of new definitions ("direct injection line" and "isolated piping") previously proposed for Article 3 of this Regulation.	Accepted	The terms 'injection lines' are amended to 'direct injection lines'
FEDAOC	ITC-ICG-01	Paragraph 5.4	The scope of the CB's inspection to verify the "conservation status" is not clear in this paragraph and it would be better to indicate "certifies the conservation status of a	Accepted	The proposed amendment is included.

			sample...": The operator of the installations must contract the services of a control body authorised to certify a sample of the conservation status of the installations subject to maintenance operations, in accordance with the following percentages.		
REPSOL	ITC-ICG-02	Paragraph 1	Any change in the layout of packaging or increase in capacity at a storage centre which does not entail a change of category shall mean that the affected part of the storage centre must be adequate in accordance with the provisions of this new Royal Decree. It compromises the operation of storage centres and does not raise the level of security. In these plants, regulatory distances and maximum authorised capacities must be respected, which is what ensures safety. This is particularly critical in Category 1, Category 2, Category 3 and Category 4 Storage Centres, which are dedicated facilities for this activity and where relocation of storage areas or variations in storage capacity are necessary to adapt to market demands due to seasonality, market trends, new types of packaging, etc. Proposed amendment: Furthermore, any substantial change to the safety conditions of the establishment laid down in this Regulation is considered to be a modification.	Partially accepted	It is considered that changes in the location of storage areas, which may affect the safety distances of the installation, should be regarded as modifications to the installation. The comment on capacity increase is accepted without changing the category.
GASIB	ITC-ICG-02	Paragraph 1	It is considered necessary to include in this point of the Regulation that Category 5 storage centres not operated by persons also fall within the scope of this ICG-02 JTI. The current Regulation has been in force for 19 years and we understand that the one to be adopted will also be in force for many years in the future. Points of sale in unmanned petrol stations are increasingly being set up and should be covered by the Regulation.	Rejected	Rejected as it would seriously undermine security.
DISA GAS	ITC-ICG-02	Paragraph	Previously this limitation was only for full packaging.	Rejected	It is considered that keeping the packaging in

			we believe that this should be the case. Empty containers or containers with other LPG, whether or not they have a safety valve, do not have any special constraints that prevent them from being placed in a horizontal position, with the safety valve acting in the same way as in a container in a vertical position, so there does not seem to be any technical justification for this limitation, and we therefore do not understand the proposal. It is not comparable to the limitation that exists in customer premises where the use of packaging in a horizontal position is prohibited because of the risk of the liquid phase escaping, a limitation that is generic to all types of packaging with or without a safety valve. In addition, packaging is managed in storage centres by staff with experience in handling packaging and always in external areas. PROPOSAL: Full containers shall always be placed upright and placed in cages if stored at more than one height.		vertical position increases safety, being independent from who handles the packaging
FEDLPG	ITC-ICG-02	Paragraph 3.5.1	The wording introduces entry barriers to the introduction of 24h automatic machines that are already in place in the rest of Europe and which make it possible to supply the population with bottled LPG immediately without human intervention by making access to the most accessible energy source. Similarly, a maximum of three heights should be allowed for the type of specific exhibitors mentioned above (e.g.: wedeal-france.fr) It is therefore proposed to delete the last indent of paragraph 3.5.1. The following wording is proposed for heading (b): (b) Storage of packages up to 15 kg: it shall be carried out in cages or display stands specific to them, with a maximum of two heights or three heights in the case of duly regulated automated dispensing machinery.	Rejected	Rejected as it would seriously undermine security. The use of fully automated machines is not considered appropriate.

REPSOL	ITC-ICG-02	Paragraph 3.5.1	There are vending machines for packaging which operate on a self-service basis even outside business hours and which should be considered in the regulation. We propose to clarify its use and operating conditions with the proposed amendment PROPOSAL: Outside the working hours, if the cage or display unit has the necessary automatisms to ensure a correct service without the need for the sale to be attended by persons, it shall be permitted to set it up. If this is not the case, the packaging may not be handled from outside by staff outside the service outside the working hours.	Rejected	Rejected as it would seriously undermine security. The use of fully automated machines is not considered appropriate.
DISA GAS	ITC-ICG-02	Paragraph 3.5.3	We consider it important to regulate the storage of packaging for own use, such as the case of industrial activities using forklift trucks with autogas containers, or the case of hotels and large restaurants using a considerable number of courtyard heating stoves, in order to be able to legalise a 5nd category storage centre that is neither a service station nor a commercial establishment. PROPOSAL: 3.5.3. Storage in an establishment for own use In establishments intended for industrial, logistical, hospitality or service activities, where LPG containers are used for own consumption (such as in forklifts and mobile heating equipment), there may be areas intended for the storage of LPG in containers with a capacity of less than 15 kg. The maximum storage limit shall be 500 kg of gas, irrespective of the unit capacity of the containers, and the safety, ventilation and distance requirements of paragraph 3.5.2 shall be complied with, as appropriate.	Rejected	Rejected as it is outside the scope of the JT1.
FEDLPG	ITC-ICG-02	Paragraph 5	The inspection of 5st category sites should be able to be certified by an installation company A. This company has sufficient capacity to certify compliance with security measures and would allow for greater agility in	Rejected	This proposal is rejected as it runs counter to the safety of the most risky installations.

			as regards the control of the largest sites on the Spanish market. This would ensure that all centres are legalised and comply with the regulations in force. The period of 5 years should be extended to all storage sites regardless of their category. We propose the following wording: 5. MAINTENANCE AND PERIODIC INSPECTION The owner of the centre is responsible for the correct use, maintenance and maintenance of the facilities, elements and equipment of which it is composed and must ensure that, at least every five years, the storage centre is subject to an inspection to verify compliance with the safety measures laid down in the legislation in force; this inspection shall be carried out by an accredited inspection body, except in category 5 centres, where it may alternatively be carried out and certified by a category A authorised installation company, which shall issue the corresponding certificate with the same validity and scope, without prejudice to the supervision task assigned to the competent administration.		
REPSOL	ITC-ICG-02	Paragraph 5	The proposal for a Royal Decree amends only the inspection scheme for 4st and 5nd category centres, which are now between 2 and 5 years old. We understand that this period of 5 years should be extended to all storage centres, regardless of their category and in line with all industrial safety regulations where the frequency of inspection is 5 years. This is all the more true given the history of this type of storage facility, which has had no notable incidents for more than 50 years. In addition, the operator of the storage facility shall also be responsible for ensuring that the facility is inspected every five years by a control body.	Rejected	This proposal is rejected as it runs counter to the safety of the most risky installations.
FEDLPG	ITC-ICG-02	Paragraph 6	Containers with filled safety valves shall be transported upright in their corresponding position.	Rejected	This is the limitation currently in force which is considered to be optimal for safety.

			transport cages or correctly stowed according to ADR (7.5.11 CV10). The limitation of transport by private vehicles to 2 packages is low. In peripheral and rural areas, the use of vehicles with a higher capacity is much more common, with the greater use of packaging by households. It is proposed that the amount of packaging be increased to 4 per vehicle. Proposed wording for paragraph 6: Containers fitted with a full safety valve shall be transported upright in their appropriate transport cages or properly stowed in accordance with ADR 7.5.11 CV10. The carriage of up to four mobile LPG containers with a unit capacity of not more than 15 kg shall be permitted in private vehicles.		
Community of Madrid – Hydrocarbons and IT	ITC-ICG-02	Paragraph 6	The transit of vehicles in a car park is being regulated when the competence lies with another body. How and by whom is this non-compliance sanctioned?	Rejected	It falls outside the scope of the Regulation.
Community of Madrid – Hydrocarbons and IT	ITC-ICG-02	Paragraph 6	The specifications that a vehicle must have for the transport of this type of packaging are being regulated when these specifications should be laid down by ADR.	Rejected	The current Regulation has not been amended on this point. It is considered correct.
REPSOL	ITC-ICG-02	Paragraph 6	There is no technical justification why containers with empty safety valve or with traces cannot be transported in a horizontal position. It is a condition for the take-back of packaging from customers. It is proposed to use the terms empty and empty non-clean packaging as defined in ADR. Full safety valve containers shall always be transported upright in their respective transport cages or properly stowed. Empty and empty containers which are not clean may, where appropriate, be securely stowed horizontally.	Rejected	The transport restrictions currently in place, which are considered optimal in terms of safety, have been maintained.
CONAIF	ITC-ICG-02	Paragraph 6	We believe that it should be made clear that this is the case for packaging that does not have a safety valve.	Partially accepted	The text is revised

			Proposal: Containers with and without a safety valve, whether filled or empty, shall always be transported upright in their corresponding transport cages or properly stowed. New or repaired gas-free packaging transported from factory or workshop to the plant may be horizontal		
PRIMAGAS	ITC-ICG-03	Paragraph 1	Changing from one reservoir to another with the same characteristics and capacity or changing the location of a reservoir should be treated in the same way as a capacity extension of less than 10 % with the production of a memory by the installer and provided that safety distances are maintained. We propose including these two scenarios in the same paragraph, leaving as an amendment only the installation of new reservoirs. DRAFTING PROPOSAL In addition, the following are considered changes to the installation without any change of category: — Installation of new tanks. In all cases, the provisions of paragraph 3 of this ITC must be complied with and, in the case of exchange of existing deposits, the provisions of paragraph 5 must also be complied with. A new project shall not be required for installations that would have required a project for its implementation where the action consists of changing the location of an existing reservoir or replacing one reservoir with another of similar characteristics with a volume difference of not more than $\pm 10\%$, the classification of the installation according to its capacity remains unchanged and safety distances are maintained. In this case, the installation company will issue a report justifying the action, which it will submit to the competent body of the Autonomous Community, together with the other documentation required.	Rejected	The replacement of deposits with other deposits of similar characteristics is already covered and exempted in the following paragraph. The change of location of the repository requires treatment as a new installation of the facility as it requires checking that the new location is appropriate with the requirements of the ITC. However, the text is amended to provide more clarity.
VITOGAS	ITC-ICG-03	Paragraph 1	It is requested that the change from one tank to another not be considered as a modification of the installation, since it is	Rejected	Changes of deposit with similar characteristics are excluded from presentation

			this change affects the installation in terms of its safety and the size of the installation itself.		manager
CONAIF	ITC-ICG-03	Paragraph 1	We understand that a change in the location of a reservoir within the same parcel or storage centre may be justified by a technical report. In addition, the following are considered changes to the installation without any change of category: - Switching from one deposit to another. - Installation of new reservoirs. In all cases, the provisions of paragraph 3 of this ITC must be complied with and, in the case of exchange of existing deposits, the provisions of paragraph 5 must also be complied with. No new project will be required in those facilities that would have project required for implementation when the action consists of replacing one reservoir with another of similar characteristics with a volume difference of not more than $\pm 10\%$, the classification of the installation according to its capacity remains unchanged and safety distances are maintained. In this case, the installation company will issue a report justifying the action, which it will submit to the competent body of the Autonomous Community together with the other documentation required. In the event of a change in the location of the tanks within the same storage centre or within the same parcel, no further processing will be required. As in the case of tanks with an upward or downward variation of 10%, a supporting report issued by the installation company will be sufficient.	Rejected	The replacement of deposits with other deposits of similar characteristics is already covered and exempted in the following paragraph. The change of location of the repository requires treatment as a new installation of the facility as it requires checking that the new location is appropriate with the requirements of the ITC.
GASIB	ITC-ICG-03	Paragraph 1	In the wording of paragraph 6, it is laid down that in the case of the installation of a reservoir replacing a reservoir with similar characteristics with a volume difference not exceeding $\pm 10\%$, the classification of the installation according to its capacity remains unchanged and safety distances are maintained, the installation company shall	Accepted	The proposed amendment is included.

			action, which shall be submitted to the competent body of the Autonomous Community together with the other required documentation. It is not clear what is defined as prescriptive documentation. We understand that in this case the required documentation consists of: - the manufacturing documentation or certificate of withdrawal from the new tank. - Certificate issued by the installer. We request that the mandatory documentation referred to be clearly reflected.		
REPSOL	ITC-ICG-03	Paragraph 3	This circumstance is already included in the draft UNE 60250 and the proviso can be included in the Regulation itself, in GAS_002 or in the Technical Guide. In sections 3.1.1 and 3.1.2, a note should be added to categories A-13 and E-13 stating that recovered tanks of 13 030 litres are considered in those categories in accordance with the draft of Standard UNE 60250. This circumstance is already included in the draft of Standard UNE 60250 and the proviso can be included in the Regulation itself, in GAS_002 or in the Technical Guide.	Accepted	The table has been amended to include the value of 13.03 m ³ .
Natural gas Transportation	ITC-ICG-03	Paragraph 3	The following omission, which we consider should be recovered, has been identified and appears in the current technical regulation: 'The installations shall be constructed in such a way as to ensure the safety of the staff involved in the work.'	Rejected	It is clear that the installations covered by this Regulation comply with the regulations on the safety and protection of the workers carrying them out and that, therefore, it is neither necessary nor the purpose of this Regulation to contribute to this aspect.
Liquefied Gas Association	ITC-ICG-03	Sections 3, 3.1 and 3.2	We would ask for these paragraphs to be deleted, since all of their technical content is already covered by standard GAS_002/UNE 60250, since it relates to all of the content of the categories of deposits. This point is precisely defined by the UNE. Furthermore, if the UNE were amended and these paragraphs were left in the final RD, it would be obliged to amend the RD as well, with all the parliamentary steps that this entails.	Rejected	We believe that this content should appear in the Regulation because it is relevant to the safety of the installations and because it should be accessible and open to consultation by the public without having to purchase the corresponding UNE standard.
CONAIF	ITC-ICG-03	Paragraph	We believe that introducing a new category will allow	Rejected	Rejected as it is based on standard 60250.

			gasify installations that currently need or do not have space for a reservoir as large as the A-5 for operational needs. Introduce a new category of surface reservoirs. This category would be category A-2,5 and would include deposits of more than 1 m³ and less than 2.45 m³. Similarly, it is proposed to create an E-2,5 category.		This proposal was also rejected by the SC drawing up the standard.
Natural gas Transportation	ITC-ICG-03	Paragraph 3.1.2	Given that it has been decided to reproduce in the JTI certain aspects included in UNE 60250 and that, during its review process, some agreements have been adopted on new requirements to be referred to, the corresponding paragraphs should be reproduced in full on this basis. We therefore propose the following amendment to the first subparagraph of paragraph 3.1.2: Deposits are considered to be buried deposits situated entirely below ground level, whether natural or artificial, so that the highest area of the generatrix or upper wall of the tank is between 30 and 50 cm from that level. If a protective housing is provided, it must not project more than 10 cm above ground level.	Accepted	The amendment is accepted
CONAIF	ITC-ICG-03	Paragraph 3.2	Amend the table of distances with the new category A-2,5 and E-2,5 A-2,5 substances: • RL: 2.25 m• RE: 4.5 m E-2,5 substances: • RL: 1.5 m• RE: 3 meters	Rejected	Rejected as it is based on standard 60250
GASIB	ITC-ICG-03	Paragraph 3.2	Work is currently under way to revise standard UNE 60250, included in reference GAS-002, which sets out the distances established for each type of installation. It is considered more operational to leave the reference to GAS-002 in this section without including the classification tables and for this content to be developed in standard UNE 60250.	Rejected	Rejected as it wanted to keep the required distances in the Regulation
PRIMAGAS	ITC-ICG-03	Paragraph 4.2	We request clarification of this paragraph. Free access is understood to mean the provisions of reference GAS_002 of the table of standards...' Within reference GAS_002 of the list of reference standards is the UNE standard.	Rejected	We do not consider it necessary to clarify the text of the Royal Decree, as it lists the need for a project in order to comply with any of the points listed, not all of them.

			60250: 2008, in its terminology section, it is stated as ‘free access: Passage or possibility of reaching a space or place without obstacles or prohibitions restricting it.’ We believe that this definition means that, with a restriction on entry to the storage centre, projects could be dispensed with in facilities located in places that are freely accessible to the public. We ask for clarification of this point.		
Community of Madrid – Hydrocarbons and IT	ITC-ICG-03	Paragraph 4.2	If a LPG tank is installed in an industry, does it not have to comply with the provisions of this ITC? Why stay out? The design of the LPG storage facility in non-industrial establishments or buildings must be drawn up and signed by a qualified technical person, who is directly responsible for ensuring that it complies with the regulatory provisions.	Accepted	The text is amended
Liquefied Gas Association	ITC-ICG-03	Paragraph 4.2	We would ask for these paragraphs to be deleted, since all of their technical content is already covered by standard GAS_002/UNE 60250, since it relates to all of the content of the categories of deposits. This point is precisely defined by the UNE. Furthermore, if the UNE were amended and these paragraphs were left in the final RD, it would be obliged to amend the RD as well, with all the parliamentary steps that this entails.	Rejected	It is rejected as it wishes to maintain the technical requirements with the greatest impact on safety in the Regulation. It is also made clear that the amendment of a UNE standard does not in any way imply the need to amend the Regulation.
NEDGIA	ITC-ICG-03	Paragraph 4.2	At the end of this section, we note the omission of the following wording, which is included in the Technical Regulation on the distribution and use of gaseous fuels: “In the case of new or renovated buildings or establishments, the author of the specific project, if different from the one carrying out the general project, should act in coordination with the general project.” We believe that it should be recovered.	Rejected	It is rejected because of the inefficiencies that may be caused by the proposal made.
PRIMAGAS	ITC-ICG-03	Paragraph 4.4	We understand this to be a mistake carried over from the previous regulation. An interim tank may be installed without the need for it to be transportable, i.e. a traditional tank in accordance with RD 709/2015 or a tank or	Accepted	The proposed amendment is included.

			transportable packaging in accordance with RD 1388/2011. It is sufficient for the deposit to comply with at least one of the two Royal Decrees, which should read as follows: DRAFTING PROPOSAL Comply with the provisions of Royal Decree 709/2015, of 24 July, or Royal Decree 1388/2011, of 14 October.		
VITOGAS	ITC-ICG-03	Paragraph 4.4	Remove the need to provide the favourable initial inspection certificate by inspection body since this is a temporary facility, i.e. with a maximum duration of three months, and with the other documentation requested, the requirements to determine the safety of the facility are already met. It should also be noted that, previously, the conditions for installing this type of temporary facility have already been subject to authorisation by the administration. In any case, the supplier shall be responsible for compliance with the safety conditions of these provisional installations.	Accepted	The participation of the inspection body in the initial inspection of temporary warehouses has been removed.
REPSOL	ITC-ICG-03	Paragraph 4.4	To date, the provisional installations have not required an initial inspection by OCA, and the certificate and tests carried out by the installer are sufficient. It involves a delay in the installation process and a significant additional expense for the customer for an installation that will be operational for a maximum of 3 months. In addition, we propose that the project or memory used in the first use of the equipment be valid for the following facilities as it is the same equipment, simplifying the documentary process. Lastly, we propose that consideration be given to the emergency towing equipment that supply and installers have developed in order to deal more quickly and efficiently with failures in customer installations. Temporary tanks shall only be considered suitable for use if they meet the following requirements: — The temporary installation shall have a maximum duration of	Partially accepted	The text of the paragraph has been amended.

			3 months. - The storage volume shall not exceed 5 m³. - They shall comply with Royal Decree 709/2015 of 24 July and Royal Decree 1388/2011 of 14 October. The protective conditions (temporary fences, capotas, etc.) and regulatory safety distances must be complied with as if they were permanent shells. Temporary supply by means of a trailer or mobile equipment approved under ADR may be permitted. The trailer shall always be located within the enclosure during the temporary supply suitably immobilised by means of chocks or other locking system. The supporting documentation (periodic test certificates) shall be attached together with the test certificate of the connection to the existing installation downstream of the reservoir. During the periodic pressure tests or during repairs involving the emptying of tanks, temporary containers or tanks may be used, if necessary, in order to continue serving the receiving or distribution facility. The first time that the temporary deposit is used, the same documentation must be submitted to the competent body of the Autonomous Community as for the putting into service of a fixed deposit. Proposal for a regulation final text Each time the interim storage facility is connected to an installation, the competent body of the corresponding Autonomous Community shall be informed of its installation with a certificate from the authorised installation company, including the plan for the new location and duration of the interim installation and a favourable initial inspection certificate from the inspection body. It will not be necessary to submit such a draft or report if temporary equipment that has previously been registered in any Autonomous Community is used. In this case, the file or installation number must be provided and the temporary installation test certificate attached.		
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			Once the installation of the reservoir has been completed, the installation company shall carry out a leakproofness test of the reservoir connections and fences, duly documenting the aforementioned operations.		
CONAIF	ITC-ICG-03	Paragraph 4.4	Because of the very essence of an interim deposit, documentation cannot be required as if it were a new installation, that is to say, if a deposit is installed in order to maintain the service, it is a matter of urgency, it is not logical to request documentation such as a project, which requires time to prepare. Proposal: The first time that the temporary deposit is used, the same documentation must be submitted to the competent body of the Autonomous Community as for the putting into service of a fixed deposit. It shall require the production of a technical report and a certificate from the installation company authorised therein stating that the tank does not leak or pose a risk to the safety of persons, property or the environment.	Partially accepted	The text of the paragraph has been amended.
CONAIF	ITC-ICG-03	Paragraph 4.4	Due to the specific circumstances of temporary storage facilities, it is not possible to have the same procedures as a new facility. The duration of the installation must be approximate, there are variables for which the US has no control and the certificate from the inspection body is a procedure that only slows down. Proposal: Each time the interim storage facility is connected to an installation, the competent body of the corresponding Autonomous Community shall be informed of its installation with a certificate from the authorised installation company, including the plan for the new location, the approximate duration of the interim installation and a favourable initial inspection certificate from the inspection body.	Accepted	The text of the paragraph has been amended.
DISA GAS	ITC-ICG-03	Paragraph 4.4	To date, the provisional installations have not required an initial inspection by OCA, and the certificate and tests carried out by the installer are sufficient. It represents a delay in the installation process and an additional expense.	Accepted	The text is amended

			important to the client for a facility that will be operational for a maximum of 3 months. PROPOSAL: Each time the interim storage facility is connected to an installation, the competent body of the corresponding Autonomous Community shall be informed of its installation with a certificate from the authorised installation company, including the plan of the new location and the duration of the interim installation.		
GASIB	ITC-ICG-03	Paragraph 4.4	First, paragraph 3 (1) states: - They shall comply with Royal Decree 709/2015 of 24 July and Royal Decree 1388/2011 of 14 October. We understand this to be a mistake carried over from the previous regulation. An interim tank may be installed without the need for it to be transportable (RD 1388/2011), i.e. tanks may be installed in accordance with RD 709/2015. It would be sufficient for the deposit to comply with at least one of the two Royal Decrees. We propose the following wording: - They shall comply with the provisions of Royal Decree 709/2015, of 24 July, or Royal Decree 1388/2011, of 14 October. On the other hand, there are temporary facilities whose task is to supply, for example, events (fairs, markets, festivals, etc.) of short duration (maximum 3 months). On the other hand, an interim deposit is also considered to be one that is used for a very short period of time to support the supply of a fixed installation at the time of the periodic testing of the fixed deposit existing at the installation. In this case, we understand that the two situations need to be differentiated, and it is not fair that the same documentation is required for putting into service in both cases. We propose to amend paragraph 5 as follows: Each time the Provisional Repository is connected to a	Partially accepted	The first part of the claim is accepted.

			installation, the competent body of the corresponding Autonomous Community shall be informed of its installation with a certificate from the authorised installation company, including the plan for the new location, the duration of the provisional installation and a favourable initial inspection certificate from the inspection body. In the case of a temporary reservoir that supports an existing fixed installation during the periodic pressure tests or in repairs involving the emptying of the tanks, the competent body of the corresponding Autonomous Community shall be notified of its installation with a certificate from the authorised installation company, identifying the fixed installation it will serve.		
Natural gas Transportation	ITC-ICG-03	Paragraph 4.4	It is proposed to add the following safeguard to the three existing ones: ‘The fuel load from the non-operational fixed storage shall be removed from the enclosure and only the temporary installation shall be loaded.’ In addition, it is proposed to add the following paragraph: ‘Temporary supply may be permitted by means of a trailer or mobile equipment approved under ADR. The trailer shall always be located within the enclosure during temporary delivery. The supporting documentation (periodic test certificates) shall be attached together with the test certificate of the connection to the existing installation downstream of the reservoir.’ Finally, it is considered necessary to clarify whether the requirements marked on tanks also concern packaging or, if not, to detail which ones.	Partially accepted	The first part of the claim is accepted.
Natural gas Transportation	ITC-ICG-03	Paragraph 4.6	It is proposed to amend the second paragraph as follows: ‘In addition, in all cases, the inspection body shall issue an inspection certificate which it shall send to the operator of the installation, the installation company and the site management, if one exists, so that the installation will be put into service if the result of the inspection is favourable (...).’	Accepted	The text is amended

PRIMAGAS	ITC-ICG-03	Paragraph 4.7	For years, they have been installed in many warehouses and by several of the operators with 85 % automatic cutting. This element does not always make it possible to check the performance of the high point, as in many cases the loading mouth closes before reaching 85 %. This proposal is already included in the current draft UNE 60250 which is being finalised. In addition, the following sentence should go to the beginning of the paragraph to keep the chronological sense of the process; 'The retail seller of LPG in bulk shall communicate the date of first filling to the operator of the installation.'; We propose to amend the wording as follows: DRAFTING PROPOSAL: During the first filling of each tank, the installer's or operator's own staff, as the case may be, shall check that the connections, fences and other installed elements are watertight and that the high filling point of the tank or, where applicable, the loading throat with automatic cut-off, acts when the LPG reaches 85 % of the geometric volume of the tank.	Partially accepted	The text is amended
Community of Madrid – Hydrocarbons and IT	ITC-ICG-03	Paragraph 4.7	Consider that communication to the administration of this type of facility may be carried out jointly with the receiving facility it serves if it is envisaged in the same project or report to facilitate processing. Provided that the competent body of the Autonomous Community is the same.	Rejected	It is not considered necessary, it is understood that the Autonomous Community body may establish how to carry out the communication of both parties to the facility by accepting a joint communication if it considers it appropriate.
Community of Madrid – Hydrocarbons and IT	ITC-ICG-03	Paragraph 4.7	Define the “documentary file” by indicating the minimum content, custody responsibility, etc.	Rejected	Already defined in Article 11 and particular cases in JTIs
CONAIF	ITC-ICG-03	Paragraph 4.7	We consider that generating documentation and submitting it to the Autonomous Community before first filling may cause a problem. The reason is that the Administration does not check the suitability of the installation only registers it, and it may be that an installation is registered, but	Rejected	We consider this method and flow of information to be more appropriate, as we consider it more appropriate to have notified installations that are not immediately filled than to have

			it is not filled for a reason x, leaving an installation with the capacity to fill, even if it spends an indeterminate time. In addition to the documentary check that it will generate. Proposal: Once the submission has been made to the competent body, the operator of the installation may proceed to request the first filling of the LPG tanks, after the completion of this operation (filling), shall have a period of 10 working days to submit the documentation to the competent body of the Autonomous Community. The company responsible for this first filling must verify that the required documentation for the facility has been submitted to the competent body of the Autonomous Community and that it will be part of the facility's documentation file.		unreported installations that have been filled.
Natural gas Transportation	ITC-ICG-03	Paragraph 4.7	The reference to the facility's documentation file, in respect of which preference is given to the electronic format, should be extended to all documentation relating to the regulation, in order to encourage the digitisation of documentation.	Partially accepted	Efforts have been made to prioritise the electronic format in all possible elements. However, it is not always possible or desirable depending on who is subject to the obligation.
Natural gas Transportation	ITC-ICG-03	Paragraph 4.7	Second paragraph, fifth heading: 'Certificate from a qualified technical person, referred to in reference GAS_002 of the table of standards for rooftop tanks, reflecting the ability of the building deck to withstand the loads produced.' This refers to some of the documentation to be submitted prior to the date of first filling to the competent body of the Autonomous Community: However, that wording must be amended, since Standard UNE 60250 (now included in reference GAS_002) does not mention, as it should be, the certificate of a qualified technical person.	Partially accepted	Linguistic improvement.
Natural gas Transportation	ITC-ICG-03	Paragraph 4.7	It is stated that the operator of the installation may proceed to request the "first filling of LPG tanks". It would be necessary to specify that it corresponds to the	Rejected	It is not considered appropriate to include the proposed amendments. The change of supplier is subject to sectoral regulation.

			filling associated with the initial commissioning of the tank of a new installation (and not that which may be carried out by a new LPG supplier replacing a previous one in the filling of a tank). In this regard, and for the sake of clarity, it would be appropriate to specify that, in the event of a change of supplier, it would only be necessary to provide the last periodic inspection certificate.		
PRIMAGAS	ITC-ICG-03	Paragraph 5.1	This access requirement should be limited to valves and tank elements that are commonly used or handled; cargo inlet, pressure gauge, level and outlet valve. There are other elements such as safety valves, manholes, caps and others that are not routinely handled, even never handled by the user throughout the life of the installation, and for which hitherto the maintainer uses a portable or temporary element to access them, such as a ladder, scaffolding or temporary platform. There are also other elements that become inaccessible as lower caps in buried tanks. This requirement may also condition the design of future deposits and the reuse of existing ones. DRAFTING PROPOSAL: There shall be a fixed element for safe access to the valves and items for normal use of the shell to allow their handling without mobile mechanical means such as portable stairs.	Partially accepted	The text is amended
VITOGAS	ITC-ICG-03	Paragraph 5.1	The paragraph "there shall be a fixed element for safe access to all valves and openings in the tank allowing their handling without mobile mechanical means such as portable stairs" is requested to be deleted as this point is already detailed in GAS_002/UNE 60250.	Rejected	It is rejected as it wishes to maintain the technical requirements with the greatest impact on safety in the Regulation.
CONAIF	ITC-ICG-03	Paragraph 5.1	CONAIF wants the installations to have homogeneous criteria and given that it is the installation companies that carry out the maintenance considered essential to include the installations as well.	Rejected	It is not considered appropriate to introduce retroactive measures in this regard.

			existing in this obligation and compliance to be ensured by the fuel suppliers. Proposal: There shall be a fixed element for safe access to all valves and openings in the shell allowing their handling without mobile mechanical means such as portable stairs. In existing facilities, it shall be the responsibility of the wholesale LPG operator or the bulk LPG marketing company or the user, failing that, who shall be responsible for installing such means through the company maintaining the facility.		
GASIB	ITC-ICG-03	Paragraph 5.1	It is not considered necessary to have a fixed element for safe access to valves that are not operable. We propose the following wording: There shall be a facility for safe access to all operable valves and openings in the shell so that they can be handled without mobile mechanical means such as portable stairs.	Partially accepted	The text is amended
Natural gas Transportation	ITC-ICG-03	Paragraph 5.1	First indent: The sentence should be qualified as, in cases where the owner of the tank is itself the retailer of bulk LPG (for channelled LPG supply), it does not make sense. The following text is proposed instead: "(...) They shall also comply with the safety recommendations communicated to them by the retailer of bulk LPG when the installation is not the property of the retailer".	Accepted	The text is amended
Natural gas Transportation	ITC-ICG-03	Paragraph 5.1	Second paragraph: The following amendment is proposed: 'This maintenance shall be carried out in accordance with the instructions in the maintenance manual which must exist in the installation and at the intervals indicated therein. This manual shall be made available to maintenance undertakings in the most appropriate format.'	Partially accepted	The text is amended

			'This maintenance shall be carried out in accordance with the instructions in the manual, the maintenance programme that must exist at the installation and at the intervals indicated therein. That programme shall be made available to maintenance undertakings in the most appropriate format.'		
Natural gas Transportation	ITC-ICG-03	Paragraph 5.1	Fourth indent: It would be sufficient to state that secure means of access must be provided, not just fixed elements. In any case, it should only apply to new deposits and not to those already in operation.	Rejected	This is a non-retroactive measure.
PRIMAGAS	ITC-ICG-03	Paragraph 5.2	We consider that, in accordance with standard UNE 60670, a main anomaly in a receiving installation may mean a partial cut and may serve other parts and equipment of the receiving installation that do not have any anomalies. Failure to supply a LPG receiving installation in which there is a main anomaly involving a partial cut is a comparative disadvantage with other energy sources and a failure to comply with the specifications of standard UNE 60670. DRAFTING PROPOSAL Pursuant to Article 46 (3) of Law 34/1998 of 7 October, LPG may not be supplied to any installation if the operator does not prove to the company retailing LPG in bulk, by means of the relevant inspection certificate in force, that there are no serious defects affecting the entire installation and that the deadline for correcting minor defects, where applicable, has not been exceeded.	Rejected	In the event of major anomalies, the supply to the installation must be cut off until it is rectified. The deadline for remedying major anomalies in recipients (15 days maximum) is considered appropriate.
VITOGAS	ITC-ICG-03	Paragraph 5.2	We would ask for the deletion of the part stating that "this inspection must in all cases be carried out by an authorised inspection body". We would ask you to continue with the current system governed by Royal Decree 919/2006, in which it is the installers who carry out the periodic checks, not inspections, given that, throughout this period of application of the current system of checks.	Rejected	Experience has shown that it is necessary to amend the inspection regime for these facilities. Experience has shown that inspection every 5 years and annual inspections do not ensure proper regulatory maintenance and safety.

at regular intervals, the distributors and/or operators have not detected an increase in the number of accidents or anomalies in this type of installation, with checks carried out by the installers. It also makes it difficult to manage and coordinate such transactions with customers/users sufficiently quickly. therefore, the change in the inspection regime is considered essential to improve this aspect.

In the same section, we request the deletion of this paragraph: Likewise, no LPG may be supplied to any installation unless evidence is provided to the bulk LPG retailer, by means of the relevant review certificate or anomaly report where applicable, that there are no major anomalies in the individual receiving installation fed from that LPG storage facility and that the deadline for correcting secondary anomalies, where applicable, has not been exceeded.

It is requested that in order to be able to supply an LPG tank, the correct documentation of the storage centre is sufficient, and not the receptors that it could feed, which have another procedure of state control and supply authorisation.

This is because reference is made in this ITC to the warehouse, not to the receiving facility. This paragraph leads to some confusion because the ITC does not refer to the receiving installation.

In addition, the deletion is requested because this paragraph in the context of the following paragraph, which states: Furthermore, LPG wholesale operators must require any LPG retail company and the owners of all facilities to provide documentation proving that their facilities comply with the legislation in force (...). This means requiring the LPG wholesale supplier/operator to check the documentation relating to the interior of the facility, which is a matter for the LPG retail seller but not for the operator.

			The wholesale operator must ensure that it has all the necessary documentation for the depot, but not the part of the installations' interiors (receiving installation), which is the responsibility of the operator, user or marketer.		
REPSOL	ITC-ICG-03	Paragraph 5.2	In accordance with the current Regulation RD 919/2006, this five-yearly official review has been carried out by the Gas Installation Company responsible for the maintenance of the installation with a beneficial impact on the activity and the customers themselves, without this approach having an impact on the safety and operability of the installations, as it was carried out by qualified staff with extensive experience in these installations. The proposed measure has a significant economic impact on the sector due to the number of installations affected estimated at more than 70.000 installations with an inspection cost that is significant for the customer (we do not provide the average cost of such inspection because it is sensitive information and has a potential impact on competition in the sector). It will also significantly affect the activity of gas installation companies which are mostly SMEs and which will lose a recurring source of income. We also anticipate that many customers are not aware of the new requirement until the installation is blocked due to a lack of inspection report. In addition, including in this ITC the inspection by control body of the common receiving facility that is not considered to be a distribution network creates a strange situation by incorporating requirements that should be included in the corresponding ITC for receiving facilities. Furthermore, it is necessary to assess the lack of consistency as regards the inspection or review system and the operator responsible for carrying it out, depending on whether or not that common reception facility is considered to be a distribution network. Even more so when the definition and scope of what is a distribution network is not adequately defined	Rejected	Experience has shown that it is necessary to amend the inspection regime for these facilities.

			resolved in the sectoral regulations themselves. Finally, the verification of whether the installation has undergone modifications is difficult to comply with and control. Many customers do not keep the original installation documentation by hand. There are very old installations for which there is no digital copy of the project, memory or sketch, making it even more difficult to obtain the original documentation. PROPOSAL: This inspection shall in all cases be carried out by a Gas Installation Company and shall include the whole of the common receiving installation in those cases where it is not considered to be a distribution network. Their correct tightness and fitness for use must be checked.		
REPSOL	ITC-ICG-03	Paragraph 5.2	Standard UNE 60250 lays down a general duration of 30 minutes for the leakproofness test of liquid pipes, which could be reduced to 15 minutes for test intervals of less than 20 m. However, the new regulation (like the current technical regulation on the distribution and use of gaseous fuels) provides for a period of 10 minutes. The test period must be the same as that laid down in the standard and regulation.	Accepted	The text is amended
REPSOL	ITC-ICG-03	Paragraph 5.2	The wording may cause confusion as it is not clear to whom it refers when referring to “the operators of all the installations to which they supply”. It is necessary to specify whether they are the operators of installations with a direct contractual relationship with the LPG wholesale operator, or the operators of installations supplied by any LPG retail operator, which in turn is supplied by a LPG wholesale operator. The second possibility raises regulatory and competition concerns because the wholesale operator should not know either the list of customers of the retail traders, or the situation of those installations so as not to infringe LOPD or competition issues.	Partially accepted	The paragraph has been amended to make it clearer.

			Furthermore, we consider that it might not be appropriate for a wholesale LPG operator to request from an LPG retailer documentation proving that its facilities comply with the legislation in force. It would be useful to specify to which documentation and facilities reference is made. Many of these companies do not own LPG facilities, acting solely as traders. If they do, they are companies established in the sector that have sufficient technical and human resources to carry out and monitor the state of their own facilities and those of their customers. Furthermore, as LPG wholesale operators are ultimately also LPG retail traders, the requirement can be transferred only to bulk LPG retail traders, simplifying the wording and avoiding the doubts described. Finally, the supporting documentation should be clearly defined. We understand that the inspection certificate in force and the current removal certificate from the warehouse would be sufficient. PROPOSAL: In addition, companies retailing LPG must require any company retailing LPG and the owners of all facilities to provide documentation proving that their facilities comply with the legislation in force.		
CONAIF	ITC-ICG-03	Paragraph 5.2	CONAIF in no way shares the spirit of the current wording. We understand that maintenance companies are legally entitled to carry out a periodic review of the installation of fixed tanks. Including this change de facto undermines the professional powers of category A gas installation companies, which we do not understand to be justified given that to date there have been no problems with:	Rejected	The participation of OCA in the activity is considered necessary.

			industrial security attributable to installation companies. We also consider that this limits the professional competences of legally authorised installation companies, which certify under their responsibility. We understand the position of the Administration when wanting an independent agent, and we understand that the Administration has the power to request documentation and inspect on-site, and in case of negligence, sanction the punishable agents. Finally, and by way of illustration, from the point of view of free competition, the number of category A installation companies registered in the Integrated Industrial Register stands at 7934 compared with 14 inspection bodies authorised in the regulatory field of inspections of fixed LPG storage tanks. 5.2. Inspections Periodic reviews Periodic inspections of installations shall be carried out in accordance with the provisions of reference GAS_002 of the table of standards. The operator of the LPG storage facility shall be responsible for having the LPG storage facility inspected every five years. This inspection must be carried out in all cases by an inspection body authorised by the installation company with which the licence holder has signed the maintenance contract and must include the whole of the common reception facility in those cases where it is not considered to be a distribution network. Their correct tightness and fitness for use must be checked. To this end, the following points will be checked: [...] The inspection body The installation company shall issue the relevant inspection review documentation, which shall be handed over to the operator of the installation and shall act in accordance with Article 20 of the Regulation. In the event that the inspection reveals that conditions have changed with respect to documentation		
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			submitted for commissioning, the body that carried out the inspection shall immediately inform the competent body of the Autonomous Community. The Autonomous Community's competent body for industrial safety may, in its powers of inspection and control, carry out inspections of facilities using its own resources or the services of the control bodies authorised to ensure proper compliance with the obligations laid down in this Regulation. The holder must always be in possession of a copy of the certificate of the last inspection carried out, this document being available to the retail seller of bulk LPG supplying LPG at the facility concerned and to the competent body of the Autonomous Community.		
GASIB	ITC-ICG-03	Paragraph 5.2	Based on experience as a wholesale LPG operator and as the entity responsible for carrying out inspections at many of the facilities it operates, we wish to point out that, since the publication of Royal Decree 919/2006 of 28 July approving the technical regulation on the distribution and use of gaseous fuels and its additional technical instructions ICG 01 to 11, which dates from 2006 (19 years ago) to the present day, there have been no accidents in the facilities affected by ITC ICG-03. Inspections have been carried out by authorised installers in a highly specialised sector and these inspections have always been available to the administration when required. In no case has the safety of the facilities been affected by the absence of a control body in the periodic inspection process. The current inspection procedure is well established and has not been	Rejected	The participation of OCA in the activity is considered necessary. Experience in the other Autonomous Communities, as well as the most recent experience in the Basque Country, makes it clear that this is a necessary change.

			I have never noticed any gaps in the safety of the installations resulting from it. However, we would again like to highlight, on the basis of the experience acquired in the Basque Country, where the proposed model is applied, the organisational complexity that the inclusion of a new official will entail in carrying out these inspections. In many cases, it is now difficult to arrange the inspection visit between the installer and the operator of the installation (second homes, for example...). By including the Control Body in the inspections, it is difficult for them to operate, especially in a market which, moreover, is very dispersed geographically. As described above, it may lead to delays in the implementation of inspections and, as a result of these delays, the inspections may expire. It is forbidden to supply facilities whose inspections have expired. This model will therefore result in a worse service to our customers. The current inspection procedure is well-established, carried out by authorised installers and, most importantly, no gaps in the safety of the installations resulting from it have been detected in the 19 years of application of the current Regulation. In view of the above, given the operational shortcomings already known in the application of the model with the control body, we would ask for this paragraph to be deleted and for the current inspection table to be maintained. We propose the following wording: The operator of the LPG storage facility shall be responsible for having the LPG storage facility inspected every five years. Such inspection shall in all cases be carried out by a gas installation undertaking and shall include the whole of the common receiving installation in those cases where it is not considered to be a distribution network. Their correct tightness and fitness for use must be checked. To this end, the following points will be checked:		
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GASIB	ITC-ICG-03	Paragraph 5.2	It should be taken into account that there may be reports of anomalies in the receiving installation that do not lead to a complete cut of the installation, but only to a partial cut of the installation. We understand that, in this case, whether the supply of LPG should be allowed. We therefore propose the following wording: Similarly, no LPG may be supplied to any installation unless evidence is provided to the bulk LPG retailer, by means of the relevant review certificate or anomaly report where applicable, that there are no major anomalies in the individual receiving installation fed from that LPG storage facility that would result in the complete shutdown of the installation and that the deadline for correcting secondary anomalies, where applicable, has not been exceeded.	Rejected	Major anomalies should mean a cut in supply.
GASIB	ITC-ICG-03	Paragraph 5.2	This is a clerical error, it is not the responsibility of LPG wholesale operators to require documentation proving that the installations comply with the legislation in force. This responsibility should lie with the LPG retail marketers who are responsible for supplying the facilities. It is possible that in some cases the two figures (wholesale and retail operators) may come together on the same company. In that case, it will remain the responsibility of the retailer to require documentation proving that its facilities comply with the legislation in force. We propose the following wording: In addition, companies retailing LPG must require operators of all installations to provide documentation proving that their installations comply with the legislation in force.	Partially accepted	The paragraph has been amended.
Natural gas Transportation	ITC-ICG-03	Paragraph 5.2	In addition to entrusting the activity to a monitoring body, which is a new development that will increase the costs of companies distributing piped gas (which	Rejected	The participation of OCA in the activity is considered necessary. The information must be kept by the operator,

			they will have to be properly recognised by the competent bodies), it is requested that it be verified that the installation has not undergone any changes since it was put into service, which would require the documentation for each of the installations to be made available to the OCA, which is not operational since many of the LPG installations are old and their original documentation is not digitised. In addition, some of the installations have undergone various transfers of ownership which may make it difficult to locate the documentation, making the process more difficult to operate.		the Control Body.
Natural gas Transportation	ITC-ICG-03	Paragraph 5.2	ITC ICG-03 Paragraph 5.2. Periodic inspections. Second paragraph, headings: The following amendments are proposed for the corresponding headings relating to the points to be checked by the control body: "(...) 1. The existence of a manual of a maintenance and servicing programme for the maintenance parts of the installation issued since the last periodic inspection. (...) 3. Adequate manning and proper condition of fire protection systems (...)" In addition, after the paragraph following the 12 headings relating to the points to be checked by the control body, it is proposed to add this further paragraph: 'The inspection of PCI equipment may be carried out simultaneously applying the inspection procedures laid down in Standard UNE 192005-2 or, failing that, in accordance with the regulation on fire protection equipment.'	Partially accepted	The maintenance programme has been incorporated. We understand that the PCI has its own regulation.
Natural gas Transportation	ITC-ICG-03	Paragraph 5.2	This section indicates that LPG wholesale operators must require any LPG retail company and the owners of all facilities to provide documentation proving that their facilities comply with the legislation in force. To avoid different	Accepted	It has been added that the revision certificate must be in force. The paragraph has been amended.

			interpretations, it should be specified that this is the inspection certificate in force and without anomalies.		
PRIMAGAS	ITC-ICG-03	Paragraph 5.3	COMMENTS: There is no reference to the omission of withdrawals from batch withdrawals of surface deposits and the criteria laid down in paragraph 6.3 of ITC-ICG 03 of the current RD 919/2006. We understand that the procedure for the omission of batch withdrawals is maintained, since GAS_002 includes standard UNE 192009-3, a standard that covers batch withdrawals. Their elimination would have a significant economic impact on the sector and on the final customers who are currently benefiting from the savings of this sample control. Sample check that has proven effective since its introduction in 2007, as there is no evidence of rejections or defects in the samples inspected in these 18 years, or even of the need to increase the sample size, demonstrating the good quality and performance of the LPG tanks installed in Spain. This statistical and sample control is similar to that carried out in Europe, as is the case in France. For the avoidance of doubt, we propose including in the body of the Regulation itself an express paragraph on the omission of withdrawals with batch checks on surface deposits and the criteria in this regard, referring to GAS_002 and in line with paragraph 6.3 of ITC-ICG 03 of the current RD 919/2006. DRAFTING PROPOSAL: Fixed LPG surface tanks shall be exempted from the first periodical hydraulic test for the whole batch. Only one statistical sample of the batch of tanks shall be tested and determined at the request of the manufacturer by a control body in accordance with GAS_002.	Rejected	Known and transferred by the Communities with competence in the matter: (a) difficulties in establishing the tanks making up the sample, (b) establishing uniform criteria for choosing the sample making up the batch, (c) difficulties in obtaining the withdrawal certificate for the tanks included in the non-pressurised batch, (d) the date on which conformity was obtained has not been permanently marked on the tanks. It is considered that the batch withdrawal and compliance maintenance system does not guarantee correct performance and should therefore be performed on all tanks.
PRIMAGAS	ITC-ICG-03	Paragraph 5.3	COMMENTS: There is a clerical error with two paragraphs that say almost the same. In any case, it includes a pipeline pressure test, contrary to the Equipment Regulation a	Rejected	The second paragraph has been amended in line with GNT's argument.

			Pressure and what has been done so far. In particular, under the Pressure Equipment Regulation, pipes with a diameter of less than LPG DN 25 do not require pressure testing. This requirement is already included in the current draft UNE 60250. We consider that the regulation should refer to the GAS-002 for further details. DRAFTING PROPOSAL Mechanical resistance tests shall be carried out on tanks, vaporisers and pipes which may contain a liquid phase. The pressure tests shall be carried out on tanks and, where appropriate, vaporisers and piping which may contain a liquid phase in accordance with GAS-002.		
PRIMAGAS	ITC-ICG-03	Paragraph 5.3	COMMENTS: Exceptionally, a supply of LPG should be allowed if it is necessary to carry out an acoustic emission pressure test in a plant which has passed such a test and for which a minimum quantity of LPG in the tank is required. This circumstance could be detailed in this section or in GAS_002 by adding the following paragraph. DRAFTING PROPOSAL An LPG supply may exceptionally be permitted in case it is necessary to perform the pressure test by the acoustic emission method.	Accepted	LPG supply is exceptionally allowed in case it is necessary to perform the pressure test.
VITOGAS	ITC-ICG-03	Paragraph 5.3	We would ask you to continue with the batch withdrawal system, which is the current section of ITC 6.3 'Fixed LPG surface tanks shall be exempted from carrying out the first periodic hydraulic test for the entire batch. Only one statistical sample of the batch of tanks shall be tested, (...)'; In the same point, the following paragraph states: "LPG may not be supplied to any installation if, after the time limit for carrying out the periodic pressure test, the holder does not provide proof of compliance by means of a copy of the manufacturer's certificate of suitability or inspection report from the inspection body", is requested in order to be able to	Rejected	Known and transferred by the Communities with competence in the matter: (a) difficulties in establishing the tanks making up the sample, (b) establishing uniform criteria for choosing the sample making up the batch, (c) difficulties in obtaining the withdrawal certificate for the tanks included in the non-pressurised batch, (d) the date on which conformity was obtained has not been permanently marked on the tanks.

			carry out the periodic tests by means of acoustic emissions, a filling of the installation on request made by the installation's maintainer describing this purpose.		It is considered that the batch withdrawal and compliance maintenance system does not guarantee correct performance and should therefore be performed on all tanks.
REPSOL	ITC-ICG-03	Paragraph 5.3	Exceptionally, a supply of LPG should be allowed if it is necessary to carry out an acoustic emission pressure test in a plant which has passed such a test and for which a minimum quantity of LPG in the tank is required. This circumstance could be detailed in this section or in GAS_002 by adding the paragraph indicated. LPG may not be supplied to any installation if, after the time limit for carrying out the periodic pressure test, the holder does not provide proof of compliance by means of a copy of the manufacturer's certificate of suitability or an inspection report from the inspection body. An LPG supply may exceptionally be permitted in case it is necessary to perform the pressure test by the acoustic emission method.	Accepted	LPG supply is exceptionally allowed in case it is necessary to perform the pressure test.
Natural gas Transportation	ITC-ICG-03	Paragraph 5.3	ITC ICG-03 Paragraph 5.3. Pressure tests. Second paragraph: It is suggested to assess a possible redundancy and whether it is appropriate to revise the wording of this	Accepted	The second paragraph has been amended and a provision for the control of valves has been added.
Natural gas Transportation	ITC-ICG-03	Paragraph 5.4	The following amendment is proposed to the first paragraph: 'Tanks buried shall be fitted with a cathode protection system unless it is demonstrated that this is not necessary by means of an aggressive terrain study. The installation company in charge of maintenance of the installation is responsible for carrying out the relevant checks in accordance with the instructions in the maintenance programme manual which must exist at the installation and with the periodicity indicated therein.'	Partially accepted	The manual or maintenance programme is included in accordance with the previous sections.
REPSOL	ITC-ICG-03	Paragraph 6	We propose increasing this deadline so that it is operationally feasible to carry it out at times of season.	Partially accepted	It is extended to three deadlines and the communication to the administration in case of

			high where it is difficult to find tanks available for this type of service. We therefore suggest that the text be amended. “(…) The holder must have the inert tank as soon as possible and no later than six months from the occurrence of any of these circumstances, except in cases of force majeure. (…)”		acts of a public authority.
CONAIF	ITC-ICG-03	Paragraph 6	CONAIF considers that the wording should be clarified, and only those installations that required it to be opened should be required to obtain authorisation for closure. In addition, we consider that the installation company must have special legal cover in order to put these installations in safety, since in many cases they encounter installations that are difficult to access and that must pass through restricted passageways. The closure of LPG storage facilities in fixed tanks shall require administrative authorisation, if required when it was put into service, when provided for in Law 34/1998 of 7 October. The wholesale LPG operator or the bulk LPG marketing company shall notify the competent body of the list of installations that have not recorded any consumption in the last two years so that it can issue a deregistration decision, authorising the installation companies designated by these communities to put this installation into safety. This case does not apply to reservoir installations supplying back-up equipment as generators provided that they are regularly maintained in accordance with the Regulation.	Rejected	The authorisation scheme is defined in Law 34/1998 by simply referring the text of the draft to this Law on its possible need.
Natural gas Transportation	ITC-ICG-03	Paragraph 6	This paragraph refers to the LSH in order to establish whether or not administrative authorisation is required for the closure of LPG storage facilities in fixed tanks, but the corresponding criterion is not identified in that Law. Clarification needed. In addition, this paragraph refers to the	Partially accepted	The authorisation scheme is defined in Law 34/1998 by simply referring the text of the draft to this Law on its possible need. The list of standards and their references have been revised.

			global reference GAS_002, but here it would be appropriate to refer to a reference containing only that of UNE-EN 13109, relating to degassing, scrapping and disposal.		
Community of Madrid – Hydrocarbons and IT	ITC-ICG-03	General	The current wording of the paragraphs does not understand whether paragraph 5 applies to anything that is considered a modification or extension or to any change, even if it is not. Paragraph 5 (maintenance and inspections), with the current wording, would only apply when the tank is changed, but not in all other cases of modification. We understand that maintenance and inspections should apply to all installations regardless of their entry into operation and even more when we have a modification. Paragraph 3 indicates that they will comply with the ITC for new installations. Paragraph 4 extends the definition of an amendment. Paragraph 5 reads 'In all cases, the provisions of paragraph 3 of this ITC must be complied with and, in the case of exchange of existing deposits, the provisions of paragraph 5 must also be complied with.'	Partially accepted	The full text is revised, clarifying the scope of the amendment and extension and on paragraphs 3 and 5.
Natural gas Transportation	ITC-ICG-03	General	Reference GAS_002, which currently contains those of standards UNE 60250, UNE-EN 13109 and UNE 192009-3, should be broken down into three, given that multiple references are made to that reference GAS_002 throughout that ITC for different reasons, the subject matter of each of the three aforementioned standards being different: - UNE 60250: Design, construction, operation, maintenance and testing. - UNE-EN 13109: Degassing, scrapping and disposal. - UNE 192009-3: Inspection It is noted that in most cases where reference GAS_002 is cited, the only standard that should actually be referred to is UNE 60250, and it makes no sense to refer to UNE-EN 13109 or UNE 192009-3.	Accepted	Reference GAS_002 is divided into three, GAS_002, GAS_057 and GAS_058
Natural gas	ITC-ICG-03	General	It is suggested that all tables be numbered and titled, as well	Accepted	The distances are reviewed and the location of

Transport			if appropriate, reiterate that the measures refer to metres.	partially	considered it necessary.
CONAIF	ITC-ICG-04	Paragraph 1	The purpose of this Supplementary Technical Instruction (ITC) is to lay down the essential technical requirements and minimum security measures to be observed when designing, constructing and operating the LNG satellite plants referred to in Article 2 (1) (e) of the Technical Regulation on the Safety of Gaseous Fuels Infrastructures and Installations (satellite plants up to 1.500 m ³).	Rejected	The volume of UNE 60210 has been reduced due to the fact that all installations with a volume of more than 200 tonnes are regulated by UNE EN 1473.
VITOGAS	ITC-ICG-04	Paragraph 3.1	Paragraphs 3.1 and 3.2 (part of the two tables contained in this paragraph). We request that these paragraphs be deleted, since all of their content is already covered by standard GAS_001/UNE 60210 and the first paragraph on page 83. Starting from the paragraph "Assembly shall be carried out...", it is correct and does not need to be deleted, both this paragraph and the following one.	Rejected	It is rejected as the distance regime has to be available to the citizen.
CONAIF	ITC-ICG-04	Paragraph 3.1	Satellite plants shall be classified according to the joint storage capacity as follows. According to UNE 60210	Rejected	The Ministry considers that the distance scheme must be available to the citizen.
CONAIF	ITC-ICG-04	Paragraph 3.2	This point suggests that an IG-A company specialising in cryogenicity will also have to be an installation company for pressure equipment. We do not consider such a circumstance to be necessary, especially where a pressure equipment company, as the sole personnel requirement, is that of a qualified technician with competence in the workforce. We take the view that, as it is carried out in accordance with a project, it must contain all the requirements, although it is true that, in the implementation of the Regulation on pressure equipment, the premises of the Regulation on pressure equipment will be respected, in the same way as in the Industrial Cold Regulation, where the refrigeration company is not required to be a pressure equipment company. Assembly shall be carried out by an IG-A authorised company specialising in cryogenicity in the performance of	Partially accepted	This requirement for pressure equipment is clarified in point 3.2 of ITC-ICG 09.

			permanent in these facilities shall comply with the Pressure Equipment Regulation on the procedures and professionals conducting these joints.		
CONAIF	ITC-ICG-04	Paragraph 4	In CONAIF's view, the statement that a supporting report is required may give rise to controversy, since, in some cases, some of the agents involved may require it to be certified by another party. We understand that the regulation of major accidents establishes a clear and circumscribed scope of application, which is why we do not consider it necessary to draw up any report, but rather, within the implementation project and in accordance with the responsibility of the designer, to decide whether or not to apply that regulation to him, as is the case in other industrial safety regulations. Description of the installation and supporting calculations, in addition the report shall contain a specific section stating under the responsibility of the designer whether or not the installation to which the project relates is subject to the regulation of major accidents and, where applicable, the level of impact.	Rejected	The regulation of major accidents is outside the scope of the gas regulation.
NEDGIA	ITC-ICG-04	Paragraph 4	Similar to paragraph 4.4 'Interim storage' of ITC ICG-03, which aims to maintain gas supply by using temporary facilities in the event of breakdown or prolonged maintenance, it is proposed to include a paragraph 4.X 'Interim storage' for LNG plants in ITC ICG 04, which also adds the following text: "The temporary installation should consist of approved mobile installations with a limited period of use. The gas load from fixed storage should be removed while the temporary installation is in operation."	Partially accepted	A new paragraph on provisional deposits has been introduced in the ICG-04 JT1 in a similar way to the ICG-03 JT1.
FIDEGAS	ITC-ICG-04	Paragraph 4.1	There is no reference to: — Safety documentation and emergency plans. Include as JT1 05	Rejected	It is considered to be already regulated in the specific civil protection legislation.
FIDEGAS	ITC-ICG-04	Paragraph	It is suggested to amend the type approval (more focused on	Accepted	The proposed amendment is included.

			administration) by certification (third party accredited), on the understanding that accreditation of compliance with the product's regulations is sought, for which reason we suggest: "... It shall include as an annex a list of the components of the installation, their characteristics and a justification for approval the certification of the parts and equipment which are required by law.'		
CONAIF	ITC-ICG-04	Paragraph 4.4	CONAIF considers that there should be flexibility in the case of installations storing fuel, and that the first filling should be permitted and the documentation recorded after that within 10 working days. We understand that if this is not the case, it can lead to installations that are registered not being filled and the current deadlines for withdrawals or similar tests being exceeded and being able to be filled without major problems. Once this authorisation has been obtained, if required, in accordance with Article 11 of the Regulation, the following documentation shall be submitted to the competent body of the Autonomous Community prior to the date of first filling: - Construction project for the facility. - Installation certificate from IG-A authorised undertaking specialising in cryogenesis. - Certificate of inspection. - Works management certificate. - Documentation and certification of all pressure receptacles in the installation and their accessories. - Maintenance contract. Once the installation has been first filled, the operator must submit the related documentation to the competent administration within less than 10 working days. Submission to the competent body of the Autonomous Community shall entitle the person concerned to put the product into service, and in no case shall the submission of the documentation imply technical compliance therewith.	Rejected	Any unsafe installation to be used should not be registered. It is the responsibility of the holder to withdraw the deposit again if it has not been used.

			by the competent body of the Autonomous Community. Once the submission has been made to the competent body, the operator of the satellite plant may request the first filling of the LNG tanks.		
NEDGIA	ITC-ICG-04	Paragraph 5.1	It is understood that this reference refers exclusively to cases where the LNG satellite plant is the property of the consumer (so-called uniclient satellite plants). In the case of a satellite distribution plant referred to in Article 73 of the LSH and owned by the distribution companies, there is no point in referring to possible recommendations from the marketing companies. The following text is proposed instead: “(…) The operator of the facility shall also comply with any safety recommendations communicated to them by the marketing company when the facility is not owned by the distribution company.”	Accepted	The proposed amendment is included.
NEDGIA	ITC-ICG-04	Paragraph 5.1	It is proposed to amend it as follows: 'This maintenance shall be carried out in accordance with the instructions in the maintenance programme manual which must exist at the installation, at the intervals indicated therein.'	Accepted	The proposed amendment is included.
CONAIF	ITC-ICG-04	Paragraph 5.2	CONAIF in no way shares the spirit of the current wording. We understand that maintenance companies are legally entitled to carry out a periodic review of the installation of fixed tanks. Including this change de facto undermines the professional powers of category A gas installation companies, which we do not understand to be justified given that to date there have been no industrial safety problems attributable to the installation companies. We also consider that this limits the professional skills of legally authorised installation companies, which certify that they are low.	Rejected	The Administration considers that, in order to guarantee the safety of the installation, it is necessary for it to be examined by a body that guarantees the impartiality and objectivity of the inspection carried out. It is therefore considered necessary for the entity carrying out the periodic inspection to be an entity accredited by ENAC.

			their responsibility. We understand the position of the Administration when wanting an independent agent, and we understand that the Administration has the power to request documentation and inspect on-site, and in case of negligence, sanction the punishable agents. Finally, and by way of illustration, from the point of view of free competition, the number of category A installation companies registered in the Integrated Industrial Register stands at 7934 compared with 11 inspection bodies authorised in the regulatory field of inspections of fixed LPG storage tanks. 5.2. Inspections Periodic reviews The operator of an LNG satellite plant shall be responsible for having the facility inspected every five years. This inspection review shall include the tests and verifications set out in reference GAS_001) of the table of standards and must in all cases be carried out by the installation company IG-A specialising in cryogenicity with which the licence holder holds the maintenance contract with an authorised control body. The inspection body shall issue the relevant inspection documentation, which shall be handed over by the operator of the installation and shall act in accordance with Article 20 of the Regulation. The administration in its inspection and control powers may carry out inspections of facilities using its own resources or that of authorised control bodies. If the inspection reveals that the conditions of the project have changed, the body that carried out the check shall immediately inform the competent body of the Autonomous Community. A pneumatic pressure test shall be carried out every fifteen years to avoid introducing moisture into the tank, in accordance with the criteria set out in reference GAS_001 in the table of standards. The test will be carried out by a control body, assisted by an IG-A authorised undertaking specialising in cryogenicity, which must issue a test report once it has been completed with		
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			success of the operation		
NEDGIA	ITC-ICG-04	Paragraph 5.2	Draft PNE 192009-4 'Procedure for regulatory inspection' is currently being prepared. Installations for gaseous fuels. Part 4 Liquefied Natural Gas (LNG) Satellite Plants', detailing the specific operations to be carried out. Pending the publication of this standard, it is proposed to include the following text after the paragraph indicated, which details the items to be inspected and checked in LNG plants, as provided for in the inspection section of ITC IGC-03: 'Visual inspection of the installation by checking the safety distances indicated in reference GAS_001 of the table of standards. Check the absence of non-installation elements within the enclosure. Adequate provision and proper condition of fire protection systems. Check on visible parts. Correct condition of the external coating of the reservoir and piping (it shall maintain a continuous layer without signs of corrosion). Correct state of bedding, drainage, anchorages and foundations. Operation of keys, control and measuring instruments (manometers, levels, etc.), regulators, transfer equipment, vaporisers and other equipment. Enclosure condition, access doors and closing elements. Existence and status of the required signs. Measurement of the resistance of the earth sockets. Control of tightness in gas phase piping at operating pressure. Leak control by gas or soapy water detector on liquid phase lines and on all other elements (vaporisers, valves, filters, purges and junctions). The inspection of PCI equipment may be carried out in a way that:	Accepted	The proposed amendment is included, with an amendment concerning the regulation on fire protection installations.

			simultaneous application of the inspection procedures laid down in Standard UNE 192005-2 or, failing that, in accordance with the Regulation on Fire Protection Equipment.'		
VITOGAS	ITC-ICG-04	Paragraph 6	We request that the inertisation be removed from supervision by a control body, since if it is carried out by an IG-A authorised company specialising in cryogenicity, it is already authorised to do so and the need for supervision by a control body does not add value to the action or increase safety.	Rejected	The Administration considers that, in order to guarantee the safety of the inertisation procedure in this type of facility, it is necessary to have a body that guarantees the impartiality and objectivity of the procedure carried out. It is therefore considered necessary for the entity carrying out the periodic inspection to be an entity accredited by ENAC.
NEDGIA	ITC-ICG-04	Paragraph 6	We propose increasing this deadline so that it is operationally feasible to carry it out at times of high season where it is difficult to find tanks available for this type of service. We therefore suggest that the text be amended as follows: “(…) The holder must have the inert tank as soon as possible and no later than six months from the occurrence of any of these circumstances, except in cases of force majeure. (...)”	Partially accepted	The deadline has been extended to three months and a clarification has been added.
DISA GAS	ITC-ICG-04	Paragraphs 3.1 and 3.2	We request that these paragraphs be deleted, since all of their content is already covered by standard GAS_001/UNE 60210 and the first paragraph on page 83. Starting from the paragraph “Assembly shall be carried out...”, it is correct and does not need to be deleted, both this paragraph and the following one.	Rejected	The Ministry considers that the distance scheme must be available to the citizen.
NEDGIA	ITC-ICG-04	General	The scope of this JTI has been amended to refer to a maximum capacity range for LNG plants of 450 m³, a range that remains within UNE 60210, but which excludes plants with a capacity between 450 and 1 500 m³, which also covers UNE 60210, but which appears to have been deliberately left out because it is a range that overlaps with that of the current UNE-EN 1473.	Rejected	Installations between 450 and 1 000 m³ that have been registered under standard UNE 60210 and the current Regulation (RD 919/2006) are covered by this Regulation and by the standard UNE 60210 with which it was registered. ITC ICG-04 talks about LNG satellite plants and UNE EN 1473 talks about facilities

			However, it is not clear that plants which have hitherto been covered by national legislation, specifically by the technical regulation approved by RD 919/2006, such as those with a capacity of between 450 and 1 000 m³, fall outside the scope of the new regulation submitted for consultation. If that approach is successful, it is necessary to clarify what will happen to those plants and under what administrative control they will be governed.		land as major infrastructure, exceeding 200 tonnes.
NEDGIA	ITC-ICG-04	General	It is suggested that all tables be numbered and titled.	Rejected	Not considered necessary as they are covered by different paragraphs.
Particular 1	ITC-ICG-05	Paragraph 1	In the second paragraph, it should be made clear that the loading of gas containers into motor caravans other than those for propulsion is permitted. Certain motor caravans, and other 'camperised' vehicles, may have gas installations with LPG containers for cooking, heating and hot water. I believe that explicitly showing that gas containers dedicated to these circuits can be refilled, would clarify this case unequivocally	Rejected	The cases in which the filling of LPG tanks is permitted and possible exclusions are well understood to be limited.
PRIMAGAS	ITC-ICG-05	Paragraph 1	COMMENTS: remove the engine reference from the means of transport. This is because they do not always have engines, as is the case for balloons. The explanatory memorandum has already been drafted along the same lines. A MEMORIA JUSTIFICATIVE EXPENDITURE In this JTI there is a relevant change in the scope to clarify that the instruction applies to stations supplying gaseous fuels for all means of transport, not only vehicles, and the limitation in the previous regulation on the supply of fuel exclusively for use as fuel has been removed, without prejudice to other supply restrictions that may be laid down in the sectoral regulations. DRAFTING PROPOSAL The purpose of this Supplementary Technical Instruction (ITC) is to set out the essential technical requirements and	Rejected	The proposal is rejected, as the term "vehicles" in the previous regulation was confusing as it was not defined. It has been decided to remove this lack of definition, which in many cases meant excluding means of transport such as trains or ships from the scope. We have already replied to the section on balloons in other comments. We do not consider it appropriate to recharge balloons at these facilities.

			minimum safety measures to be observed when designing, constructing and operating storage and supply facilities for bulk liquefied petroleum gas (LPG), compressed natural gas (CNG) and liquefied natural gas (LNG) or hydrogen for use in any means of transport referred to in Article 2 (1) (f) of the Technical Regulation on Safety of Gas Fuel Infrastructure and Installations, without prejudice to other supply restrictions that may be laid down in sectoral regulations, for example on the type of tanks.		
PRIMAGAS	ITC-ICG-05	Paragraph 1	COMMENTS: We propose a change to the wording in order to resolve a specific case that is presented sporadically, since this paragraph excludes the use of caravan and motor caravan containers that have a charging mouth and other elements that allow them to be filled in situ and which, according to this wording, cannot be filled in the service stations as they are not an indivisible part of the gas installation. The fact that they cannot be filled in the packaging plants will be ruled out, affecting both Spanish and foreign caravan lovers. The regulation should specifically provide for the filling of these containers in EESS provided that it has the necessary elements for filling them (the equivalent of the fuel tank of a Autogas vehicle) and that they are not withdrawn and clearly differentiating these containers from the traditional ones that must be sent to a packaging plant for refilling. DRAFTING PROPOSAL: Filling of LPG containers at service stations is prohibited unless they are part of the gas installation of the means of transport and have the necessary elements for on-site filling such as level gauge, separate filling connection and automatic cut-off system.	Accepted	The text has been changed
Community of	ITC-ICG-05	Paragraph 1	Cases that qualify as enlargement have not been defined, or	Accepted	

Madrid – Hydrocarbons and IT			amendment. To consider any changes that would change the safety requirements as distances in the current legislation		
GASIB	ITC-ICG-05	Paragraph 1	In the detailed paragraph, the filling of LPG containers is prohibited unless they form an integral and indivisible part of the gas installation of the means of transport. We understand that the indivisible adjective may give rise to interpretations as to whether or not the packaging is removable/separable from the gas installation. We propose the following wording: Filling of LPG containers is prohibited at service stations unless they form an integral and indispensable part of the gas installation of the means of transport and have a separate filling connection.	Partially accepted	The text is amended
FEDAOC	ITC-ICG-05	Paragraph 1	It is not very clear from the scope of the ITC what other gaseous fuels are covered by section 2.1.f. Paragraph 2.1.f states: (image) And within the scope of JTI IGC 05: (image)	Rejected	We consider the current wording to be correct.
PRIMAGAS	ITC-ICG-05	Paragraph 3	COMMENTS: We propose making an express reference to the existence of unattended service stations by referring to GAS_XXX for the additional safeguards required for each type of supply station. DRAFTING PROPOSAL: Unmanned petrol stations shall be operated with the additional safeguards established in their respective GAS_XXX.	Rejected	Not considered appropriate due to the safety of the installations
PRIMAGAS	ITC-ICG-05	Paragraph 3	COMMENTS: We do not understand the reason for this paragraph and why it is limited to LPG filling stations only. We propose that they be removed or, where appropriate, that the requirement be extended to CNG, LNG or Hydrogen Service Stations. Furthermore, it is not consistent with what is currently laid down in UNE 60630.	Rejected	The specified distance is considered necessary to be incorporated in the Regulation, however, a mistake observed in line with another claim is corrected.
Government of Catalonia	ITC-ICG-05	Paragraph 3	Error in defining the minimum distance in LPG stations “LPG service stations shall respect a minimum distance of 3 metres from tank holes to storage hydrants; or	Accepted	The proposed amendment is included.

			venting of other hydrocarbons.' Read: 'LPG service stations shall respect a minimum distance of 3 metres between manholes in buried liquid fuel tanks and dispensers supplying gas.'		
BEQUINOR	ITC-ICG-05	Paragraph 3	It is proposed to add minimum distances in a new Annex to the ITC-ICG. Distances H2 ICG 05 are included in Annex I	Accepted	The distance ANNEX has been drawn up.
BEQUINOR	ITC-ICG-05	Paragraph 3	Amendment to ITC-ICG 13 of reference Gas_027 to include 17127: 2024 The proposed wording of the new ITC ICG-05 states that the design, construction, assembly and operation of gaseous fuel stations must comply with RD 639/2006. Regulation (EU) 2023/1804 repeals Directive 2014/94/EU (which was transposed into Royal Decree 639/2006). Both this European Regulation and the first final provision of this draft Regulation, which amends Royal Decree 639/2016, include UNE-EN 17127 as a reference standard with regard to the interoperability of hydrogen supply points and filling protocols. Standard UNE-EN 17127: 2024 refers to standard UNE-ISO 19880-1: 2022 as a reference standard for the safety and performance requirements of the entire hydrogen service station, so both standards are complementary and mandatory and therefore we believe both standards should be included in reference GAS_027 of the new ITC ICG-13.	Accepted	
BEQUINOR	ITC-ICG-05	Paragraph 3	Collect homogeneous framework of fire protection measures (PCI) for H2 storages integrated into hydropower/hydroliners It is necessary to specify the applicable regulations on fire protection in H2 storage facilities integrated into hydropower plants/hydroliners.	Rejected	It is outside the scope of this draft RD. The specific ICP measures and their containment will be included in the risk analysis set out in standard UNE EN 19880.

			With regard to the possibility of using the Regulation on Fire Safety in Industrial Establishments (RSCIEI) as a reference only, it is important to note that the RSCIEI is designed for industrial installations where fuel products are present, but not for those with a specific risk. In fact, the Chemical Storage Regulation (RAPQ), currently applicable to fixed and mobile H2 storages not intended for use as fuel, considers higher fire protection measures than those established by the RSCIEI, due to the specific risks of the chemicals within its scope. In view of the above, it is necessary to specify the applicable legal framework and the complementary measures to be implemented taking into account the specific risk of hydrogen.		
CONAIF	ITC-ICG-05	Paragraph 3	We believe that CONAIF should remove all references to safety distances that may conflict with the applicable UNE standards. It is not appropriate to refer to an implementing provision and introduce some similar provisions in the regulation itself that could give rise to conflicting interpretations. LPG service stations shall respect a minimum distance of 3 metres from the openings in the tanks to the storage vents or vents of other hydrocarbons.	Rejected	It is considered necessary to lay down certain mandatory safety measures in the Regulations. A typo in the proposed distance is corrected
ENAGAS Transport	ITC-ICG-05	Paragraph 3	In line with this draft Royal Decree approving the Technical Regulation on the Safety of Infrastructure and Installations for Gaseous Fuels, it should be noted that: In those aspects not regulated by the aforementioned Royal Decree, the design, construction, assembly and operation of service stations for gaseous fuels shall be carried out in accordance with the following ITC-ICG-13 references.	Partially accepted	The text has been amended.
CONAIF	ITC-ICG-05	Paragraph 4	We believe that the wording can generate	Accepted	The text has been amended.

			complications, a priori, the list of tests to be carried out is defined in the project, and the project management then indicates which tests have been carried out or which variations have been made from the project. — Tests and trials to be carried out.	partially	
ENAGAS Transport	ITC-ICG-05	Paragraph 4.5	Comments on paragraph 1: the references to 'distribution company' or 'marketing company' are not correct in view of the different types of refuelling stations. The definition of distribution company under Articles 58 (c) and 77.1 of Law 34/1998 of 7 October does not fit into the supply of LNG or hydrogen. In addition, the definition of a marketing undertaking in accordance with Article 58 (d) of Law 34/1998 of 7 October 2007 does not fit into the supply of hydrogen. The following wording (or similar) is proposed: Paragraph 1: In accordance with Article 11 of the Regulation, the following documentation shall be submitted to the competent body of the Autonomous Community prior to the date on which the supplier carries out the first supply: Paragraph 3: Once the submission to the competent body has been made, the installation shall be deemed to be serviceable, at which point the operator of the installation may contact the supplier in order to request the first supply to the installation.	Partially accepted	The "supplier" companies are not a defined figure, it is considered appropriate to maintain consistency with the Hydrocarbons Law. It is qualified for the case of the Hydrogenum.
CONAIF	ITC-ICG-05	Paragraph 4.3	In CONAIF's view, the initial inspection should not be an additional step in the process of bringing the facilities into service, but rather a check on the sample of facilities put into service, i.e. random inspections will be required of some facilities before they are put into service. The reason is simple, we understand that the execution of an EE SS is associated with a project, which is carried out by a qualified technician. In addition, the installation company certifies that it has carried out the actions in accordance with	Rejected	The various Autonomous Communities that have been involved in the preparation of the project and the review of claims consider it essential that the initial inspection be carried out by a CB for the implementation of the EESS, and it is not sufficient for the installation company to carry it out.

			finally, there is a project management which again certifies that everything has been done in accordance with the project or with the changes approved by the project management. We do not understand why installation companies will be required to provide more civil liability insurance, along with more specific training so that their actions are finally certified by a new agent. Once the tests referred to in the previous paragraph have been completed, the commissioning of the installation may require an initial inspection. During this inspection, the tests and verifications provided for in the above standards shall be carried out, as appropriate. The initial inspection may or may not be ordered by the competent body of the Autonomous Community where the facility is located. To that end, it may use its own resources or the services of an inspection body. These operations shall be carried out by an inspection body. The inspection, if carried out, shall be attended by inspection staff assisted by the installation company and the site management. During the tests, the site management and the installation company must take all necessary precautions to ensure that they are carried out safely in accordance with the standards they apply for each of the fuels and their storage.		
FIDEGAS	ITC-ICG-05	Paragraph 4.4	It is suggested to modify conformity (it refers to a product, process or service complying with specific requirements, while certification is a formal process that validates such conformity, usually through a document or marking) by certification (accredited third party), on the understanding that accreditation of the product's regulatory compliance is sought. ".... A list of the components of the installation, their characteristics and a justification of the conformity of the certification of parts and appliances which	Accepted	The text is amended

			this is required by law.'		
CONAIF	ITC-ICG-05	Paragraph 4.4	In line with justification section 6 ICG 04 The gas installation company shall send the relevant installation certificate to the operator of the installation. Furthermore, once the tests have been completed with a favourable result, the inspection body or the competent administration where the initial inspection is required shall issue an inspection certificate, which it shall send to the operator of the installation, the installation company and the site management.	Rejected	The certificate will be issued by the CB.
EXOLUM	ITC-ICG-05	Paragraph 4.5	It is proposed to simplify the authorisation procedure for portable installations for the supply of gaseous fuels. In accordance with ITC-ICG 05 of Royal Decree 919/2006, service stations for gas vehicles must comply with a series of technical and administrative requirements for their implementation and operation. However, in the case of portable installations, which maintain the same intrinsic technical and safety conditions on each site, the current procedure is considered redundant, especially when: • The installation does not undergo technical modifications between locations. • It is ensured that assembly and dismantling is carried out by competent technical personnel. • A technical check is carried out prior to each launch in the new location. We therefore request that ITC-ICG 05 provide for an exception or simplified procedure for portable installations, so that: 1. Only one authorisation for initial start-up is required at Autonomous Community level, in accordance with the requirements.	Rejected	The inclusion of provisions for portable installations is not considered appropriate.

			referred to in section 4 of ITC-ICG 05 for initial commissioning, provided that the installation does not undergo technical modifications between locations. 2. At each new location, commissioning is permitted by means of a technical review certified by competent personnel and a self-declaration issued by the supplier certifying that the installation complies with ISO 19880. 3. It is certified that the equipment complies with all safety regulations, including the applicable technical inspections and maintenance to ensure that the station is safe for the public. This measure would make it possible to speed up operations, reduce unnecessary administrative burdens and maintain the levels of safety required by the legislation in force. 4.5.1 portable installations For portable installations, provided that the installation does not undergo technical modifications between locations, after the first putting into service as specified in ITC-ICG-05 Section 4.5; The operator must submit to the competent body a self-declaration issued by the operator of the installation certifying compliance with GAS_027 regulations; the initial start-up authorisation, as well as a copy of the documentary file ensuring compliance with the established Maintenance and Inspection Plan, in accordance with section 5.		
PRIMAGAS	ITC-ICG-05	Paragraph 4.5	COMMENTS: We propose to revert to the current wording of Royal Decree 919/2006 in which the notification to the administration is made after the first filling and must be made within 15 days of the first filling.	Rejected	It is considered appropriate that the notification be made prior to filling in order to avoid unreported installations.
Community of Madrid – Hydrocarbons and IT	ITC-ICG-05	Paragraph 4.5	Consider that communication to the administration of an EESS for NG gas vehicles may be carried out jointly with the receiving installation from the mains connection to the connection point if it is the only one.	Partially accepted	The text is amended

			service. Provided that the competent body of the Autonomous Community is the same.		
CONAIF	ITC-ICG-05	Paragraph 4.5	As they are reservoir facilities, we understand that submitting a request for filling may give rise to a problem that has not been taken into account, namely that there are facilities that are never filled and when they are filled they do not present the relevant evidence of retimbrations in force. In accordance with Article 11 of the Regulation, the following documentation shall be submitted to the competent body of the Autonomous Community prior to the date on which the first supply is made by the distribution company: — Installation certificate, – Inspection certificate (if applicable) – Construction design of the installation. Certificate of management of the works. — Maintenance plan, either by external contract or by own means. The documentation shall be submitted no later than 10 working days after the first filling of the installation. The submission of such documentation does not under any circumstances imply technical compliance with it by the competent body. Submission to the competent body of the Autonomous Community shall entitle the person concerned to put the product into service, and in no case shall the submission of the documentation imply technical compliance with it by the competent body of the Autonomous Community. Once the submission to the competent body has been made, the facility shall be deemed to be serviceable, at which point the operator of the facility may contact the marketing or distribution company to request the first supply to the facility.	Rejected	It is considered appropriate that the notification be made prior to filling in order to avoid unreported installations.
CONAIF	ITC-ICG-05	Paragraph 5	The Confederation considers that the USSs must be subject to regular checks, but by installation companies and not by inspection bodies. If the Administration so wishes, it can order campaigns for	Rejected	The various Autonomous Communities involved in the preparation of the draft and the review of claims consider it essential that for the proper functioning and safety of

			inspection of facilities. In any event, we do not share the view that a control body must intermediate in order to certify the correct maintenance or otherwise of an installation, on the understanding that an installation company and a gas installer of a sufficient category are qualified for this purpose in accordance with ITC-09. In addition, due to an issue that is a fundamental pillar of the European Union, due to a question of competence, this system of inspections would be carried out by only 11 authorised officials. 5. MAINTENANCE AND PERIODIC INSPECTIONS AND PERIODIC INSPECTIONS Maintenance and periodic inspections of service stations shall be carried out in accordance with the provisions of the standards referred to in paragraph 3 of this ITC, as appropriate. [...] The operator of the service station shall be responsible for requesting the periodic inspection of the installation every five years from an installation company authorised by a control body authorised for the type of fuel in question, which shall issue the corresponding inspection review certificate. That periodic inspection shall include all the elements forming part of the service station, including storage tanks. Irrespective of the above, at the discretion of the competent administration, the latter may order an inspection after 5 years of a random number of installations. This inspection may be carried out by inspection bodies or by the administration using its own resources.		the regular check is carried out by a CB, and it is not sufficient for the installation company to carry it out.
DISA GAS	ITC-ICG-05	Paragraph 5	As in previous clarifications, the reference to the performance of the inspection by an authorised inspection body should be deleted from the third paragraph. Periodic inspection of the whole LPG service station (requested	Rejected	The various Autonomous Communities involved in the preparation of the draft and the review of claims consider it essential that for the proper functioning and safety of

			LPG is required), must be carried out by an approved installer as he is qualified to do so. In addition, the LPG dispenser is already subject to annual metrological control in accordance with Order ICT/155/2020 of 7 February regulating the metrological control of certain measuring instruments (page 37, section D). PROPOSAL: The operator of the service station shall be responsible for requesting the periodic inspection of the facility every five years from a control body authorised for the type of fuel concerned, which shall issue the relevant inspection certificate.		the regular check is carried out by a CB, and it is not sufficient for the installation company to carry it out.
ENAGAS Transport	ITC-ICG-05	Paragraph 5	There is a certain inconsistency between the requirement for each supply facility to have a documentary file, and for it to be preferably electronic. Indeed, the electronic document file does not have to be in each installation, given the existing technology. In fact, it would be preferable if it were not digitally stored in each facility, but simply accessible. We suggest the following wording: For each service station, there shall be a documentary file, preferably electronic, containing the records of all the operations carried out. That file, which shall be held by the operator of the station, may be consulted by the competent administrative body where that body considers it appropriate.	Accepted	The proposal is accepted
SEDIGAS	ITC-ICG-05	Paragraph 5	Fifth indent: 'In the case of LPG storage, the provisions of section 5 of ITC ICG-03 shall be followed with regard to maintenance, periodic testing and inspections.' It is proposed to add the following paragraph: "In the case of supply of natural gas through a LNG satellite plant, both compressed (CNG) and liquefied (LNG), maintenance, periodic testing and inspections	Accepted	

			they shall be carried out in accordance with paragraph 5.2 of ITC ICG-04.'		
REPSOL	ITC-ICG-06	Paragraph 1	Previously, ICG-06 applied to packaging associated with reception facilities. Now it does so even for packaging that feeds mobile devices. For example, according to this new wording, it is not clear whether the user will be able to change either the regulator or the pipe of a stove or paeller by having to resort to a gas installer contrary to what is allowed by the ITC-ICG08 itself. Or the following requirement "The connection of packaging and apparatus without an interlayer of a regulator is prohibited unless the apparatus is designed to operate under direct pressure, in which case a rigid channel for the connection shall be used", when there are mobile apparatus operating under direct pressure such as torches, which do not have a regulator or rigid channel. We understand that the aim is to count packaging used in mobile equipment and packaging in stock that is not connected in the total number of kilograms eligible in the installation. If this is the case, an explicit paragraph could be included with this consideration.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment. ITC 8 already provides that these devices may be connected by the user, unless otherwise specified by the manufacturer.
REPSOL	ITC-ICG-06	Paragraph 3.1.1	When battery packs are used in simultaneous discharge, no regulator is installed but a free output adaptor is installed. Furthermore, we understand it to mean a user key, which is the term used in the definitions and defines the start of the receiving installation. We propose to revert to the original paragraph of the previous JTI. Where containers are installed outside (terraces, balconies, courtyards, etc.) and consumer appliances are inside, the installation must be provided inside the dwelling with an easily accessible gas cutting key.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
REPSOL	ITC-ICG-06	Paragraph 3.1.1	Confirm with regulators manufacturers whether these elements are manufactured in accordance with Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016 on appliances burning	Accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			gaseous fuels and repealing Directive 2009/142/EC, as regulators are not themselves gas-fired appliances or appliances burning gaseous fuels.		
DISA GAS	ITC-ICG-06	Paragraph 3.1.1	In practice, it is common to find cabinets intended for LPG bottle batteries with poor or even inadequate access conditions for packaging-exchange distributors. There are cases where these deckhouses are elevated to more than 40 cm above track level, which makes it necessary to raise 35 kg bottles with high ergonomic risk, as well as configurations with very small openings or depths of more than 2 metres, which seriously hinder loading and unloading operations. These situations not only pose a risk to occupational safety and health, but also make it difficult to correctly refill packaging in safe and efficient conditions. PROPOSAL: The installation shall be carried out by a gas installation company. In the case of batteries in bottles located in cabinets, their design, dimensions, accesses and location must ensure compliance with the principles of safety, ergonomics and hygiene laid down in Law 31/1995 on the Prevention of Occupational Risks. Cabinets intended for the storage of packaging batteries shall be fully accessible to handling personnel, allowing the exchange of bottles under safe conditions and without compromising the physical integrity of the workers. In particular, configurations requiring packaging to be raised or inserted into enclosures with forced access, reduced openings or without sufficient space for manoeuvring with appropriate tools shall be avoided.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
DISA GAS	ITC-ICG-06	Paragraph 3.1.1	When battery packs are used in simultaneous discharge, no regulator is installed, but an adaptor is installed.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			free exit. Furthermore, we understand it to mean a user key, which is the term used in the definitions and defines the start of the receiving installation. We propose to revert to the original paragraph of the previous JTI. PROPOSAL: If there is more than one packaging connected to the receiving installation by regulators with a shut-off valve, the packaging storage facility shall end up in a shut-off valve which shall be the user valve. Where containers are installed outside (terraces, balconies, courtyards, etc.) and consumer appliances are inside, the installation must be provided inside the dwelling with an easily accessible general gas-cutting key.		
GASIB	ITC-ICG-06	Paragraph 3.1.1	We do not understand the wording of the paragraph. Regulators do not have a cut-off valve beyond the actual actuation of the regulator. Free-outlet adapters are usually placed and the adjustment is placed in the bottle collector with a key downstream of the cylinder regulator. Furthermore, the end of the user valve is blurred, on the understanding that it refers to the user key, which is the term used in the definitions and defines the start of the receiving installation. We propose the following wording: If there is more than one packaging connected to the receiving installation, the packaging storage facility shall end up in a shut-off valve which shall be the user key.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
FEDLPG	ITC-ICG-06	Paragraph 3.1.2	- The wording is confusing and very restrictive. It is not clear whether the limit is per user or per building. On the understanding that it is per user, a wording is proposed that discriminates against users with regard to access to an energy source based on their type of dwelling. The capacity of 300 kg should be maintained in all housing scenarios. - By limiting the number of packages in stock,	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			compromise the operability of the supply. Proposed wording of paragraph 3.1.2 The total storage capacity, obtained as the sum of the unit capacities of all packaging included, both filled and empty, shall not exceed 300 kg. The operator of the installation shall be free to determine how many containers it will keep in stock to ensure continuity of supply, provided that it complies with the ventilation, stowage and separation conditions laid down by law.		
FEDLPG	ITC-ICG-06	Paragraph 3.1.2	- There are still a multitude of facilities where packaging is permanently exposed to the weather on the façade, which is the only solution for poor and vulnerable families. The possible deterioration of the packaging does not pose any problems affecting the safety of the installation. - It is proposed to delete this paragraph.	Accepted	A new JTI has been proposed on the basis of the comments received for amendment.
FEDLPG	ITC-ICG-06	Paragraph 3.1.2	- Distances must be such as to protect any leakage of one of the packages and should therefore be independent of the quantity stored. - We propose the following wording: At least 1 m safety distance from the boundary of the packaging storage area must be kept in archetypes, dormant windows, sewers, communications with staircases, basements or other premises situated at a lower level.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
FEDLPG	ITC-ICG-06	Paragraph 3.1.2	- It is proposed to revert to the current ITC-ICG-06 requirements of the current RD whose wording is simpler to interpret and comply with. - The stored stock containers must be adequately ventilated.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
REPSOL	ITC-ICG-06	Paragraph 3.1.2	It limits the activity of, for example, a restaurant or bar with 10 heated courtyards or stoves. In summer, you would have no choice but to store the equipment with the packaging coupled, otherwise you would not be able to have one in stock or not connected, or even store those that	Rejected	A new JTI has been proposed on the basis of the comments received for amendment.

			was in use. In addition, it would limit the customer's operational capability and stock management. Elimination: The sum of standby and non-connected packaging shall not exceed the number of packaging in use for all existing equipment.		
REPSOL	ITC-ICG-06	Paragraph 3.1.2	A typical configuration of 2 + 2 to feed one kitchen and one heater plus one oven with 1 container in use plus 1 unconnected would be prohibited as it would exceed the proposed limits. This limitation would specifically affect the most vulnerable groups of families. It would also not be possible to have multi-stove installations as there would be only 2 additional non-connected packaging for use, de facto limited the total number of packaging in use, which would be particularly critical in dwellings without a heating system. Elimination: In residential blocks at a height (including outdoor areas such as balconies or terraces) the sum of standby and non-connected packaging: — May not exceed 2 in dwellings.	Accepted	A new JTI has been proposed on the basis of the comments received for amendment.
REPSOL	ITC-ICG-06	Paragraph 3.1.2	The new wording introduces limitations that, from a technical and operational point of view, create significant restrictions on the operation of professional facilities, especially in the hospitality sector. One of the most problematic aspects is the limitation to the number of non-connected packaging. This measure prevents, for example, an establishment from having stoves or heating courtyards stored off-season without keeping the packaging connected, which is inoperative. The only alternative that the regulation would allow would be to keep the packaging connected throughout the year, which may pose an unnecessary risk. In addition, typical configurations in professional facilities, such as 4 + 4, 5 + 5 or 6 + 6, would be restricted, as only a maximum of three packages in stock would be allowed. This would limit the ability to vaporise in	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			times of high demand, compromising the simultaneous operation of the appliances and creating risks such as burning off burners or interruptions in service. These restrictions directly affect the operability of users, eliminating the possibility of maintaining a minimum stock of packaging and requiring orders to be placed more frequently. This situation is exacerbated in rural environments or in facilities with high consumption turnover, especially on non-working days, where delivery times may not be sufficient to ensure continuity of service. In short, the proposal represents a substantial change in the number of packaging permitted in the facilities, without there being any clear technical justification or evidence of any prior impact on safety that would justify such a change. Elimination: For uses other than residential use, it may not exceed 3, except where there are more than 6 packages in use, in which case it may not exceed half the number of packages in use rounded up to the next whole number.		
REPSOL	ITC-ICG-06	Paragraph 3.1.2	It could be discriminatory for operators to establish different packaging storage capacities depending on whether they are residential blocks at a height or not. In addition, it is not clear whether the limit is per user or per building. We understand that it would be per user as otherwise there would be no way to monitor compliance. Such a limitation would undermine citizens' rights to be supplied from an energy source. This should be clarified or a clearer wording established. Nor does it seem consistent to limit the maximum number of containers for height-level dwellings to 150 kg when a maximum of 2 containers for height-level dwellings is set elsewhere in the Regulation. Something	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment. It is understood that the risk of installations in blocks at a height is greater than that which may exist in isolated dwellings.

			similar to 300 kg for all other cases. Elimination: In any case, the total storage capacity of standby and non-connected packaging, obtained as a sum of the unit capacities of this packaging, may not exceed 150 kg for any use in residential blocks at height and 300 kg in all other cases.		
CONAIF	ITC-ICG-06	Paragraph 3.1.2	The current wording is considered to be extremely complex to understand and a new wording is therefore proposed. We understand that there are conditions that are not currently on the market taking into account that LPG containers used in batteries have a part in use and a part in discharge. 3.1.2. Limitations on the number of packs The sum of non-connected packs filled may not exceed the number of packs in stock. In a dwelling, no more than two containers may be placed on standby and two in use. For more than two standby packages, a stand on the outside of the dwelling or embedded on the façade of the dwelling shall be used. For all other uses, other than residential, the packaging shall comply with: • Up to 70 kg (in-use + back-up packaging) may be placed inside the premises, in connected batteries of packaging and back-up type n + n (n in-use packaging and n back-up packaging). • Above 70 kg of gas (including in-use and standby containers) shall be placed in a cupboard or stand that meets the conditions of point 3.2.3. The total number of containers (filled and empty) is not permitted to exceed 300 kg.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
GASIB	ITC-ICG-06	Paragraph 3.1.2	Analysing the wording of this paragraph, it would not be possible to place an example of a typical configuration that could not be given: 2 connected packaging, 2 standby and two non-connected packaging We propose the following wording: The sum of non-connected packaging shall not exceed the number of packaging in use for all existing equipment.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
GASIB	ITC-ICG-06	Paragraph	It is not clear whether the limit is per user or per building.	Accepted	A new JTI has been proposed on the basis of

		3.1.2	We understand that this would be for housing, as otherwise there would be no way to monitor compliance. Who would determine who is entitled to packaging and who is not? Such a limitation would undermine citizens' rights to be supplied from an energy source. This should therefore be clarified or a clearer wording established. In addition, the number of standby or non-connected packaging is limited, but there is no limit for packaging that could be used unlimited and therefore higher than the maximum 300 kg currently allowed. We propose to revert to the existing wording: The total storage capacity, obtained as a sum of the unit capacities of all containers including both full and empty containers, must not exceed 300 kg.	partially	comments received for amendment.
EHIC	ITC-ICG-06	Paragraph 3.1.3	It requires ventilation to the outside in the premises or quarters of the dwellings where the containers are stored. The current regulation only provides ventilation for container cabinets, it does not establish outdoor ventilation conditions for standby containers stored indoors for which it only requires this ventilation to be adequate. This requirement will have a direct impact on a multitude of facilities, jeopardising the use of bottled LPG in the sector, in addition to thousands of Spanish homes that do not have a storage room with an external connection. It is proposed to revert to the requirements laid down in ITC-ICG 06 of the current RD 919/2006, the wording and requirements of which are much simpler to interpret and comply with. Where packaging is located at a place other than that of use of the gas-fired appliances, it shall be stored either outdoors or in spaces that meet the requirements set out in reference GAS_008 of the table of standards to be considered ventilation courtyards, or in premises that	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			have at ground level one or more openings for direct ventilation to the outside or to these ventilation courtyards, which may not be more than twice the size of the other, with the following minimum surfaces:		
REPSOL	ITC-ICG-06	Paragraph 3.1.3	There are a multitude of facilities in Spain where packaging is permanently exposed to the weather on the façade of the building itself. Such packaging is more degraded and damaged than if protected, but LPG packaging is still weathering well and is the only option for families with low resources. Limiting their installation would have a direct impact on these vulnerable groups. In REPSOL we are sensitive to these groups and we understand that often they have no choice but to place them outside or even façade. Elimination: Connected outdoor packaging (sufficiently ventilated terraces and balconies, courtyards, etc.) must be positioned in such a way as to be protected from atmospheric conditions such as solar radiation, rain, etc.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
REPSOL	ITC-ICG-06	Paragraph 3.1.3	The distances set seem excessive, even inconsistent with the JTI itself. For example, later in the ITC itself, it establishes distances from basement openings of 0,5, 1,5 and 2 m for storage of containers with a load of more than 35 kg, which means that the limit of 2 m is excessive, and even more so for storage of household packaging of 4 and 8 m. We believe that the distances should be defined on the basis of the capacity of the stored packaging and not on the basis of the number of packaging, since the aim is to protect against the possible leakage of one of the stored packaging, it is no longer foreseeable that more than one of the packaging will abscond, so the distances for packaging of less than 35 kg should be lower than those laid down for packaging of more than 35 kg and not greater than what is the case with the proposed Royal Decree.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			At least 1 m safety distance from the boundary of the packaging storage area must be kept in archetypes, dormant windows, sewers, communications with staircases, basements or other premises situated at a lower level. Where more than 150 kg is stored in the same place, that distance shall be 4 m in open places and 8 m in enclosed places.		
REPSOL	ITC-ICG-06	Paragraph 3.1.3	It is not clear where the ventilation openings should lead as from the description of the enclosed space it seems to be an inner courtyard. We do not know the technical justification, which is why it is required that the distance from the packaging to the grilles be less than 2 m. In addition, it establishes ventilation dimensions that are not consistent with the provisions set out above in the regulatory text. We propose to unify or eliminate these dimensions, given the difficulty of driving these ventilations to the outside (they would normally do so to a neighbour's house given that it is an inner courtyard, aggravating the risk of a possible absconding). It should be borne in mind that the leakage rate from LPG containers is minimal. During the packaging process, the containers are found to be leaking and those exceeding 5 g/h are rejected. Leakage rate that spreads in the environment without major consequences, apart from the characteristic odour with which LPG odorises, allowing detection thresholds in the environment of parts per million (ppm). Proposed deletion: Enclosed spaces (four closed sides open only at the top) shall be considered as outdoor spaces exclusively for the storage of packages of less than 15 kg, where they meet the following conditions: — Has a floor area of more than 6 m² plus an additional 700 cm² for each stored package. — Walls shall have permanent ventilation openings above the ground.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			the installation must not exceed 15 cm, must not be covered at any time and must be less than 2 m from the packaging. — The lower ventilation rate shall be at least 200 cm ² for each stored container.		
CONAIF	ITC-ICG-06	Paragraph 3.1.3	The text is not contrary to definition 28 of Article 3 of the draft, where back-up packaging is defined as packaging that is not in use, but can supply the installation automatically. If a refill packaging is not connected to the in-use packaging, according to the definition it is not refill but not connected packaging If the containers in stock inside the dwelling are not attached to the packaging in use with a flexible pipe, the containers in stock which are not connected must be placed in a room different from that in which the packaging in use is located and away from any kind of heating source.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
DISA GAS	ITC-ICG-06	Paragraph 3.1.3	It is common to find packaging boxes that are inaccessible to distributors, either due to their design, size or even location, access to the packaging poses a risk to their safety. PROPOSAL: Containers located outside may be housed in an outdoor stand or cabinet made of materials of class A2-s3, d0, with protection against rain and atmospheric agents in general. In addition, it may be protected by doors to prevent it from being accessible to persons outside the service. Their design, dimensions, access and location must ensure compliance with the principles of safety, ergonomics and hygiene laid down in Law 31/1995 on the Prevention of Occupational Risks. Cabinets intended for the storage of packaging batteries shall be fully accessible to handling personnel, allowing the exchange of bottles under safe conditions and without compromising the physical integrity of the workers. At	Partially accepted	The text is amended

			in particular, configurations requiring packaging to be raised or inserted into enclosures with forced access, reduced openings or without sufficient space for manoeuvring with appropriate tools shall be avoided.		
GASIB	ITC-ICG-06	Paragraph h 3.1.3	We do not understand the wording of these two paragraphs, it is not clear which types of packaging are affected by this requirement. Do you refer to connected, standby or non-connected packaging? We do not make a drafting proposal because we do not understand the objective pursued by these ventilation requirements. We request that the wording be amended to clarify the situation of each packaging with regard to these ventilation requirements.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
GASIB	ITC-ICG-06	Paragraph h 3.1.3	In the same way as for the previous paragraphs, we do not generally understand what is described in this paragraph. - It is not clear where ventilation openings should drive - We do not understand the reasons why it is required that the distance from the packaging to the grilles be less than 2 m. - The ventilation dimensions are not consistent with those set out in the previous paragraphs. - The established criterion of ventilation surface per container is not understood. The possibility for cylinders to leak at the same time is quite remote, in addition to the minimal leakage rate from LPG containers. A minimum general ventilation area should be established.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
CONAIF	ITC-ICG-06	Paragraph 3.1.3.1	The Confederation does not understand the risk that the wording is intended to mitigate. We believe that an analogy should be made with meters that have a ventilation area depending on their location and number. Moreover, it should be borne in mind that LPG containers of less than 15 kg have a safety valve. In order for it to act, there must be a temperature increase in accordance with the Law on ideal gases, so ventilation will not in itself be a reduction.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			at risk, it may be more interesting to define a quantity of stored packaging from which an adequate supply of fire extinguishers is required, and which is needed between 1 and 2. 3.1.3.1. Ventilation requirements. For packaging located at the same place of use of the gas-fired appliances, the ventilation conditions shall be as required by the appliances, respecting the requirements for the configuration, ventilation and evacuation of combustion products in the rooms intended to contain the gas-fired appliances set out in reference GAS_008 (UNE 60670) of the table of standards. In the case of type C gas-fired appliances, the following ventilation surfaces shall be provided. • For 2 or less packaging in use: 25 cm², with upper and lower ventilation. • For more than two in-use packaging: upper and lower ventilation of 200 cm². Where packaging is located in a place other than that where the gas-fired appliances are used, it shall be stored outside or in spaces that meet the requirements laid down in reference GAS_008 (UNE 60670) of the table of standards for being considered ventilation courtyards, or in rooms with at ground level one or more openings for direct ventilation to the outside or to such ventilation courtyards, which may not be more than twice the size of the other and have an area of 200 cm², both greater and smaller, as follows: — Up to 50 kg stored in the same premises: 125 cm². — Over 50 kg and up to 150 kg stored in the same premises: 300 cm². — More than 150 kg stored in the same premises: 400 cm². Enclosed spaces (four closed sides open only at the top) shall be considered as outdoor spaces exclusively for the storage of packages of less than 15 kg, where they meet the following conditions: — Has a floor area of more than 6 m² plus an additional 700 cm² for each stored package. — Walls shall have permanent ventilation openings which shall not be longer than the floor of the installation.		
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			greater than 15 cm, may not be covered at any time and shall be less than 2 m from the packages. — The lower ventilation shall be at least 200 cm ² for each stored container.		
NEDGIA	ITC-ICG-06	Paragraph 3.2.1	This paragraph also states that the investor must comply with Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016 on appliances burning gaseous fuels and repealing Directive 2009/142/EC. For the same reason as that given in the previous comment, this Regulation does not apply to investors, and Standard UNE-EN 16129 should apply.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
DISA GAS	ITC-ICG-06	Paragraph 3.2.3	PROPOSAL: The design, dimensions, access and location of the stands must ensure compliance with the principles of safety, ergonomics and hygiene laid down in Law 31/1995 on the Prevention of Occupational Risks. Cabinets intended for the storage of packaging batteries shall be fully accessible to handling personnel, allowing the exchange of bottles under safe conditions and without compromising the physical integrity of the workers. In particular, configurations requiring packaging to be raised or inserted into enclosures with forced access, reduced openings or without sufficient space for manoeuvring with appropriate tools shall be avoided.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
Natural gas Transportation	ITC-ICG-06	Paragraph 3.2.3	ITC ICG-06 Paragraph 3.2.3. Conditions of the stand. Second paragraph: 'There must be ventilation gaps in the upper and lower areas (less than 15 cm from the floor level and from the top of the deckhouse), each of these gaps having a width of at least 1/10 of the surface of the deckhouse, which may not be more than twice the size of the other.' It is proposed to add text to clarify that the minimum dimensions of 1/10 refer to high and low ventilation: 'It must have ventilation gaps in high and low areas (a	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			less than 15 cm from the ground and from the top of the deckhouse), each of these openings (high area and low area) with a width of at least 1/10 of the surface of the openings may not be more than twice the size of the other.'		
Natural gas Transportation	ITC-ICG-06	Paragraph 3.2.5	This section refers to the global reference GAS_002, but here it would be appropriate to refer to a reference containing only that of UNE 60250, relating to design, construction, operation, maintenance and testing.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
CONAIF	ITC-ICG-06	Paragraph 4.1	Same justification as the second argument Installations consisting of a single LPG container with a content of less than or equal to 1 535 kg connected by a flexible pipe and directly attached to a single mobile gas appliance shall be excluded from this paragraph.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
DISA GAS	ITC-ICG-06	Paragraph 4.2	Changes to LPG container storage facilities are not regulated. PROPOSAL: Before putting into service a storage facility LPG containers or after a modification of an existing one, the installation company shall carry out the following tests:	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
Community of Madrid – Hydrocarbons and IT	ITC-ICG-06	General	Cases of storage extensions or changes have not been covered	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.
REPSOL	ITC-ICG-06	General	We have serious doubts about the proposed changes to this JTI for packaging storage facilities. This is all the more true given that the criteria laid down in Royal Decree 919/2006 have been the same since before the publication of the RIGLO in 1993 and there is no evidence that they have had any impact on the safety of gas installations. This is the change in requirements that we propose to delete all amendments and revert to the current wording and offer to discuss the intended approach, in order to make a proposal.	Partially accepted	A new JTI has been proposed on the basis of the comments received for amendment.

			agreed with the industry. It gives us the feeling that there is a particular concern about non-connected packaging. According to our history and analysis of the accident rate in packaging, the number of accidents caused by non-connected packaging is very low, not least because in packaging plants leak detection checks are carried out on all packaging and leaking packaging is rejected. These existing detection methods in plants have evolved technologically and make it possible to reject packaging with very low leakage thresholds, minimising the risk at customers' premises. In addition, the odouriser used makes it possible to detect any small leakage quickly. In any case, we assess the scope and impact of the proposed changes to this JTI, pointing out in some points anomalous circumstances that they would start to occur if this proposal were to succeed.		
FIDEGAS	ITC-ICG-07	Annexes	IRG-3 It should be noted that ventilations and safety devices have been successfully tested. "... and that shunting, ventilation and safety devices function properly."	Accepted	The text has been amended.
FIDEGAS	ITC-ICG-07	Annexes	IRG-4 Lack of a section where it can be described and indicated whether the safety devices are adequate in compliance with the regulations, are correctly installed, maintained and their correct functioning has been verified.	Accepted	The text has been amended.
REPSOL	ITC-ICG-07	Annexes	Within the model forms, we consider it necessary to provide a model 'Certificate of prior testing and commissioning of gas installations not fed from a distribution network', which is necessary for gas installations directly fed by a storage centre for LPG or LNG bottles or tanks. We also consider that a model verification certificate should be drawn up for installations receiving a re-opening of installations, as this is referred to in the body of the Regulation. We propose the creation of two model certificates	Partially accepted	IRG 7.2 'Certificate of prior testing and commissioning of gas installations not fed from a distribution network' is added. The verification of the receiving installation is already in the new IRG 3 model, it is not considered necessary to incorporate a new model.

			as described above.		
CONAIF	ITC-ICG-07	Annexes	A space should be included for the customer to sign the certificate for better traceability. Furthermore, we do not understand why installations should have a higher minimum guarantee than the one established by law and therefore we believe that it should only be governed by the provisions of Royal Legislative Decree 1/2015. IRG-1: • A space must be included for the client to sign the certificate. • Delete the paragraph on the 5-year guarantee. IRG-2: • A space must be included for the client to sign the certificate. • Delete the paragraph on the 5-year guarantee. IRG-3: • A space must be included for the client to sign the certificate. • Delete the 5-year guarantee paragraph	Partially accepted	The customer's signature is included. The claim concerning the plant guarantee, which is a legislative reference unrelated to the PRD, is rejected. The guarantee applies to bad plant operations only.
NEDGIA	ITC-ICG-07	Annexes	Generally speaking, there has been a considerable increase in the number of data that distribution companies must refer to in the models corresponding to their actions. The cost involved must be recognised in some way.	Rejected	The claim is rejected as it falls outside the scope of the draft Royal Decree.
NEDGIA	ITC-ICG-07	Annexes	In the tables attached to certain document templates in the annex to refer to information on the types of connected devices, "nominal" should be added to the term "power".	Accepted	The amendment is accepted.
NEDGIA	ITC-ICG-07	Annexes	IRG-2 In the declaration of model IRG-2, the words 'Number of common feeders' should be replaced by the words 'Number of individual feeders'.	Accepted	The amendment is accepted.
NEDGIA	ITC-ICG-07	Annexes	IRG-3 It is proposed to delete the field 'Initial completion date' as it is unknown to the installation company issuing a certificate of modification, verification or extension.	Partially accepted	The means of verifying the date of completion for the verification of off-supply facilities for one year have been indicated in the text. In the rest of the case, it is understood to be a new installation and therefore known.
NEDGIA	ITC-ICG-07	Annexes	IRG-6 It would be wrong to consider the identification code	Accepted	The text in the Annex is amended to clarify the

			supply point for natural gas installations. The types of feed (natural gas, bulk LPG or bottled LPG) would not include hydrogen. Details of the installer. It may be that the person is SAT and not installer. To match the signature caption you should put "Installation Technical Person or SAT Details". With regard to the wording 'The undersigned CERTIFY, who, as of today, in relation to the inspection/date review all of the anomalies detected during this inspection/review, detailed below:' It should be noted that it does not provide an option for defects to be corrected by two companies, e.g. equipment with SAT and leaks with an installer.	partially	of fuel and type of feed. The word ALL has been deleted as follows:
NEDGIA	ITC-ICG-07	Annexes	IRG-7 The reference to the distribution company appears twice. The first one should be deleted and start with the heading "--Details of the company distributing or selling LPG in bulk:"	Accepted	The amendment is accepted.
NEDGIA	ITC-ICG-07	Annexes	IRG-8 We consider that it is not clear what needs to be specified in terms of ventilations, whether they are correct or not, which would already be indicated as an anomaly. Furthermore, in the case of length and materials, it is not possible to indicate this as the periodic inspection is only carried out on sight parts and therefore it is not possible to provide this information. - Clarity in ventilation information: The current regulations on ventilations in gas receiving installations set out specific requirements to be complied with. Failure to comply would result in the detection of an anomaly in the inspection. It is therefore not clear why this paragraph should be included in the format. - Limitations of the periodic inspection: Regular inspections of gas receiving installations are carried out only on visible parts. This means that it is not possible to provide precise information on the length and materials of pipes and other components that are not	Partially accepted	The Annex is amended. The part of the costs is outside this RDP

			they are on sight. Including this data in the report can lead to errors and confusion. Legislation in force: According to the regulations in force, inspections should focus on the visible and accessible aspects of the facility. The requirement to provide details on the length and materials of non-visible parts is not in line with the regulations and may lead to difficulties in reporting. In the light of the above, we request that the reference to ventilations be deleted as it is already included/corrected in the inspection result itself. In addition, we request to remove the requirement to provide data on the length and materials of non-visible parts of the installation, as this is not possible in regular inspections. Compliance with this requirement would also entail an increase in the time taken to carry out operations. If measurements are to be taken in the end, the time taken to carry out operations will be increased and productivity and effectiveness will therefore be reduced, with the corresponding economic impact.		
NEDGIA	ITC-ICG-07	Annexes	IRG-9 It is proposed to amend the last paragraph indicated below, so that communication to the competent body of the Autonomous Community is a requirement that can be requested by the Autonomous Communities if they decide to regulate the cut in supply due to minor defects without correcting it within the regulated time limit. Similarly, the Royal Decree should reflect the concept that the distributor could charge for such cutting (but not reconnection, because it would reconnect the installer who repairs the defects), the amount of which would also be regulated by the Autonomous Community. If all the anomalies set out in this report are not remedied within the period indicated, the company distributing or selling LDC in bulk shall inform the body thereof.	Rejected	The part of the costs is outside this RDP It is not considered necessary to add the proposed parenthesis as no information is added to the procedure

			competent for the Autonomous Community, which may suspend the supply of this facility under the terms and conditions (for information to the Administration and for action in the field) laid down in its legislation. Similarly, as a result of this suspension of supply, the distributor will be charged 50 % of the disconnection and reconnection rights, the amount of which is also regulated by the Autonomous Communities.		
NEDGIA	ITC-ICG-07	Annexes	IRG-11 The 'Policy number' that already appeared in the model of RD 919/2006, which does not appear in the model IRG-5 PERIODIC REVISION CERTIFICATE FOR COMMON INSTALLATION NOT fed DISTRIBUTION REQUIREMENTS, appears. It does not make much sense to refer to it in a model for CRI's, as the policies are made by	Accepted	The policy has been removed from the installation data
CONAIF	ITC-ICG-07	Paragraph 3.1	We understand that the current wording may open the door to installing appliances such as atmospheric boilers in kitchens, we do not share this vision and we understand that the wording included in the RITE does not give rise to doubt and has therefore been expressly taken from it. Reception installations with a maximum operating pressure of up to 5 bar shall be carried out in accordance with reference GAS_008 of the table of standards. Furthermore, the installation of boilers and gas heaters is specifically prohibited, in both cases up to 70 kW and type B in accordance with the definitions given in standard UNE-EN 1749: 2021, unless they are located in premises that meet the requirements laid down for machinery rooms, or in the case of heaters if they are located in an external area defined in accordance with standard GAS 008 (UNE 60670-6). This prohibition does not apply to B3X type equipment, namely: open-circuit gas appliances driven for rooms for domestic use must be installed in galleries, terraces, enclosures or premises exclusively for these	Accepted	The proposed amendment is included.

			appliances in kitchens, provided that the measures are necessary to prevent interaction between devices mechanical extraction of the kitchen and the system for the these limitations do not apply to equipment used exclusively for the production of domestic hot water.		
Natural gas Networks	ITC-ICG-07	Paragraph 3.1	ITC ICG-07. Paragraph 3.1. General. First indent: 'Reception installations with a maximum operating pressure of up to 5 bar shall be carried out in accordance with reference GAS_008 in the table of standards and, in particular, open-circuit gas appliances driven for domestic premises shall be installed in galleries, terraces, enclosures or premises exclusively for these appliances or in other premises for restricted use (washbasins, individual garages, etc.). Such appliances may also be installed in galleys, provided that the necessary measures are implemented to prevent the interaction between the mechanical extraction devices of the galley and the system for the evacuation of combustion products. However, these limitations do not apply to equipment used exclusively for the production of domestic hot water.' Noting this paragraph, it is striking that the new regulation is more permissive for the installation of type B equipment than what is provided for in UNE 60670-6: 2023. In fact, what was already included in the current regulation has been maintained. It should be aligned with what has already been discussed and agreed in UNE 60670, which, moreover, was developed taking into account the limitations that the RITE already established with regard to this type of equipment, or make direct reference to that standard. In addition, the wording of this ITC seems not to place restrictions on the installation of conducted open-circuit heaters, which, given what is already regulated in this regard, makes no sense. At the same time, we do not consider the last sentence of	Partially accepted	The wording is amended in line with another argument, adding its final proposal in paragraph 4.4.

			correct, as it could suggest that the exclusion also affects reference GAS_008 for appliances used exclusively for DHW, which is not permissible. We propose deleting this sentence and specifying which limitations do not apply, while maintaining the obligation to comply with GAS_008. We therefore propose the following alternative wording to this paragraph: 'Reception installations with a maximum operating pressure of up to 5 bar shall be carried out in accordance with reference GAS_008 of the table of standards and, in particular, open-circuit gas appliances driven for domestic premises shall be installed in separate premises meeting the requirements set out in reference GAS_005 of the table of standards, premises considered to be an outdoor area (in the case of appliances exclusively intended for the production of domestic hot water) and, in the case of B3X appliances only, it is permitted to install them in premises or enclosures exclusively intended for these appliances or other premises for restricted use (washing rooms, garages, etc.), as well as kitchen rooms. In the case of existing type B natural draught appliances and for the commissioning of the gas installation (opening or reopening of an already registered installation or a change of gas), the necessary measures must be implemented to prevent, automatically, the interaction between the mechanical kitchen extraction devices and the system for the evacuation of combustion products.'		
FIDEGAS	ITC-ICG-07	Paragraph 3.2	Given that the yards where the products of combustion are evacuated may have roofs on the upper part of the yard, it is proposed, in the interests of human safety, to install a certified CO gas detection system, with the common gas installation being cut off, which demonstrates compliance with standards (UNE-EN IEC 62990-1).	Rejected	We understand that having a higher roof means that it does not comply with outdoor conditions unless it has ventilation measures in place. If it no longer has the required ventilation conditions to be considered external, it cannot be solved by a CO detector.
CNI	ITC-ICG-07	Paragraph	In our view, the	Accepted	The proposed change is accepted and 4.3 is

			reference to standard NTE-ISH-74, obsolete standard (from 1974), which in its definitions ISH-17 to ISH-20 indicates pieces of concrete or brick, on the one hand, incompatible with condensing apparatus (now widespread in domestic use), on the other hand, these pipes will be carried out by masonry personnel who, in our opinion, are not qualified to carry out evacuation pipes. '3.2. Evacuation of combustion products In new buildings and renovated buildings, where chimneys for the evacuation of combustion products are provided, they shall be designed and calculated in accordance with the procedures described in references GAS_010 and GAS_020 of the standard table, and the materials shall comply with reference GAS_015 when these are metallic or those recommended by equipment manufacturers in their assembly standards, in terms of materials and dimensions.'		it also removes the reference to legislation.
Natural gas Networks	ITC-ICG-07	Paragraph 3.2	This section does not reproduce verbatim the provisions of paragraph 5.2 of UNE 60670-6: 2023, leaving aside the fact that if there is an air supply from the outside by means of an opening for direct entry from the outside or a duct connecting the yard directly from the outside, with an opening or duct having a minimum free area of 300 cm², the dimension of the ventilation yard may remain at 3 m².	Accepted	The text is amended
CONAIF	ITC-ICG-07	Paragraph 3.3	Not all engine rooms are covered by standard 60601, which excludes industrial process equipment. In fact, a contradiction between the requirements of the standard and those of the Pressure Equipment Regulation should be avoided. Gas-fired boilers for heating or hot water with an effective output of more than 70 kW shall be installed in accordance with reference GAS_005 (UNE 60601) of the table of standards, as regards the safety requirements applicable to premises and enclosures housing hot-water or steam boilers. Also direct flame equipment for	Rejected	We are waiting for a specific standard to be drawn up for this type of facility. Once it has been developed, it will be included in reference GAS_005.

			absorption cooling, as well as equipment for electricity generation or cogeneration, provided that their combined rated effective output exceeds 70 kW, must be installed in machinery rooms or integrated as stand-alone equipment in accordance with the requirements set out in reference GAS_005 (UNE 60601) of the table of standards. Ventilation requirements for industrial process equipment shall be governed by the Pressure Equipment Regulation.		
FIDEGAS	ITC-ICG-07	Paragraph 4.2	Only the leakproofness test is required, no assessment being made of the need to test the safety devices, where applicable. Proposal: "The installation company shall carry out a leakproofness test of the receiving installations and safety devices where they exist according to reference..."	Accepted	The text is amended
Natural gas Networks	ITC-ICG-07	Paragraph 4.3	ITC ICG-07. Paragraph 4.3. Installation certificates. Last subparagraph: 'In addition, prior to the commissioning of a reception facility that supplies a new floor building and in the event that the building has chimneys for the evacuation of combustion products, a certification shall be required certifying that the chimneys comply with the provisions of references GAS_010 and GAS_020 of the table of standards as regards their design and calculation, and, as regards materials, with the provisions of references GAS_015 when these are metallic or with standard NTE-ISH-74 when they are non-metallic. If the works management certificate does not include such evidence, a certificate issued by the technical person entitled to be responsible for its construction or by an inspection body shall be required.' We propose that this requirement be removed as it is contained in the obligation to submit the thermal certificate issued by the RITE.	Rejected	We consider it necessary to maintain this certification requirement in the Regulation on the Safety of Gaseous Installations.

ENI Spain	ITC-ICG-07	Paragraph 4.4.1	In our view, there is a lack of clarity on who is responsible for the commissioning of a gas receiving facility connected to a unicient natural gas satellite plant (i.e. a gas receiving facility not connected to a distribution network). If we consider that this type of installation is an installation where the operator has a supply contract with a marketing company (the entity referred to in Article 58 (d) of Law 34/1998 of 7 October) and is NOT powered from distribution networks, as reflected in the proposed wording of ITC ICG-07. Gaseous COMBUSTIBLE Reception Facilities, specifically in point 4.4.1. Individual reception facilities with home delivery contract, "... the LPG retail company must carry out the tasks described as preliminary tests and issue the certificate of prior testing and commissioning in order to be able to supply the gas to the facility". We believe that if the responsibility for commissioning these facilities should lie with the marketing company (the entity referred to in Article 58 (d) of Law 34/1998 of 7 October), the text should be amended as follows: 'In the case of other plants not fed from distribution networks, the supplier must carry out the tasks described as preliminary tests and issue the certificate of prior testing and commissioning in order to be able to supply the gas to the plant'. The distributor or, in the case of installations not fed from distribution networks, the supplier, must archive a copy of the installation certificate and the certificate of prior testing and commissioning of the gas installation, so that the documents can be consulted at any time by the competent body of the Autonomous Community. The proposed text is the current REAL text.	Partially accepted	the text has been amended to clarify the proposed point.
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			Decree 919/2006, of 28 July, in force. If the responsibility for setting up these facilities should lie with another actor, this should be clarified.		
FIDEGAS	ITC-ICG-07	Paragraph 4.4.1	In the section on preliminary tests, in the case of safety devices, e.g. gas detection systems, bell interlocking with gas valve, etc., it is not expressly mentioned in the tests prior to the start of supply.	Accepted	prior testing includes checking safety elements and devices at all facilities, not just at regulating stations.
PRIMAGAS	ITC-ICG-07	Paragraph 4.4.1	COMMENTS: Although it solves the problems of lack of documentation in reopening existing facilities, it creates others. A model certificate of verification should be included in the body of the regulation. On the other hand, to which initial date of entry into service does it refer? To the original installation? How can I get to know the second installer? And without knowing how the installer will know the current regulations under which it was built? We need clarification whether this mentioned certificate of verification corresponds to a regular inspection in the case of installations connected to distribution systems or a regular review in the case of installations connected to bulk or packaging tanks.	Partially accepted	The verification of the receiving installation is already in the new IRG 3 model, it is not considered necessary to incorporate a new model. The verification is proposed as a form of re-entry into service without requiring a new IRG 3 that could make it impossible to do so as it is not possible to adapt the installation, therefore the date of entry into service should be the initial one. The deadlines for inspections in the case of reopening have been clarified. The wording of the text has been amended to clarify it.
FIDEGAS	ITC-ICG-07	Paragraph 4.4.1.1	On the understanding that the facility has been shut down, and without maintenance or control of all the equipment of which it is composed, it is essential that the IRG-03 model (as mentioned in a later specific submission) mentions the verification and testing of the proper functioning of the safety devices. It is understood that, within the minimum requirements, a certificate of prior testing is required, in which the existing safety features should be clearly indicated.	Partially accepted	The revision of the safety features is included in the text.
FEDLPG	ITC-ICG-07	Paragraph 4.4.1.1	- It is not clear what technical criterion should be applied when an installation is reopened, whether it is the old or the new regulation. Clarification needed. - Applying the new rules in practice would mean re-installing the facility in many	Partially accepted	It is considered appropriate to amend the current wording in order to clarify the provisions of the paragraph.

			cases where their use may disappear. We propose the following wording: When reopening installations which have remained unsupplied for more than one year, verification shall be carried out by reference to the regulations in force at the date of their initial entry into service; it is only mandatory to adapt the installation to subsequent requirements when these incorporate expressly declared retroactive safety measures or when, following an inspection carried out by the authorised installation company or a control body, deficiencies are detected that compromise leakproofness, ventilation, the evacuation of combustion gases or any other critical aspect referred to in GAS_008.		
REPSOL	ITC-ICG-07	Paragraph 4.4.1.1	We include companies selling LPG in bulk, as this can also be the case in bulk facilities. Although the article solves the problems of lack of documentation in reopening existing facilities, it causes certain difficulties. A model certificate of verification should be included in the body of the regulation. It would be necessary to clarify to which initial date of commissioning it refers (original of the installation or specific), how the installer will be able to check it and how he will know what the regulations in force under which it was built were. The pipeline gas distribution company or, where applicable, the retail LPG retailer in bulk or packaged, shall verify the existence of a certificate of verification of the individual receiving installation issued by an installation company indicating, in addition to the provisions of model IRG-03 in the Annex to this ITC, at least the initial date of commissioning of the installation, and shall then verify, issue and archive the certificate of prior testing and commissioning.	Accepted	The methods for proving initial entry into service have been incorporated.
Natural gas	ITC-ICG-07	Paragraph	ITC ICG-07. Paragraph 4.4.1.1. Reopening of facilities	Accepted	It is considered appropriate to amend the

Transport		4.4.1.1	supply of more than one year. ‘The provisions of this paragraph shall apply to the reopening of installations after termination of a contract which are brought back into service after a period of interruption of supply of more than one year. It shall be verified that the installation complies with the regulations applicable to it when it was put into service and, where applicable, that they have been adequate in relation to the technical criteria, safety conditions and guarantees of good service set out in reference GAS_008 of the table of standards. The pipeline gas distributor or, where applicable, the retail supplier of bottled LPG shall verify the existence of a certificate of verification of the individual receiving installation issued by an installation company indicating, in addition to the provisions of model IRG-03 in the Annex to this ITC, at least the initial date of commissioning of the installation, and shall then verify, issue and archive the certificate of prior testing and commissioning. For the purpose of issuing the certificate of verification referred to above, the installation company must check, at least, the leakproofness of the installation to the appliances, including the latter, by means of a pressure gauge leakproofness test, the correct functioning of the installation's regulation, the correct functioning of the consumer appliances and the evacuation of the LCP, as well as the correct ventilation of the room in which the installation is located.’ It is proposed to replace the text of these paragraphs with the following: ‘The provisions of this paragraph shall apply to the reopening of installations after termination of a contract which are brought back into service after a period of interruption of supply of more than one year. It shall be verified that the receiving installation is built with the materials, types of joints, suitable fittings and arrangements for the positioning of pipes, the correct functioning of the adjustment and the correct condition; and	partially	current wording to clarify the provisions of the paragraph.
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			existence of installation ventilations specifically listed in references GAS_006 or GAS_008 of the table of standards (as appropriate according to their supply pressure) and that the flue outlet for combustion products is of rigid material. If these checks have been favourable, the installation must satisfactorily comply with the requirements for regular monitoring of receiving installations defined by the same GAS_006 or GAS_008 references. The pipeline gas distribution company or, where applicable, the retail supplier of bottled LPG, shall verify the existence of a certificate of verification of the individual receiving installation issued by an installation company indicating the provisions of model IRG-03 in the Annex to this ITC, then verify the installation, depending on its supply pressure, in accordance with the technical criteria referred to in the previous paragraph, and issue and archive the certificate of prior testing and commissioning only in the event of absence of defects. For the purpose of issuing the certificate of verification referred to above, the installation company must check the technical requirements, safety conditions and guarantees of good service referred to above, in turn verifying the leakproofness of the installation to the appliances, including the latter, by means of a leakproofness test with a pressure gauge, the correct operation of the installation regulation, the correct design of the evacuation of the CDTs, as well as the correct ventilation of the room in which the installation is located.'		
FIDEGAS	ITC-ICG-07	Paragraph 4.5	As this is so important for the safety of persons and installations, the certificate of performance tests should specify the existing safety devices, including how to carry them out (for example, the first paragraph of section 60601 of UNE 2013: 8.1.1).	Rejected	The content of the test certificate is not covered by this point of the ITC.

FEDLPG	ITC-ICG-07	Paragraph 4.5	• It establishes the obligation to notify the administration of the project prior to the procurement of the supply. It would be more appropriate for this obligation to be for the holder, but not for it to bind the supplier company in the procurement. • Proposed wording of paragraph 4.5 In installations requiring a project, the operator shall, before putting them into service, submit to the competent body of the Autonomous Community in which the installation is located the identification of the installation – operator, location, type and expected date of commissioning – together with the construction project, the installation certificates referred to in paragraph 4.3, the works management certificate and the performance test certificate; this presentation entitles the licence holder to put the installation into service, but does not imply the technical approval of the administrative body or condition the supplier company, which may conclude the supply contract once it has received the supporting documentation issued by the licence holder.	Rejected	There is no obligation on the reporting agent. Article 11 of the Regulation already provides when the holder is responsible
SEDIGAS	ITC-ICG-07	Paragraph 4.5	In this paragraph, the words “start up” should be replaced by “start up”.	Accepted	The amendment is accepted.
SEDIGAS	ITC-ICG-07	Paragraph 4.5	When it is stated at the end of the section that the pipeline gas distribution company or LPG retail marketing company, as appropriate, will keep available for the Administration the documentation described in this ITC that is necessary for each facility, it should be indicated for how long, as is done in other ITCs.	Accepted	The amendment is accepted and the deadline for keeping information is included.
SEDIGAS	ITC-ICG-07	Paragraph 4.5	It is proposed to mention only the company that distributes piped gas, since this concept also includes the company that sells LPG at retail level, leaving the paragraph as follows: “For installations not requiring a project, no communication is required. However, the undertaking distributing the piped gas or, in the case of	Rejected	The suggestion is not accepted.

			installations not fed from distribution networks, the LPG retail marketing company shall keep at the disposal of the Administration the documentation described in this ITC that is necessary for each installation.'		
FEDLPG	ITC-ICG-07	Paragraph 4.6	• In the case of installations powered by bottles, it is complex to leave the key closed, locked and plugged, since it is the user who removes his or her containers and returns them, which would require a technical visit for each deregistration and knowledge of each deregistration. • Proposed wording of paragraph 4.6 When the supply is withdrawn or discontinued, the distribution company must close, lock, plug and seal the supply key for the individual installation. In the case of plants powered exclusively by mobile LPG containers, the operator must, by its own means, remove the containers and locks from their valves and, where appropriate, seal or remove the existing regulator without requiring a technical visit, unless elements remain that could cause leaks. The operator must duly notify the supplier of the deregistration or cessation of supply and facilitate the collection of the containers.	Partially accepted	The text has been amended to clarify the possible alternatives for cessation and deregistration depending on the company supplying from distribution networks depending on the installation.
VITOGAS	ITC-ICG-07	Paragraph 4.6	We request that it be added at the end of the paragraph "..... must perform these tasks by its own means or by subcontracting these tasks by third parties qualified for this purpose".	Partially accepted	The amendment is accepted
Natural gas Transportation	ITC-ICG-07	Paragraph 4.6	It is proposed that the wording be amended as follows to bring it into line with reference GAS_008 in the table of standards: 'In general, both for deregistrations of installations and for cessation of supply, the distribution company must ensure that the key to the supply of individual installations is closed, blocked, plugged and sealed or, failing that, implement remote means by means of a system to detect their condition and handling in order to prevent the opening of individual installations that are to be	Rejected	We consider it necessary to block and physically seal the installation. The addition of detection systems is considered a good practice, but it cannot and should not replace physical measures.

			deregistration or cessation of supply, as the case may be, which must be carried out by their own means.'		
FIDEGAS	ITC-ICG-07	Paragraph 5	In the interests of the safety of the operator and other potential users, provision should be made for the obligation to subscribe to a memory, with the same sections of the project, for all installations of less than 70 kW.	Rejected	It is considered that the required minimum requirements already appear in the installation certificate.
FIDEGAS	ITC-ICG-07	Paragraph 5.1	The existence of gas detection and shut-down systems does not in any way guarantee that they: are certified in accordance with current regulations, that the sensors are or are not within their lifetime, that they are well installed and that they function correctly. 5. There are legally certified gas detection and shut-down systems, within their lifetime and verified for their correct operation, that replace or complement rapid ventilation when needed.	Partially accepted	The text has been amended to include a review of the correct functioning.
FIDEGAS	ITC-ICG-07	Paragraph	Modify GAS_08 to GAS_008	Accepted	The amendment is accepted.
CNI	ITC-ICG-07	Paragraph 5.2	Practice confirms that communication sometimes does not arrive or arrives late '5.1. General criteria in periodic checks ... (a) The pipeline gas distribution undertaking must inform the user, in a reliable manner, three months in advance, of the obligation that the inspection must be carried out on its installation, which may be carried out by an authorised installation undertaking or by itself. "	Partially accepted	Communication to the holder and user is incorporated to ensure communication.
NEDGIA	ITC-ICG-07	Paragraph 5.1	ITC ICG-07. Paragraph 5.1. General criteria in periodic checks. Second paragraph, second heading (this is established as one of the checks to verify that): 'Appliances burn gas in such a way as to produce hygienic combustion, meaning combustion in which the corrected concentration of carbon monoxide in the products of combustion is less than or equal to 1 000 ppm.' This requirement should be aligned with UNE 60670-13: 2023.	Rejected	There are technical criteria which, because of their relevance to the safety of the installations, it was considered appropriate to maintain the Regulation.

			It is not appropriate for the Regulation to refer to details of technical requirements already laid down in the Implementing Regulation because any amendment to the latter would also entail an amendment to the Regulation. The following alternative wording is proposed: 'The appliances burn the gas, producing hygienic combustion, in accordance with reference GAS_008 of the table of standards, meaning that the carbon monoxide concentration corrected in the products of combustion to not more than 1.000 ppm.'		
NEDGIA	ITC-ICG-07	Paragraph 5.1	This section establishes as one of the checks that there are no type A or type B gas appliances installed in bedrooms or in bathrooms or showers. The installation restrictions for this type of equipment should be aligned with sections 3.2.2 and 3.2.3, respectively, of UNE 60670-6: 2023.	Rejected	There are technical criteria and safety considerations that, because of their relevance to the safety of the installations, it was considered appropriate to maintain the Regulation.
NEDGIA	ITC-ICG-07	Paragraph 5.1	ITC ICG-07. Paragraph 5.1. General criteria in periodic checks. Fourth indent: 'In the periodic monitoring of existing reception facilities, the technical criteria laid down in the applicable legislation shall be applied when they are put into service or amended, and the procedure laid down in reference GAS_008 of the table of standards shall be considered valid.' It is proposed to replace the text of this paragraph with the following: 'The technical criteria laid down in the applicable legislation in force and the procedure laid down in reference GAS_08 of the table of standards shall be applied in the periodic inspection of existing reception facilities.'	Rejected	The proposal would entail retroactivity of standards to existing installations
FIDEGAS	ITC-ICG-07	Paragraph 5.2	For installations of more than 70 kW, as well as for installations of less than 70 kW serving concurrent public buildings or more than one user, the inspection of safety devices should be included.	Rejected	The proposal is rejected because it is impossible to specify the procedures and requirements for all safety features, as well as the difficulty for the on-site inspection itself of

			“... including appliances with a rated effective output of 70 kW or less regardless of the total installed power, as well as safety devices installed in compliance with the regulations		certain elements. However, it is considered necessary to study them in order to incorporate them into a review of the relevant inspection standard and possible clarifications in the Technical Guide on the interpretation of the Regulation.
Canary Islands	ITC-ICG-07	Paragraph 5.2	It is proposed to replace, in line with paragraph 2.2 of ICG-09, by: “... In any case, the personnel carrying out the inspection shall be required to be a gas installer under the terms set out in ITC ICG-09. ...”	Accepted	The proposed amendment is included.
Canary Islands	ITC-ICG-07	Paragraph 5.2	1. If, at the choice of the customer, the authorised gas installation company carries out the inspection with a favourable result, it shall issue the corresponding inspection certificate, handing over a copy to the operator of the installation, by means to be determined, another copy to the pipeline gas distribution company and keeping another copy in its possession. The certificate shall be signed by the gas installer and stamped by the responsible installation company.	Accepted	The proposed amendment is included.
Community of Madrid – Hydrocarbons and IT	ITC-ICG-07	Paragraph 5.2	The following sentence is not understood: Generally speaking, regardless of the installed capacity, in installations supplied at a maximum operating pressure of more than 5 bar, the inspection shall range from the drop key to the connection of the gas appliances, excluding the latter. The maintenance of the equipment shall be the responsibility of the operator of the installation and shall be included in the plant's general maintenance plans. What is the obligation of this “plant” to have a general maintenance plan”? What if there is no obligation? Why is the maintenance obligation mixed with the inspection?	Partially accepted	The text is amended
CONAIF	ITC-ICG-07	Paragraph 5.2	CONAIF considers that this regulatory anomaly should be resolved. The Regulation requires the personnel carrying out the inspection to be a gas installer.	Rejected	The qualification is for the installation company, not for the persons.

			enabled. Insofar as the certification of the person referred to in the paragraph does not lead to the qualification as a gas installer, this option should not be allowed as it is not subject to any regulatory point or provision. 2. In the case of a pipeline gas distribution company, by its own staff or under contract to the distribution company. Both contracted and own staff must have the corresponding qualifications as indicated in the previous section (b.1) or be duly certified for this activity by an entity accredited for the certification of persons in accordance with Royal Decree 2200/1995 of 28 December. Similarly, the staff recruited must work within an authorised installation company.		
CONAIF	ITC-ICG-07	Paragraph 5.2	CONAIF has long been calling for an effective liberalisation of the inspection market. One of the main problems is that with the current legislation it is a very complicated task for an installation company to carry out inspections, the reason: • Communications do not always reach the customer but the time to carry out the inspection by the installation company starts to count. • There are only 45 days for the installation company to upload the inspection certificate, so we propose that there should be at least 6 months and that the system for notifying the obligation to inspect should be a system that certifies receipt by the customer. 1. The pipeline gas distributor shall send a communication to the owner of the point of supply stating the obligation to carry out the periodic inspection, using the services of an installation company or the distributor. This communication shall state the date from which the customer will be deemed to carry out the inspection with the distribution company. The time to be given by the distributor for the customer to express	Rejected	It is considered that the time set in the procedure is sufficient and there are sufficient guarantees to be able to contact an installation company and notifying this communication would increase the cost of management for the user. A period of 6 months is considered too long due to the need to carry out the inspection in the calendar year.

			your opinion will be at least 6 months. If the pipeline gas distribution company carries out the inspection at the customer's choice, it shall give at least 5 days' notice of the date of the inspection visit and request access to the installation on the day indicated.		
Natural gas Transportation	ITC-ICG-07	Paragraph 5.2	ITC ICG-07. Paragraph 5.2. Regular inspection of reception facilities supplied from distribution networks. First paragraph, second bullet point: “- In centralised heating systems and systems with an installed capacity of more than 70 kW, the inspection shall range from the building key to the connection of gas appliances, including appliances with an effective rated output of 70 kW or less regardless of the total installed capacity.” The requirement to have a maintainer that maintains all equipment in centralised installations combined with the continuous operation of the equipment in installations of more than 70 kW, usually for commercial or industrial use and with an influx of people, justifies maintaining the criterion currently regulated for these installations as regards the fact that responsibility for maintaining all equipment, including equipment with a rated effective output of 70 kW or less, lies solely with the operator of the installation and is carried out in accordance with the manufacturer's instructions. We therefore request that the wording of the paragraph be amended as follows: “- In centralised heating systems and systems with an installed capacity of more than 70 kW, the inspection shall range from the building key to the connection of gas appliances, excluding gas appliances, including appliances with an effective rated output of 70 kW or less regardless of the total installed capacity.”	Rejected	This is an amendment made to increase safety in installations that are not required to be maintained by another type of regulation.
Natural gas	ITC-ICG-07	Paragraph 5.2	ITC ICG-07. Paragraph 5.2. Periodic inspection of	Accepted	The text has been amended.

Transport			reception facilities supplied from distribution networks. Fourth paragraph, point (a): “(a) The pipeline gas distribution undertaking must inform the user, three months in advance, of the obligation that the inspection must be carried out on its installation, which may be carried out by an authorised installation undertaking or by itself.” The Regulation should specify the deadline for setting the deadline and that there is no room for interpretation of the deadline by the actors involved. The following alternative wording is proposed: “(a) The piped gas distribution undertaking shall inform the user, three months in advance, of the obligation that the inspection must be carried out on its installation, which may be carried out by an authorised installation undertaking or by itself, and shall indicate the deadline for carrying out and submitting the certificate of periodic inspection of the installations in the event that the operator decides to carry out the inspection with a gas installation undertaking that is different from that of the distribution undertaking. That deadline may not be less than 45 calendar days from the date of dispatch of the letter by the distribution undertaking.’		
Natural gas Transportation	ITC-ICG-07	Paragraph 5.2	ITC ICG-07. Paragraph 5.2. Regular inspection of reception facilities supplied from distribution networks. Fourth paragraph, heading (b.1): “(b) The inspection must be carried out by: In the case of an authorised gas installation undertaking, by persons in the same category as those who could carry out the installation or inspection. (...)” That wording appears to be meaningless, since it indicates that the inspection must be carried out by installers of the same category as those who could carry out the inspection.	Rejected	The meaning of the sentence which they consider confusing is explained below.
Natural gas Transportation	ITC-ICG-07	Paragraph 5.2	ITC ICG-07. Paragraph 5.2. Periodic inspection of reception facilities supplied from	Partially accepted	The text has been amended.

			distribution. Fourth paragraph, heading (c.1): “(c) General procedure for action taken by an installation company authorised to install gas: 1. If, at the choice of the customer, the authorised gas installation company carries out the inspection with a favourable result, it shall issue the corresponding inspection certificate, handing over a copy to the operator of the installation, by means to be determined, another copy to the pipeline gas distribution company and keeping another copy in its possession. The certificate must be signed by the authorised installer and stamped by the responsible installation company.’ We request that the wording be amended to clarify the way in which this is done, given that the Seventh Transitional Provision of Royal Decree 984/2015, which establishes the need for a telematics platform, is still in force and it is therefore proposed to specify the maintenance of the current operation in order to ensure a secure exchange of the documentation associated with the inspection process. The following alternative wording is proposed: “(c) General procedure for action taken by an installation company authorised to install gas: 1. If, at the choice of the customer, the authorised gas installation company carries out the inspection with a favourable result, it shall issue the corresponding inspection certificate, handing over a copy to the operator of the installation, by means to be determined, another copy to the pipeline gas distribution company and keeping another copy in its possession. The certificate must be signed by the authorised installer and stamped by the responsible installation company. The gas installation undertaking must send the inspection certificate to the distribution undertaking via the telematic platform authorised for that purpose in order to ensure and guarantee a secure exchange of the documentation associated with the inspection process.’		
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Natural gas Transportation	ITC-ICG-07	Paragraph 5.2	ITC ICG-07. Paragraph 5.2. Regular inspection of reception facilities supplied from distribution networks. Fourth paragraph, point (e): “(e) The pipeline gas distribution undertaking shall have a permanently updated database containing, inter alia, the date of the last inspection of the reception facilities and the result thereof, and shall retain that information for 10 years. The whole system must be able to be consulted by the competent body of the Autonomous Community when the latter considers it appropriate. “ The following new wording is proposed: “(e) The pipeline gas distribution undertaking shall have a permanently updated database. To that end, the marketing companies shall share with the distribution companies the customer contact information available to them. The database shall contain, inter alia, the date of the last inspection of the reception facilities and the result thereof, and shall retain this information for 10 years. The whole system must be able to be consulted by the competent body of the Autonomous Community when the latter considers it appropriate.’	Rejected	It is not within the remit of the regulation to regulate this.
FEDLPG	ITC-ICG-07	Paragraph 5.3	We propose the following wording: That review shall be carried out every five years and shall extend from the key to the gas-consuming appliances, including gas-consuming appliances, where the installed power is less than or equal to 70 kW, or from the key to the switching key of appliances, excluding gas-consuming appliances, where the installed power exceeds that value.	Rejected	This is an amendment made to increase safety in installations that are not required to be maintained by another type of regulation.
FEDLPG	ITC-ICG-07	Paragraph 5.3	• The obligation for the installation company or user to communicate the outcome of the reviews to the supplier (s) is not clear (a customer can source from different companies).	Rejected	It is understood that the current wording is sufficiently clear. The purpose of the point is only for servicing, not for maintenance or use. The wording is justified by the obligations arising from RD 1085/1992.

			• A ban on supplying bottled gas to an installation without proof of a review certificate would lead to a collapse of the system. • How does the supplier ensure that a customer sourcing from a point of sale is certified? • How does a domestic en route packager control if the customer has informed of its review? • We propose the following wording: The holders of the supply contracts, or in their absence users of the facilities, shall be responsible for the correct use of the facilities, their proper maintenance and the performance of periodic reviews. In the case of installations subject to inspection, they must carry out the inspection with an authorised gas installation undertaking or with the gas supply undertaking itself. In the absence of communication of the result of the inspection, it shall be understood that the operator wishes the inspection to be carried out by the supplying undertaking and it shall be the latter that carries out the inspection. This review shall be carried out every five years and shall range from the user key to the connection of gas-consuming appliances, including appliances with a rated effective output of 70 kW or less, regardless of the total installed power. In addition, the periodic inspection of the receiving installation shall be carried out at the same time as that of the installation supplying it. In case the installation is fuelled from an LPG tank, the inspection body performing the periodic inspection should verify the existence of the current certificate of review. In addition to the provisions of section 5.1, the condition of the cathode protection of the		
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			buried steel pipes. When the visit produces a favourable result, the authorised undertaking must complete and deliver to the user a periodic review certificate, which will in each case follow the models presented in the annex to this ITC for common or individual recipients, and send this certificate electronically to the supplier undertaking indicated by the holder. If the operator does not communicate the result within the regulatory deadline, it shall be understood that it wishes the review to be carried out by the supplier that usually supplies it, which may carry it out at the expense of the operator. In the event that major or secondary anomalies of those indicated in references GAS_006 or GAS_008 of the table of standards, as appropriate, are detected, the corresponding anomaly report, including the minimum data indicated in the annex to this ITC, shall be provided to the user at the end of the review. The absence of a valid certificate shall not lead to an automatic halt of the supply of containers or of LPG in bulk; however, after three months from the expiry of the certificate without proof by the licensee that the main anomalies have been overcome, the supplying undertaking may suspend the service following a reliable notification.		
FEDLPG	ITC-ICG-07	Paragraph 5.4	We propose the following wording: All leaks detected in gas installations shall be considered as a major abnormality, except: In individual reception facilities, those produced outside without risk. — In common reception facilities, those which are	Rejected	The anomalies are based on those set out in UNE 60670, parts 12 and 13.

			produce on an external airside with a leakage rate between 1 and 5 litres per hour.		
VITOGAS	ITC-ICG-07	Paragraph 5.3	In the third paragraph, we request that the reference to 'control body carrying out...' be deleted, as this is one of the central arguments in these arguments. Both in this JT1 and in the rest, it is not the control body that was requested to carry out these operations. They shall be carried out by the inspector or installer, who is qualified to do so. In the same paragraph, we request the deletion of this sentence: 'In addition, the periodic inspection of the receiving installation shall be carried out at the same time as that of the installation supplying it'. In the last paragraph of this section 5.3, we consider that a reference should be included not only to LPG but also to the other fuels affected by this ITC.	Rejected	It is rejected because the periodic LPG inspection is part of the ITC-ICG 03 and it is considered that the action of the control body for this type of facility is necessary.
REPSOL	ITC-ICG-07	Paragraph 5.3	It represents an important change of criterion in establishing how to account for power and whether or not gas-fired appliances are included in the revision. We doubt whether this measure will affect retroactively the stock of existing installations or only new installations to be implemented as of the entry into force. It obliges companies to change their maintenance plans and IT applications in order to adapt to the new way of calculating power, and if it were not retroactive to the reviews of existing installations, it would lead to a breakdown of the sector, with two conflicting criteria for classification and action. That review shall be carried out every five years and shall extend from the key to the gas-consuming appliances, including gas-consuming appliances, where the installed power is less than or equal to 70 kW, or from the key to the key-key of appliances, excluding gas-consuming appliances, where the installed power exceeds that value.	Rejected	This is an amendment made to increase safety in installations that are not required to be maintained by another type of regulation.
REPSOL	ITC-ICG-07	Paragraph 5.3	There may be more than one reception facility dependent on a storage facility each with its review frequency, so this cannot be done	Accepted	The suggested paragraph has been deleted.

			coinciding in time. Proposal for amendment 5.3 Periodic review of the reception facilities not fed from power distribution Amendment. Furthermore, the periodic review of the receiving installation shall be carried out at the same of the plant supplying it. In the event that the the installation is powered from an LPG tank, the inspection body carrying out the periodic inspection must check the existence of the current certificate of revision.		
REPSOL	ITC-ICG-07	Paragraph 5.3	Bottled LPG suppliers can block orders from packaging facilities that have the expired periodic review, but we cannot prevent the en-route sale of packaging to customers or users who request it. Furthermore, there is the aggravating factor that the activity of marketing liquefied petroleum gas (butane gas and propane) in packaging is liberalised under Article 47 of Law 34/1998, with the exception of the setting of maximum prices by the State Government, to which these products are temporarily subject. As a result of this liberalisation, companies selling liquefied petroleum gas in containers, mainly through the popular butane bottle, do not need to be gas distributors. Marketing may take place at multiple sales points outside those available to supply undertakings. This may lead to the consumer or user of these products not being related to any gas supply undertaking, but only to a trader. At these points of sale, users who do not have a review certificate can be served, which creates a competitive asymmetry and a comparative disadvantage in the performance of the activity. We therefore propose excluding LPG packaging facilities from the restriction on supply by the	Rejected	It is rejected in line with the provisions of Royal Decree 1085/1992, of 11 September, approving the Regulation on the activity of distribution of liquefied petroleum gases: Article 20. Obligations of the supplier prior to supply. 1. Before starting to supply gas to a reception facility, either in containers or by means of a fixed deposit, or in bulk supplies to fixed tanks, G.L.P.'s suppliers must: (a) Check that the installation has the technical documentation set out in the relevant instructions and standards, which is required of it on the basis of its specific characteristics.

			bottled LPG marketing company. There are also major anomalies that partially affect the installation, allowing the rest of the receiving installation to remain operational and thus fit for supply. The Regulation itself, in Articles 19 and 20, classifies defects between serious and critical, providing that such defects may affect the whole installation or part of it. In the latter case, the rest of the installation can continue to operate and will need gas supply. The inspection and review certificate should indicate whether the defect affects the whole or part of the installation, or whether it is a complete or partial cut of the installation. In this way, the supplier will be unequivocally aware of the situation in which the installation is located and will discontinue the supply only in cases where a total cut-off is indicated. Proposed deletion As established in the corresponding ITCs, LPG may not be supplied in bulk or packaged to any LPG storage facility or LPG packaging facility unless proof is provided to the retail LPG marketing company in bulk or packaged by means of the corresponding certificate of review or, where applicable, a report on anomalies that there are no major anomalies in the receiving facility fed from that LPG facility and that, if they have not been detected, the deadline for correcting the anomalies has not been exceeded.		
CONAIF	ITC-ICG-07	Paragraph 5.3	In addition, the periodic review of the receiving installation is it shall coincide with that of the plant supplying it. In case the installation is powered from an LPG tank, the authorised installation company carrying out the periodic review of the tank the inspection body carrying out the periodic inspection should check the existence of the current review certificate.	Partially accepted	The paragraph suggested to be amended has been deleted.

Natural gas Networks	ITC-ICG-07	Paragraph 5.3	ITC ICG-07. Paragraph 5.3. Regular review of reception facilities not fed from distribution networks. First four paragraphs: ‘The owners or, failing that, the current users of reception facilities not supplied from distribution networks are responsible for commissioning a periodic review of their installation, using for that purpose the services of a gas installation company authorised in accordance with the provisions of ITC ICG-09. This review shall be carried out every five years and shall range from the user key to the connection of gas-consuming appliances, including appliances with a rated effective output of 70 kW or less, regardless of the total installed power. In addition, the periodic inspection of the receiving installation shall be carried out at the same time as that of the installation supplying it. In case the installation is fuelled from an LPG tank, the inspection body performing the periodic inspection should verify the existence of the current certificate of review. In addition to the provisions of section 5.1, the state of cathode protection of buried steel pipes must also be checked.’ We consider that the indication that the overhaul of the receiving installation coincides with that of the installation that supplies it is not appropriate, since it may result in temporary decoupling due to unsynchronised prior reviews, which could create confusion and difficulties in planning and carrying out the overhaul. — Temporary decoupling: In many cases, reception and feeding facilities may have been overhauled in different years in the past. Forcing both revisions to coincide in time may result in the need to bring forward or delay revisions, which is not only inefficient;	Accepted	The suggested paragraph has been deleted.
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			it can also lead to confusion and logistical difficulties. - Planning and Implementation: The planning of periodic reviews should be clear and simple for operators and users of installations. The obligation to align reviews may complicate the programming and implementation of reviews. - The actors involved are different: The review of the storage facility is the responsibility of the distribution company, while the review of the receiving facility is the responsibility of the authorised installation companies only. In the light of the above, we request that the proposed text be amended to remove the requirement that the inspection of the receiving installation be carried out at the same time as that of the installation that supplies it. This measure shall ensure greater flexibility and efficiency in the planning and execution of periodic reviews.		
FIDEGAS	ITC-ICG-07	Paragraph 5.4	It is not clear that, as it is mandatory, the lack of safety devices in compliance with the regulations is a main or secondary anomaly, so it should be indicated as a case by case identification.	Rejected	The anomalies are based on those laid down in standard UNE 60670.
PRIMAGAS	ITC-ICG-07	Paragraph 5.4	COMMENTS As indicated in standard UNE 60670, where there is no specific deadline for rectification. DRAFTING PROPOSAL ... (a) Main Anomalies: Major anomalies are those which, by their very nature, must be rectified at the same time as they are detected. In the event that this is not possible, the gas supply to the receiving installation, partially or totally, or to the affected gas appliance, as applicable, should be interrupted...	Partially accepted	The wording has been amended to clarify the deadlines for remedying the main anomalies.
PRIMAGAS	ITC-ICG-07	Paragraph 5.4	COMMENTS: It does not take into account anomalies that can be repaired by the customer itself, such as the expiry of the tube, lack of ventilation, or electrical interlockings without the need to use a gas installer or technical service PROPOSAL FOR REDACTION:	Rejected	There must be proof of the correction of anomalies signed by an authorised undertaking that verifies it.

			The operator or, failing that, the user is responsible for correcting the anomalies detected in the installation (including the underground drop) and in the gas appliances, using the services of a gas installation company or a manufacturer's technical assistance service as appropriate, or even by the customer himself in the cases provided for by law.		
PRIMAGAS	ITC-ICG-07	Paragraph 5.4	COMMENTS: Historical discrimination against LPG compared with natural gas is maintained, with the result that LPG is not allowed to leak at all and natural gas is allowed to leak in certain cases. Scenarios that should be unified as is the case for leakages to the outside without risk or those occurring on external air sections with a leak flow. DRAFTING PROPOSAL All leaks detected in gas installations shall be considered as a major abnormality, except: • In individual reception facilities, those produced outside without risk. • In common reception facilities, those that occur on an external airside with a leak flow of between 1 and 5 litres per hour.	Rejected	Rejected as there is a different risk of gas accumulation.
CONAIF	ITC-ICG-07	Paragraph 5.4	Installations that are not inspected should be required to have the possibility to cut off supplies, should not be allowed not to have an installation checked and should not have any consequences. 5.4. Correction of anomalies (a) Main anomalies (including all leaks): they must be rectified immediately. If the supply is interrupted in whole or in part, the maximum period for cure shall be 15 working days from the date on which the review or inspection is carried out. In the event that a major anomaly is detected, the gas supply shall be interrupted and the affected part of the installation or equipment sealed, as appropriate.	Rejected	This is rejected as it is already reflected in point d.6 of section 5.2 of ITC 07.

			applicable. All leaks detected in gas installations lighter than air shall be considered as a major abnormality, except: • In individual reception facilities, those produced outside without risk. • In common reception facilities, those that occur on an external airside with a leak flow of between 1 and 5 litres per hour. All leaks detected in gas installations heavier than air shall be considered as a major abnormality. (b) Secondary anomalies: • Lack of watertight: they must be remedied within 15 working days. • Other anomalies: they must be remedied within six months. [...] Major anomalies must be rectified within 15 working days. Secondary anomalies shall be rectified within 6 months. Once the deadlines for remedying the anomalies have passed, the supply will be suspended, and each Autonomous Community may regulate the specific terms. The Autonomous Community will have 2 years to regulate the cut-off procedure. If this is not the case, the company distributing the piped gas will cut off the supply, indicating this to the competent body of the Autonomous Community.		
Natural gas Networks	ITC-ICG-07	Paragraph 5.4	ITC ICG-07. Paragraph 5.4. Correction of anomalies. Second paragraph: 'The anomaly report shall indicate the following maximum deadlines for correction, depending on the type of anomaly in question: (a) Main Anomalies (including all leaks): they must be rectified immediately. If the supply is interrupted in whole or in part, the maximum period for cure shall be 15 working days from the date on which the review or inspection is carried out.	Partially accepted	The exception for the main anomaly in the case of leaks with a leak rate of up to 5 litres per hour has been amended. It is considered that the leakage flow measurement procedure may be developed at GAS_008.

			In the event that a major anomaly is detected, the gas supply shall be interrupted and the affected part of the installation or equipment, as appropriate, sealed. All leaks detected in gas installations lighter than air shall be considered as a major abnormality, except: § In individual reception facilities, those produced outside without risk. § In common reception facilities, those that occur on an external airway section with a leak flow of between 1 and 5 litres per hour. All leaks detected in gas installations heavier than air shall be considered as a major abnormality.' (b) Secondary anomalies: § Lack of tightness: they must be remedied within 15 working days. Other anomalies: they must be remedied within six months.' This is a certain change from what is specified in the Technical Regulation on the distribution and use of gaseous fuels, which states: § the main anomalies are those contained in standard UNE 60670 or UNE 60620, as appropriate, and all leaks detected in LPG installations; § a period of 15 calendar days for the correction of leakages considered to be secondary anomalies; § as secondary anomalies those contained in standard UNE 60670 or UNE 60620, as appropriate. Both regulations describe in detail the cases of anomalies and which leaks are considered to be main anomalies and which are secondary anomalies, a detail which cannot be summarised in an extension text such as that contained in ITC-ICG 07 of the proposal for a regulation. In addition, it should be noted that the current proposal requires:		
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			flow measurement in all cases. However, UNE 60670-12 does not require the flow rate to be measured when it is a leak on an external stretch. On the other hand, in the case of common reception facilities, the ITC-ICG 07 proposal does not indicate how the indicated leakage volumes should be measured and justified. The lack of a clear protocol may lead to inconsistencies in the assessment and handling of leaks, affecting the safety and efficiency of installations. For these reasons, it is proposed to revert to the formula used in the technical regulation for the distribution and use of gaseous fuels, i.e. the one indicated above and which relies on the aforementioned rules to establish the corresponding requirements. We therefore propose deleting the text shown in the left-hand column and replacing it with the following: ‘The anomaly report shall include the maximum time limits for correction according to the type of anomaly in accordance with GAS_006 and GAS_008.’		
Natural gas Networks	ITC-ICG-07	Paragraph 5.4	ITC ICG-07. Paragraph 5.4. Correction of anomalies. Third, fourth and fifth paragraphs: ‘Once the deadlines for remedying the anomalies have passed, the supply will be suspended, and each Autonomous Community may regulate the specific terms. Once all anomalies have been resolved, the gas installer or the manufacturer’s helpdesk, as appropriate, shall provide the user with proof of the correction of anomalies in accordance with the model included in the annex to this ITC, and shall send a copy to the pipeline gas distribution company in the case of a pipeline gas receiving installation. § The inspection or review shall be deemed to have been favourable if the proof of correction of the anomalies is issued without the need to issue any additional inspection certificate.’	Rejected	Rejected as it is considered a decrease in safety conditions. With regard to the termination of the contract, it does not fall within the scope of the Regulation.

		It is necessary to clarify what the suspension of supply referred to entails, since, if this were to lead to a closure of supply, it would be a notable change from the current situation, where this action is not carried out and could have a very significant impact. It should be borne in mind that an anomaly, whether primary or secondary, does not always apply to the installation as a whole, but may apply to one of the sections of the installation or to one of the equipment supplying the installation. Currently, when primary anomalies are detected, the part of the installation affected is left closed and therefore in safety, so we do not see the need to add this additional requirement of suspension of supply to the whole installation. On the other hand, in the case of secondary anomalies, which generally do not pose a safety problem for the installation, the operator is informed of the situation encountered, how it should be rectified and subsequently communicated to the distributor and within the deadlines that should be set, as well as reminders of that situation. In addition, all relevant situations are communicated to the administration. Establishing mechanisms in addition to process management and execution can have a significant impact on operations in terms of organisation, execution, cost overruns and also for clients. - Installation safety: Installations with major anomalies are closed immediately until they are rectified. This procedure ensures the safety of the installation and prevents any risk associated with its malfunction. - Communication to the Administration: All relevant situations are communicated to the Administration. This process ensures that authorities are informed and able to take the necessary measures without the need to put in place additional mechanisms that could complicate the operation. - Operational impact: The implementation of additional mechanisms for the suspension of supply may generate		
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			cost overruns and complications in the organisation and implementation of inspections. This affects not only the companies in charge of the reviews, but also the customers, who might face unnecessary disruptions in supply. For all these reasons, we request that the paragraph referring to the maximum period for rectification in the event of suspension of supply in the main anomaly be deleted, because, if this is interrupted, it makes no sense to set a period for rectification, given that there is no gas supply (and therefore no risk) until it is remedied, which is therefore a period to be decided by the operator in accordance with its interests and which has no impact on the safety of the installation. In any event, if we wish to maintain the paragraph on suspension of supply in the event that the deadlines for remedying anomalies are exceeded, given that it would be particularly burdensome for the user or holder if a contract with the marketing company at the point of supply were to be terminated, we propose that this condition be explicitly excluded, leaving the third paragraph as follows: ‘Once the deadlines for remedying secondary anomalies have passed, the supply shall be suspended as a precautionary measure, and in each case the Autonomous Community regulating the specific terms may have regulated them (for reasons of legal certainty for users). The precautionary interruption of supply due to anomaly shall not in itself constitute grounds for termination of the contract.’		
FIDEGAS	ITC-ICG-07	Paragraph 6	Safety features should not be included in brackets in the interests of the safety of persons and installations.	Rejected	The inclusion of safety devices is rejected as it is considered to be included in the safety measures related to ventilation.
PRIMAGAS	ITC-ICG-07	Paragraph 6	We hope that this cost will be defined by regulation, a cost that has not been developed since 2006, i.e. 19 years since the sector has been providing this service for no financial consideration.	Rejected	The regulatory definition of this cost is outside the remit of this unit.

Community of Madrid – Hydrocarbons and IT	ITC-ICG-07	Paragraph 6	The responsibility for communicating any changes should lie with the operator and not with the installation company. It can be indicated that the installation company will inform the holder of the obligation to notify the distributor/retailer of bulk LPG.	Accepted	The proposed amendment is included.
CONAIF	ITC-ICG-07	Paragraph 6	It has to be defined that different technical characteristics are considered. — Any extension of consumption and replacement of equipment by other equipment with different technical characteristics. Changes in type B equipment by type C are considered to be different characteristics. Increases with a rated thermal input of more than 25 % in equipment of the same type are considered to be different characteristics. Appliances with different draught or appliances requiring a change in the system for discharging combustion products.	Partially accepted	The text is partially amended on the basis of the proposal made.
DISA GAS	ITC-ICG-07	Paragraph 6	The current wording of the Article creates uncertainty as to the extent of the technical suitability required for an existing receiving installation when a modification is made. In particular, it is not specified whether such modification implies the need to adapt the whole installation to the existing technical requirements – such as those provided for in the new regulation – or only to the amended part. This ambiguity may lead to disproportionate interpretations, forcing unjustified interventions in installations that, for the most part, comply with the rules in force at the time of their commissioning PROPOSAL: Whenever a reception facility is modified, the installation undertaking carrying out the works must inform the distribution undertaking or, where appropriate, the undertaking retailing LPG in bulk or packaged as appropriate, regardless of the extent of the modification. For the purpose of determining the application of existing technical requirements to an existing installation,	Rejected	Article 2 of the Regulation provides that the Regulation shall apply to installations existing before its entry into force which are subject to modification or extension. As a general rule, and if the relevant ITC does not indicate otherwise, this Regulation shall apply only to the modified or extended part, provided that the modification or extension does not affect or modify the safety conditions of the whole installation, in which case the whole installation shall be adapted.

			a modification is a modification that affects more than 30 % of its total linear development (at least 1 metre), or involves a substantial change in its functional configuration, such as fuel type, fuel consumption capacity by more than 30 % or main route changes its route to different premises or spaces from the current ones. In any case, the technical requirements in force shall apply in full to the part of the installation that is extended or modified.		
Natural gas Transportation	ITC-ICG-07	Paragraph 6	In this section, the cancellation of part of the installation and the corresponding apparatus is considered as an amendment, however, UNE 60670-11: 2023 does not consider it as such, but as a separate section. The recently agreed criterion for UNE 60670 should be respected. Otherwise, from the entry into force of the new regulation, it would be mandatory to make a bulletin for each annulment and to review them. This section also considers as a modification any modification in the building resulting in a change in the initial conditions of the gas system (accessibility, ventilation, distances, etc.), even if the receiving system is not materially transformed. Such a requirement, as it stands, allows many cases to be regarded as amendments, which should not be the case, but rather a case-by-case approach, given that any amendment involves a series of specific procedures. In any event, if this is the case, it should be established that when the terrace of a dwelling is closed, the owner or user of the installation must be informed that he or she must call an installer to see whether he or she has altered the initial conditions of the installation and, if so, amend what is appropriate (ventilations, evacuation, etc.), issue the bulletin and indicate that he or she must contact the distribution company.	Partially accepted	The text has been amended with regard to the modification of the building. It is considered that the cancellation of consumption points in the installation should be treated as an amendment to the installation and it is suggested that standard UNE 60670-11: 2023 be amended accordingly. Communication to the holder of the proposed obligation is not considered feasible.

Natural gas Transportation	ITC-ICG-07	Paragraph 6	ITC ICG-07. Paragraph 6. MODIFICATION OF RECEPTION FACILITIES. First indent: ‘Whenever a reception facility is modified, the installation undertaking carrying out the work must inform the undertaking distributing or retailing LPG in bulk or packaged as appropriate.’ Last subparagraph: ‘Once the amendment has been notified, the company distributing LPG in bulk or packaged or, as the case may be, the company retailing LPG shall carry out the prior tests laid down in the regulations, the cost being passed on in accordance with the relevant sectoral regulations.’ In our view, there is a lack of clarity on who should inform the installation company about the modification of a gas receiving installation connected to a monolithic natural gas satellite plant (i.e. a gas receiving installation not connected to the distribution network). We believe that, for the sake of clarity, the gas marketing company should also be included in this case, according to the following drafting proposal: ‘Whenever a reception facility is modified, the installation undertaking carrying out the work must inform the undertaking distributing or retailing LPG in bulk or packaged, as appropriate. In the case of gas reception facilities not fed from a monolithic LNG satellite plant, the installation company carrying out the work must inform the marketing company referred to in Article 58 (d) of Law 34/1998 of 7 October 2003.’ We believe that the last paragraph should also be qualified to include the gas marketing company, applicable in that case, according to: ‘Once the amendment has been notified, the distribution company or, where appropriate, the marketing company to the	Rejected	LNG is distributed through a distribution company.
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			the retail sale of LPG in bulk or packaged, or the gas marketing company, shall carry out the prior tests laid down in the regulations, the cost being passed on in accordance with the relevant sectoral regulations.'		
Natural gas Transportation	ITC-ICG-07	General	When reference is made throughout this JTI to the model certificates or reports referred to in the annex to this JTI, it would be appropriate to specify, as far as possible, the specific models to which it refers in each case.	Accepted	The text has been modified
Natural gas Transportation	ITC-ICG-08	Annex 3	ITC ICG-08. Annex 3. Paragraph 3.2. Operational tests. Last two entries: · 'after the operation tests have been carried out, a visual check shall be made to ensure that the materials and organs of the apparatus, both the receiver and the combustion equipment, do not exhibit abnormal deformation or deterioration likely to have a negative effect on their operation. Markings and instructions shall also be verified." These two headings should not be included in the list in which they are now presented, as they appear in the current regulation on the distribution and use of gaseous fuels, since they do not, strictly speaking, correspond to the verification of the correct functioning. The first corresponds to a verification to be carried out immediately after the verification of the correct functioning and the second relates to markings and instructions.	Partially accepted	A new section on prior tests (3.1) has been created, including part of the claim, and point 9 on operational tests (3.3) has been deleted.
CONAIF	ITC-ICG-08	Paragraph 2.2	The placing on the market of equipment should be restricted in similar terms as the placing on the market of pre-charged F-gas equipment, in the interests of the safety of installations, the environment and people. When gas appliances are placed on the market via supermarkets, the internet or similar, the marketer shall be required to provide the end-user with the gas appliance start-up certificate and inform him that he must	Rejected	It falls outside the scope of the draft Royal Decree.

			return it signed by a gas installer within a maximum of one year.		
REPSOL	ITC-ICG-08	Paragraph 5.1	Requirements previously contained in UNE 60670 have been moved to the body of the Regulation, resulting in misinterpretations due to a lack of precision. For example, there are devices such as bumpers with a hose several metres long, hoses that could be considered as elastomeric flexible tube. We consider that this requirement is better reflected in UNE 60670, which can specify the different types of connections permitted and their limitations. In the case of elastomeric flexible tube connections with a clamp, the maximum length of the tube may not exceed 1.5 metres, except in the case of mobile heating appliances, which may not exceed 0.6 metres.	Partially accepted	The distance is the same as that indicated in standard UNE 60670-7. The following has been added: "If applicable, for mobile devices this will be in line with GAS_008.
CONAIF	ITC-ICG-08	Paragraph 5.1	We consider that this paragraph does not provide more clarity and may cause serious harm. The first paragraph is already sufficiently clear. Gas appliances not connected to a receiving installation must be connected in accordance with the above reference and may be connected by the user, unless otherwise specified by the manufacturer. Similarly, gas appliances not connected to a receiving installation are covered by the provisions of the same reference as regards the requirements for their location and for the ventilation of the premises where they are used. In the case of elastomeric flexible tube connections with a clamp, the maximum length of the tube may not exceed 1.5 metres, except in the case of mobile heating appliances, which may not exceed 0.6 metres.	Partially accepted	The distance is the same as that indicated in standard UNE 60670-7. The following has been added: "If applicable, for mobile devices this will be in line with GAS_008. '
Community of Madrid – Hydrocarbons and IT	ITC-ICG-08	Paragraph 5.2	Replace "lifetime of the appliance" by "while the appliance is installed or in use or similar".	Rejected	The wording of other regulations is maintained.
CONAIF	ITC-ICG-08	Paragraph 5.2	We, CONAIF, understand that the requirements for action	Accepted	The wording has been amended to improve

			they should be comparable, we understand that there are several access routes for the qualification of gas installer, but we do not share the view that a quality management system is a prerequisite for starting an appliance when a gas installer is required to undergo additional training. (a) For the technical assistance department of the manufacturer, provided that it has a certified quality system, or for gas installers meeting the requirements indicated in paragraph 4 of ITC ICG-09, in the case of conducted gas appliances (type B and C appliances) of more than 24.4 kW of effective power or covered fire gas vitroceramic; (b) For the technical assistance department of the manufacturer or a gas installation company, for the rest of the appliances.	partially	clarity.
CONAIF	ITC-ICG-08	Paragraph 5.2	The aim is to harmonise the current rules along the lines of the RSIF. (c) For appliances intended for the thermal comfort and well-being of persons who are also covered by the Thermal Installations Regulation, the operator who starts the appliance may work within a thermal installation company but the installer must meet the following requirements: 1. For IG-A gas installers• Gaseous installer• Keep the operator card for thermal installations. 2. For IG-B or IG-C gas installers• Gaseous installer• Keep the operator card for thermal installations. • Hold an APMR or APMR – AD rating if the appliance has to be adapted due to a change in the gas family. It shall not be mandatory for the undertaking to register with the competent body of its Autonomous Community as a gas installation undertaking, and its activities shall be limited only to equipment intended for the well-being and thermal comfort of persons.	Rejected	Is rejected. It is stated that the starting of industrial appliances must comply with point 5.2 of ITC ICG 08, and the figure of the RITE installer should not be involved if they are industrial in scope. On the other hand, where an appliance is to be converted from one gas to another, the same figures should be given in the same way. A RITE installer does not process appliances, but carries out the thermal installation.

CONAIF	ITC-ICG-08	Paragraph 5.2	CONAIF considers that, although a good measure, it is practically impossible for the licence holder to keep the documentation during its lifetime, we do consider that the distributor or supplier should be notified of the commissioning of the equipment. On the other hand, we do not understand that a control body is not intermediated to certify an action of a gas installation company. The operator who starts up a gas appliance must issue and deliver to the holder, where appropriate, a start-up certificate in accordance with the model in Annex 4 to this ITC. The owner shall also keep this documentation in the documentary file and make it available to the competent body of the Autonomous Community. The holder must send the abovementioned certificate to the point of sale where he acquired it. It must also inform the gas distribution company or LPG marketing companies that keep it with the plant documentation throughout the lifetime of the appliance. In the event of a fuel switch and adaptation of the gas burner, the gas installation company shall issue a certificate of action. An inspection body shall be required to certify that maintenance has been properly carried out.	Rejected	In recent years, various accidents have been detected in gas ramps of industrial appliances with injuries of varying severity, and those of which the Administration is not aware. The distribution companies claim that in these cases they reach the key of the apparatus. For this reason, the Administration assesses the imposition of the registration of existing and operating apparatus and the periodic inspections to be carried out every five years by inspection bodies. Finally, the licence holder is responsible for having its own documentation, at the request of the administration.
Natural gas Transportation	ITC-ICG-08	Paragraph 5.2	ITC ICG-08. Paragraph 5.2. Commissioning, maintenance, repair and adaptation of gas appliances. Third indent: 'Appliances may be switched from one gas family to another by the manufacturer's technical assistance department, provided that it has a certified quality system, or by gas installers of category A or B who meet the requirements set out in paragraph 4 of ITC ICG-09. Components with the same technical characteristics as those approved in the type-certification shall always be used for this purpose.'	Rejected	The start-up agent, or the installer, is responsible for the validation of the components used, as specified in standard UNE 60670-10.

			There may be a dispute here between the manufacturers of these parts and the manufacturers of the equipment. Who validates that they have the same technical characteristics,		
Natural gas Transportation	ITC-ICG-08	Paragraph 5.2	ITC ICG-08. Paragraph 5.2. Commissioning, maintenance, repair and adaptation of gas appliances. Last subparagraph: 'In the event of a fuel switch and adaptation of the gas burner, provision must be made for the intervention of a control body to certify that maintenance has been properly carried out.' Clarification is requested as to what is meant by 'change of fuel' and confirmation that it does not include the adjustment of appliances due to a change of gas family referred to in the previous paragraph of this point.	Partially accepted	The paragraph is cancelled.
CONAIF	ITC-ICG-08	Paragraph 5.3	We do not understand why a monitoring body should not be used to certify the actions of a gas installation company. Elimination: Favourable certificate of inspection by a control body indicating the place where it is set up	Partially accepted	It has been specified that these are equipment for industrial use.
NEDGIA	ITC-ICG-08	Paragraph 5.3	— A new requirement is therefore introduced for the participation in any event of an OCA for the start-up of the equipment. As in the case of fuel-changeover operations, this will complicate management and increase the cost of intervention, which may be a disproportionate requirement.	Partially accepted	It has been specified that these are equipment for industrial use.
CONAIF	ITC-ICG-08	Paragraph 6	We understand that an IG-A company is able to carry out the periodic review of these gas-fired appliances. 6. Periodic INSPECTIONS The operator of gas-fired appliances not subject to Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016, which have been certified by the unit verification procedure, shall be responsible for contracting every five years, and within the calendar year, the performance of the periodic inspection of the gas-fired appliance to a gas installation company in category IG-A.	Rejected	The proposal is rejected because of the nature of the action on gas equipment for industrial use, since it is not an action to maintain the equipment (which, if it is to be carried out by an installation company), and it is considered essential that the CB act as a periodic inspection.

			inspection body, which shall issue the corresponding inspection review certificate		
Natural gas Transportation	ITC-ICG-08	General	The point 'Administrative authorisation' in the current ICG-08 JTI in the Technical Regulation on the distribution and use of gaseous fuels, where it is stated that it is not necessary, has been removed from JTI ICG-08. Although this could be inferred from the wording of Article 4 of the proposal for a new regulation, we consider it appropriate to include a paragraph on this subject in this JTI, in line with the other ITCs.	Rejected	We do not consider it necessary to include it since, as stated in the claim, it follows from the rest of the Regulation.
Regional Government of Valencia	ITC-ICG-08	Not defined	It sets out the communication for the start of the gas-fired appliances and records. This will increase the responsibility of the competent body and a register should be established. Responsibility for both the supervision of submissions and the need for the corresponding inspection to carry out the control that is somehow inherent to the competences of the industry body. We consider that it is a step backwards in the putting into service of these appliances to gas, since the previous legislation did not require communication to the competent body for industry, even though no accidents or accidents have occurred in this type of appliance.	Rejected	In recent years, various accidents have been detected in gas ramps of industrial appliances with injuries of varying severity, and those of which the Administration is not aware. The distribution companies claim that in these cases they reach the key of the apparatus. For this reason, the Administration assesses the imposition of the registration of existing and operating apparatus and the periodic inspections to be carried out every five years by inspection bodies. Finally, it is the owner who is responsible for having his own documentation, at the request of the administration. This action does not increase the responsibility of the competent body that will continue to reside with the operator, or installation company, but rather facilitates real knowledge of the risk that gas installations and appliances pose to society, improving the control of their safety.
Community of Madrid – DG PEI	ITC-ICG-09	Annexes	It is proposed that, in line with the provisions of other industrial safety regulations, the method of accrediting welding knowledge should be laid down in Annex 1 so that it is applicable to all installations falling within the scope of the regulation and not only to	Partially accepted	The ANNEX to the JTI is amended.

			of the ITC-ICG-12. An example is provided by the general provisions of the Regulation on pressure equipment and its ITCs approved by Royal Decree 809/2021 of 21 September 1997. Specifically, Article 4 provides as follows: 'Permanent joints to be carried out on the premises must be carried out by suitable welding procedures and by accredited professionals. Procedures and staff for the performance of permanent partnerships may be certified by all bodies accredited by an accreditation body, either as a control body or as an independent body for the certification of procedures and professionals performing permanent partnerships. Similarly, in accordance with paragraph 3.1.2 of Annex I to Royal Decree 709/2015 of 24 July, the procedures and personnel for the performance of permanent unions may be certified by Notified Bodies, or by Third Entities recognised by the Member States and notified to the Commission to carry out the evaluation of the personnel and those procedures.' Similarly, the Regulation on the Safety of Refrigeration Facilities and their ITCs, approved by Royal Decree 552/2019 of 27 September, establishes the following in section 3.2.2.2 Welding of 'IF-06 INSTALLATION COMPONENTS': 'Welders shall be accredited to perform the work, depending on the material to be welded, in accordance with standards UNE-EN ISO 9606-1 or UNE-EN ISO 9606-3.'		
CONAIF	ITC-ICG-09	Annexes	The disposal proposals respond to the fact that these materials are no longer used in industry or manufactured. General comments are provided below: • Delete all references to the lead pipe, whether welds or transitions. • Remove petrol lamparilla equipment.	Rejected	We consider it necessary to keep it in the JTI and in the ANNEX.
CONAIF	ITC-ICG-09	Annexes	Adaptation to existing and new materials	Accepted	Plastic piping is included

			they are in use. Include new materials from reception facilities such as multilayer pipelines.		
CONAIF	ITC-ICG-09	Annexes	This comment is subject to the acceptance or not of comment #67. If the proposal in comment #67 is accepted, this comment is null and void. If not, it is requested that this be taken into account. Polyethylene welds are excluded from the scope of competence of gas installers A. Remove within the requirements the practical knowledge part related to polyethylene welding.	Rejected	Polyethylene welds must be made by approved welders in these joints.
CONAIF	ITC-ICG-09	Annexes	The standard applies to installations supplied at pressures above 5 bar, which is excluded for the category B installer. Remove from the regulatory knowledge requirements the reference to UNE 60620 (GAS 006) from the category B installer.	Accepted	The authorised person of category A is transferred
CONAIF	ITC-ICG-09	Annexes	The category C installer's knowledge does not include containers of more than 15 kg of LPG, but is required as a theoretical knowledge by linking all of Instruction 6 without limiting its scope to containers of less than 15 kg. Enter the following qualification for the installer of category B: ITC ICG-06 "Installations for own use of liquefied petroleum gas (LPG) containers". Enter the following qualification for the installer of category C: ITC ICG-06 "Installations for own use of liquefied petroleum gas (LPG) containers", only for containers containing up to 15 kg.	Rejected	ITC-ICG 06 has been revised
CONAIF	ITC-ICG-09	Annexes	We understand that implicitly maintaining this basic knowledge means indicating that a category B or C installer is a second-level technician, as his access routes require a series of basic training content not linked to the activity itself but to the background.	Rejected	Not considered appropriate as this is a minimum knowledge to ensure the safety of the installations

			academic of the person. We consider that the minimum basic knowledge of science such as mathematics, chemistry or physics included in the knowledge of category B and C installers should be removed as this knowledge was considered to be possessed by installers themselves.		
CONAIF	ITC-ICG-09	Annexes	The content removed has no direct impact on the daily work of the APMR installer, but the proposed content if relevant. Delete point 10 and replace it with: 10. Handling and measurement of electrical quantities: — Handling of amperimetric clamps. — Multi-meter operation – Polymeter operation	Rejected	Not considered appropriate as this is a minimum knowledge to ensure the safety of the installations
Natural gas Transportation	ITC-ICG-09	Annexes	ITC ICG-09. Annex 1. Paragraph 1.1.1. Theoretical knowledge for category A installer. Polyamide should be added between pipe materials and pipe joints.	Partially accepted	Plastic pipes in category C installers are included
Natural gas Transportation	ITC-ICG-09	Annexes	ITC ICG-09. Annex 1. Paragraph 1.1.2. Practical knowledge for a category A installer. Polyamide should be added to the working knowledge.	Partially accepted	Plastic piping is included and practical knowledge is already considered to be included in the rest of the requirements.
Natural gas Transportation	ITC-ICG-09	Annexes	ITC ICG-09. Annex 1. Paragraph 1.1.2. Practical knowledge for a category A installer. Since PCI (Fire Protection) equipment is necessary for the commissioning and maintenance of LPG and LNG storage facilities, it is proposed to include the following additional training under point 1.1.2: “- Security and emergencies: Maintenance and servicing of PCI equipment. Operation of PCI equipment to extinguish fire cones. First aid.” It is also proposed to move this requirement to paragraph 3.1.2 so that it applies to all categories (A, B and C).	Partially accepted	They are partly included in category C theoretical knowledge, and therefore applicable to categories A and B
Natural gas Transportation	ITC-ICG-09	Annexes	ITC ICG-09. Annex 1. Paragraph 1.2. Regulatory knowledge for the category A installer. At the end of this section, where references are quoted	Partially accepted	Reference GAS_003 and GAS_004 are included

			GAS_002, GAS_005, GAS_006 and GAS_008, if the aim is to empower installation undertakings to provide pipelines, the reference contained in standards UNE 60310 and UNE 60311 should be added.		
Canary Islands	ITC-ICG-09	Paragraph 2	The ICG-09 does not contain any procedure for the 'clearance' of personnel by the Autonomous Communities, so the meaning of the paragraph should be deleted or changed, given that the gas installer is not authorised by an Autonomous Community but, within an authorised gas installation company, must be able to prove one of the situations set out in paragraph 2 of the ICG-09. In line with this, the word 'qualified' should be replaced throughout the text by 'qualified', referring to gas installers, or, failing that, provision should be made for the creation of a register of qualified professionals, and the corresponding authorisation procedure.	Accepted	The proposed amendment is accepted.
CONAIF	ITC-ICG-09	Paragraph 2	CONAIF considers it essential to refer to draft standard PNE 330000-1 so that all certification bodies follow the same parameters to certify installers. In addition, accredited bodies must comply with the provisions of standard PNE 330000-1 governing the requirements for the certification scheme for persons in the field of industrial security.	Rejected	It is not considered appropriate to include a draft standard. When UNE is a standard, its inclusion will be assessed.
Natural gas Transportation	ITC-ICG-09	Paragraph 2.1	ITC ICG-09. Paragraph 2.1. Operations which may be carried out by gas installers. “(…) 2.1.1. In gas installations (a) Assembly, modification or extension, overhaul, maintenance and repair of: (…) § Installation of gas in service stations for gas vehicles. § Installations for the supply of gaseous fuels for means of transport. · (…)” Both headings are understood to have the same purpose.	Accepted	Amended

			therefore, only one of them should be listed.		
Natural gas Transportation	ITC-ICG-09	Paragraph 2.1	ITC ICG-09. Paragraph 2.1. Operations which may be carried out by gas installers. "(...) 2.1.1. In gas installations (b) Assembly, modification or extension, overhaul, maintenance and repair of: (...) For CNG, LNG and hydrogen facilities, a specific rating shall be available.' It is established that, for CNG, LNG and hydrogen facilities, a specific rating will be available, but only the cryogenic specialist (for LNG) and the hydrogen specialist are mentioned afterwards, therefore should the previous reference to CNG not be excluded as a result?	Accepted	The error is corrected
CONAIF	ITC-ICG-09	Paragraph 2.1.1	CONAIF understands that there are contradictions between the enforcement capacities granted by the Regulation and the minimum knowledge required for IG-A installers. Within this minimum knowledge, a content linked to welding and polyethylene joints is required, but then the installer is not empowered to execute them. We understand that this misalignment needs to be addressed. 2.1.1. In gas installations (a) Assembly, modification or extension, overhaul, maintenance and repair of: Proposal for a regulation final text 150• Gaseous fuel receiving installations, including regulating stations and indoor connections buried and parts of installations buried outside the building. Polyethylene gas pipes and their welds may be carried out by installers of category IG-A, with the exception of welds of polyethylene gas pipes, which shall be carried out by welders of polyethylene gas pipes.	Rejected	It is not considered equivalent to having knowledge of welding such as that required by the ITC to be an approved welder capable of doing so.
CONAIF	ITC-ICG-09	Paragraph 2.1.2	CONAIF considers that the adaptation and start-up operations covered by the APMR-AD qualification are covered by the knowledge of an IG-A installer.	Rejected	The equipment can only be started by the manufacturer's accredited SAT or APMR.

			2.1.2 in gas racks (b) Start of gas appliances, maintenance and repair, in accordance with paragraph 5.2 of ITC ICG-08, except in the case of conducted appliances (type B and C appliances) with an effective power of more than 24.4 kW, covered fire glass-ceramics or the fitting of appliances due to a change of gas family, for which gas installers must additionally comply with the requirements set out in paragraph 4 of this ITC. Installers of category IG-A shall be deemed to be qualified for the operations for which they qualify under the APMR-AD rating.		
VITOGAS	ITC-ICG-09	Paragraph 2.2	Section (a) and category (A) indicate that there are two specialist qualifications for working with hydrogen and LNG, but the rest of the ITC does not indicate how this qualification is obtained, who grants it and what exactly is authorised. Clarification of this point is requested.	Rejected	It is considered to be included in point 3.2.d
ENAGAS Transport	ITC-ICG-09	Paragraph 2.2	1) Does not agree with the names of specialists in paragraphs 2.2 and 3.2, since the first paragraph refers to 'specialists working with hydrogen' and '[specialists working with] LNG', while the second paragraph refers to 'hydrogen specialist' and 'cryogenic specialist'. In order to avoid misunderstandings, it is considered appropriate to harmonise the names of specialists in the following (or similar) way, so that the same terminology is used throughout the document: - Hydrogen Specialist: this would allow work to be carried out in installations supplying H₂ as fuel to vehicles and industrial installations. - Cryogenic Specialist: this would allow work to be carried out on facilities supplying natural gas as fuel to vehicles supplied by LNG, and on LNG satellite plants. 2) We also consider the training of this type of specialist to be of great importance.	Partially accepted	The text has been amended in line with the first part of the claim. With regard to the training of these specialists, it is considered to be sufficiently covered in the current section, but it is adapted to the proposals received.

			proposes that the scope of the training for the so-called hydrogen specialist and the cryogenic specialist set out in section 3.2 of the JTI be expressly included in Annex 1 MINIMUM CONOCIENTS FOR GAS INSTALLATION PERSONS, or even in a specific section in a similar way as is done for installers with regard to gas appliances in section 4. Of the JTI. 3) in addition, it is considered essential to supplement the training described in the draft Royal Decree along the following lines, and to provide a significantly more detailed exercise of the training required for specialists in hydrogen and cryogenic. At least the following should be considered: - For Hydrogen Specialist: the training indicated should include knowledge of material compatibility with H2, knowledge of H2 compression system and knowledge of H2 detection systems. - For Cryogenic Specialist, it is considered that the training indicated should include knowledge of high pressure facilities for natural gas (CNG), knowledge of natural gas compression system (liquid and gas), knowledge of vacuum technology and knowledge of methane detection systems.		
AC BALEARIC ISLANDS	ITC-ICG-09	Paragraph 2 (c)	The text reads as follows: "Have passed a theoretical and practical examination in the Autonomous Community of the minimum contents set out in Annex 1 to this ITC" It is proposed to delete this option from the Regulation. Reasons: The Regulation does not require a person to complete a preparatory course for the examination, so there is a possibility that a person with little knowledge, some experience and a lot of luck may obtain a professional qualification which is denied to another person who has completed a VET or a Professional Certificate.	Rejected	Following consultation with the Working Group of the Autonomous Communities, it is considered appropriate to maintain the option

			The elimination of the examination also avoids any difference in the level of requirements in the examination between the various Autonomous Communities which, in the exercise of their conferred powers, may unintentionally lead to differences between professionals. The removal of the examination route does not harm the sector, but rather benefits it, since it places duly authorised professionals on the market on an equal footing throughout the national territory. The other routes provided for in the article are sufficient to enable people to be trained, since the market is very mature, so that it is not necessary for the Autonomous Community to carry out theoretical and practical examinations.		
Canary Islands	ITC-ICG-09	Paragraph 2 (c)	It is proposed to qualify the requirement so that the theoretical and practical examination can be carried out by an interested party in any Autonomous Community that calls it: “(c) have passed a theoretical and practical examination before an Autonomous Community of the minimum contents	Accepted	The proposed amendment is included.
Canary Islands	ITC-ICG-09	Section 2.f	As this paragraph refers to gas installers, Annex 2 of ICG-09 would not be applicable to it. We therefore propose the following wording: ‘All bodies accredited for the certification of persons wishing to award these certifications must include in their certification scheme an evaluation system that includes at least the contents indicated in Annex 1 to this ITC.’	Accepted	The proposed amendment is accepted.
Community of Madrid – DG PEI	ITC-ICG-09	Paragraph 3	It is proposed to clarify where the self-declaration should be submitted, taking into account the agreement adopted at the last meeting of the Market Unit Working Group, as recorded in Minutes 23/2024 of 5 November 2024, which replaces the previous agreement on the same subject recorded in Minutes 17/2019. In line with this agreement, the following wording is proposed: ‘3.1 1. Before commencing their activities as gas installation undertakings, natural or legal persons who:	Accepted	Amended

			to establish themselves in Spain, they must submit to the competent body of the Autonomous Community in which they are established, which will be the one where the person concerned is habitually resident, in the case of natural persons, or where they have their business name, in the case of legal persons, a self-declaration in which the person who owns the undertaking or its legal representative declares:’		
Community of Madrid – DG PEI	ITC-ICG-09	Paragraph 3	The two new specialist qualifications included for category A gas installers have not been taken into account for category A companies: to work with hydrogen (for petrol stations supplying H2 and industrial facilities supplying H2) and LNG (petrol stations supplying LNG and LNG satellite plants). The first paragraph of points 3.1.1 and 3.1.2 should be amended to read as follows: • For which category and, where appropriate, speciality the activity will be carried out and, where appropriate, whether it will carry out the activities of starting, maintaining, repairing or adapting equipment.	Accepted	Amended
Community of Madrid – DG PEI	ITC-ICG-09	Paragraph 3	In line with the two specialities created for category A, it is proposed to replace point 3.2 (b) with the following: (b) have at their disposal the necessary contracted staff to carry out the activity safely, in sufficient numbers and for the time necessary to cover the facilities they have contracted, with a minimum of one gas installer of category equal to or greater than the category of the installation company and with the corresponding specialisation, in the case of category A with the qualification to work with hydrogen or with the qualification to work with LNG.	Accepted	Amended
Community of Madrid – DG	ITC-ICG-09	Paragraph 3	In order to clarify the documentation that must be available to the administration in order to be able to prove that	Accepted	Amended

			has the staff required by paragraph 3.2 (b) and the technical manager required by paragraph 3.2 (d), recruited through any of the contractual arrangements permitted by law, it is proposed to add a paragraph between the two paragraphs on the left, i.e.: 'The authorised gas installation undertaking may not make available, assign or dispose of installation certificates which it has not carried out itself. In order to prove that the staff or technical manager required in points 3.2 (b) and 3.2 (d) respectively are employed through any of the contractual arrangements permitted by law, the authorised installation companies must be able to submit, at the request of the competent administration, documentation justifying the employment relationship between the staff recruited and the company and also between the technical manager, where applicable, and the company, as well as the hours during which they provide their services to the said company. This requirement shall also be deemed to be satisfied if the above figures bear: • One of the partners of the organisation, when the qualified company is a legal person, provided that it works for the company on a full-time basis, or during the hours during which the company provides its services. • The natural person, where the authorised undertaking is a natural person registered under the special scheme for self-employed persons. Failure to comply with the requirements, verified by the competent authority and declared by means of a reasoned decision, shall result in the cessation of the activity, unless proceedings can be initiated to rectify errors, without prejudice to any penalties that may result from the seriousness of the actions carried out.'		
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ITC-ICG-09	Paragraph 3.2	CONAIF does not agree that there is a need for a technical manager in IG-A to carry out CNG, LNG and hydrogen facilities. First, sub-specialties have been established, with additional specific training for workers, and civil liability insurance has also been extended. There is a direct link between the qualifications of a company and professionals and the possession of a university degree, and we clearly believe that this approach is flawed. Deletion point d	Rejected	It is considered appropriate to include these specialities.
ITC-ICG-09	Paragraph 3.2	In CONAIF's view, in order to ensure the equality of all installation companies, courses must have a fixed minimum duration and be given in training centres that have requested that they be given. We understand that the model laid down in Royal Decree 115/2017 should be followed. The IG-A authorised gas installation company shall be responsible for training its personnel to work on this type of technology: IG-A companies will have the obligation for their staff to complete and complete a course of the minimum duration set out below, the subject of which is listed in this section: For hydrogen (hydrogen specialist IG-A), the training shall be at least: • Working pressures of H2 plants. (5 hours) • Regulation of H2 installations. (3-hour) • Combustion of H2, flame temperature and pressures. (3-hour) • Materials suitable for the flame temperature of H2 (4 hours) • Storage and conduction of H2; specific materials and joints. (2-hour) • H2 production: hydrogen production system, distributed facilities (2 hours). • Assessment (1 hour) For LNG (IG-A cryogenic specialist):	Rejected	It is considered to be the responsibility of the company to ensure the training of workers.

			training shall be at least: • Specific materials and connections for cryogenic temperatures. Welding approval. (4-hour) • Working pressures of LNG facilities. (3-hour) • Welding in materials working at cryogenic temperatures (3 hours)• Materials welding practices for work with cryogenic systems (5 hours)• Assessment (2 hours) Courses shall be given in schools which must notify the said competent authority two months before the start of each course, specifying the training programmes to be followed in their school. The following are considered to be valid centres for the provision of these courses: a) Centres within the administrations responsible for vocational training for employment and public entities or undertakings that are accredited or registered to provide training leading to the qualification of gas installer. b) Private training centres and entities accredited or entered in the relevant register to provide professional training leading to professional certificates related to the gas installations industry c) Education centres authorised by the education administration to provide the training courses leading to vocational qualifications related to the gas installations industry. d) In addition to the centres listed in the previous section, the courses referred to may be given and assessed by centres authorised by the competent administration, subject to the same authorisation and notification requirements as those laid down in the previous section, after checking the availability of teaching staff and the appropriate technical and material resources, as well as the notification and record-keeping procedures to ensure that the results are documented.		
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			individual and global aspects of the evaluation of the training programmes provided		
DISA GAS	ITC-ICG-09	Paragraph 3.2	Article 45(3) of Law 34/1998 on the hydrocarbons sector requires wholesale LPG operators to have at their disposal to retail LPG traders and, where appropriate, their customers, a permanent technical support service for the installations of their users to ensure the proper functioning of those installations. Article 21 of Royal Decree 1085/1992 states that LPG suppliers must have a permanent service for receiving enquiries, complaints and failures and must have the appropriate personal and technical means to maintain the safety of their installations and a service providing technical assistance to users. However, this obligation is not expressly and uniformly passed on to the installation companies that are materially the most appropriate actor to provide such on-site assistance, where necessary. It is only mentioned when there is a formalised maintenance contract, as referred to in ITC ICG-03. What if no installation company offered a permanent emergency service? PROPOSAL: Gas installation companies that provide maintenance services in LPG facilities, regardless of their configuration (packaging, bulk or fixed tanks), must have a technical emergency service available on a permanent basis (24 hours a day, 365 days a year), operational within their territorial scope of operation. This service will be intended to be contracted by both the user and the LPG marketing companies.	Rejected	The obligation to have the maintenance service is incumbent on the operator under the law on the hydrocarbons sector, and the content of the contract is outside the scope of the draft Royal Decree.
Canary Islands	ITC-ICG-09	Paragraph 3.2.d	It is proposed to replace this paragraph with the following one consistent with paragraph 2.2 of ICG-09: “(d) Category A gas installation undertakings which operate CNG installations;	Rejected	Changes are not considered necessary.

			LNG or hydrogen facilities must have a technical manager of the undertaking holding a university degree with specific competence in the matters covered by this Regulation, recruited through any of the contractual arrangements permitted by law. The gas installation company category A shall be responsible for the training of its personnel to work on this type of technology: For hydrogen, the formation shall be at least: • Working pressures of H2 plants. • Regulation of H2 installations. • Combustion of H2, flame temperature and pressures. • Materials suitable for the flame temperature of H2. • Storage and conduction of H2; specific materials and joints. • H2 production: hydrogen production system, distributed facilities For LNG, the training shall be at least: • Specific materials and connections for cryogenic temperatures. Welding approval. • Working pressures of LNG facilities. • Welding in materials working at cryogenic temperatures. “		
Canary Islands	ITC-ICG-09	Section 3.2.e	It is proposed to replace this paragraph with the following one consistent with paragraph 2.2 of ICG-09: “... Category A gas installation undertakings operating CNG facilities, LNG facilities or hydrogen facilities shall have liability insurance or other equivalent guarantee covering the damage they may cause in the provision of the service for a minimum amount of EUR 1 200 000 per claim.’	Partially accepted	The text is amended for clarification
Canary Islands	ITC-ICG-09	Paragraph 3.3	It is proposed to replace this paragraph, in line with paragraph 2.2 of ICG-09, by the following:	Partially accepted	The text has been amended to include specialities.

			'3.3. Obligations of gas installation companies Obligations of gas installation companies: To employ, for the performance of the work, gas installers of the corresponding category with the type of operation to be carried out, who may be assisted by qualified specialist operators, always under the direct supervision of the above. The checks and inspections shall always be carried out by gas installers. ..."		
CONAIF	ITC-ICG-09	Paragraph 3.3	The Confederation does not agree that the guarantee for a gas installation is by regulatory requirement greater than the general guarantee provided for in consumer protection legislation. — To guarantee, for a period of five years to be determined by the legislation in force on guarantees and consumer protection, the shortcomings attributed to improper performance of the operations entrusted to them, and the consequences thereof;	Rejected	The deadlines in the current rules are maintained.
Canary Islands	ITC-ICG-09	Section 4.2.e	It is proposed to put the text similarly to paragraph 4.1 (e) of ICG-09: "(e) be certified by an accredited body for the certification of persons by ENAC or any other national accreditation body appointed in accordance with Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008. All bodies accredited for the certification of persons wishing to award these certifications must include in their certification scheme an evaluation system that includes the contents set out in Annex 2 to this ITC.'	Accepted	The proposed paragraph has been included.
ENAGAS Transport	ITC-ICG-09	General	It is necessary to harmonise the designation of category "IG-A" in order to comply with the ICG-09 JTI: — On the one hand, no definition of the	Accepted	The names IG-A, IG-B and IG-C have been added to point 2.2.

			category 'IG-A', nor is it related to section 2.2 of the aforementioned ITC, which identifies the categories of persons installing gas, which includes in section (a) the capacities of the Category A Gas Installation Person, without in any case referring to the term 'IG-A'. - Similar terminology is not used for categories of type B and C installers. Therefore, one of the following alternatives is proposed: - Delete references to category "IG-A", and correct them to refer to the Gas Installer Category A, as indicated in paragraph 2.2 of this ITC. - Define in section 2.2 of this ITC that the Category A Gas Installation Person is called IG-A. In addition, this should also be done for the Gas Installation Person of Category B "IG-B" and the Gas Installation Person of Category C "IG-C".		
CONAIF	ITC-ICG-10	Annexes	IRV-2 We do not share the obligation of installation companies as it provides greater guarantees than any other professional or manufacturer. In addition, this entails an extra cost for the US. II by extending the scope of liability so that their CR insurance premiums would be increased proportionally to the longer term of the guarantee imposed. Remove the 5-year guarantee from the certificate	Rejected	The deadlines in the current rules are maintained.
NEDGIA	ITC-ICG-10	Annexes	In the tables in models IRV-1 and IRV-2 "nominal" should be added to the term "power".	Accepted	The tables have been amended.
NEDGIA	ITC-ICG-10	Annexes	In model IRV-2, the wording of the last heading should be reworded so that the full text of the sentence reads as follows: 'The undersigned CERTIFY that, at present, in the event that the installation is powered by a rechargeable reservoir, the revision found that the stamp date is in force.'	Accepted	Amended

CONAIF	ITC-ICG-10	Paragraph 1	CONAIF considers that this ITC must accommodate under its umbrella the installations of foodtrucks and similar vehicles where the use is not domestic. Vehicles equipped with LPG installations other than for domestic use shall also be subject to the provisions of this ITC. As long as there is no UNE or international standard applying to such vehicles, the provisions of normative reference GAS_016 of the table of standards shall apply.	Rejected	They must comply with the conditions of ITC ICG 07. GAS_016 refers to domestic installations.
GASIB	ITC-ICG-10	Paragraph 1	Food Trucks, vehicles or small vans have been proliferating for years, with a kitchen fed with LPG containers and selling food at fairs, festivals and various events. The same problem is shared by historic friction stations or mobile churches. This type of vehicle is in a regulatory limbo since it is not itself a caravan or a motor caravan and, moreover, it is not expressly covered by UNE 1949. This configuration should be included as equivalent to caravans and motor caravans and even allow gas to be installed in accordance with EN 1949 as an equivalent safety standard. Such inclusion could be in the ITC-ICG 10 itself, in the guide to the application of the regulation or in the corresponding GAS, and both the installation and the periodic review of that installation by a gas installer could be regulated. To this end, we propose the following wording of the above paragraph: This ITC applies to LPG installations and appliances for domestic or professional use in habitable road vehicles.	Accepted	The purpose of the ITC, as well as GAS_016, refers to domestic installations.
REPSOL	ITC-ICG-10	Paragraph 2	There are installations that are covered and certified by the caravan manufacturer itself or caravan bodies, many of them imported vehicles, without the caravan being a gas installer. These facilities have a building certificate in accordance with EN 1949, which is similar in scope.	Accepted	Added to the text

			which may be emitted by a gas installer The installation shall be carried out by a gas installation company or by the caravan manufacturer himself.		
CONAIF	ITC-ICG-10	Paragraph 4.1	We, CONAIF, propose to delete it by limiting and contradicting standard UNE EN 1949. Gas appliances of type 3P (37), 3P (50) and 3B/P (50) are excluded from being installed, although they are allowed in other Member States. The operating pressure of gas-consuming appliances shall be 30 mbar.	Rejected	The pressures referred to in the claim under standard UNE EN 1949 are used in own facilities for holiday home caravans (defined in standard UNE and which do not comply with vehicle conditions) that fall outside the scope of ITC-ICG 10 and must be registered as fixed installations.
GASIB	ITC-ICG-11	Paragraph 1	In order to bring us into line with what is stated in ITC ICG-03 of this Regulation, we propose that amendments involving an increase of less than 10 % in storage capacity compared to the initial condition prior to the publication of this Regulation should not be considered as extensions. We propose the following wording: For installations, this JTI will apply to: — New installations, their modifications and extensions. — Amendments and extensions to existing installations before their entry into force, in the amended or extended part. An increase in storage capacity of less than or equal to 10 % shall not be considered an extension. — Installations existing before its entry into force, as regards the inspection regime, although the technical criteria applicable in these inspections will be those corresponding to the regulations under which they were approved.	Rejected	In line with ITC-ICG-03, it is not consistent, since in this JTI in addition to the change in volume, the change in category is considered to be a change, whereas in this JTI there are no categories. In any case, it is clarified what is considered to be a modification of the installation.
GASIB	ITC-ICG-11	Paragraph 1	The term 'installation fiche' is defined in the paragraph above. It is considered that a model or at least a minimum content of such a fiche should be provided. As long as there is no model for such an installation fiche,	Accepted	The proposal has been incorporated with minor clarifications.

			we propose the following content to be added to the current paragraph 5: In order to document modifications or extensions, the installation fiche shall be kept up to date and available to the Administration and the authorised inspection bodies. The fiche shall contain at least the following information: - Number and volume of LPG tanks. - Number and volume of LPG spheres. - Capacity of the filling house. - No description of loaders. - Description of relevant installations subject to industrial safety regulations (AT, BT, PCI...). - Installation sketch		
VITOGAS	ITC-ICG-11	Paragraph 2	For installations of less than 50 tonnes, this administrative authorisation is not required because their reduced capacity is more akin to the installation of a 'standard' end-user than to a 'classical' transfer plant.	Rejected	The administrative authorisation scheme is outside the scope of this text.
PRIMAGAS	ITC-ICG-11	Paragraph 3.2	In the reference to "GAS_30 standard" reference is made to two issues: — Reference is made several times in ITC ICG-11 to the 'GAS_30' standard which, as such, does not exist in ITC ICG-13 – RELATION OF REFERENCE RULES. The closest thing we can find in the list of standards is 'GAS_030', but it refers only to standard UNE 23500 Water supply systems for firefighting. We request that the reference 'GAS_30' in ITC ICG-11 and 'GAS_030' in ITC ICG-13 be revised and the corresponding corrections made. We are aware that the ORDEN of 1 December 1964 approving safety standards for the construction, assembly and operation of 'Liquefied Petroleum Gas (LPG) filling and transfer plants' was under development for a new UNE standard. Has the UNE standard been issued? And, where appropriate	Accepted	Incorrect reference is made to a draft standard that will be developed after the processing of the regulation. Correct appropriate reference

			yes, should it not be part of the List of Reference Standards (ITC ICG-13)?		
Community of Madrid – DG PEI	ITC-ICG-11	Paragraph 5	This type of installation does not fall within the scope of the Regulation on Fire Safety in Industrial Establishments approved by Royal Decree 164/2025 of 4 March 1997 (hereinafter RSCIEI), so it is not possible to establish the register of fire protection installations in accordance with this Regulation. Its reference to this Regulation should be understood simply as referring to the technical requirements laid down therein, similarly to what is done in other Regulations such as RAPQ, but the control and supervision that these requirements are adequate is a matter for the competent body in the Fuel Gas Regulation, not for the competent body in RSCIEI and should be clearly specified in ITC ICG-11.	Accepted	The reference to the latest published ISDS has been corrected.
FIDEGAS	ITC-ICG-11	Paragraph	Modify GAS_30 to GAS_030	Accepted	The error is corrected.
VITOGAS	ITC-ICG-11	Paragraph 5.3	Given that the content of this section is the subject of a specific UNE standard, the same content should not be included in this ITC, since if the UNE is amended at any time, this ITC will be out of date and should also be amended. We believe that with the sole reference to the UNE standard regulating these safety distances would be sufficient.	Rejected	The text of the Royal Decree retains the safety aspects deemed appropriate.
PRIMAGAS	ITC-ICG-11	Paragraph 5.4.5	COMMENTS: We understand that a level electronic measuring system, coupled with a reliable alarm system activated at a high degree of filling PROPOSAL OF REDACTION, would be appropriate: Storage vessels shall incorporate systems to prevent overfilling, either by automatic action or by an alarm, and shall be equipped with a continuous level measurement system.	Partially accepted	The wording of the text is amended by incorporating part of the proposal as the concrete solutions should be content of good practice standard.
DISA GAS	ITC-ICG-11	Paragraph 5.4.8	In paragraph 5.4.4 above. Supports, foundations and anchors, it is stated that “The supports of the overhead receptacles shall have a fire stability EI-180.” The proposal is therefore consistent with this standard stability of 180.	Rejected	It is a reduction in safety conditions.

			minutes. Since in class A and B storages a 90-minute diluting action is requested, it is logical for the storage envelope to also have a lower stability requirement for the media or foundations, and therefore an additional drafting alternative is indicated. Proposal 1: delete 'Bearings of ball shells and ball legs shall have a minimum fire stability of 120 minutes by means of their constructional components or insulation protections.' Proposal 2: 'Shells and ball legs shall have a minimum standard fire stability of 180 minutes by means of their constructional components or insulation protections, which may be reduced to 120 minutes in class A and B storages.'		
REPSOL	ITC-ICG-11	Paragraph 5.6.2	The wording does not indicate the objective of the thermal system, which should provide for the internal fire event and, to that end, prevent the gas supply valve from being cut off to the packaging house. On the other hand, the wording of 'blocking thermal system' is confusing, as it resembles magnetothermal protections of electrical equipment or process temperature ranges for the operation of equipment, even for low temperatures. The proposal consists of a wording (or alternatives) clarifying that the purpose of this protection is to enable the gas inlet valve to be shut off if it is installed inside the building in the event of a fire event, including inside the building. An emergency stop must be carried out on each of the machinery in the container filling house that could cause an entrapment, LPG projection or other type of hazard. The emergency stop button shall be remote from or protected from danger and easily accessible. A must also be implemented.	Rejected	The proposal is rejected as the objective of the measure is considered sufficiently clear.

		general emergency stop of the container filling house resulting in gas closure inside the container and de-energisation of all equipment except lighting. The ship's general emergency stop system shall be alarmed. The gas shut-off valve to the filling house shall be protected against improper operation. Such a valve may be installed inside the craft only if a fire locking system is provided, either by a thermal actuator or by electronic detection.		
ITC-ICG-11	Paragraph 5.8	COMMENTS: There is a duplication of the obligation to have a system for disconnecting the arm or hose in the event that the tank moves without having previously been disconnected. DRAFTING PROPOSAL: The installation shall have an emergency disconnection system which closes the connections both in the arms and in the event of loading/unloading by hose in the event of unwanted movements of the tank. Emergency breaking devices must be fitted for both load arms and hoses.	Accepted	The proposal is included.

ITC-ICG-11 Section To ensure that the rejection standards are adopted. This is not considered necessary as the plants remain
5.12.1 fire defence immediately: the criteria registered under the regulations under which
they were placed in service and not classed as RD
for the design of these fire-fighting systems, in general no retrospective, unless otherwise indicated.
they have been maintained with the 1964 core criteria.
they have been gradually adapted to the updated good practices and standards of the NFPA and APQ type, which are those reflected in Chapter 5.12 of the ICG-12 JTI. Secondly, it is proposed to explicitly leave the situation of continuity as regards the legalisation of facilities in transit among the reference standards.

Installations existing before its entry into force as regards fire protection in fixed surface installations (point 5.12 of ITC ICG-11), the provisions on this point being repealed in the Order of 64 The plants that were in operation and

			registered in accordance with the requirements of the Order of 1 December 1964 approving safety standards for the construction, assembly and operation of "Liquefied Petroleum Gas filling and transfer plants" shall be considered as similarly registered, according to the new ITC-ICG11, after its entry into force.		
CONAIF	ITC-ICG-11	Paragraph 6	We believe that, in accordance with the qualifications of an installation company set out in ITC-09, it should be included that the installations subject to ITC-09 are carried out by IG-A installation companies. The installations shall be built under the responsibility of the owner of the installations, who shall instruct an IG-A installation company to carry out the installation personally or externally, ensuring the safety of the staff involved in the work and taking appropriate precautions to avoid affecting other buried installations.	Rejected	The proposal was rejected.
CONAIF	ITC-ICG-11	Paragraph 7.1	We understand that the installation company IG-A has sufficient capacity to perform and certify the tests carried out. We therefore propose the amendment introduced. Before the installation is put into service, the installation company IG-A responsible for carrying out the installation shall carry out the stress and leakproofness tests, in the presence of a control body provided for in standard GAS_30 of the table of standards as appropriate depending on the type of installation. A mechanical strength test shall be carried out at the site certified by a control body when the tanks are changed from their site or if a defect or anomaly caused by transport, installation or handling is observed at the discretion of the site management. During the preparation and execution of the stress and leakproofness tests, the absence of persons from outside the stress and leakproofness tests shall be ensured in the working area affected by the risk. On completion of the tests with a positive result, your	Rejected	The intervention of CBs is considered necessary.

			description and results shall be incorporated in the project management certificate.		
GASIB	ITC-ICG-11	Paragraph 7.2	Currently, existing LPG plants have a Puesta en Servicio (Order of 1 December 1964) or RI as a Recarga centre (Royal Decree 809/2021 of 21 September (ITC-EP-6)). It is possible that in a few years, when their condition is normalised by ITC ICG 11, the previous administrative suitability will be diluted. The situation of existing LPG plants should be covered in some way in this point of the new Regulation or in an additional provision or in any other way deemed appropriate. We propose the following wording: Storage, transfer and filling plants for LPG containers in existence at the entry into force of this ITC and authorised in accordance with the Order of 1 December 1964 or EP6 of the REP and which have packaging filling facilities shall retain their status as facilities capable of filling LPG containers for the purposes of the other regulations and technical implementing provisions.	Rejected	Rejected as it is a future assumption. Plants put into service prior to this draft RD will be governed by the rules applicable to them, except for explicit indications regarding the retroactivity of any element.
PRIMAGAS	ITC-ICG-11	Paragraph 8	In the same vein as in the previous point, this section refers to Royal Decree 809/2021 of 21 September. We are aware that this rule is being amended. The provisions of this section are therefore already covered by the aforementioned Royal Decree. We request that reference be made only to this rule, but that not all its content be copied since, if Royal Decree 809/2021 is amended, this ITC will also have to be amended as it will become obsolete.	Rejected	We consider it necessary to incorporate these aspects into the RDP.
FIDEGAS	ITC-ICG-11	Paragraphs 6 and 7.1	Modify GAS_30 to GAS_030	Partially accepted	The references have been revised.
GASIB	ITC-ICG-11	General	There are serious inconsistencies in the definition of the categories of installations, within the ICG-11 JTI. They are sometimes referred to as I, II and III and sometimes as A, B and C.	Accepted	The reference to categories within ITC-ICG-11 is unified

			tonnes of product, decrease as category increases. It should be noted that in the rest of the legislation, when referring to categories, the opposite is true. It is requested that the nomenclature of the categories and its definition be unified at all points of the standard.		
GASIB	ITC-ICG-11	Index	Point 11 is included in the index of ITC ICG 10. Inspections, which are not then developed in the text of the corresponding ITC, we do not know whether this is a mistake in the table of contents or, on the contrary, a mistake in the text of ITC ICG 11. This point is not developed, although it can be found in the table of contents. We do not know whether this is an error or, in any event, we propose the following wording: The operator shall be responsible for the proper use, maintenance and maintenance of the installations, elements and equipment that form it. In addition, the operator shall also be responsible for ensuring that the installation is inspected every five years in such a way as to verify that the safety conditions and measures laid down in the regulations continue to be complied with. This inspection must in all cases be carried out by an approved inspection body and must include the entire plant. To this end, the following points will be checked: 1. Existence of the maintenance plan and review of the parts of the facility maintenance intervention issued since the last periodic inspection. 2. Visual inspection of the installation, including verification of the safety distances indicated in this ITC. 3. Good condition of fire protection systems. 4. Enclosure condition, access door and closing elements. 5. Existence and state of required signs. 6. Update of the Installation fiche. 7. Verification of the performance of the periodic checks	Accepted	Point 10 has been added. INSPECTIONS

			defined in point 8 of this ITC-ICG by the control body within the deadline and with a favourable result. The inspection body shall issue the corresponding inspection documentation, which shall be handed over by the operator of the facility and shall act in accordance with Article 20 of the regulation 'on infrastructure for industrial quality and safety, approved by Royal Decree 2200/1995 of 28 December'. If the inspection reveals that there are changes that have not been communicated to the competent authority, the body that carried out the check shall immediately inform the competent body of the Autonomous Community. The holder must always hold a copy of the certificate of the last inspection carried out, this document being available to the competent body of the Autonomous Community.		
Liquefied Gas Association	ITC-ICG-11	Index	A chapter 10 on inspections is mentioned which is not developed or mentioned in the text of the ICG-11 JTI. Furthermore, as mentioned above, in Chapter 8, 'Periodic monitoring, repairs and modifications', the periodicities of controls at facilities, including packaging filling facilities, have been established in accordance with criteria in accordance with ITC EP-3 of the Pressure Equipment Regulation RD 809/2021. However, if Chapter 10 were to aim at compiling regulatory inspections of installations according to ITC ICG-11, it could avoid differences of interpretation on the applicability of the inspection regime according to ITC EP-6 of the Pressure Equipment Regulation RD 809/2021. It is considered appropriate to indicate that the inspection regime and the security criteria for the design of installations according to ITC ICG-11 exceed those of ITC EP-6, and that it would therefore be appropriate not to apply this ITC EP-6 in a facility with its own technical safety regulation, in analogy with packaging for equipment of	Accepted	Point 10 has been added. INSPECTIONS

			self-contained breathing and fire extinguishers. Delete point 10		
FEDAOC	ITC-ICG-11	Not defined	This JTI states: Periodic inspections and repairs of vessels, pipes and installations shall be carried out within the scope of ITC-EP-3 of Royal Decree 809/2021. Periodic inspections will be carried out using the criteria of Annex I of JTI EP-3 of the REP and the periodicities according to this JTI (they are the same in both regulations). Repairs and modifications of equipment shall be carried out in accordance with the criteria set out in the REP and JTI EP-3. However, we have doubts as to whether the certification by the CB will be carried out with the CSR or with this regulation and whether the CB should be accredited for both	Rejected	Rejected as it was not a proposal.
Community of Madrid – DG PEI	ITC-ICG-12 – General	Paragraph 2	The fire protection envelope is set out on pages 241 and 242. Page 242 states: ‘The evacuation requirements laid down in the regulations applicable to installations must also be complied with.’ Page 247 states: ‘The facility must have fire protection appropriate to the risk, as laid down in Royal Decree 2267/2004 of 3 December.’ Page 248 states: ‘The evacuation requirements laid down in Royal Decree 2267/2004 of 3 December shall also be complied with.’ This type of installation does not fall within the scope of the RSCIEI. Therefore, its reference to this Regulation should be understood simply as referring to the technical requirements laid down therein, in a similar way as in other regulations such as the RAPQ, but the control and supervision that these requirements are adequate is the responsibility of the competent body in the RSCIEI.		It is considered necessary to establish that these facilities should have minimum systems for ICP and their inspections.

			combustible gases, not to the competent body in the CRISIS and should be clearly specified in the ICG-12 JTI.		
ENAGAS Transport	ITC-ICG-12 – General	General	In some paragraphs of ITC ICG-12, (pages 226, 227 and 247) the term “maximum working pressure” is still retained when it should refer to “maximum operating pressure” in order to bring it into line with the applicable regulations. It is proposed to replace “maximum working pressure” by “maximum operating pressure”.	Accepted	The proposed amendment is included.
FEDAOC	ITC-ICG-12 – General	General	It replaces O.M 1974, will affect the entire network to be developed/used by H2, and we are surprised that there is no intervention by CBs either under construction or in regular checks. We propose including initial and periodic inspections of these facilities.	Rejected	According to paragraph 4, ‘The owner of the infrastructure shall establish in writing or in a computerised management system an operation, maintenance, monitoring, inspection and control plan in accordance with the provisions of this ITC’. Section 4.5 also states that ‘The owner of the infrastructure must develop an integrity management programme for the pipelines in accordance with reference GAS_038 of the table of standards’. The CBs already carry out checks on other aspects of these facilities through other regulations that apply to them.
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 1	The current wording may lead to misinterpretation of the requirements for repurposing existing infrastructure. We suggest the following wording: ‘Existing gas infrastructures of this type that are converted to vehicular gas other than that originally designed (for example, conversion of an infrastructure that vehicular natural gas to vehicular hydrogen exceeding the percentages of hydrogen authorised for natural gas networks) shall be considered as new installations and, therefore, the provisions of Chapter VI of this JTI shall apply to them.’	Accepted	The proposed amendment is included.
SEDIGAS	ITC-ICG-12 – I	Paragraph 3.1	Fifth indent: ‘Joints between tubes and between tubes and fittings shall:	Accepted	The proposed amendment is included.

			remain watertight and maintain uniformity of quality throughout the pipeline in order to ensure its correct operation at the maximum operating pressure for which the pipeline is designed...' It is proposed that the paragraph be amended as follows: "Pipe joints and tube fittings shall remain watertight and maintain uniformity of quality throughout the pipe..."		
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 4.1	This requirement may lead to duplication of procedures in the case of installations whose competent body is the State (MINTERD), and such installations should therefore be exempted from this requirement. We suggest the following wording: 'The operator of the installations shall inform the body responsible for industrial safety in the Autonomous Community or the State, as appropriate, in which the installation is located, at least three working days in advance of the date and approximate time on which these tests will be carried out. Such communication shall be made by electronic means established by the competent body.'	Partially accepted	The reference to the competent body of the Autonomous Community or of the State, as appropriate, has been included.
SEDIGAS	ITC-ICG-12 – I	Paragraph 4.2	The last paragraph should be amended to also take into account cases where a transport undertaking is to be responsible for the placing in service or cases involving private pipelines (direct lines). The following amendment is therefore proposed: 'The commissioning of an installation shall be carried out by qualified personnel authorised by the infrastructure operator or the operator of the installation.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 4.2	This requirement may lead to duplication of procedures in the case of installations whose competent body is the State (MINTERD). Such installations should therefore be exempted from this requirement. We suggest the following wording:	Partially accepted	The reference to the competent body of the Autonomous Community or of the State, as appropriate, has been included.

			'Facilities may be put into service once the documentation referred to has been submitted to the competent body of the Autonomous Community or the State, as appropriate, without prejudice to the other safety requirements of other applicable regulations.'		
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 5	We suggest the following wording: 'The operator of the pipelines shall periodically, and at least once a month, monitor the value of the actual gas pressure at the outlet of the pressure monitoring stations, mixing/injection stations, partitioning or measuring stations and the compressor stations, which may be carried out with instrumentation connected to an automatic data acquisition and control system.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 5	We suggest the following wording: 'The operator of the pipelines shall periodically, and at least once a month, monitor the value of the actual gas pressure at the outlet of the pressure monitoring, mixing/injection or measuring stations and the compressor stations, which may be carried out with instrumentation connected to an automatic data acquisition and control system. The instruments shall be properly held.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 5	We suggest the following wording: "They may also manage leak control through a risk assessment system based on data analytics of endogenous (construction and operational parameters) and exogenous (environmental and human activity parameters) variables and define the leak control frequency based on this system. Network tightness monitoring is required in networks with an implemented risk assessment system and where no such system is in place, a tightness monitoring shall be required every 2 years at category 3a and 4a sites and every 4 years outside those sites.'	Partially accepted	The proposed amendment is included with minor changes.
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 5	Editorial correction: 'In order to ensure the security and continuity of	Accepted	The proposed amendment is included.

			operation of the pipelines, the owner of the pipelines shall organise...'		
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 6	In order to reproduce the time sequence of the abandonment process it is proposed to: 'The abandoned pipeline or section must first be inert in such a way as to ensure that there is no gas.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – I	Paragraph 6	As the scope of this JTI also includes transport installations, the following wording is proposed: 'The temporary decommissioning of a pipeline must be notified to the body responsible for industrial security in the Autonomous Community or the State, as the case may be.'	Partially accepted	The reference to the competent body of the Autonomous Community or of the State, as appropriate, has been included.
Natural gas Transportation	ITC-ICG-12 – II	Paragraph 2.2	Under this proposal, the term "hydrogen pipelines" covers hydrogen in-service gas pipelines of all kinds: transmission network, direct injection lines, isolated pipelines, etc. We propose the following change to the wording: "(...) – for hydrogen pipeline services, the separation between sectioning valves may be modified, provided that the safety of the infrastructure is ensured by means of the relevant study."	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.2	Editorial correction. We suggest the following wording: "For safe operation, valves shall be installed on the shunting lines. The valve shall be installed as close as possible to the main line."	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.2	Editorial correction. We suggest the following wording: 'When fixing the position and spacing between the shut-off valves, the following points shall be taken into account by considering...' To avoid double shapes of the verb 'consider' in the same sentence.	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	We suggest the following wording: 'Where, for justified reasons, the minimum distances between services laid down in this paragraph cannot be maintained, the two services shall be interposed.'	Accepted	The proposed amendment is included.

			elements to maintain the safety of the piping (e.g. screens made of HM-20 concrete or other structurally resistant materials, protecting the pipe with anti-theft coating, filling with terrain bags, etc.)."		
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	Replace the term "sleeve" with "pod" as it is the most technically accepted term. We therefore propose the following wording: 'On crossings with railways and roads with heavy traffic, the pipeline must be protected by a casing made up of another pipeline with a larger diameter which is resistant to the stresses to which it will be subjected.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	It is proposed that the wording of the paragraph be supplemented as follows: 'The ends of the pod shall be hermetically sealed and shall be fitted with two aeration and venting tubes with outlets arranged in such a way that the ingress of water and dirt is not possible and the risks of ignition of the air-to-gas mixtures are minimised. Alternatively, the space between pipes may be filled with a cement-bentonite mixture to isolate the piping from the outside.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	Replace the term "sheaths" with "pods". We therefore propose the following wording: 'Where the terrain so permits, crossings may be made without cladding, provided that the designer justifies that the pipe has been dimensioned to withstand external actions and that the lining of the piping does not suffer during the construction of the pipe.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	Replace the term "sheaths" with "pods". We therefore propose the following wording: 'Where pods are used, the burial depths shown above shall be measured from the protective cover generatrix.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	Conceptually, it is more precise to define vibrations as being generated by 'compressors', not by 'stations'. Also anti-vibration elements	Accepted	The proposed amendment is included.

			they must be installed inside the “station”. It is therefore proposed to replace the paragraph with this more specific one. ‘Where necessary, elements limiting the transmission of vibrations and pulsations to the piping system shall be installed upstream and downstream of each compressor.’		
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.3	The installation of interception valves in water courses corresponds to the transport of liquid hydrocarbons, providing no advantage from the point of view of safety and protection of the environment in the case of gaseous hydrocarbons, since the gases covered by this regulation are lighter than air, non-toxic and not soluble in water under ambient conditions. We therefore propose the following wording: ‘Crossings with water courses shall be marked by means of the corresponding milestones. In any event, the competent body shall lay down the technical and administrative constraints for carrying out the cross-check.’	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.4	We suggest the following wording: ‘Immediately before the pipe is dipped, the condition of the casing shall be checked by a soak jump dielectric stiffness detector at least 10 kV or other similar procedure.’	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.4	Add an additional paragraph after the existing one on protection in the event of momentary high voltage conditions: “In cases where the risk of corrosion by alternating current is anticipated, special measures shall be taken on the channelling and on the cathode protection system, or by installing mitigation systems according to the requirements of each case. To this end, the recommendations in references GAS_044 and GAS_051 of the table of standards must be followed. When the pipeline is close to	Accepted	The proposed amendment is included.

			high Voltage (HV) installations and it is expected that unacceptable momentary conductive and inductive influences may exist, appropriate mitigation measures shall be taken.'		
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.4	The project should include a cathode protection study taking into account these circumstances. We therefore propose the following wording: 'The design of the cathode protection system shall take into account sections where the conduction is installed underwater or underwater.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.6	Carbon steel is generally used for the development of these pipelines. We therefore propose the following wording: 'Carbon steel shall normally be used for the construction of pipelines covered by this chapter. In any event, the materials used must ensure adequate mechanical resistance to internal pressure and external loads and a level of safety equivalent to that of steel in respect of any aspect regulated in this chapter.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.6.1	The European regulatory development, more specifically standard EN 1594, is defining additional criteria for hydrogen service that are more restrictive. It is therefore proposed to add the following note under the table: "For hydrogen service, the design factor shall not exceed the value recommended in GAS_014".	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.6.1	In order to be more precise, the following wording is proposed: 'ΔE = Specified minimum elastic metal limit, at design temperature, in N/mm ² (MPa) [...]'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.6.1	We suggest the following wording: 'The ratio between the elastic limit and the breaking strength of the pipes must be equal to or less than that indicated in references GAS_042 or GAS_047 (whichever is applicable to the manufacture of the pipe) of the table of standards or other recognised standards guaranteeing similar minimum safety conditions.'	Accepted	The proposed amendment is included.

ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.6.2	“Separation stations” are not included. We therefore propose the following wording: ‘Exceptions shall be made in respect of diameters for which such instrumented devices do not exist, direct lines, as well as pipes in compressor stations and in pressure control stations, mixed-injection or measuring stations, and separation stations.’	Accepted	The proposed amendment is included.
SEDIGAS	ITC-ICG-12 – II	Paragraph 2.6.2	Ninth paragraph: ‘Pipes must be designed and constructed to allow internal inspections to pass through and be carried out using instrumented devices.’ This requirement has been introduced as a novelty in this draft Regulation and would require the installation of scratch trap positions in all piping with a pressure greater than 16 bar. So far, these internal inspection systems have only been installed on the core transport network. Introducing this requirement in pipelines with MOP below 60 bar may make projects technically unfeasible, due to the need for spaces for positions and the complexity of routes with hot curves, etc. We propose the following wording: ‘Pipes with a pressure greater than 60 bar of effective pressure must be designed and constructed to permit the passage and execution of internal inspections by means of instrumented devices.’	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.7	Replace “same” by “same”. We therefore propose the following wording: ‘The monitoring and control of the installation of the pipes, the performance of the joints and the tests and trials to be carried out shall be carried out by the operator of the gas infrastructure or by a specialist undertaking designated by it.’	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 2.7	Replace “temporary” by “permanent”. We therefore propose the following wording: ‘Based on the assessment of the probability of corrosion, a cathode protection system may be required.’	Accepted	The proposed amendment is included.

			permanently installed when the ducts are buried and before activation of the main cathode protection system.'		
SEDIGAS	ITC-ICG-12 – II	Paragraph 2.8.3	First indent: 'The emergency plans provided for in Chapter I (3.2) of this ITC must include the fire-fighting extinguishing elements existing in the installations.' It is proposed to add the following to the paragraph: "The contingency plan shall indicate the training and training required for intervention teams. Practical drill exercises shall be carried out to verify the effectiveness of the plan and the means envisaged."	Accepted	The proposed amendment is included.
Natural gas Transportation	ITC-ICG-12 – II	Paragraph 3.1.1	The conditions required are not in all cases in line with UNE-EN 1594 (GAS_014). We understand that it would be preferable to state that the stress test must be carried out in accordance with the European standard UNE-EN 1594 (GAS_014).	Rejected	It is not considered necessary to make explicit reference to the proposed rule. In the case of hydrogen service pipelines, the draft RD considers full alignment with standard UNE-EN 1594 for categories 1a and 2a, and somewhat more restrictive for categories 3a and 4a, and for the natural gas service, the historical criteria set out in the Regulation on networks and offences have been maintained, as they have proved effective in ensuring the integrity of the infrastructure.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 3.1.1	We believe that this is a mistake. Replace by the minimum pressure reading (in category 4a) with 1,5· MOP.	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 3.1.1	In the gas system, it has been verified that the coefficients traditionally used are effective in ensuring the integrity of the infrastructure. Therefore, there does not seem to be a need to change them. For the design of the future hydrogen-network, being a more problematic molecule than for natural gas, it seems reasonable to increase these factors and thus increase safety.	Partially accepted	The proposed amendment is included. "Pipelines" has been replaced by "pipelines" and the wording has been changed on the basis of a similar claim.

			For these reasons, the following wording is proposed: “As a particular requirement for hydrogen pipelines, the tests shall be carried out at a minimum pressure of $(0,15 * DP + MIP)$ for site categories 1a and 2a, and at a minimum pressure of 1,5 times the MOP for categories 3a and 4a.”		
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 3.1.1	We suggest the following wording: 'By way of exception and subject to the express authorisation of the competent body, the provisions of this table relating to categories 3a and 4a shall not apply in any of the following cases.'	Accepted	The proposed amendment is included. In addition, the article 'the' has been deleted from 'express authorisation'.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 3.2	Replace “may” by “may”. We therefore propose the following wording: 'Putting into service must result in a fully functional cathode protection system that can be used as a reference for monitoring and inspection.'	Accepted	The proposed amendment is included.
SEDIGAS	ITC-ICG-12 – II	Paragraph 3.2	Fourth indent: 'An internal inspection shall be carried out, where technically possible, on the section of gas pipeline concerned, with confirmation of the appropriate operating conditions, using intelligent tools that make it possible both to identify manufacturing or construction anomalies and to establish a baseline for subsequent inspections.' In line with the comment on paragraph 2.6.2, it is proposed to replace this paragraph by the following text: 'In pipelines to be designed and constructed to allow internal inspections to pass through and be carried out by means of instrumented devices as referred to in paragraph 2.6.2, an internal inspection shall be carried out where technically possible on the relevant pipeline section, confirming the appropriate operational conditions, using intelligent tools that allow both manufacturing or construction anomalies to be identified and established.'	Accepted	The proposed amendment is included.

			a baseline against subsequent inspections.'		
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.1	Adding: "... a Supervisory Control and Data Acquisition System (SCADA)". We therefore propose the following wording: 'The owner of the infrastructure shall have the human and material resources, own or contracted, to enable it to carry out properly the operation, maintenance, surveillance, inspection and control of the installations in accordance with the provisions of this ITC, part of which may be carried out remotely by means of a monitoring and data acquisition system (SCADA).'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.1	Replace "monitoring of" by "monitoring and verifying". We therefore propose the following wording: "By monitoring their condition."	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.1	We suggest narrowing down the meaning of 'monitoring' so that it does not mean that it must be continuous monitoring throughout the pipeline, for example by means of fugitive emission campaigns. In addition, in the fourth point, it is proposed to replace "carrying out maintenance..." by "carrying out maintenance". We therefore propose the following wording of paragraph 3 and its corresponding points: "The operator (...) of the infrastructure shall take the necessary precautions and measures to ensure the safe operation of pipelines: - Monitoring of their condition. - Carrying out systematic leak review campaigns. - Monitoring in the most appropriate way (not necessarily continuous), verifying the levels of methane emissions in the different infrastructures and establishing appropriate repair schedules. - Carrying out maintenance in a safe and efficient manner.	Accepted	The proposed amendment is included.

			— Efficiently and responsibly controlling incidents and emergency situations.'		
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.2	Add "separation stations": 'The operators of the infrastructure shall regularly, at least once a month, monitor the value of the gas pressure in their networks. These measurements shall normally be carried out at pressure, mixed-injection, partitioning or measuring stations and at compression stations, and may be carried out using remote monitoring systems.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.2	Replace by: '[...] Air-burial transitions [...]'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.2	Replace by: "Between the third month and the year of the start of the pipeline..."	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.3	Replace by: '... With systems...'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.3	It is suggested to narrow down the meaning of "leak detection system indications" so that it does not imply having a continuous leak detection system in the piping. We therefore propose the following wording: 'Detected leakages shall be classified, according to their significance, into emergency intervention leaks, scheduled intervention leaks and progression monitoring leaks, according to the following factors: - Physico-chemical properties of the gas transported. - Operating pressure of installations. - Indications of leak detection system (not necessarily continuous). - Proximity of the detected leak to installations.'	Accepted	The proposed amendment is included.
SEDIGAS	ITC-ICG-12 – II	Paragraph 4.3	First paragraph: "Welds carried out in the repair which have not been tested for strength shall be checked by non-destructive tests." It seems logical to extend this to 100 % welds as indicated in 2.7 or simply to refer to the	Accepted	The proposed amendment is included.

			compliance with Section 2.7 'Construction': 'Welds in the repair shall be checked by non-destructive tests as indicated in paragraph 2.7.'		
Natural gas Transportation	ITC-ICG-12 – II	Paragraph 4.4	In the general body of the regulation, this is already regulated in Article 30 and more broadly and rationally, so we propose to delete this, as the online option also conflicts with the sensitivity and confidentiality of this information. On the other hand, there is no comment on the control centre which does appear in paragraph 5.1 of ITC ICG-01 and which we believe should also be included here as a requirement.	Accepted	The second subparagraph of paragraph 4.4 is deleted as it is considered to be covered by Article 30. The concept of 'hub' is merged with the concept of 'hub' referred to in the JTI as in other chapters of the ICG-12.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.4	Add in brackets "Operation and Control Centre" in the term "Reporting station". The following text is therefore proposed: 'The operator of the infrastructure shall set up at least one central advisory centre (Operation and Control Centre) permanently attended in order to receive warnings, both from its own staff and from third parties, concerning anomalies, leaks or pipeline incidents. To that end, it shall notify public entities, emergency services (such as the police or firefighters) and users of the company's warning telephone number and put in place publicity measures for the general public, such as warnings, indicators distributed along the route in site category 1 and 2 areas or other information systems through the usual means of communication.'	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – II	Paragraph 4.5	Clerical error. Should read: "Procedure for ensuring the incorporation of proposals for improvement."	Accepted	The proposed amendment is included.
Natural gas Transportation	ITC-ICG-12 – III	Paragraph 1	Given that the subject matter and scope include reverse flow compression equipment, it is proposed that this equipment be explicitly mentioned in the title of Chapter III and that the reference to pressure be deleted in order to simplify it, given that ITC-ICG 12 is already known to be more than 16 bar for MOP infrastructures, and that it be amended accordingly.	Accepted	The proposed amendment is included.

			as follows ITC ICG-12. CHAPTER III – PRESSURE MONITORING STATIONS, MEZCLA-INYECTION, MEASUREMENT AND SEPARATION AND REVERSE FLOW INSTALLATION It is also proposed that the first paragraph be amended as follows: “(…) The scope of this chapter also includes reverse flow installations, including compression equipment, capable of feeding gas into a pressure network greater than 16 bar from a lower pressure network”.		
ENAGAS Transport	ITC-ICG-12 – III	Paragraph 1	Add “separation stations”. We therefore propose the following wording: “The design, construction and operation of pressure monitoring stations, mixed-injection, partitioning or measuring stations...”	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – III	Paragraph 2.1	Add “separation stations”. We therefore propose the following wording: ‘In order to prevent the formation of explosive atmospheres through the accidental accumulation of gas, the premises where pressure monitoring stations, mixing, injection, partitioning or measuring stations are located must have independent ventilation air inlets and outlets so that any gas/air mixtures can be scanned.’	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – III	Paragraph 2.1	In order to avoid including names specified in other regulations, the following wording is proposed: “Each pressure monitoring station shall be required to have an emergency bypass, at least for networks with a maximum operating pressure greater than 60 bar.”	Accepted	The proposed amendment is included.
Natural gas Networks	ITC-ICG-12 – III	Paragraph 2.11	We consider that a gas detection system is more effective by preventing ignition before a fire is generated, while the alarm system will not extinguish it and damage to the installations will be aggravated. It makes no sense to install an open-space gas detection system. The following changes are proposed:	Accepted	The proposed amendment is included.

			Detection of gas leaks: a fire gas detection system shall be installed in the boiler room and control room acting on a manual rearmament shut-off valve located outside the boiler room and control room. Furthermore, regulating stations buried or located inside rooms must have a suitable gas detection system that allows the early detection of gas leaks inside the installation.		
ENAGAS Transport	ITC-ICG-12 – III	Paragraph 2.9	Add “separation stations”. We therefore propose the following wording: ‘Smoking shall be prohibited in all areas of pressure monitoring stations, mixing/injection stations, partitioning stations or in all areas where a possible gas leak constitutes a risk of fire or explosion.’	Accepted	The proposed amendment is included.
Natural gas Networks	ITC-ICG-12 – III	Paragraph 3	In line with section 3.1.1 of Chapter II, we propose citing European reference standard GAS_018 (UNE-EN 12186) in this section.	Rejected	It is not considered necessary to make explicit reference to the proposed rule. The draft Royal Decree has considered, for the hydrogen service, a more restrictive requirement than that laid down in the European standard, at the level of stress tests. For the natural gas service, the historical criteria set out in the Network and Offences Regulation have been maintained, as they have proved effective in ensuring the integrity of the infrastructure.
ENAGAS Transport	ITC-ICG-12 – III	Paragraph 4	Add “separation stations” and also clarify point 5. We therefore propose the following wording: ‘The programmes established by the operator of the infrastructure for the operation and maintenance of pressure monitoring stations, mixed-injection, partitioning or measuring stations must include at least: — [...] - Metrological checks of measuring equipment in accordance with its applicable regulations as set out in Chapter 2 of the NGTS. - [...]”	Accepted	The proposed amendment is included.

ENAGAS Transport	ITC-ICG-12 – III	Paragraph 4	This requirement is generic, as “pressure monitoring stations, mixed-injection, measuring and separating stations for inlet pressures greater than 16 bar” include elements that are not regulated by any specific regulation. What is more, the regulation governing them is the one at issue here, and therefore a minimum frequency should be established. It seems reasonable to set it at one year. There are also safety valves in these facilities that are not associated with pressure equipment, as defined in RD 809/2021. For this reason, a frequency should be indicated. In the light of the above, we propose the following wording: ‘The frequency of these inspections and tests shall be at least once a year, except in the case of equipment covered by specific regulations. In such cases, the periodicities referred to therein shall be undermined.’	Partially accepted	The proposed amendment has been included, with a slight amendment to clarify the reading: ‘The frequency of these inspections and tests shall be at least once a year, except in the case of equipment covered by specific regulations. In such cases, the periodicities indicated therein shall be taken into account.’
Natural gas Transportation	ITC-ICG-12 – IV	Paragraph 2	It is proposed to add a new paragraph: ‘2.21 windows: Where the installation requires gas vents for starting a gas turbine, these shall be located in the part furthest from the enclosure and at least 25 m from compressors, electrical installations, overhead lines (aviation) or railways (rail) and ignition sources. The vent height shall be calculated to ensure the correct diffusion of the gas into the air, avoiding the formation of gas clouds.	Accepted	The proposed amendment is included.
Natural gas Transportation	ITC-ICG-12 – IV	Paragraph 2.1	We propose the following wording: “Provision must be made around the pressurised parts of the compressor station, streets or a minimum space of 2 metres free to allow machinery access in maintenance and emergency response”	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – IV	Paragraph 2.11	Editorial correction. It is proposed to replace by: “The envelope of these filters...”	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – IV	Paragraph 2.14	In order to clarify that this limitation applies both to the elements of the station, including those supplying fuel gas to the station, we propose the following wording:	Accepted	The proposed amendment is included.

			“Compressor stations shall be provided with safety devices to prevent the pressure from exceeding the maximum pressure in case of an incident (MIP) as set out in GAS_018 and GAS_035.”		
Natural gas Transportation	ITC-ICG-12 – IV	Paragraph 2.18	Given that currently the European implementing rules do not define the need or conditions for odourisation for hydrogen, and that a requirement to incorporate a leakage detection system is already laid down in paragraph 2.19, the following wording is proposed: The gas used for the needs of the compressor station itself shall be odorised as required by the relevant implementing legislation.	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – IV	Paragraph 2.5	We suggest the following wording: ‘The valves provided for in the event of an emergency and the control devices installed shall be clearly identified. Major gas pipelines shall be identified by conventional signs or colours indicating their function.’	Accepted	The proposed amendment is included.
Natural gas Transportation	ITC-ICG-12 – IV	Paragraph 3	In line with what is stated in Chapter III, we consider it more logical to refer in this section to the provisions of European reference standard GAS_035 (UNE 12583).	Rejected	It is not considered necessary to make explicit reference to the proposed rule. The draft Royal Decree has considered, for the hydrogen service, a more restrictive requirement than that laid down in the European standard, at the level of stress tests. For the natural gas service, the historical criteria set out in the Network and Offences Regulation have been maintained, as they have proved effective in ensuring the integrity of the infrastructure.
Natural gas Networks	ITC-ICG-12 – IV	Paragraph 4	We propose the following wording: “- The actuating systems and the compressors themselves shall be subject to functional inspections and checks in accordance with the maintenance plans established by the equipment manufacturer or the person owning the infrastructure. The frequency of such inspections and tests shall be appropriate to the operating hours. At	Accepted	The proposed amendment is included.

			in the absence of an inspection plan, reviews shall be carried out at least annually.' In addition, it is proposed to add the following requirement, as an additional heading, in relation to what should be included in the programmes established by each person owning the infrastructure for the operation and maintenance of compressor stations: "- Periodic testing of gas leak detection systems and associated cutting equipment."		
ENAGAS Transport	ITC-ICG-12 – V	Paragraph 1	Incorrectly delineated, because the venting lines have continuity along the entire pipeline, and this is incorrect. The corrected figure should be as follows: (image)	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – VI	Paragraph 1	The European regulatory development, more specifically Amendment 1 to standard EN 1594 (expected to be adopted in 2025), is defining additional criteria specific to hydrogen service, without already referring to ASME code B31.12 (GAS_050). It is therefore appropriate to refer to GAS_014 instead of GAS_050. It is therefore proposed to add the following note under the table: "(...)" — Mechanical behaviour proficiency tests, e.g. tenacity, girth welds fatigue behaviour and the tube itself (welding, thermally affected area and base material), meeting the minimum requirements laid down in reference GAS_014 of the table of standards or other recognised standards guaranteeing similar minimum safety conditions, or, failing that, studies to demonstrate the suitability of the installation. (...)"	Accepted	The proposed amendment is included.
ENAGAS Transport	ITC-ICG-12 – VI	Paragraph 1	It is proposed to replace the term "reclassification" by "review", so that it is analogous to the previous points in the Regulation. We therefore propose the following wording: "- Review of site categories."	Accepted	The point 'reclassification of site categories' is amended to 'revision of site categories'.

FIDEGAS	ITC-ICG-13	Gas_006	UNE 60620-5, Part 65 to amend by Part 5	Accepted	This is corrected as an error in part 5 of reference GAS_006.
Government of Catalonia	ITC-ICG-13	GAS_027	Insert part 2 on H2 dispensers GAS_027 • UNE-ISO 19880-1: 2022 Gaseous hydrogen. Service stations. Part 1: General requirements. EDIC. 2020 • ISO 19880-2 Gaseous hydrogen – Fuelling stations – part 2:	Accepted	The proposed reference is included.
ENAGAS Transport	ITC-ICG-13	General	The proposed wording of the new ITC ICG-05 states that the design, construction, assembly and operation of gaseous fuel stations must comply with RD 639/2006. Regulation (EU) 2023/1804 repeals Directive 2014/94/EU (which was transposed into Royal Decree 639/2006). Both this European Regulation and the first final provision of this draft Regulation, which amends Royal Decree 639/2016, include UNE-EN 17127 as a reference standard with regard to the interoperability of hydrogen supply points and filling protocols as a mandatory standard. Standard UNE-EN 17127 refers in turn to standard UNE-ISO 19880-1: 2022 as the reference standard for the safety and performance requirements of the whole hydrogen service station. Both standards are therefore complementary and mandatory, and therefore both standards should be included in reference GAS_27 of ITC ICG-13. Reference GAS_027 should therefore contain the following standards: UNE-ISO 19880-1: 2022 Hydrogen gas. Service stations. Part 1: General requirements. EDIC. 2020. UNE-EN 17127: 2024 Outdoor hydrogen supply points dispensing gaseous hydrogen and incorporating filling protocols.	Accepted	The proposed reference is included.

			EDIC. 2024		
FEDAOC	ITC-ICG-13	Not defined	The list of reference standards includes in GAS_002 the standard: UNE 192009-3 Procedure for regulatory inspection. Installations for gaseous fuels. Part 3: Installations for the storage of liquefied petroleum gases (LPG) in fixed tanks. EDIC. 2018; 2018/1M: 2022 However, the other UNE CTN 192 standards are missing: UNE 192009-2: 2022: Procedure for regulatory inspection. Installations for gaseous fuels. Part 2: Storage and distribution centres for liquefied petroleum gas (LPG) containers. PNE 192009-4: Procedure for regulatory inspection. Installations for gaseous fuels. Part 4: Satellite Liquefied Natural Gas (LNG) plants.	Partially accepted	
FIDEGAS	Another	General	As one of the main reasons, updating the regulatory framework relating to the safety of installations, as well as including some safety conditions laid down in the rules and which have been transferred to the regulation, we note in relation to the above-mentioned ITC-ICG: ITC-ICG-XX in general (all): a more comprehensive inspection plan (clear and detailed) in relation to mandatory security measures, such as: gas detection system certified to standards, correct maintenance and recording (UNE 60601: with 30 % LEL tester) and lifetime check (most expired and with risk of lack of adequate/effective detection). ITC-ICG-07 in particular the most critical installations representing several hundred thousand, if not one million, of the national territory: Engine rooms (> 70 kW) and industrial kitchens (UNE 60670-6): requiring a certified and maintained gas detection system, but none of its	Rejected	We do not consider the proposed text to be a statement, but rather a general comment on it, which is taken into account in the examination of the other comments received.

			linked Regulations (Royal Decree 1027/2007 and Royal Decree 919/2006) include the obligation to inspect the security systems in the mandatory periodic inspections (and in the initial inspections that are occasionally required in some ACs, since they are based on the aforementioned Regulations), so it is a latent reality that the aforementioned security aspects have not been inspected since 2006/2007. However, in the annexes on gas-fired appliances, if there is this rigour of certification and inspections, we therefore believe that it would be a serious error for this version 2025/2026 not to take into account the importance of safety devices as rigorously as possible on the basis of the evidence described in the previous paragraph. We therefore consider that the Public Administration is the most appropriate actor to establish the regulation of these security aspects, as minimum requirements for the whole of the national territory, this being the opportunity to mark a real sooner and later on in terms of security and its verifications/inspections.		
CNI	Another	General	It may be noted that there is no reference to gas mixtures (e.g. H2 with Natural Gas, up to which percentages they would be permissible and others, but this is a complex issue which is probably better than it is not in the regulation.	Rejected	It is not a concrete claim to the text of the draft.
Natural gas Networks	Another	General	(No ALEGATION) In the light of the draft Royal Decree approving the Technical Regulation on the Safety of Gaseous Fuels Infrastructure and Installations and in order to be taken into consideration, the following comments are made to ITC ICG-12 Gaseous Fuels Installations by Pipe at Maximum Design Pressure exceeding 16 bar. The introduction of the new Royal Decree entails new requirements for companies that should be recognised.	Rejected	It is not a specific claim and falls outside the scope of the draft RD.

			in their remuneration		
ENAGAS Transport	Another	General	General comment on the draft Royal Decree approving the technical regulation on the safety of gaseous fuel infrastructure and installations: the rules governing the transmission and distribution of natural gas are laid down in Law 34/1998 on the hydrocarbons sector. Similarly, Directive (EU) 2024/1788 of the European Parliament and of the Council of 13 June 2024 on common rules for the internal markets in renewable gas, natural gas and hydrogen, which will regulate the hydrogen sector, including its transmission and distribution, is in the process of being transposed into national law. We therefore take the view that this draft Royal Decree should not be included in the references set out therein concerning the activity regime for the transmission and distribution of both natural gas and hydrogen, which is regulated in the above-mentioned rules, and whether it should therefore address the specific technical issues relating to the safety of gaseous fuel infrastructure and installations.	Rejected	It is not a concrete claim to the text of the draft.
Liquefied Gas Association	Another	General	There is an erroneous reference to ITC-IGC 12 which we believe actually corresponds to ITC-IGC 11. Irrespective of whether the reference to ICG-12 might be erroneous and more applicable to ICG-11, it appears to be an excellent clarifying amendment on the operation of the pressure test at installations according to EP-6, by providing alternatives to the use of fluids in pressure tests, due to their incompatibility in some cases. Undoubtedly, this is a substantial improvement in the development of JTI EP-6 of the Pressure Equipment Regulation RD809/2021 for those installations that do not have a robust system of inspections and controls defined in their own technical safety regulation, as is the case for installations according to JTI ICG-11 and the consequent proposal to exclude them from the applicability of	Accepted	The reference to ITC ICG 11 has been amended.

			EP-6. PROPOSAL: A final provision has been added to amend the Regulation on pressure equipment, approved by Royal Decree 809/2021 of 21 September, and its ITC-EP 6 on transportable pressure vessels. Specifically, the amendment to ITC-EP 6 is in line with the conditions included in the new ITC-ICG 11...		
Liquefied Gas Association	Another	General	We believe that it should be possible to use the LPG fluid itself to carry out these noise emission tests and the words "... provided that these are not dangerous" should be removed. PROPOSAL: It has also been clarified which fluids may generally be used in the hydrostatic test set out in section 2.3 of Annex III to the Regulation on pressure equipment, so as to include not only water but also other working fluids, provided that these are not dangerous.	Rejected	This is merely a statement in the preamble justifying a subsequent amendment of the CSR.
NEDGIA	Another	General	In the light of the draft Royal Decree approving the Technical Regulation on the Safety of Gas Fuels Infrastructure and Installations and in order to be taken into consideration, we would like to make the following comments: Some of the new measures developed in the draft Royal Decree will entail additional costs for customers and in certain cases even suspension of supply, which could condition their availability of gas supply. This may be particularly relevant for vulnerable customers. An example is the remedying of certain anomalies, where these do not pose a security risk but do lead to a suspension of supply. We believe that this aspect should be assessed, removing some of these new obligations, as will be seen throughout the document.	Rejected	It is not a concrete claim to the text of the draft.

			On the other hand, the regulatory update resulting from the draft Royal Decree entails, for distribution companies, the need to have up-to-date and complete information from their customers, in order to be able to effectively comply with the technical and safety requirements required by the legislation. Data on customers who do not have distributors should, as far as possible, be provided by marketing companies.		
NEDGIA	Another	General	The report states that 'The total impact of the identified burdens is EUR 4.413.350. This value is obtained by the difference between charges (EUR 28.808.600) and estimated savings (EUR 24.395.250)'. A preliminary analysis of the economic impacts resulting from the implementation of the Royal Decree brings the impact on the Nedgia Group to EUR 1.200.000. This assessment has been carried out with the best knowledge to date and with the available data, so it does not incorporate certain concepts and costs that will also entail a significant administrative burden. Before the Royal Decree is published, for each measure included in the Proposal, the impact and potential benefit of each measure should be analysed, so that it can be assessed whether or not the implementation is appropriate, and in any case these burdens can be recognised for operators. However, it could be considered to include a recommendation to enable the Autonomous Communities to update the prices they regulate (regular inspections, etc.) so that they incorporate the new additional obligations laid down in the Royal Decree. Throughout the document, the following are set out in each section:	Partially accepted	The MAIN was revised. It should be emphasised that the calculations have been carried out in accordance with RD XXXXXXXXX using the load concepts regulated and with the estimates explained in the MAIN on the number of existing installations affected.

			analysis discussed, taking into account the possibility of economic impacts in addition to those already reflected in the current document of allegations that may be detected when implementing and enforcing the Regulation after its entry into force, as well as, where appropriate, a consideration of the cost-benefit analysis of implementing a specific measure. Details of the economic impacts resulting from the following requirements: Article 12. Putting into service The installation company's request to the distribution or marketing company for a provisional gas supply, which may be maintained for a period of less than 5 months, entails an economic impact in terms of the following quantifiable burdens identified as – 'Development of control systems and tools' – 'handling complaints' There are currently no adequate tools to control interim gas supply times that are variable and dependent on each applicant. It is also necessary to establish a clear procedure for the temporary cessation of supply after the end of the testing period. The economic impact that has been identified in order to implement the request with regard to this section of the current draft Royal Decree is EUR 21.500, without taking into account the cost of claims whose estimation is complex. In order to obtain this value, a number of hours was considered necessary for the creation and running of a procedure in SSII that complies with the requirement laid down. ITC ICG-01 Paragraph 5.4 Maintenance Burden relating to the obligation of certification by a control body empowered to certify a sample of		
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			conservation status of installations subject to maintenance operations. It entails economic impact in terms of quantifiable burden identified as — “audits or controls by external organisations or professionals” The economic impact of the administrative burden identified is EUR 64.800 1 % of the maintenance operations carried out in the year in each of the Autonomous Communities were taken into account, with a unit cost of this type of load of EUR 1.500, the unit cost set by the Administration for this type of load. We consider that the certification work carried out by the authorised inspection body is exclusively for clearance purposes. If the authorised control body were to carry out an on-the-spot visit, significant consideration would have to be given to the increase in cost. On the other hand, it should also be considered that the internal cost of our staff carrying out the tasks of accompanying the control body is not included in the calculation. The cost relating to the administrative burden of this obligation set out in the Report on the Regulatory Impact Analysis of the Draft Royal Decree is EUR 7.500 for the total of 5 gas distributors covering the territory, EUR 1.500 per distributor. ITC ICG-01 Paragraph 5.4 Maintenance The obligation to notify the Autonomous Communities of the maintenance plan for installations to be carried out the following year and the result of the previous year's maintenance plan entails an economic impact in terms of quantifiable burden identified as – ‘Obligation to communicate or publish some information’ While this obligation entails an impact, which will have to be assessed, it may not be significant. ITC ICG-04 Paragraph 5.2		
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			Regular inspections The obligation for regular inspection of LNG PS every 5 years by OCA entails an economic impact in terms of quantifiable burden identified as - "Audits or controls by external organisations or professionals" Of the impact set out for the sector in the report of EUR 1.500.000, Nedgia would be entitled to EUR 150.000 for 100 LNG plants. ITC ICG-07 Paragraph 5.2 Regular inspection of reception facilities supplied from distribution networks In centralised heating systems and systems with an installed capacity of more than 70 kW, the inspection will range from the key to the connection of gas appliances, including appliances with an effective rated output of 70 kW or less, regardless of the total installed capacity. Compliance with this requirement means an increase in operating costs compared to the scenario set out in the current Regulation, since inspections and checks will have to be carried out which are not currently carried out. Therefore, the increase in execution times for operations will lead to lower daily productivity, which is why we believe it should be recognised with higher prices in this type of facility. ITC ICG-07 Paragraph 5.4. Correction of anomalies '... Once the deadlines for correcting the anomalías/15d-primaria, 6 m-secondary) have passed, the supply will be suspended, each Autonomous Community being able to regulate the specific terms'. It entails economic impact in terms of the following quantifiable burdens identified as - "Development of Control Systems and Tools": EUR 212.000 - "Complaint handling": EUR 20.800		
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			- 'Field operations': EUR 500.000 - Notifications: EUR 230.000 The total economic impact of the administrative burdens identified for this measure is: EUR 1.000.000 After a thorough analysis of the economic implications of the new requirement in the draft Royal Decree in relation to the section indicated, we must highlight the high impact in terms of costs, both of developments to ensure control, calls to avoid field visits, and costs of operations that are not currently carried out. We also found an impact on the number of complaints received and subsequent unnecessary operations initially. We should also point out that this impact is not reflected in the various impacts of the administrative burdens set out in the report on the regulatory impact analysis of the draft Royal Decree.		
NEDGIA	Another	General	All references to "combustible gases" should be replaced throughout the RD proposal by "gaseous fuels".	Partially accepted	The wording has been revised throughout the text.
NEDGIA	Another	General	It is suggested to use throughout the RD proposal the term "gas appliance" instead of "gas appliance" in all cases.	Partially accepted	The wording has been revised throughout the text.
NEDGIA	Another	General	It is recommended that in Article 3 of the definitions in the Regulation all terms should be referred to in the singular, and that the definition should not start with 'It is...'. See cases in definitions 32 to 36, 54 to 57 and 62.	Partially accepted	The wording of the definitions in Article 3 has been revised.
NEDGIA	Another	General	When the text of the RD proposal refers to the correction of defects or anomalies, it is noted that sometimes it is referred to as 'remedying' or 'remedying' and sometimes as 'correcting' or 'correcting'. While having the same meaning, perhaps for reasons of editorial coherence it would be appropriate to use a single expression.	Rejected	Rejected as not relevant.
NEDGIA	Another	General	It is suggested that the entire text of the proposal for a Royal Decree be revised, as in many cases there is no need to label the concept of 'installation company' or 'person'.	Partially accepted	The wording has been revised throughout the text.

			installer' with the term 'qualified'. In others, to avoid being excessively repetitive when it has been specified shortly before, this omission could perhaps be maintained.		
Natural gas Transportation	Another	MAIN	The analysis of the economic impacts, including that set out in the explanatory memorandum, is detailed in Chapter 6 of the proposal, the aim of which is to study the impacts on the economic aspects arising from the draft Royal Decree. The report states that 'The total impact of the identified burdens is EUR 4.413.350. This value is obtained by the difference between charges (EUR 28.808.600) and estimated savings (EUR 24.395.250)'. A preliminary analysis of the economic impacts resulting from the implementation of the Royal Decree increases the impact on Gas Natural Red LPG, S.A. by EUR 1.500.000. Before the Royal Decree is published, for each measure included in the Proposal, the impact and possible benefit of each measure should be analysed, so that it can be assessed whether or not the implementation is appropriate, and in any case these burdens can be recognised for operators.	Rejected	The calculations for the current installations have been reviewed and the administrative burden has been revised to take into account the unit costs. The MAIN was revised. It should be emphasised that the calculations have been carried out in accordance with RD XXXXXXXX using the load concepts regulated and with the estimates explained in the MAIN on the number of existing installations affected.
VITOGAS	Another	Preamble	The paragraph which states: 'In order to prevent this situation, a system of reference to timeless standards has been implemented, using fixed codes that will be matched in the ITC containing the list of standards. Thus, any change in the numbering of a rule will always refer to the fixed code originally assigned, without there then being any possibility of such a loss of traceability.' We consider that there is a risk that when a rule that is not listed in the Annex is amended, there will be a situation of legal uncertainty in order to determine whether or not it is in force.	Rejected	
CNI	Another	Preamble	The preamble refers to:	Rejected	It is considered that the proposal would make it

			“... a system of reference to timeless standards has been implemented, using fixed codes which will be matched in the ITC containing the list of standards.” It seems correct, but it would make identification easier if the code included a numerical reference to the standard, although at the time the code did not reflect the latest version, due to possible amendments, it would make identification easier. For example, in the case of standard GAS_023, it does not diminish the operability of the table in the event of a future change in the name of the standards, but it helps to identify them if they are called GAS_023-16923 or GAS_023-60670 (the standards to which that code GAS_023 refers are, according to the table, UNE-EN ISO 16923 and UNE 60797.		operationalisation of the document and its update.
REPSOL	Another	Preamble	There is an erroneous reference to ITC-IGC 12 which we believe actually corresponds to ITC-IGC 11. It seems to be an excellent clarifying amendment on the operation of the pressure test at installations according to EP-6, by providing alternatives to the use of fluids in pressure tests, due to their incompatibility in some cases. It is certainly a substantial improvement in the development of JTI EP-6 of the Pressure Equipment Regulation RD809/2021 for those installations that do not have a robust system of inspections and controls defined in their own technical safety regulation, as is the case for installations according to JTI ICG-11 and the consequent proposal to exclude them from the applicability of EP-6. A final provision has been added to amend the Regulation on pressure equipment, approved by Royal Decree 809/2021 of 21 September, and its ITC-EP 6 on transportable pressure vessels. Specifically, the amendment to ITC-EP 6 is in line with the conditions included in the new ITC-IGC 11 approved by this Royal Decree, allowing pressure tests on charging circuits to be carried out.	Partially accepted	The erroneous reference to ITC-IGC 12 is corrected

			also by means of a pneumatic test, provided that the respective safety measures required for this type of test are taken, and without the need to request administrative authorisation.		
DISA GAS	Another	Preamble	We consider that the use of LPG itself should be allowed for noise emission testing, which would make it necessary to delete the phrase 'provided that these are not dangerous', as it unnecessarily limits the technical options available. PROPOSAL: It has also been clarified which fluids may generally be used in the hydrostatic test set out in section 2.3 of Annex III to the Regulation on pressure equipment, so as to include not only water but also other working fluids, including LPG itself in noise emission tests.	Rejected	The preamble of the standard cannot specify technical details which will be the subject of the development of the Regulation and its JTIs.
GASIB	Another	Preamble	Based on experience as a wholesale LPG operator, retailer and as the entity responsible for carrying out inspections in many of the facilities it operates, we wish to point out that since the publication of Royal Decree 919/2006 of 28 July approving the technical regulation on the distribution and use of gaseous fuels and its additional technical instructions ICG 01 to 11, which dates from 2006 (19 years ago) to the present, no accidents have occurred in the facilities affected by that regulation. Inspections in the years of application of the current Regulation have been carried out by authorised installers and these inspections have always been available to the administration at the time when they were required to enable them to exercise the role of control over them correctly. In no case has the safety of the installations been affected by the absence of a control body in the process. The	Rejected	This argument was not accepted. The involvement of CBs in inspections has proved necessary for proper safety

			the current inspection procedure is well established and no gaps have been detected in the safety of the installations resulting from it. Similarly, based on the experience gained in the Basque Country, where the inspection model with control bodies is applied, we would like to highlight the organisational complexity involved in including a new official in carrying out these inspections. In many cases, it is now difficult to arrange the inspection visit between the installer and the operator of the installation (second homes, for example...). By including the Control Body in the inspections, it is difficult for them to operate, especially in a market which, moreover, is very dispersed geographically. As described above, it may lead to delays in the implementation of inspections and, as a result of these delays, the inspections may expire. It is forbidden to supply facilities whose inspections have expired. This model will therefore result in a worse service to our customers. The current inspection procedure is well-established, carried out by authorised installers and, most importantly, no gaps in the safety of the installations resulting from it have been detected in the 19 years of application of the current Regulation. In view of the above, given the operational shortcomings already known in the application of the model with the control body, we would ask for this paragraph to be deleted and for the current inspection table to be maintained.		
GASIB	Another	Preamble	Reference is made to the new ITC ICG 12. This is understood to be a mistake and reference should be made	Accepted	The proposed amendment is included.
GREENE	Another	Not defined	Section: Chapter VI. Network injection of H2 No technical limits are specified for composition, mixing or acceptance of H2 per type of network (high or low pressure). Proposed amendment: Include specific technical annex or JTI for H2-NG mixture, with reference values and	Rejected	Falls outside the scope of the draft RD

			procedures for requesting access		
GREENE	Another	Not defined	Section: Certification requirement It is not clear whether non-electrolytic thermochemical technologies are explicitly recognised. Proposed amendment: Include as a valid pathway the production of H2 by thermochemical processes such as pyrolysis, gasification, cracking or reforming of waste or biomass	Rejected	Hydrogen production is outside the scope of the RDP
GREENE	Another	Not defined	Section: Authorisation procedure It is not clarified or specified whether specific environmental processing is required for mixtures of wastes with non-biogenic content. Proposed amendment: Request the inclusion of a simplified procedure if it is demonstrated that the net environmental impact is lower than that of the equivalent fossil fuel	Rejected	The environmental authorisation is outside the scope of the RDP
GREENE	Regulation	Article 01	The feasibility of installations using mixed waste fractions (biogenic + plastics) to produce H2 is not explicitly mentioned. Proposed amendment: Insert the following wording: Installations producing H2 from mixed waste may benefit from this Royal Decree if traceability, separation of fractions and compliance with emission thresholds in accordance with European legislation are ensured.	Rejected	The inclusion of installations producing combustible gases is rejected because the subject matter of this Royal Decree does not cover the production of gases. It should be recalled that, according to the third paragraph of Article 1, compliance with the requirements laid down in this Regulation in respect of the installations falling within its scope does not exempt compliance with other provisions relating to the same installations and regulating matters other than the subject matter of this Regulation.
FIDEGAS	Regulation	Article 02	Extension of the scope of RD It is proposed that recreational craft be included in section 'j' and ITC ICG-10 or in a subsequent new point and its ITC ICG-11 (renaming the other ITCs), as is done for caravans and motor caravans. In accordance with Royal Decree 297/1998 of 27 February 2007 (Directive 94/25/EC).	Rejected	Recreational craft are subject to their specific regulations and are therefore not covered by this Regulation.

FEDLPG	Regulation	Article 02	It is not clear where the reception facility starts in the facilities supplied with loading containers of more than 15 kg.	Accepted	The wording has been amended in order to clarify the scope of the reception facility in facilities supplied with packaging with a load of more than 15 kg.
PRIMAGAS	Regulation	Article 02	COMMENTS: The definitions read as follows: 45. Means of transport: This means any self-propelled device or appliance intended for the transport of persons or goods. Capable of circulating on public roads or terrain, both urban and interurban, on roads and terrain which, without such suitability, are in common use and, in the absence of other rules, on private roads and terrain which are used by an indeterminate community of users, including artefacts whose only route of circulation is water, air or a railway track. It should place in the facilities to which it is applied only means of transport by removing "by engine". Air means of transport are included in this definition and non-powered balloons should be included. (f) Gaseous fuel supply plants for means of transport: Storage and supply facilities for bulk liquefied petroleum gas (LPG), compressed natural gas (CNG), liquefied natural gas (LNG), hydrogen or other gaseous fuels, for use in any means of transport	Rejected	The safety requirements for means of transport such as balloons, helicopters and sports boats, among others, are regulated by their specific regulations and are therefore not the subject of this Regulation.
CNI	Regulation	Article 02	Although the wording does not change compared to RD 919/2006, it seems to contradict ITC ICG-07, in which those tranches are considered within the scope of application by referring to standard GAS_008: The connection to the consumer appliances and the receiving installation shall be made in accordance with reference GAS_008 of the table of standards, as regards the installation and connection requirements of the appliances to gas. Also in ITC ICG-07, when referring to periodic monitoring, reference is made to the need to test and inspect these	Rejected	ITC-ICG 07 covers both aspects of the receiving installation and gas appliances for the specific case of installations of less than 70 kW.

			installations below 70 kW: In installations of up to 70 kW installed power, the inspection shall range from the user key to the gas-consuming appliances, including the gas-consuming appliances.		
CONAIF	Regulation	Article 02	Both this Regulation (Royal Decree 919/2006) and the draft amendment regulate LNG satellite plant facilities in accordance with UNE 60210. CONAIF considers that the most logical approach is to increase and not to reduce the scope of the corresponding ITC in order to bring it into line with the UNE standard governing its implementation and design. If the increase until 1500 is not accepted, we understand that it is prudent to maintain the current scope of 1 000 m³. We are particularly concerned that if the new scope is accepted, the situation will remain in which installations exceeding the limit of 450 m³ and below which regulatory umbrella are subject. In addition, we understand from the Confederation that this new picture may be harmful to installation companies, insofar as the requirements of IG-A companies carrying out this type of installation are defined in much more detail, while civil liability insurance is increased and training requirements are increased. We understand that there is no proportionality between the two changes and they are completely opposite directions. (e) LNG satellite plants: Liquefied natural gas (LNG) storage facilities with a combined storage capacity of up to 1 500 m³ and a maximum operating pressure of more than 1 bar, intended for direct supply to distribution networks or reception facilities.	Rejected	The purpose of the change is to delimit the regulatory scope. The previous limit of 200 tonnes (approx. 450 m³) was based on UNE EN 1473, which reaches that limit, so that there is no overlap in the scope of UNE 60210 and UNE EN 1473. A new IG-A installer for LNG has been created to improve the safety conditions of the facilities.
CONAIF	Regulation	Article 02	CONAIF does not agree with this proposal for a change. We understand that the wording of the current Regulation does not create problems in the sector, however, the change will be a minor step towards safety. The main reason for not considering an installation as	Partially accepted	Arguments based on ease or convenience of use do not undermine safety. No packaging up to 35 kg without a safety valve has been identified.

CONAI F	Regulation	Article 02	an assembly consisting of a flexible pipe and a container, which feeds a single device for mobile use, is the technical simplicity of that device and the ability to purchase those containers at points of sale such as service stations. Packaging with a capacity of more than 15 kg is no longer purchased at points of sale but has to be the subject of a supply contract. In addition, containers with a unit load of more than 35 kg do not have a safety valve, which is a potential risk. Furthermore, these containers have complex transport operations, are beautiful cylinders 143 cm high, and therefore collide directly with the ease of movement. Furthermore, their connection to a mobile appliance may be complex due to the difference in height between the appliance and the gas outlet. Installations supplied by a mobile LPG tank with a unit load not exceeding 15 kg, connected by a flexible pipe or directly attached to a single appliance for mobile use, shall not be regarded as receiving installations. CONAIF wants to solve a latent problem in the field of gas installations in vehicles. Installers are currently faced with a myriad of doubts when dealing with gas installations in vehicles for commercial use, which is excluded from the ITC. The problem lies in: These systems or solutions are popular for temporary events, where the municipal authorities require a safety check (as is logical and mandatory). The user then contacts an installer, who is not sure which certificate to issue in addition to any legal protection problems that may arise from issuing a certificate in accordance with legislation that does not include this installation in its scope. In addition, a similar issue occurs in the legalisation or registration of these vehicles. During the technical inspection of vehicles, the station requested documentation, but there was no umbrella to collect these.	Rejected	'Installations supplied by a mobile LPG tank with a unit load of not more than 15 kg, connected by a flexible pipe or directly attached to a single appliance for mobile use, or mobile industrial installations of the blast type supplied by containers of up to 35 shall not be regarded as receiving installations.' ITC-ICG 10, the scope of which is the same as that laid down in Article 2.1.j), regulates the installations of caravans and motor caravans for domestic use (like standard GAS_016), excluding portable devices and packaging external to the bodywork. The proposed vehicles and their gas installations are not for domestic use but for commercial or industrial use, so the installation of these systems is outside the scope of this JTI.
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			installations, so let us return to the same problem as above. (j) LPG installations for domestic use in caravans and motor caravans: Installations consisting of one or more LPG containers, pipes, accessories and appliances, including these, for domestic supply in habitable road vehicles. Portable appliances incorporating their own power supply or separate gas containers and appliances external to the vehicle body shall not be considered part of the installation. Recreational vehicles or trailers used for commercial or non-domestic purposes, such as foodtrucks, shall also be included in this ITC.		
CONAIF	Regulation	Article 02	We consider it essential to clarify what is meant by changing safety conditions. We believe that there must be a precise definition that provides certainty for the installation companies as a whole when faced with a refurbishment of an installation. As an example, a possible definition of what is or can be understood by safety conditions has been illustrated. 2. With regard to installations, the regulation shall apply to: [...] — Installations existing before its entry into force which are subject to modification or extension. As a general rule, and if the relevant ITC does not indicate otherwise, this Regulation shall apply only to the modified or extended part, provided that the modification or extension does not affect or modify the safety conditions of the whole installation, in which case the whole installation shall be adapted. The following shall be understood as affecting safety conditions: change in the calorific consumption of type A or type B appliances, change the location of the installed appliances (A or B appliances) by moving them to another enclosure within the	Rejected	The security modifications in each JTI have been incorporated into the text. This point aims to establish the application of the Variations Regulation in a generic way for those installations that may fall outside all JTIs.

			same room, perform any action that changes the characteristics of the pipes (concealment, underrun, etc.).		
ENAGAS Transport	Regulation	Article 02	Taking into account the definition of 'infrastructure' in this Regulation: 'This means all installations consisting of the gaseous fuel pipeline itself (including cold-formed in-situ curves), fittings, factory-formed curves, auxiliaries inserted into it (such as valves, insulating joints, scratch traps, pressure equipment, etc.), supplementary installations (valve positions, pressure monitoring stations, mixed-injection or measuring stations, separation stations, compression stations, and other auxiliary systems).' We suggest the following wording: "Installations for gaseous fuels by pipeline with a maximum design pressure exceeding 16 bar and their complementary installations." This avoids having to list each and every one of the complementary facilities, with the risk of being mistakenly ignored.	Partially accepted	The wording of the definition in Article 3 is amended to include both transmission and distribution infrastructure. Infrastructure: Set of installations consisting of the pipeline of gaseous fuels itself and its complementary installations.
NEDGIA	Regulation	Article 02	It refers to a maximum capacity range of 450 m³, a range that remains within UNE 60210, but which excludes plants with a capacity between 450 and 1 500 m³, which is also covered by UNE 60210, but which appears to have been deliberately left out because it is a range that overlaps with that of the current UNE-EN 1473. However, it is not clear that plants which have hitherto been covered by national legislation, specifically by the technical regulation approved by RD 919/2006, such as those with a capacity of between 450 and 1 000 m³, fall outside the scope of the new regulation submitted for consultation. If that approach is successful, it is necessary to clarify what will happen to those plants and under what administrative control	Rejected	Installations existing at the entry into force of this Royal Decree would, like all industrial installations, be subject to the regulation and regulations with which they were put into service.

			they shall be governed.		
Community of Madrid – Hydrocarbons and IT	Regulation	Article 02 (1) (f)	With regard to 'other gaseous fuels', a little more could be specified as 'other gaseous fuels considered renewable whose Wobbe index value classifies gas in one of the three families in accordance with standard UNE-EN 437'.	Rejected	The scope of "gaseous fuels" is defined in Article 3 in a manner equivalent to the proposal.
Community of Madrid – Hydrocarbons and IT	Regulation	Article 02 (1) (K)	Slightly amend the text to better understand the requirements for amendments and consider including renewable gases as in the previous comment: Installations [...] excluding plants using LPG for different applications for the use of LPG as a fuel, such as a refrigerant.	Accepted	The proposed amendment is included.
Community of Madrid – Hydrocarbons and IT	Regulation	Article 02.2	We do not agree with 'the fact that they are not expressly included in any other regulation'. If we wish to include possible renewable gases, it is indeterminate to refer to the definition given in previous comments in relation to the Wobbe index.	Rejected	Refers to installations not covered by other regulations and using gases as fuels.
CONAIF	Regulation	Article 03	The Confederation considers that the concept of the location of the installation should be clarified. Royal Decree 919/2006 states that they could not be in the same room. We believe that a clarification such as the proposal would help to clarify the definition and avoid different interpretations. 30. Unconnected packaging: Packaging that is in the same location as the installation and is not ready for immediate use, including empty packaging. Packaging is considered to be in the same location as the installation and cannot be used immediately if it is in another enclosure or annex belonging to the installation's premises.	Partially accepted	The definition of non-connected packaging has been revised.
CONAIF	Regulation	Article 03	Same considerations and justification as in Article 2 43. Individual installation: Assembly of pipes and accessories... The following shall not be regarded as an individual installation:	Partially accepted	The definition of exclusion has been clarified.

			Assembly consisting of a mobile LPG tank with a unit load of not more than 35 kg 15 kg and a mobile appliance		
CONAIF	Regulation	Article 03	The Confederation considers that, although the definition is correct and taking into account the reference table of UNE standards, this system is limited to ITC-12, we consider that making a clarification such as the proposal is not harmful. The reason for asking for this clarification is that unfortunately our companies have been victims of requests for regulatory requirements taken out of context and because the process of implementing and registering facilities can involve several actors, the clearer it is, the better for all those involved. 60. Integrity management system: In accordance with the provisions of ITC-12, a set of appropriate activities and practices by which a person owning the infrastructure preserves the integrity of the pipeline to ensure the safe and reliable transport of gas.	Rejected	This is clearly understood to be applicable to ITC-ICG 12 as it is the only point in the text where reference is made.
CONAIF	Regulation	Article 03	The Confederation considers that, although the definition is correct and taking into account the reference table of UNE standards, this system is limited to ITC-12, we consider that making a clarification such as the proposal is not harmful. The reason for asking for this clarification is that unfortunately our companies have been victims of requests for regulatory requirements taken out of context and because the process of implementing and registering facilities can involve several actors, the clearer it is, the better for all those involved. 61. Operation and maintenance management system: In accordance with the provisions of ITC-12, grouping of IT tools and resources that support and systematise the processes for operating and maintaining the assets covered by this Regulation	Rejected	This is clearly understood to be applicable to ITC-ICG 12 as it is the only point in the text where reference is made.
CONAIF	Regulation	Article 03	CONAIF advocates two changes to the wording.	Accepted	

			Firstly, as this is a minor change in terms of expanding the text, we consider it very positive to include the reference to ITC 11 on LPG packaging transfer and filling plants, especially as there is another ITC with a similar scope, for reasons of clarity for the actors involved. The second change concerns the sentence on means for firefighting and leak detection. While we share the spirit, we consider that introducing this sentence in the definition can be counterproductive and lead to requirements that are not technically achievable. In the case of fire extinguishing arrangements, these shall be dimensioned to the risk to be mitigated. 68. LPG storage area. In accordance with the provisions of ITC-11, space of the plant where the LPG storage tanks are located with working space for maintenance and inspections. In this area, leak detection systems and fire defence equipment should give early warning of the start of scenarios with the greatest consequences.		The text is changed accordingly: '68. LPG storage area: In accordance with the provisions of ITC-11, space of the plant where the LPG storage tanks are located with working space for maintenance and inspections.'
ENAGAS Transport	Regulation	Article 03	It is proposed to complete the definition as follows: 'Measuring stations: Means all equipment, piping and fittings, control instruments, valves, safety features, auxiliaries and enclosures installed for the purpose of quantifying physical and chemical quantities of gas (e.g. concentration of components).'	Accepted	The proposed amendment is included.
ENAGAS Transport	Regulation	Article 03	Having regard to the definition of 'Incident' in the European reference standards EN 1594, EN 12583 and EN 12186: 'Incident: Unexpected event which could lead to an emergency situation.' We suggest the following definition: 'Incident: Unexpected event or event that could lead to an emergency situation (damage, damage to people, property or the environment) or that affects	Accepted	The proposed amendment is included.

			the supply of fuel gases.'		
ENAGAS Transport	Regulation	Article 03	Add the following definitions: 'Incident pressure (IP): Is the pressure at which a safety device acts in the event of an incident in a system.' 'Maximum Incident Pressure (MIP): Is the maximum pressure that can be achieved in a gas system for a short period of time, limited by the safety devices.' Both are defined as follows in the reference standards: EN 1594, EN 12583 and EN 12186.	Accepted	The proposed amendment is included.
ENAGAS Transport	Regulation	Article 03	new definition Add the following definition: 'Design temperature: Temperature value used for design calculations.'	Rejected	It is not considered necessary to include this definition.
Natural gas Transportation	Regulation	Article 03	definition of an accident 'Reportable accident (in the area of distribution and use of gaseous fuels): An unforeseen and unforeseeable occurrence, related to a gaseous fuel, which has caused: - Physical injury or death; - or material damage. Excluded are those occurring at the premises of industrial customers. Also those where the gas has been the magnifying agent of the event, but not the root cause of the event. Personal injury should be understood as damage occurring in any person, excluding own or contracted personnel, in which case they are considered as accidents at work and do not fall under this definition. Deaths should be understood to mean deaths as a result of a gas accident, occurring immediately or within 30 days of the accident. Physical damage should be understood as damage to persons injured as a result of a gas accident.	Rejected	It is not considered appropriate to limit the reporting of accidents to be carried out in accordance with Article 28.

			have had to be hospitalised for at least one day (24), having spent the night in a health institution. Material damage should be understood as damage the value of which exceeds EUR 100.000 in the case of distribution and EUR 1.000 in the case of reception facilities.'		
Natural gas Transportation	Regulation	Article 03	Definition of infrastructure This definition seems to focus on networks, but does not seem to cover other types of installations that are not part of them, such as LNG plants, tanks (NG or LPG), etc. It would be appropriate to revise it and extend its scope. The following amendment is therefore proposed: "(...) partitioning stations, compressor stations, and other auxiliary systems, as well as LNG satellite plants or LPG storage facilities in fixed tanks)."	Partially accepted	The definition of infrastructure has been amended.
Natural gas Transportation	Regulation	Article 03	Definition of Maintenance It is proposed to amend the definition as follows: 'Maintenance: All operations designed to preserve installations or equipment in good condition and functioning so as to prevent their degradation and to maintain their operational capacity and safety over time.'	Accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	Article 03	Definitions of holder and user The establishment of these two figures raises doubts as to the implications of differentiating between them in terms of information limitations, compliance with the GDPR, etc. In most cases the holder will be the same as the user, but in which cases they will not be the same and how each will have to be proven to distinguish them. — Information limitations: Differentiating between operator and user can create confusion about who is entitled to receive information and make decisions about the installation. It is essential to clearly set out the responsibilities and rights of each figure to avoid	Partially accepted	Obligations are laid down for the user, such as reporting accidents or incidents that must be carried out by the user as a result of operations. This agent cannot be deleted as it is not always the same as the holder The text is revised, especially ITC-ICG 07 to clarify the regime for communications with the owner and user when the two do not coincide.

			conflicts and ensuring proper management of the facility. - Compliance with the General Data Protection Regulation: The distinction between the holder and the user involves the processing of personal data of both types, which must be carried out in accordance with the General Data Protection Regulation. It is necessary to ensure that all information, consent and data protection obligations for both parties are complied with, thus avoiding potential sanctions and guaranteeing the privacy of personal data. - Differentiation scenarios: Although in most cases the owner and the user will be the same person, there are situations where they will not be the same, such as in the case of leases or transfers of use. It is crucial to clearly define these scenarios and establish the mechanisms to prove the ownership and use of the facility, ensuring that both can be correctly identified and differentiated. - Obligation to inform who is the user of the facility at any given time: It should be established who has the obligation and through which mechanisms (in principle the supplier and the distributor should be) to report who is the user at any given time, informing them of any changes throughout the period of use of the installation. In addition to the above, this proposal has an economic impact, as it is necessary to develop IT systems to differentiate between the two types and the actions carried out on them: "Development of Control Systems and Tools" The impact could be thousands of euros. As the assessment of this impact involves working days to analyse the implications of each figure on all systems and their interaction, for each consumer activity, it is not possible to include this assessment for the time being.		
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			For all these reasons, we consider that including this new distinction has more costs and complications than benefits, and we therefore propose not to include it.		
Natural gas Transportation	Regulation	Article 03	Definition of simultaneous useful potential for individual installation This definition refers to the simultaneity factor of the installation. In this regard, it should be noted that although UNE 60670-4: 2023 provides for the possibility of considering a simultaneity factor (coefficient) in an individual installation, where it considers this to be the default factor when calculating the design power of the internal connection or the common installation. Therefore, if a definition relating to the simultaneous useful power of an individual installation is included a fortiori, a definition relating to the simultaneous power of an indoor connection or a common installation should be included.	Partially accepted	The definition has been amended.
Natural gas Transportation	Regulation	Article 03	Article 3 Regulation. Definition 54 “Design pressure” “This is the pressure at which an infrastructure is designed (piping, equipment, valve). The design pressure shall be equal to or greater than the maximum operating pressure.’ Since it is strange to refer to equipment or a valve as infrastructure, it is proposed to amend the definition as follows: ‘Pressure at which an infrastructure or part of an infrastructure is designed (piping, equipment, valve, etc.). The design pressure shall be equal to or greater than the maximum operating pressure.’	Accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	Article 03	Article 3 Regulation. Definition 67 ‘Storage area for filled and empty packaging’ It is proposed to extend the term for May clarity: “Storage area for filled and empty LPG containers”	Accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	Article 03	Article 3 Regulation. Definition 68 “LPG storage area” ‘LPG storage area. Space in the plant where LPG storage tanks are located with working space for maintenance and	Accepted	The proposed amendment is included.

			inspections. In this area, leak detection systems and fire defence equipment should give early warning of the start of scenarios with the greatest consequences.” It is proposed to delete the second sentence of the definition as it is not a definition but a requirement.		
Natural gas Transportation	Regulation	Article 03	Article 3 Regulation. Definition 69 “LPG container filling area” ‘LPG container filling area: Installation for filling the packaging, comprising all the associated phases and operations, from de-palletising, pre-checking, filling, post-checking and final palletising.’ Certain editorial corrections are proposed, to read as follows: ‘LPG container filling area: An installation for the filling of LPG containers, comprising all associated phases and operations, from palletising to pre-checking, filling, post-checking and final palletising.’	Accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	Article 03	Article 3 Regulation. Definitions (new definitions suggested) The term ‘injection line’ referred to in ITC-ICG 01 is understood to correspond to the term ‘direct line’ (Article 78 LSH) intended for the injection of renewable gas. In that sense, it would be more appropriate to use the term “direct injection line”. In addition, both for this term and for the term ‘isolated pipeline’, to which ITC-ICG 01 also refers, it is necessary to include in the regulation its correspondence with the respective articles of the LSH. In this regard, it is proposed to include the following definitions in the Regulation: - ‘XX. Direct injection line: Gas pipeline referred to in Article 78 of Law 34/1998 of 7 October. - XX. Isolated channelling: Channelling referred to in the thirty-third provision of Law 34/1998 of 7 October.’	Accepted	The proposed amendment is included.

Natural gas Transportation	Regulation	Article 03	Article 3 Regulation. Definitions (new definition suggested) It is proposed to add the following definition: 'XX. Special installation: A gas installation covered by a ITC under these regulations of use for a limited (temporary) period in order to maintain continuity of supply to an existing distribution network or reception facility.'	Rejected	The term 'special installation' has been changed to 'temporary', so it is not considered appropriate to include this definition.
AENOR TRUSTS	Regulation	Article 04	To correct the imprecision of the current wording of the second subparagraph when determining whether materials, equipment and appliances not affected by European or national provisions should have certification and quality mark of conformity to standards. In the absence of such provisions, they must comply with the requirements set out in this Regulation and in the JTIs implementing it, and compliance with the requirements laid down must be justified. The justification shall be provided by means of the corresponding certificate and mark of conformity to standards, which are granted by the control bodies referred to in Chapter IV of Royal Decree 2200/1995 of 28 December 2007.	Partially accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	Article 04	Article 4 Regulation. Gas materials, equipment and appliances. 'The gas materials, equipment and appliances used in the installations covered by this regulation must comply with European and, where appropriate, national provisions which do not contradict the above and which are applicable. In the absence of such provisions, they must comply with the requirements set out in this Regulation and in the JTIs implementing it. For this purpose, materials, equipment and apparatus covered by certificates and conformity marks shall be deemed to comply with the standards granted by the inspection bodies referred to in Chapter IV of Royal Decree 2200/1995 of 28 December 2007. (...)' In this respect, the current Distribution Technical Regulation	Accepted	The text is amended

			and the use of gaseous fuels establishes: '1. The gas materials, equipment and appliances used in the installations covered by this Regulation must comply with the provisions applying European and, where appropriate, national directives which do not contradict the above and which are applicable. 2. In the absence of such provisions: (a) They must comply with the requirements set out in this Regulation and in the ITCs implementing it. For this purpose, materials, equipment and equipment covered by certificates and conformity marks shall be deemed to comply with standards, which are awarded by the certification bodies referred to in Chapter III of Royal Decree 2200/1995 of 28 December 2007. (...)' This means that the proposal for a regulation replaces the presumption of conformity that certificates and marks of conformity can offer with standards issued by certification bodies by which they offer certificates and marks of conformity with standards issued by control bodies. It is questionable why this modification and the benefit that could be observed in this respect. We understand that the current scheme supported by the certification bodies has worked well and should continue to be maintained. On the other hand, it is also questionable what happens to equipment that is not covered by certificates and conformity marks. If both certificates and non-certificates are also to be accepted, what is the practical meaning of the above text?		
ENAGAS Transport	Regulation	Article 07	This requirement may lead to duplication of procedures in the case of installations whose competent body is the State (MINTERD). Such installations should therefore be exempted from this requirement. We suggest the following wording: 'Where this occurs, and in addition to the procedure laid down in the aforementioned law and its legislation on	Partially accepted	The proposed amendment is included.

			development, the owner must submit to the Autonomous Community, together with the application for prior administrative authorisation, the technical documentation indicated in each of the JTIs. This shall not apply to installations for which the State has the administrative authorisation.'		
CONAIF	Regulation	Article 09	We believe that it is necessary and appropriate to point out who is responsible for carrying out the checks on the correct execution of an installation, that for the installations included in the scope of the installation companies' activities, it will be an undertaking of a sufficient category in accordance with the provisions of ITC 09 and, in the case of installations not included in the implementation capacity of the gas installation companies, the agent or undertaking that carries them out. We understand that, in another case, the figure of the installation company is diluted by using an impersonal form where it is not identified which agent performs the tests. Article 9. Tests and inspections prior to the commissioning of the facilities. On completion of the installation, the installation company or agent that has carried out the installation for those installations outside the scope of the gas installation companies in accordance with the provisions of ITC 09 (ITC-11 and ITC-12) must verify the correct implementation and safe operation of the installation. Where appropriate, the tests specified in the relevant JTI must be carried out.	Partially accepted	The proposed amendment is included.
REPSOL	Regulation	Article 11	With the proposed amendment to the draft Royal Decree (Article 11), it will be necessary to submit the documentation to the Administration prior to the request for gas supply, extending the deadline for commissioning the installations and impacting the service. In addition, Article 12 provides for provisional supplies for a period of 5 months for the performance of the tests, which are necessary to issue the certificates.	Rejected	The proposal is rejected. It is understood that the submission of documentation to the administration prior to supply is relevant in order to avoid unreported filling or supply to installations.

			one part is conditional on supply and the other part is allowed for a period of 5 months. In addition, there are documents such as the certificate of prior tests that form part of the installation's documentation and for which gas tests need to be carried out and therefore need to be supplied beforehand. Finally, with the proposed change, many files of installations that are never supplied and put into service will be registered with the administration, undermining the control of installations precisely intended by the proposed amendment. We propose to revert to the previous wording that allowed the documentation to be submitted within 15 or 30 days after the gas supply. Elimination: Article 11. Communication to the Administration. In order for the operator of the installation to be able to request the supply of gas, proof must be provided to the company distributing or retailing LPG or equivalent that the corresponding documentation has been submitted to the Administration, or a self-declaration where established, in accordance with the terms of this Article, with the exception of the cases referred to in the relevant ITCs.		
CONAIF	Regulation	Article 11	CONAIF considers that it is appropriate to distinguish between two types of installation, those which store fuel and those which feed from networks, and we understand that, since the Administration does not take a decision on the validity or otherwise of an installation, there may be a lapse of 10 working days between commissioning and communication to the Administration in general. The aim is to prevent installations with storage capacity from becoming available for filling after long stops because they have already submitted documentation.	Rejected	The proposal is rejected. It is understood that the submission of documentation to the administration prior to supply is relevant in order to avoid unreported filling or supply to installations.

			As a general rule, except as provided for in each ITC, the operator of the installation must provide the company that distributes, retails LPG or has an equivalent status with proof of submission of the corresponding documentation to the Administration, or a self-declaration where established. The documentation shall be sent to the competent body of the Autonomous Community no later than 10 working days after commissioning. In order for the operator of the installation to be able to request the supply of gas, proof must be provided to the company distributing, retailing LPG or equivalent that it has submitted the relevant documentation to the Administration, or a self-declaration where established, in accordance with the terms of this Article, except in the cases referred to in the relevant ITCs.		
CONAIF	Regulation	Article 11	The wording may give rise to confusion and error and may give rise to an interpretation in an unintended sense. CONAIF is keen to introduce the above clarification. If the relevant ITC requires an administrative procedure, the operator of the installation shall be responsible for submitting to the competent body of the Autonomous Community the documentation established in each ITC or in the regulatory provisions of the Autonomous Communities and, if not defined, the following: - Identification of the installation indicating the operator of the installation, its location, type and provisional date of commissioning. - Technical documentation - Installation certificate. - Performance test certificate. - Works management certificate, if applicable. - Certificate from the inspection body, at its premises	Rejected	The current text is considered sufficiently clear.

CNI	Regulation	Article 12	It is proposed to keep the wording similar to that of the current regulation, in order to avoid that a delay in processing (remember the pandemic) could force a service or activity to stop. 'Following the tests, and if the results of the tests are favourable, the distribution or marketing company may, where appropriate, maintain the provisional supply pending the processing of the plant's documentation.'	Rejected	It is considered necessary to establish a maximum period.
REPSOL	Regulation	Article 12	Contradiction with the provisions of Article 11. Elimination: Article 12. Commissioning. The distribution or marketing company, where appropriate, may maintain the interim supply pending processing of the plant's documentation and always for a period of less than five months.	Partially accepted	The time limit of five months has been deleted as it is understood that there is no need for a supply for evidence and that, if requested, it should be kept to the minimum possible during processing.
Natural gas Transportation	Regulation	Article 12	Article 12 Regulation. Commissioning. Second paragraph: 'Where the actions described in those articles are necessary and certified, the installation undertaking may, with the knowledge and authorisation of the operator of the installation, ask the distribution or marketing undertaking, where appropriate, for a provisional gas supply in order to carry out operational tests on the installation or the appliances. Responsibility for installation and testing shall lie with the installation company. Following the tests, and if the result of the tests is favourable, the distribution or marketing company, as the case may be, may maintain the provisional supply as long as the plant documentation is processed and always for a period of less than five months.' The draft RD includes, for the first time, a maximum period for provisional supply. However, it is unclear when it comes to defining who is responsible for this function, as it indicates 'the distribution or marketing company, if any...'. We believe that this function should be performed by the marketing company. On the other hand, we consider that the period of five months	Partially accepted	The time limit of five months has been deleted as it is understood that there is no need for a supply for evidence and that, if requested, it should be kept to the minimum possible during processing.

			it is too long for what is supposed to be a period of performance testing of the installation/equipment. This makes it necessary to have a parallel control over a very long period, and there are currently no tools controlling these deadlines that are variable and dependent on each applicant. In addition, after the end of the gas test period, there is a lack of procedure as to how the temporary supply is to be discontinued. - Excessive testing period: The period of five months for the provisional supply of gas is too long for the performance testing. Operating tests usually take much less time, and extending this period can lead to complications in the management and control of installations and compromise their safety. - Control of time limits: There are currently no adequate tools to control interim gas supply times, which are variable and dependent on each applicant. This may lead to a lack of adequate follow-up and possible non-compliance with the set deadlines. - Procedure for cessation of supply: After the end of the interim supply period, it is not specified how the supply should be discontinued. It is necessary to establish a clear and detailed procedure to ensure that the cessation of supply takes place in an orderly manner and without affecting the operation of the installations. We call for the proposed text to be amended in order to reduce the interim gas supply period to a more reasonable timeframe and in line with the actual needs of the performance tests. In addition, we request that a clear procedure be established for the cessation of provisional supply after the end of the testing period.		
NEDGIA	Regulation	Article 12	In light of the above, we are asked the following question: Does the commissioning of a project require the	Rejected	The conditions and requirements of the current Regulation are maintained

			responsible person proves that he/she has submitted all the documentation to the Administration? On the other hand, we note an inconsistency because Article 12 provides that the distribution company (the person responsible for putting into service) must receive and hold a copy of all the technical documentation referred to in Articles 10 and 11. However, part of the documentation referred to in Article 11 is a certificate of performance tests and the certificate of the inspection body, which are two documents issued after putting into service.		
REPSOL	Regulation	Article 14	The purpose of the provision is to ensure that LPG customers are aware of safety measures in the use of the product in installations other than those of the supplier. This information should be provided at the start of the supply and should be accessible at all times. To this end, and in line with the digitalisation effort of the administration and society in general, it is proposed to open up the possibility for this information to be provided, on a continuous basis, by digital means. It is important to bear in mind that the LPG sale business is a digitalised business, in the sense that it is achieved by Law 56/2007 on measures to promote the information society, which already requires that contracting and the invoicing history be accessible digitally. In this regard, it boosts the digital profile of LPG customers who, since 2007, have been familiar with digitalisation. The proposed amendment allows: i. Information is always accessible. ii. The information is accessible to a customer who, since 2007, is already digital. iii. Be in line with the objective of boosting digitalisation and reducing the impact on the environment. iv. The customer is informed from the start of the supply. This is without prejudice to the fact that LPG containers already include	Partially accepted	The text is amended

			information on the product safety of the supplier printed on the packaging. The removal of the two-year period allows customers to have continuous and up-to-date access to user recommendations and security measures, which are more operational than a two-year reminder that the customer may have lost or thrown away when they need access to such advice. This is particularly important in an environment where technologies and regulations can change rapidly by ensuring that information reaches more efficiently and effectively. Finally, it contributes to increased awareness and thus to a reduction of accidents and misuse of gas installations. Customers can receive the information at the time they need it, without having to wait for a biennial cycle. In addition, this amendment is in line with the reduction of plastic waste in the guidelines of Royal Decree 1055/2022 of 27 December 2011 on packaging and packaging waste, the ultimate aim of which is to prevent or reduce its impact on the environment. The information discs that are currently included in the bottles are made of plastic, would otherwise not withstand their entire logistics cycle, and often end up being inappropriately discarded by the customers themselves. The marketing company shall provide its customers with the use recommendations and security measures for the use of its facilities in the supply contract. Those recommendations shall also be accessible, at all times, through digital channels of the trader and its customer services.		
GASIB	Regulation	Article 14	Nowadays, information technology has undergone major advances and also huge changes in the way customers seek access to the information they need. Based on the experience gathered we can provide that once the initial recommendations have been provided	Partially accepted	The text is amended

			in terms of use and safety measures for the use of its facilities, it is much more operational that these recommendations can be found on an ongoing basis at the disposal of customers. We propose the following wording for this paragraph: The marketing company shall provide its customers in writing with the recommendations for use and safety measures for the use of its premises whenever the customer so requests. These recommendations for use and security measures for the premises shall always be available to customers by publishing them in easily and immediately accessible electronic media. In the event of non-compliance, recommendations for use and safety measures for the use of their facilities shall be provided at least every two years and in writing.		
REPSOL	Regulation	Article 15	In line with the comment on Article 14, the reference in Article 15 to safety recommendations notified by the trader should be deleted or, in any case, it should be mentioned that it does not apply to natural gas traders. Proposed deletion: Users shall also comply with the safety recommendations communicated to them by the marketing company, the distribution company, the installation company and the manufacturer of the equipment, by means of the standards and recommendations issued to the holder, in accordance with Articles 4 and 14 of this Regulation.	Partially accepted	The text is amended
CONAIF	Regulation	Article 15	We understand from CONAIF that the Regulation should not mention that a manufacturer's SAT can act on the equipment. We believe that the Regulation must be fair to all operators in the sector and given that a technical support service provided by the manufacturer does not have to be a gas installation company, we consider it harmful to link the manufacturer's TPS to the performance of appliances. The	Rejected	The manufacturer's SAT is deemed to be capable of maintaining its equipment.

			Confederation argues that it is a multi-brand SAT that is a gas installation company that meets the qualification requirements for the equipment on which to act (i.e.: be a gas installer or a gas installer and have APMR) Article 15. Maintenance of installations and equipment. [...] For this purpose, it shall use the services of a gas installation company or a helpdesk of the appliance manufacturer, as appropriate.		
Government of Catalonia	Regulation	Article 16	Add paragraph with non-retroactivity of the rule as indicated in the comments column The regular inspections carried out by the CB will be carried out on the basis of the regulation or standard with which it was registered/legalised/communicated. In the case of reception facilities, this type of periodic inspection is carried out in accordance with Parts 12 and 13 of standard UNE 60670 in force and Part 5 of standard UNE 60620 in force.	Rejected	Is defined in Article 2.
Government of Catalonia	Regulation	Article 16	Error in the last paragraph of Article 16: it is not a third final provision but a third transitional provision. It should say: 'In all periodic inspections, in addition to the provisions of each ITC, account shall be taken of existing additional technical requirements issued under the third transitional provision of this Regulation.	Accepted	Correction of an error in the last paragraph of Article 16, referring to the third transitional provision.
Natural gas Networks	Regulation	Article 16	Article 16 Regulation. Regular inspection of installations. Beginning of the article: 'Installations covered by this Regulation shall be subject to regular monitoring to be defined in the relevant JTIs. Depending on the type of installation and the operator carrying out the periodic inspection, these may be: (a) Periodic inspections: · Where it is carried out on reception facilities (individual or common) supplied from distribution systems (natural gas, hydrogen or LPG (...))" For a correct specification and which is not capable of	Rejected	The proposal is rejected as it is understood that there is no difficulty in interpreting the current wording.

			interpretation is requested to amend the relevant text as follows: 'Installations covered by this Regulation shall be subject to regular monitoring to be defined in the relevant JTIs. Depending on the type of installation and the operator carrying out the periodic inspection, these may be: (a) Periodic inspections: · Where it is carried out on reception facilities (individual or joint) supplied from infrastructure of undertakings distributing piped gas (natural gas, hydrogen or LPG (...))		
FIDEGAS	Regulation	Article 16 (a)	enlargement "... from distribution systems (natural gas, hydrogen or LPG)". It is suggested to extend to a broader real case: "... from distribution systems (natural gas, hydrogen, LPG or mixture between them)".	Accepted	The proposed amendment is included.
PRIMAGAS	Regulation	Article 17	COMMENTS: There are defects that can be repaired by the customer himself, such as the ventilation of the premises or the change of the flexible tube, and should therefore be included in the wording. DRAFTING PROPOSAL: Similarly, the operator or user of the installation, as the case may be, is responsible for correcting the defects and anomalies detected in the installations and in the gas appliances during the periodic inspections, using for that purpose the services of a gas installation company, by staff of the distribution or supply companies or by a technical assistance service of the manufacturer, as the case may be, or even of the customer itself in the cases provided for by law.	Rejected	Article 17 does not prohibit subcontracting of the proposed works, which must in any case be certified by the authorised installation company or technical assistance service, which are ultimately responsible for resolving the defect.
CONAIF	Regulation	Article 17	In addition, the operator or user of the installation, as the case may be, is responsible for correcting defects and anomalies detected in installations and gas appliances during periodic inspections, using the services of an undertaking.	Rejected Not an allegation	

			gas installer or manufacturer's helpdesk, as appropriate.		
CONAIF	Regulation	Article 17	In some cases, anomalies are limited to ventilation on the façade or on a glass pane, where the installation company does not actually carry out the work. This possibility should be envisaged. All anomalies that can be rectified by the user through the intervention of a company that is not a gas installer limited to ventilations of gas installations (glassware or masonry companies) may be rectified by those companies. Once this has been rectified, the operator will have a gas installation company that certifies that the solution adopted is correct and complies with the regulatory provisions.	Rejected	Article 17 does not prohibit subcontracting of the proposed works, which must, however, be certified by the authorised installation company or technical assistance service, which are ultimately responsible for resolving the defect.
PRIMAGAS	Regulation	Article 19	In any case, a typology and classification of defects should be clearly established at sectoral level, presumably in a series of GAS-XX specific to each ITC-ICG. In addition, recidivism in a minor defect should not escalate or change the consideration of the defect to serious. It is not a standard criterion in other industrial safety regulations and seems excessive, also impacting the continuity of supply of the facility if it is not corrected. Moreover, this check is difficult to set up and follow up because the customer may not keep the inspection certificate 5 years later and the inspection agent may be from a different company than the one that carried out the previous check. Finally, we propose that the deadline for correcting serious defects should be 6 months. There are defects that are difficult to rectify or require a long period of rectification, such as administrative or documentary defects that do not even depend on the user.	Partially accepted	The text is amended

CONAIF	Regulation	Article 19	The Regulation applies to a multitude of installations, this should not be defined in the articles but in each JTI. In addition, it should be borne in mind that technical criteria already exist specifically for reception facilities fed to more than 5 bars (UNE 60620) and less than 5 bars (UNE 60670), which already determine whether a defect is primary or secondary and as appropriate. We understand that this has to be removed from the articles and applied in the ITCs where it is considered that it is not defined. However, one understands the idea of homogenisation, that is to say, although the purpose is positive, it may pose a risk of interpretation and its use should therefore not be general but restricted. Deletion Article 19 (or at least part)	Rejected	We consider the current wording to be appropriate.
GASIB	Regulation	Article 19	We understand that it is not standard practice in other regulations to establish that the repetition of a minor defect escalates to a serious defect if it does not intrinsically affect the safety of the installation. The definition of the typology and classification of defects should be set out exhaustively in the relevant rules of each JTI, thus discriminating between defects affecting the safety of the installation and minor administrative defects which should not end up escalating to a higher category. This is not a standard criterion in other industrial safety regulations and seems excessive, also impacting the continuity of supply of the facility if it is not corrected. Finally, we propose that the deadline for correcting serious defects should be 6 months. There are defects that are difficult to rectify or require a long period of rectification, such as administrative or documentary defects that do not even depend on the user.	Partially accepted	The text is amended
Natural gas Transportation	Regulation	Article 19	This Article establishes the classification of defects in installations in minor, serious and very serious or critical defects. However, it is not clear how it fits with the	Rejected	It is considered to apply regardless of the official carrying out the inspection.

			defectology that has been applied in the sector for certain areas, such as reception facilities (UNE 60620 and UNE 60670), which distinguishes defects such as primary or secondary anomalies. It is understood that this Article (in the same way as Articles 18 and 20) refers only to inspections carried out by a control body and that it does not apply to those referred to in ITC-ICG07, but should be specified in the title.		
Natural gas Transportation	Regulation	Article 19	The headings relating to the various types of results recorded in the inspections include the following: “(b) Conditioned: Where at least one serious defect or minor defect resulting from another previous inspection is detected and has not been corrected. In this case, the period within which the correction must be verified, which may not exceed 2 months, shall be stated.” Considering that this Article concerns the periodic inspections to be carried out by the control bodies, we request that the deadline set for remedying defects be longer than 2 months.	Rejected	We consider the current wording to be appropriate.
Regional Government of Valencia	Regulation	Article 19; 20	Articles 19 and 20 on OCH inspection procedures lay down criteria different from those established by Valencian Decree 125/2012: deadlines for remedying serious deficiencies of 2 months, immediate communication of results, deactivation in case of serious deficiencies not remedied within the deadline, even if there is no serious and imminent risk to humans, animals or things. We are of the opinion that the criteria of the aforementioned Decree 125/2012 should be maintained.	Rejected	We consider the current wording to be appropriate.
FEDAOC	Regulation	Article 20	We do not see any reason why, when the outcome of the inspection is favourable, communication should be carried out immediately. This makes sense if it is negative, but not favourable. In addition, it is stated that the control body is responsible for checking that the deadline for	Partially accepted	The immediate notification of favourable inspections has been changed to a maximum period of 15 days and the text has been amended.

			carry out the second inspection visit to verify the correction of serious defects. There are occasions when the customer does not allow us to access its premises to carry out the second visits, or when the customer/maintainer confirms us for the second visits are already outside the deadline for correction. It is also stated that the CB cannot communicate the negative report if the defects are not corrected in due time until the installation or affected part is left out of service, but the CB does not leave the installation out of service, so it may happen that the client/maintainer does not do so. We propose that the notification of the negative report to the administration should not be conditional on the facility being left out of service.		
Regional Government of Extremadura	Regulation	Article 20 (a)	The requirement to immediately notify an inspection with a favourable result could be seen as a clerical error. It should also be indicated, where appropriate, whether the OCAs are obliged to submit inspections with a favourable opinion.	Accepted	The immediate notification of favourable inspections has been changed to a maximum period of 15 days.
PRIMAGAS	Regulation	Article 22	In relation to persons or entities authorised to operate in facilities, we consider that the staff of gas distribution companies should be included.	Accepted	A provision on the technical staff of distribution companies has been included.
VITOGAS	Regulation	Article 22	It is requested that the persons authorised to operate gas installations and appliances include the staff determined by the LPG wholesale operator, provided that they have the necessary training and professional experience to operate in LPG storage tank facilities/centres, i.e. assembly, dismantling, inertisation and breakdown of these storage tanks/centres. Section 3.2 ICG 03: It states that 'The installation shall be carried out by a qualified gas installation company, except in the case of installations owned by LPG wholesale operators, which may also be	Partially accepted	A provision has been included relating to the technical staff of the companies involved in the retail sale of LPG in bulk by pipeline.

			carried out by these companies' is requested to be specified by 'The installation shall be carried out by a gas installation company authorised to do so, except in those owned by LPG wholesale operators, which may also be carried out by the staff authorised to do so as indicated in Article 22.'		
GASIB	Regulation	Article 22	In the relationship described, we believe it is necessary to include the definition of one more figure: — Own staff of LPG operators. Personnel qualified to repair or maintain gas installations in an industrial environment and qualified as a gas installer, category A.	Rejected	It is considered that they are already included in paragraph (b).
Regional Government of Extremadura	Regulation	Article 24	The opinion and acceptance of the equivalent security measures and techniques are left to the discretion of the competent body for subsequent express authorisation of the exceptional nature. The involvement of accredited bodies or control bodies specialised in this regulatory discipline should be made mandatory in order to support the subsequent authorisation of the competent body. An example is provided in the now repealed Regulation on Fire in Industrial Establishments in relation to exceptional authorisations.	Partially accepted	The text is amended
PRIMAGAS	Regulation	Article 25	COMMENTS: There is an inconsistency between the heading 'Special' and the wording of the article 'Temporary'. It would be useful to define what is meant by special installation. Special facilities are those carried out in accordance with Article 23 (b). Compliance with requirements. This would therefore be a particular type of facility for which we understand the need for the administration to be informed in advance. Very different from temporary or temporary installations, the vast majority of which are carried out as a result of the breakdown of existing installations and have to be carried out quickly so as not to affect supply and customer activity.	Partially accepted	The text has been amended to make it clearer that it applies to temporary installations. In addition, requirements have been derogated from and qualified for those installed for reasons of urgency.

			a period of 15 days would compromise and render useless all efforts by the installer or maintainer to avoid impacting the customer. Since 2007, the sector has been operating without the need for prior communication at these provisional facilities, without our being aware that the installation requirements have been breached or that safety or operational problems have arisen. We propose to delete this 15-day period or to limit it to special installations only. All special installations which, due to their characteristics, fall within the scope of this Regulation, must be notified to the competent body of the Autonomous Community at least 15 days before they are put into service.		
GASIB	Regulation	Article 25	The current wording of this Article refers to temporary installations, which is not in line with its title. Article 25. Special and temporary installations. (a) Temporary facilities All temporary installations which, because of their characteristics, fall within the scope of this Regulation must be notified to the competent body of the Autonomous Community before they are put into service. (a) Special facilities Special facilities are defined as those that do not supply a conventional gas recipient or those whose design needs do not comply with the standard must be notified to the competent body of the Autonomous Community at least 15 days before they are put into service. Examples: LPG liquid-phase supply installation for LPG test bench engines, supply to non-fixed tanks for use in recreational vehicles In both cases, a draft or memorandum signed by each qualified technical person or undertaking must be submitted.	Partially accepted	The text has been amended to make it clearer that it applies to temporary installations. In addition, requirements have been derogated from and qualified for those installed for reasons of urgency.

			installer, as appropriate, with justification of the safety measures adopted, giving precedence to regulatory compliance with other regulations, UNE, UNE-EN, ISO applicable to it, whether in parts or functional modules of the installation. The competent body of the Autonomous Community shall issue an acknowledgement of receipt of the communication of this facility, which may require any additional information it deems necessary, authorising the person concerned to put it into service, without this implying technical compliance on the part of the administration.		
ENAGAS Transport	Regulation	Article 25	This requirement may lead to duplication of procedures in the case of installations whose competent body is the State (MINTERD). Such installations should therefore be exempted from this requirement. We suggest the following wording: ‘All temporary installations which, due to their characteristics, fall within the scope of this Regulation, must be notified to the competent body of the Autonomous Community or the State, as appropriate, at least 15 days before they are put into service.’	Accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	Article 25	Article 25 Regulation. Special installations. First indent: ‘All temporary installations which, because of their characteristics, fall within the scope of this Regulation must be notified to the competent body of the Autonomous Community at least 15 days before they are put into service.’ It is proposed that the following paragraph be added immediately after this paragraph: “In the case of distribution systems powered by LNG or LPG storage facilities, where an emergency occurs that interrupts supply and requires service replenishment as soon as possible, the request to:	Partially accepted	The text has been amended to allow temporary installations for reasons of urgency with immediate communication to the competent body.

			the temporary installation shall be notified, together with the emergency report, 24 hours before putting into service.'		
Natural gas Transportation	Regulation	Article 25	It is proposed to add the following paragraph at the end of the Article: 'The temporary installation may serve up to a maximum of 90 calendar days, after which it must cease its service and be dismantled from the site.'	Partially accepted	The text has been amended to set a maximum deadline of 60 days for temporary installations, with emergency installations set to take as short a time as possible.
NEDGIA	Regulation	Article 25	It is proposed that the following paragraph be added immediately after this paragraph: 'It will not be necessary to submit such a draft or report if mobile equipment is used that has previously been registered in any Autonomous Community. In this case, the file or installation number must be provided and the temporary installation test certificate attached.'	Rejected	It is understood that, for provisional warehouses, provisions to that effect are included in ITC-ICG 03 and 04, which is not considered appropriate for the other installations.
CONAIF	Regulation	Article 26	The Confederation understands the search for simplicity in order to update the regulation in the future, however, each regulation must have an unambiguous reference. It should also be borne in mind that introducing this reference system adds additional complexity to the daily management of the regulation. General comment: The alphanumeric reference to standards should be unambiguous.	Rejected	It is understood that the new model will make it easier to read and adapt the text to regulatory changes.
REPSOL	Regulation	Article 28	This Article provides some more detail with regard to the current paragraph on communications to the Administration in the event of accidents or incidents 'affecting the provision of the fuel gas supply service'. In order to prevent such an open statement from introducing disproportionate administrative burdens due to minor incidents (e.g. in the event of any incident involving a drop, minor breakages due to third-party services, etc.), it is considered that it might be appropriate to narrow down its definition by setting some reference threshold (e.g. identifying a notification threshold based on a minimum time of non-supply and a certain minimum number of customers).	Partially accepted	The scope of Article 28 is clarified.

CONAIF	Regulation	Article 28	We understand that a report within a maximum of 7 days is somewhat disproportionate and disproportionate. Due to the involvement of multiple actors, more time is needed to analyse and identify possible causes. Once the incident has been notified, the identified agents, or the user himself in the cases indicated, must submit a report on the accident within a maximum of 90 days from the date on which it occurred, to the competent body of the Autonomous Community, attaching a copy of the relevant information on the installation in their possession (installation certificates, certificates of inspection or periodic review, reports or maintenance contracts, etc.).	Rejected	Deadlines are maintained compared to the Regulation currently in force.
NEDGIA	Regulation	Article 28	The following amendments are proposed: 'Article 28 of the Regulation. Action in response to reportable accidents and incidents. 'In the event of an accident reportable as defined in Article 3 or an incident affecting the provision of the fuel gas supply service, the person using the installation shall inform the agents identified below, depending on the type of installation. (...) These agents or the user himself or herself, in the cases indicated, must notify the incident as soon as possible and no later than 24 hours to the competent body of the Autonomous Community, identifying the undertaking with which he or she has concluded a maintenance contract in those cases where it is mandatory in accordance with the provisions of the ITCs of this Regulation. Once the incident has been notified of the accident, the identified agents, or the user himself in the cases indicated, must submit a report on the accident within a maximum of 7 days of the date on which it occurred, to the competent body of the	Partially accepted	The environmental impact of the reporting requirements has been removed.

			autonomous Community, enclosing a copy of the relevant information held by the installation (installation certificates, certificates of inspection or periodic review, reports or maintenance contracts, etc.). (...)” On the other hand, we request that the environmental impact be excluded from the content of the accident/incident report, given that it falls outside the remit of the distribution company.		
REPSOL	Regulation	Article 29	The intention is to describe in Article 29 the establishments that must have an integrated self-protection plan. The wording includes ‘at least’, leaving the paragraph open to possible interpretation. In order to avoid this, we request the deletion of the ‘at least’, moving to a detailed description of the situations in which the Self-Protection Plan must be available. Delete ‘at least’	Accepted	The proposed amendment is included.
CONAIF	Regulation	Article 29	CONAIF believes that the current wording will impose a huge administrative and economic burden on businesses. The self-protection plan should be a rational element that cannot be extended to any installation storing combustible gases, but should be limited to the largest and most risky installations. Article 29. Self-protection plan. 1. Establishments containing one or more storage facilities for the fuel gases covered by this Regulation must have an integrated self-protection plan at least in the following cases:	Rejected	It is rejected on the grounds that the Self-Protection Plan is an important element in ensuring the safety of the installations included in the article.
Liquefied Gas Association	Regulation	Article 29	The intention is to describe in Article 29 the establishments that must have an integrated self-protection plan. The wording includes ‘at least’, leaving the paragraph open to possible interpretation. To avoid this, we would ask for the deletion of the ‘at least’, moving to a detailed description of the situations in which a self-protection plan must be available. PROPOSAL:	Rejected	It is not limited if there are installations that do not fall within the established cases that want to have a self-protection plan.

			1. Establishments containing one or more storage facilities for the fuel gases covered by this Regulation must have an integrated self-protection plan at least in the following cases:		
Community of Madrid – Hydrocarbons and IT	Regulation	Article 30	Should it be stated that the period of validity of that information will be expressly stated in the document issued by the owner of the pipeline?	Accepted	The text is amended
CNI	Regulation	Article 30	In our view, a deadline should be set for providing this information. Article 30. Prevention of medical conditions by third parties. 'Upon receipt of the request, within one month, the owners of these pipelines shall provide the entity or applicant with information on the location of their facilities, as well as the obligations and rules to be respected in their immediate vicinity and the means of communication with the emergency service. The information supplied shall be valid for a period specified therein.'	Partially accepted	The text is amended
Natural gas Transportation	Regulation	Article 30	Article 30 Regulation. Prevention of medical conditions by third parties. First two paragraphs: The following amendment is proposed: 'Where installations for the supply of fuel gases by pipeline exist in a municipality, any entity or person wishing to carry out works on the public highway shall communicate its intentions and request information from the undertakings distributing and transporting piped gas or the person who owns those pipelines sufficiently in advance of the start of the works. The competent authority shall not grant the corresponding works permit without the applicant providing justification that it has collected the information referred to in this Article. The request for information shall indicate the details of the	Partially accepted	The text has been amended to include the documentation to be provided in the request for information.

			location shall be processed in writing or by the established telematic channels, providing the following data: • Reason for the request. • Company, body or person requesting it and the necessary contact details (address, e-mail, telephone, fax, etc.) of the applicant. • Scheduled start and end date of work. • Detailed drawings of the work areas, excavation depth and width of the work to be carried out. Upon receipt of the request, the owners of these pipelines shall provide the entity or applicant with the information on the location of their facilities, the supervision required by the holder if necessary and to be paid for by the third party, as well as the obligations and rules to be respected in their vicinity and the means of communication with the emergency service. These constraints, as well as the drawings requested, must be present on the applicant's site. The information supplied shall be valid for a period specified therein.'		
Natural gas Transportation	Regulation	Article 30	It is proposed to add the following text at the end of the Article: 'In the event of damage to the premises by this third party, the person causing the damage shall be liable to pay compensation to the company. The following items shall be taken into account: · Materials, municipal permits and internal and external labour, associated with civil and mechanical work for repair. · Lost gas: Equivalent kWh of lost gas shall be recorded according to the gas sector methodology. · Posting: The number of hours used for the repair and the hours of the vehicles used shall be recorded. · Expert, notary or court fees where applicable. · Loss of profit: Depending on the hours of supply disruption and the number of customers affected. · Other damage from third parties in connection with the event.	Rejected	Is outside the scope of this draft RD

			The competent body of the Autonomous Community shall be informed of the damage so that it can take appropriate measures in the event of repeated infringements.'		
Community of Madrid – Hydrocarbons and IT	Regulation	Chapter II	Amend title by Chapter II. Design, implementation and commissioning of installations	Accepted	The proposed amendment is included.
Natural gas Transportation	Regulation	General	Some of the new measures developed in the draft Royal Decree will entail additional costs for customers and in certain cases even suspension of supply, which could condition their availability of gas supply. This may be particularly relevant for vulnerable customers. An example is the remedying of certain anomalies, where these do not pose a security risk but do lead to a suspension of supply.	Partially accepted	This is not an allegation to any specific part of the draft Royal Decree. However, the comment made has been assessed.

ANNEX III

Second hearing and public information

The entities that replied to the second public hearing are listed below:

N	PERSON/BODY
1	BJ ATLANTY
2	BEQUINOR
3	CEEES
4	EXOLUM
5	FHARAGON
6	GASNAM
7	C. Madrid – Hydrocarbons and IT
8	HVR
9	SHYNE
10	AGL
11	GASIB
12	CONAIF
13	DISA
14	NEDGIA
15	REPSOL
16	SEDIGAS
17	PRIMAGAS
18	CALVERA HYDROGEN
19	FEDLPG
20	CNI
21	C. Madrid – DG PEI
22	ENAGES
23	Endesa

24	ENI
25	FEDAOC
26	UNITES

The following table provides a summary list of the arguments received during the second public hearing and information procedure, including the section of the Royal Decree to which they refer, the entity (or individual) issuing them and the corresponding valuation. The following codes are used to perform the assessment: **Accepted, Partially Accepted or Rejected.**

In the case of submissions sent several times by several entities and those with proposals on the same subject, in order to facilitate the drafting of the document and its reading, these are shown only **once in the table**. In general, **they are associated with the entity that provided the most content or information**, trying to maintain, where possible, the entity that sent them chronologically first. However, **the valuation included in the table applicable to all of them**.

Furthermore, it should be noted that the references to numbers of articles, paragraphs or tables appearing here correspond to the order contained in the draft Royal Decree at the time of the hearing, which may subsequently have changed in its subsequent versions as a result of the amendments made during the procedure.

Entity	Paragraph	Sub-section	Drafting proposal/comments received	STATE	Answer
1	CEEEES	3.1	Justification: In relation to the following text: For the design of service stations supplying hydrogen meeting the following requirements, the internal distances of the installation set out in Annex I to this ITC shall at least be complied with: a) Storage capacity greater than 141,6 Nm³ (12.74 kg). b) Have piping systems with internal diameters up to 3.' c) Have a maximum pressure in the storage or distribution system of up to 1 034.2 bar. Compliance with AFIR requires supply at 700 bar and a capacity of 1 MT/day, so virtually all service stations will meet these conditions. It should be considered that the hydrogen supply facility will have to be accommodated at an existing service station, usually with an additional compact module. We propose opting for an RTA analysis or compliance with a distance table. Proposal: The following options may be chosen without distinction: - Design and definition of internal distances by means of a quantitative risk analysis in accordance with standard UNE-ISO 19880-1: 2022 - Compliance of the minimum storage distances with the objectives included in the exposure groups referred to in the tables	Partially accepted	We do not consider it an obligation for hydrogen service stations to integrate into existing service stations. The aim of the draft Royal Decree is to guarantee minimum safety conditions. from the the same, regardless of their location. The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.
1	Exol m XO um	3.1	With regard to the following paragraph: 'Other installations which do not comply with one or more of the above points must be designed and defined as Accepted internal distances by means of a quantitative analysis of part risk according to reference GAS_027 of the table of standards." According to the initial claim submitted by Bequinator,		The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.

we consider that a second paragraph should be added, specifying that, where it is not possible to meet the prescriptive distances between the storages and the objectives included in the exposure groups referred to in the tables, or where objectives other than those envisaged must be considered, quantitative risk analysis (ACR, FERA, BRA, etc.)/or consequence analysis may be carried out to establish between equipment, installations or buildings based on the results obtained, and thus ensure the safety of the installations, following the recommendations on carrying out risk analysis in Standard UNE-ISO 19880-1: 2022 and other specialised references. Proposal: Other installations that do not comply with one or more of the above points must be designed and define internal distances by means of a quantitative risk analysis in accordance with Standard UNE-ISO 19880-1: 2022. Similarly, if it is not possible to comply with these minimum prescriptive distances from storage to the objectives included in the exposure groups referred to in the tables or if it is necessary to consider objectives other than those referred to in the exposure groups indicated in the tables, quantitative risk or consequence analyses may be carried out to establish distances between equipment, installations or buildings based on the results obtained from these analyses following the recommendations on carrying out risk analyses of Standard UNE-ISO 19880-1: 2022 and other specialised references.	
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1

Exolum

3.1

With regard to the following paragraph:

Accepted

‘Finally, the distances to external parts of all installations must be calculated and duly justified by means of the corresponding quantitative risk analysis and may not under any circumstances contradict or reduce safety distances which are

The text has been amended to make it clear that facilities must carry out a risk analysis and that sometimes they may be selected as an alternative to the distance annex following a favourable report from the CB.

imposed by any other legislative provision.” Proposal for amendment

It is proposed that the obligation to carry out a quantitative risk analysis (QRA) to determine external distances be limited exclusively to cases in which potential sources of vulnerable and less vulnerable external population are identified, as defined in accordance with Standard UNE-ISO 19880-1, and in which it is necessary to verify compliance with the risk acceptability criteria for such sources close to the installation.

Justification

Strict compliance with the safety distances laid down in the Annex constitutes, in itself, a comprehensive preventive measure against the inherent risks, addressing the risk in accordance with established engineering and regulatory criteria, in accordance with the origin of the distance table based on the NFPA 2.

— According to Annex E to the NFPA 2, those distances are based on a calculation of the risk to the general public (vulnerable elements) assumed which does not exceed $2 \times 10 - 5$ deaths/year, a risk associated with conventional petrol service stations. This criterion is mentioned in UNE-ISO 19880-1 as a reference for the acceptability of the risk to ‘the general public’.

Requiring an additional RTA in installations that already meet distances defined by regulatory criteria based on risk calculation leads to duplication of requirements. In line with UNE-ISO 19880-1 (A.6.3.1), it is proposed that the RTA be carried out only when there are pockets of vulnerable or less vulnerable external population, understood in accordance with the Dutch legislation referred to in that standard, whose limits of risk acceptability are $10 - 6$ deaths/year and $10 - 5$ deaths/year respectively.

The definitions of vulnerable and less vulnerable population can be taken from what is already established in the industrial safety regulations (e.g. Instruction 8/2007 of Catalonia) or in other regulations that provide for differentiated distances for ‘concurrent public’ environments.

— Examples in similar legislation in force within Royal Decree

919/2006 itself in other Supplementary Technical Instructions:
ICG-02 (Category 1): 30 m to public competition, ICG-03 (A-500): 30 m to public competition, ICG-05 – LNG (UNE EN ISO 16924: 2018): 30 m from storage, ICG-05 – CNG (UNE EN ISO 16923: 2018 + IP-04): 15 m to external public buildings
Or in the APQ regulations that can be assimilated to the same characteristics of type of fluid and storage: APQ-05 (Category 5, flammable, open area): 15 m to inhabited buildings or third parties (comparable to public competition). If there is REI-180 wall according to note 7, the distance may be 0 m (not required).

Proposed criterion for RTA

Taking as a reference the most restrictive distance indicated in similar industrial safety regulations of the Regulation on the Distribution and Use of Gaseous Fuels, specifically Table B.1 for the separation of LNG air equipment, it is proposed to make it mandatory to carry out an RTA only when the distance between the vulnerable element and the storage exceeds 30 m, which can be reduced to a maximum of 50 % if protective walls are available, in accordance with the criterion of the NFPA 2.

It is proposed as a criterion that the RTA be mandatory only when the distance between the vulnerable element and the storage is less than 30 metres, which is the most restrictive distance indicated in ITC ICG-05 – LNG (UNE EN ISO 16924: 2018). This has been compared with the results of calculations carried out using simulations using specific software with the most conservative criteria used in the NFPA2 for establishing safety distances.

The simulations have assessed the possible consequences of an accident that could affect external vulnerable elements, considering thermal radiation in the event of hydrogen leakage in storages at various pressures and quantities, as the most likely effect, following the NFPA2 approach.

Leaks have been considered in the larger diameter connection to the storages, using as the leak size that established in previous versions of the NFPA2, considered very conservative in the new updated versions, which have decreased the leak

sizes.

Jet fire by immediate ignition is considered the most likely development in the event of hydrogen leakage, given its low ignition energy, with the thermal radiation associated with jet fire being the variable establishing safety distances according to NFPA 2.

Distances have been determined at a static radiation value of 1.6 kW/m² considered as the value at which the unprotected general public can be exposed unharmed.

For the HRS examples considered, the distances obtained are less than 30 metres in all simulated examples.

The results are attached in the file 'Simulation exercise for distances to vulnerable HRS storage elements'.

With regard to the definition of vulnerable elements, we propose the provisions of Instruction 8/2007 of Catalonia regarding vulnerable and very vulnerable elements (Ref. Microsoft Word – Instrucció 8-2007 SIE Informe ajuntament article 53.5.doc).

Vulnerable elements:

Offices > 150 m² or with capacity > 50 persons

Public establishments > 150 m² or > 50 persons

Hospitals and health centres; Care homes for the elderly;

Prisons; Kindergartens, schools; Public local camping sites with large capacity or spaces

Sports facilities without spectator capacity (e.g. swimming pools without slipways).

Smaller shopping centres, restaurants, bars, religious buildings.

Meeting rooms such as neighbourhood associations, parks and gardens.

Conclusion

The proposal seeks to ensure safety through objective and proportionate criteria, avoiding unnecessary administrative burdens and aligning national regulations with international standards and specific national regulations.

Possible text:

Finally, distances to external elements of all facilities when public concurrent places or vulnerable elements are identified, within a radius of 30 metres from the storage units, must be calculated and duly justified by means of the corresponding quantitative risk analysis in accordance with the risk acceptability criteria laid down in Standard UNE-ISO 19880-1: 2022 and may not under any circumstances contradict or reduce safety distances imposed by any other regulatory provision.

This radius of 30 metres may be reduced by a maximum of 50 % if protective walls are available which have the following characteristics:

(a) have no openings or penetrations, unless pipe penetrations through the wall are protected by a fire protection system having the same fire resistance as the wall and which shall be duly justified; (b) have a minimum fire resistance REI 120; (c) Has a height of at least 0.5 m above the maximum height of the storage unit and is located between the storage and the vulnerable element so that it completely covers the line of vision of the protected vulnerable element.

Public places shall mean public places of competition or

			vulnerable elements: Offices > 150 m² or with capacity > 50 persons Public establishments > 150 m² or > 50 persons Hospitals and health centres; Care homes for the elderly; Prisons; Kindergartens, schools; Campsites Public premises with large capacity or spaces Sports facilities without spectator capacity (e.g. swimming pools without slipways). Smaller shopping centres, restaurants, bars, religious buildings. Meeting rooms such as neighbourhood associations, parks and gardens.		
1	Exolum	Annex	Table 1 sets out the distances from Group 3, which includes the 'Fuel distribution system'. Table 2, for its part, indicates a distance of 9 metres for 'other parts of the installation with a fire or explosion hazard, e.g. storage of flammable products'. Unless it is specified that such storage of flammable products is different from storage for hydrogen, these distances are contradictory. Proposal: Table 2: "Other parts of the installation with fire or explosion hazard, e.g. storage of flammable products other than hydrogen storage".	Accepted	The proposed amendment is included.
1	Exolum	Annex	In relation to the distance indicated in Table 2 for "other parts of the installation with fire or explosion hazard, e.g. storage of flammable products": It is not specified that this distance may be reduced by 50 % by the installation of walls whose characteristics are described in the preceding paragraphs. Following the same logic and for reasons of regulatory consistency, this distance of 9 metres should also be reducible when the systems are separated by walls that meet the characteristics mentioned in the text of the RD. Proposal:	Accepted	The text is amended

			Table 2: "Other parts of the installation posing a fire or explosion hazard, e.g. storage of flammable products other than hydrogen storage" (3). Notes: (3) this distance may be reduced by a maximum of 50 % if walls protecting the characteristics set out in the preceding paragraphs are available.		
1	Exolum	Annex	In relation to the distance indicated in Table 2 for "ignition sources such as switchboards": If the electrical switchboard is certified for installation in the ATEX Area, it is understood that it can be located within those 3 metres. It would therefore be appropriate to clarify that such distance applies only to elements that are not suitable for ATEX environments. Proposal: Table 2: Sources of ignition such as electrical switchboards not suitable for ATEX areas.	Accepted	The text is amended
1	Exolum	Annex	In the following paragraph: 'For storage units with pressures equal to or greater than 517.1 bar, the distance to limits of ownership may under no circumstances be less than 15 m unless they have a protection wall as described in the previous paragraph, in which case it may be reduced to a maximum of 10 m, with a maximum reduction of 50 % of the original distance.' The paragraph is contradictory, as it establishes a minimum distance of 15 metres, which can be reduced to 50 %, which would be 7.5 metres, but it is then stated that it cannot be less than 10 metres. Proposal: For storage units with pressures equal to or greater than 517.1 bar, the distance to limits of ownership may under no circumstances be less than 15 m unless they have a protection wall with the characteristics of the previous paragraph in which case a maximum reduction of up to 7.5 m may be justified.	Partially accepted	The text is amended
1	Exolum	Annex	With regard to the following paragraphs:	Rejected	Distances to limits of ownership are

1 GASNAM

Annex I – Air intakes (≥ 500 bar $\rightarrow \geq 8$ m)

'For storage units with pressures equal to or greater than 517.1 bar, the distance to limits of ownership may under no circumstances be less than 15 m unless they have a protection wall as described in the previous paragraph, in which case it may be reduced to a maximum of 10 m, with a maximum reduction of 50 % of the original distance.

For storage units between 17 and 517.1 bar, the minimum distance to property boundaries, or parcel boundaries, may under no circumstances be less than 10 m.

When the storage system pressure is less than or equal to 17 bar, distances to property boundaries or parcel boundaries shall be permitted from 4 m.'

In accordance with the initial claim made by Bequinor, we consider that the distances established by the NFPA 2 to ownership limits should remain unchanged, unless another technical justification is presented to refute it. These distances are supported by specific analyses under a reputable standard.

they have been higher than those proposed by the NFPA2 standard and established in line with those established by other European countries such as France or Italy.

The distance of 8 m for air intakes of compressors and buildings is incompatible with compact designs. In international practice (Germany, Japan, USA) air inlet distances are determined by:

- dominant wind direction
- physical barriers

- ascending jet curtains
- high location of the sockets

Proposal: allow RTAs to justify smaller distances with mitigation measures.

Accepted
partially

The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.

'For air intakes located in the vicinity of storage equipment with a pressure greater than 500 bar, the prescriptive distance indicated in the table or the distance resulting from an ACR in accordance with UNE-ISO 19880-1: 2022 may be applied, provided that the non-entry of hydrogen in hazardous concentrations is justified by appropriate mitigation measures (high location, ducts).

			sealed, forced ventilation, physical barriers or flow diverters)."		
1	GASNAM	Annex	Annex I – Storage to compression ratios for pressures ≥ 517.1 bar Prescriptive distances do not consider compact configurations where compression, storage and chillers are integrated into single modules. ISO 19880-1 allows internal distances to be justified by means of frequency and consequence analyses. Alignment with SHYNE and BEQUINOR is requested, allowing ACR to justify shorter distances. Proposal: "Distances between hydrogen storage units with pressure equal to or greater than 517.1 bar and compression systems may be those indicated in the table in Annex I or justified by ACR, integrating appropriate mitigation measures."	Partially accepted	The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.
1	GASNAM	Annex	Annex I – general performance-based design for > 517.1 bar The rigid prescriptive approach does not allow for innovation (type IV storages, compact modules, encapsulated, skid solutions). NFPA-2 and ISO 19880-1 recommend using ACR as the main route. SHYNE explicitly requests to enable this model. Proposal: 'For storage units with pressure equal to or greater than 517.1 bar, the use of ACR performance-based design criteria shall be permitted, in order to optimise deployment at existing stations without compromising the level of safety.'	Partially accepted	The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.
1	C. Madrid – Hydrocarbons	Annex	First indent: Reference is made to the distribution units in "... from the different elements of the installation to distribution and storage units...", however, it defines what a storage unit is and not what a distribution unit is. Does it refer to the unit of suminsitro?	Accepted	The definition of supply unit is included in the text.

		Only the proposed text, no justifications			
1	Calvera Hydrogen	Annex	With regard to point: 'For storage units with pressures equal to or greater than 517.1 bar, the distance to limits of ownership may under no circumstances be less than 15 m unless they have a protection wall as described in the previous paragraph, in which case it may be reduced to a maximum of 10 m, with a maximum reduction of 50 % of the original distance. For storage units between 17 and 517.1 bar, the minimum distance to property boundaries, or parcel boundaries, may under no circumstances be less than 10 m. When the storage system pressure is less than or equal to 17 bar, distances to property boundaries or parcel boundaries shall be permitted from 4 m.' We consider that these distances should be subject to a risk analysis and a contingency analysis in order to reduce these risks as mentioned above applicable to Table 1. We propose to delete it.	Partially accepted	The possibility of not complying with the distance annex is provided for in Article 24 of the Regulation. If this is not technically possible, express authorisation must be obtained from the Autonomous Community in which the facility is located, and the corresponding risk analysis must be carried out to ensure the safety of the facility. The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.
1	BJ ATLANTY	Table 1	Justification: The requirement to maintain at all times 15 m at a pressure edge ≥ 517 bar, even with walls, makes it unfeasible to set up in existing stations and contradicts the European objective of reusing infrastructure. It is necessary to introduce an alternative text allowing RTA optimised distances, especially on soils already dedicated to fuels/gases. The distance formulas set and their reduction limits hinder the deployment of hydropower in existing stations and compromise the achievement of the objectives set out in the AFIR and the Hydrogen Roadmap. It is necessary to introduce a mechanism allowing for the adjustment of distances through risk assessment, while preserving compliance with national deployment objectives. Its scope affecting almost all hydrogen refuelling stations. Proposal: Replace the text of the paragraph with:	Partially accepted	The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.

			'The distances set out in Table 1 shall be of general application. However, they may be replaced by those determined in a quantitative risk analysis carried out in accordance with ISO 19880 or other applicable technical standard, ensuring a level of safety equivalent to or higher than that provided for in this JTI.'		
1	BJ ATLANTY	Table 1	Justidfication: The requirement to maintain a minimum distance of 15 m at borders for pressures equal to or greater than 517 bar limits the adaptation of existing stations and prevents the provision of a significant number of sites. In order to ensure the viability of the minimum network required by AFIR, and the fulfilment of national targets, the determination of external distances through risk analysis should be allowed. Proposal: Replace current wording by the following: 'In installations located at existing service stations or on plots previously intended for the supply of fuels or gases, the external distances may be determined by means of a quantitative risk analysis demonstrating a level of safety equivalent to or higher than that required by this ITC, and may differ from the values set out in Table 1 where this is the result of the analysis.'	Partially accepted	The text has been amended to include the possibility of carrying out risk analyses, which must be validated by the CB.
1	Calvera Hydrogen	Table 1	These measures are highly dependent on both the installation and its surroundings, so we see the need for them to be able to be modified according to the results of a risk analysis. For instance. The measurements are based on the calculated length of a jetfire due to a breach of a storage pipe. However, this is not the case where the cylinders are stored horizontally rather than vertically. Where the collectors are on the top and any leakage shall be in the vertical direction The distances in Table 1 shall be recommendations to be assessed in comparison with a risk analysis of the installation.	Partially accepted	
1	C. Madrid – Hydrocarbons	Table 2	(definition of the table and first cell) Delete "installation" when referring to other "elements"	Partially accepted	The text is amended to 'establishment'

			of the installation'. As these elements would not be part of the definition of installation (parking, ownership limit) Table 2. [...] Compressed outside other elements of the installation. Installation elements		
1	CEEES	Table 2	Justification: We consider that Table 2 contradicts point 8.4.4 of ISO 19880, which specifies that the dispensing process is a closed system where there is no venting of gas. And that the possibility of any leakage is mitigated by the measures taken under points 8.2.1.6, 8.2.2.5 and 8.2.2.6 AND that therefore no flammable atmosphere is expected in the dispensing area. As a safe area there should not be a possibility of jet fire and therefore distances do not apply. Compliance with point 8.4.4 of ISO 19880-1 shall be ensured by the pump manufacturer himself. To take another example, the vehicle to be refuelled itself is a possible source of ignition and could therefore not enter the refuelling area with these three metres. Proposal: It must be demonstrated that the dispensing area is a safe area in accordance with ISO 19880 with the measures taken in accordance with points 8.2.1.6, 8.2.2.5 and 8.2.2.6.	Rejected	It is understood that dispensing systems are safe, however, it is considered necessary to establish minimum safety distances in the event of possible failures or problems.
1	Calvera Hydrogen	Table 2	If Table 2 is maintained, a distinction should be made between the distances applied to the boquerel and distribution systems and whether the distance to the boquerel includes hose length or is a handrail point.	Rejected	Are defined in the notes
1	Calvera Hydrogen	Table 2	Other parts of the installation which present a fire or explosion hazard, e.g. storage of flammable products. — 9 metres Are storage facilities specific to the dispensing system included?	Partially accepted	The text is amended
2	FEDLPG	1	This Supplementary Technical Instruction (ITC) has	Rejected	Have been incorporated in the scope of

CONAI F	the purpose of this Regulation is to lay down the essential technical requirements and minimum safety measures to be observed when designing, constructing and operating storage facilities for own use and LPG supply referred to in Article 2.1 (g) of the Regulation in packaging with a unit load of more than 3 kg intended to supply reception facilities or gas-consuming appliances connected by a flexible pipe or directly attached to a single appliance for mobile use. The design of basement and semi-basement can lead to confusion, as it can be interpreted as any place where the floor is lower than the outdoor floor or a ventilation yard, regardless of height. On the other hand, standard UNE 60670 defines what is considered to be semi-colony, and we therefore consider it positive because of the harmonisation of criteria to refer to that definition. We also consider that it is not appropriate to delete the paragraph stating that, unless expressly authorised by the competent body of the Autonomous Community, we consider that it should be possible to propose an alternative solution to the Autonomous Community and that the latter should decide whether or not it is appropriate to do so. Proposal: Packaging may not be installed or stored in dwellings or premises where the floor is lower than the ground level (basement or semi-basement, in accordance with the provisions of the Chapter of Definitions of Standard UNE 60670-2), in staircase boxes and corridors, unless the competent body of the Autonomous Community has expressly authorised it, subject to justification of the proposed solution showing that safety conditions are not being undermined.	gas appliances are applied as storage facilities intended for consumption have the same or equivalent risk as those intended for reception facilities. The prohibition itself provides that storage is not permitted in dwellings or premises where the floor is lower than the floor.
2 CONAIF	3 We understand that there is no place since the storage in the centres regulated by ITC-02, it is stated that they will be stored in cages or displays, but they are not indicated that they are sheltered from the weather. In addition, we understand that the packaging is subject to control by the supplier, which means that it is in a	Rejected Rejected No obligation, recommended conditions or good practices to be followed where possible.

			optimal state of safety and use. Proposal: When the packaging is on the outside, it shall, wherever possible, be protected from environmental conditions such as solar radiation, rain or snow. For this purpose, they may be housed in cabinets if, in addition, they meet the ventilation conditions for cabinets set out in point 3.1.4.		
2	CONAIF	3	For type C appliances, there are no ventilation requirements, as ventilation is marked by the need for oxidising air. The following ventilation measures are therefore proposed. Proposal: By way of derogation from the previous paragraph, the connected packaging may be located in the same area of use of the gas-fired appliances. In this case, the ventilation conditions shall be as required for the appliances, respecting the requirements for the configuration, ventilation and evacuation of combustion products in the rooms intended to contain the gas-fired appliances set out in reference GAS_008 of the table of standards. In the case of type C gas-fired appliances, the following ventilation surfaces shall be provided: · For 2 or less in-use packaging: 25 cm², with upper and lower ventilation. · For more than two in-use packaging: upper and lower ventilation of 200 cm².	Partially accepted	The text has been amended.
2	CONAIF	3	We believe it is appropriate to specify what can be understood as equivalent resistance, in particular to accommodate materials. Proposal: Decks may be made on the façade of the building, towards the inside of the building, provided that the resistance of walls, floors and roof is in accordance with the fire resistance prescribed by the legislation in force on fire sectorisation, CTE-DB SI or RSCIEI, the measurements are kept and	Partially accepted	Reference is made to existing legislation in the text.
conditions of the external deckhouses and double the direct ventilation surface required of the external deckhouses.					

In practice, it is common to find cabinets intended for LPG bottle batteries with poor or even inadequate access conditions for packaging-exchange distributors. There are cases where these deckhouses are elevated to more than 40 cm above track level, which makes it necessary to raise 70 kg bottles (gas + packaging) with high ergonomic risk, as well as configurations with very small openings or depths greater than 2 metres, which seriously hinder loading and unloading operations. These situations not only pose a risk to occupational safety and health, but also make it difficult to correctly refill packaging in safe and efficient conditions.

2	DISA	3	Proposal: It is proposed to add the text in this paragraph. In the case of batteries in bottles located in cabinets, their design, dimensions, accesses and location must ensure compliance with the principles of safety, ergonomics and hygiene laid down in Law 31/1995 on the Prevention of Occupational Risks. Cabinets intended for the storage of packaging batteries shall be fully accessible to handling personnel, allowing the exchange of bottles under safe conditions and without compromising the physical integrity of the workers. In particular, configurations requiring packaging to be raised or inserted into enclosures with forced access, reduced openings or without sufficient space for manoeuvring with appropriate tools shall be avoided.	Partially accepted	The text has been amended by adding the first paragraph.
2	FEDLPG	3.1.1	In case there is more than one packaging connected to the reception facility by regulators with shut-off valve, the packaging storage facility shall end with a shut-off valve which shall be the user valve.	Rejected	We consider the current wording to be

Proposal:

If the containers are installed outside and the consumer appliances inside, the installation shall be provided inside the dwelling with an easily accessible general cutting key.

3.1.2 justification:

Rejected

AGL

The limitation of 150 kg for non-residential uses in building blocks seems scarce and will have a major impact on the development of hospitality and

restoration activity given that it is a small volume that determines and limits LPG heating solutions on terraces. This limitation also creates an asymmetry or discrimination in the sector between premises located in block buildings and those that are independent. Furthermore, in so far as the room has sufficient space to house the packaging, that volume should not be limited. What is more, the current volume of 300 kg is small for large premises whose possibility of extending the use of their terraces in winter is limited.

On the other hand, the restriction of 6 containers in residential flats limits certain configurations and uses of LPG in such flats. For example, the configuration of cooking and DHW plus heating with stoves would be seriously compromised, as in practice there could only be one stove in dwelling 2 + 2 for DHW and cooking and 1 + 1 in stove. The installation would not have the necessary autonomy in cold areas compromising the comfort of customers.

We propose extending the limit to 10 containers = 2 + 2 for DHW and cooking and 3 stoves with their respective reserves. In addition, 10 packages of 11 kg would be 110 kg, which is very similar to 6 packages of 15 kg = 90 kg, but with greater flexibility of use. Proposal:

The total storage capacity, obtained as a sum of the unit capacities of all packages, shall in no case exceed 300 kg. In the case of storage in a residential block

The proposed disposal is not accepted since storage in an isolated and independent room is not considered to be an equivalent or even similar risk to storage in a block of flats.

On the other hand, it is considered appropriate to limit packaging in installations in height-block dwellings in order to avoid undermining the safety of the installations, given that, in exceptional cases, if a capacity extension is necessary, it could be processed in accordance with the Regulation.

			in height, this limitation shall be 150 kg per installation. In addition, in installations in dwellings in high blocks, the number of non-connected packaging, in each of these installations, may not exceed the number of connected packaging and, in any case, the total number of packaging shall be less than or equal to 6 10.		
2	C. Madrid – Hydrocarbons	3.1.2	In the same way that the number of packs in high block dwellings is limited, it could be limited in any dwelling, for example, paired chalet yards. In addition, in installations in dwellings (in blocks of dwellings or single-family dwellings), the number of non-connected packaging, in each of these installations, may not exceed the number of connected packaging and, in any case, the total number of packaging shall be less than or equal to 6.	Accepted	The proposal is included.
2	FEDLPG	3.1.2	The sum of standby and non-connected packaging shall not exceed the number of packaging in use for all existing equipment. In residential blocks at a height (including outdoor areas such as balconies or terraces) the sum of standby and non-connected packaging: - It may not exceed 2 in dwellings. - For uses other than residential use, it may not exceed 3, except where there are more than 6 packages in use, in which case it may not exceed half the number of packages in use rounded up to the next whole number. In any case, the total storage capacity of standby and non-connected packaging, obtained as a sum of the unit capacities of this packaging, may not exceed 150 kg for any use in residential blocks at height and 300 kg in all other cases. Proposal: The total storage capacity, obtained as the sum of the unit capacities of all packaging included, both filled and empty, shall not exceed 300 kg.	Rejected	The claim does not correspond to the proposed text of public information.

			The operator of the installation shall be free to determine how many containers it will keep in stock to ensure continuity of supply, provided that it complies with the ventilation, stowage and separation conditions laid down by law.		
2	FEDLPG	3.1.2	Dispose of: Connected containers located outside (sufficiently ventilated terraces and balconies, courtyards, etc.) must be positioned in such a way as to be protected from atmospheric conditions such as solar radiation, rain, etc. If placed in cabinets, they must meet the same requirements as in the previous paragraph.	Rejected	The claim does not correspond to the proposed text of public information. It is established that they should be protected from environmental conditions where possible. It does not explain why this qualification was dispensed with when submitting the claim.
2	FEDLPG	3.1.2	At least 2 m safety distance from the boundary of the packaging storage area must be kept in archetypes, dormant windows, sewers, communications with staircases, basements or other premises situated at a lower level. Where more than 150 kg is stored in the same place, that distance shall be 4 m in open places and 8 m in enclosed places. Proposal: At least 1 m safety distance from the boundary of the packaging storage area must be kept in archetypes, dormant windows, sewers, communications with staircases, basements or other premises situated at a lower level.	Rejected	The claim does not correspond to the proposed text of public information. The proposed text is in line with the text published during the second public information procedure.
2	FEDLPG	3.1.2		Rejected	The claim does not correspond to the proposed text of public information.

Where packaging is located at a place other than that of use of the gas-fired appliances, it shall be stored either outdoors or in spaces that meet the requirements laid down in reference GAS_008 of the table of standards for being considered ventilation ducts, or in rooms with one or more openings at ground level for direct ventilation to the outside or to such ventilation ducts, which may not be more than twice the size of the other and with the following minimum surfaces:

- Up to 50 kg stored in the same premises: 125 cm².
- Over 50 kg and over 150 kg stored in one

			room: 300 cm². — More than 150 kg stored in the same premises: 400 cm². Proposal: Reverting to the current ITC-ICG-06 requirements of the current RD, the wording of which is simpler to interpret and comply with. The stored stock containers must be adequately ventilated.		
2	AGL	3.1.4	Justification: The ventilation requirements for the premises where the packaging is stored are aligned with the requirements laid down in Section 4.3. Rapid ventilation of premises UNE 60670-6, as the alternative of installing a gas detection system in customers' homes seems unfeasible for practical purposes. Paragraph 4.3 of UNE 60670-6 provides: 'Rapid ventilation may be considered to be one which occurs indirectly, through an easily practicable door with a minimum surface area of 1.2 m², to an adjacent room with rapid ventilation.' Proposal: Exceptionally and only when due to the particularities of the enclosure it is not possible to carry out these ventilations, indoor storage of up to 60 kg, including full and empty containers, is allowed, provided that they have an easily practicable door, with a minimum area of 1.2 m², to an adjacent room with rapid ventilation or with gas detection systems in all enclosures where these containers are located and it is not possible to carry out ventilation.	Rejected	Inclusion of the proposal is not considered appropriate.
2	C. Madrid – Hydrocarbons	3.1.4	It should be made clear that where containers are housed in cabinets within a room, in addition to the ventilation of the cabinets, this room will also have to have the ventilation indicated. Containers stored inside premises meeting the above conditions may also be placed in cabinets if these cabinets meet the following requirements:	Accepted	Incorporated in the text.

2			conditions		
	C. Madrid – Hydrocarbons	3.1.4	Change the order of the paragraphs for better understanding, leave the cabinet conditions at the end so that the local porpium ventilation conditions appear first.	Accepted	The text has been amended.
2	NEDGIA	3.1.4	It is recommended for safety to install a controlled output shut-off electrovalve. Standard UNE 60670-6 states that when there is no rapid ventilation, detectors must operate an automatic gas shut-off system using an electrovalve located outside the enclosure. We therefore consider it essential to transpose this measure into the text of the Regulation, thus ensuring an additional level of safety in installations where ventilation is not possible. Proposal: 'Exceptionally and only when due to the particularities of the enclosure it is not possible to perform these ventilations, indoor storage of up to 60 kg, including full and empty containers, shall be permitted, provided that gas detection systems are in place in all enclosures where these containers are located and ventilation is not possible. In such cases a controlled output shut-off electrovalve shall be incorporated.'	Rejected	The derogation is based on storage of non-connected packaging, so it is not considered necessary to have a shut-off valve.

2	C. Madrid – Hydrocarbons	4.2	The last paragraph states that an installation certificate must be issued but there is no model proposed as in other JTIs. Develop a model installation certificate for ICG 06.	Accepted	Reference is made to the specific ITC-ICG-07 certificate.
	CONAIF	4.3	We understand that the holder must always keep the Accepted documentation of your installations without a time limit, partially		The proposal is accepted but the time limit for storing documentation has been increased to

however, an installation company has to keep time-bound documentation due to the large volume of documents it generates.

Proposal:

No communication to the administration is required. Not

years

			however, both the operator and the installation company shall keep and keep at the disposal of the administration the installation certificate showing the installation of LPG containers and the receiving installation, without prejudice to the provisions of other JTIs. The installation company shall only be required to keep the installation documentation for a period of five years.		
2	C. Madrid – Hydrocarbons	5	In the second paragraph reference is made to the periodic review, there is no model proposed. Develop a minimum model or content for the LPG storage facility periodic review certificate.	Rejected	There is no reference to a certificate in the above paragraph.
3	AGL	10	Justification: This series of elements and their checks correspond to the operations of the maintenance plan for the installation carried out by the operator itself and not to checks to be verified by a control body. The control body checks this in item 1 of this list of points; Existence of the maintenance plan and review of the parts of the facility maintenance intervention issued since the last periodic inspection. Proposal: To this end, the following points will be checked: (...) 4. The operation of keys, control and measuring instruments (manometers, levels, etc.), regulators, transfer equipment, vaporisers and other equipment.	Accepted	It is accepted as it is assumed that this should be done in the review and inspection of the equipment.
3	AGL	10	Justification: The frequency of inspections is not the same in the respective regulations. On the other hand, the control bodies may be different or not have accreditation in each of the aforementioned regulations. In any case, what seems reasonable is for the Control Body to check that the inspection of the fire protection means was carried out in due time and form, as is the case for the other safety inspections.	Partially accepted	The fire protection measures required in accordance with Annexes I to IV to the Regulation on Fire Safety in Industrial Establishments (RSCIEI) shall be inspected in accordance with Article 13 thereof, as part of the inspection of the gas installation referred to in this paragraph.

			Europe as such. Proposal: The fire protection measures required in accordance with Annexes I to IV to the Regulation on Fire Safety in Industrial Establishments (RSCIEI) shall be inspected in accordance with Article 13 thereof, at the same time as the inspection of the gas installation referred to in this paragraph. Furthermore, the inspection of fire protection equipment (PCI) shall also be carried out simultaneously, coinciding with the inspection of the installation in due time and in any case following the provisions laid down in the Regulation on Fire Protection Installations, approved by Royal Decree 513/2017, of 22 May.		Furthermore, the inspection of fire protection equipment (PCI) will also be carried out as part of the inspection of the installation, in any case following the provisions laid down in the Regulation on Fire Protection Installations, approved by Royal Decree 513/2017 of 22 May.
3	AGL	5.12.1	Justification: Allow the operator to adapt existing installations to the requirements laid down in the RSCIEI which are more effective than the provision of fire extinguishers required by the 1964 Order. Proposal: Installations, equipment and their components intended for fire protection of filling and transfer plants and their associated facilities shall comply with this paragraph. In installations existing before entry into force, the operator may decide to adapt their fire protection installations and systems to the provisions of this section.	Rejected	The operator may always adapt the installation to the most up-to-date provisions provided that safety conditions are not reduced, so it is not considered necessary to specify this in the text.
Others	CONAIF	Article 02	Article 2 (1) (e): (e) LNG satellite plants: Liquefied natural gas (LNG) storage facilities with joint storage capacity of up to 450 m³ up to 1 500 m³ and a maximum operating pressure greater than 1 bar, intended for direct supply to distribution networks or receiving facilities. LNG satellite plant facilities in both the	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

this Regulation (Royal Decree 919/2006) and the draft amendment are regulated in accordance with UNE 60210.

CONAIF considers that the most logical approach is to increase and not to reduce the scope of the corresponding ITC in order to bring it into line with the UNE standard governing its implementation and design.

If the increase until 1500 is not accepted, we understand that it is prudent to maintain the current scope of 1 000 m³. We are particularly concerned that if the new scope is accepted, the situation will remain in which installations exceeding the limit of 450 m³ and below which regulatory umbrella are subject.

In addition, we understand from the Confederation that this new picture may be harmful to installation companies, insofar as the requirements of IG-A companies carrying out this type of installation are defined in much more detail, while civil liability insurance is increased and training requirements are increased. We understand that there is no proportionality between the two changes and they are completely opposite directions.

Article 2 (1) (j):

(j) LPG installations for domestic use in caravans and motor caravans: Installations consisting of one or more LPG containers, pipes, accessories and appliances, including these, for domestic supply in habitable road vehicles. Portable appliances incorporating their own power supply or separate gas containers and appliances external to the vehicle body shall not be considered part of the installation. Recreational vehicles or trailers used for commercial or non-domestic purposes, such as foodtrucks, shall also be included in this ITC.

CONAIF wants to solve a latent problem in the field of gas installations in vehicles. Installers are currently faced with a myriad of doubts about the

Other CONAIF

Article 02

Rejected This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

		time of handling gas installations in vehicles for commercial use, which is excluded from the JTI.
		The problem lies in: These systems or solutions are popular for temporary events, in which the municipal authorities require a safety check (as is logical and mandatory). The user then contacts an installer, who is not sure which certificate to issue in addition to the legal protection problems that they may have as a result of issuing a certificate in accordance with legislation that does not include this installation in its scope. In addition, a similar issue occurs in the legalisation or registration of these vehicles. At the Technical Inspectorate of Vehicles, the station requests documentation, but there is no umbrella covering these facilities, so we return to the same problem as stated above.
Article 02	Article 2.2. With regard to installations, the regulation shall apply to:	Rejected
	[...]	
		— Installations existing before its entry into force which are subject to modification or extension. As a general rule, and if the relevant ITC does not indicate otherwise, this Regulation shall apply only to the modified or extended part, provided that the modification or extension does not affect or modify the safety conditions of the whole installation, in which case the whole installation shall be adapted. The following shall be understood as affecting safety conditions: change in the heat consumption of type A or type B appliances, change the location of the installed appliances (A or B appliances) by moving them to another enclosure within the same room, take any action that alters the characteristics of the pipes (concealment, underrun, etc.).
Other CONAIF		We consider it essential to clarify that this is understood as an amendment to the
		This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

			safety conditions. We believe that there must be a precise definition that provides certainty for the installation companies as a whole when faced with a refurbishment of an installation. As an example, a possible definition of what is or can be understood by safety conditions has been illustrated.		
Others	CONAIF	Article 03	Definitions Section: 30. Unconnected packaging: Packaging that is in the same location as the installation and is not ready for immediate use, including empty packaging. Packaging is considered to be in the same location as the installation and cannot be used immediately if it is in another enclosure or annex belonging to the installation's premises. The Confederation considers that the concept of the location of the installation should be clarified, and Royal Decree 919/2006 states that they could not be in the same room. We understand that a clarification such as the proposal would help to clarify the definition and avoid different interpretations.	Rejected	The text referred to does not correspond to the text published for the second hearing. This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.
Others	CONAIF	Article 03	60. Integrity management system: In accordance with the provisions rejected, this claim was already rejected at the hearing. in ITC-12, set of activities and practices of the hearing appropriate means by which a person holding the infrastructure preserves the integrity of the pipeline for ensure safe and reliable transport of gas. The Confederation considers that, although the definition is correct and taking into account the reference table of UNE standards, this system is limited to ITC-12, we consider that making a clarification such as the proposal is not harmful. The reason for asking for this clarification is that unfortunately our companies have been the victims of calls for regulatory requirements taken out of context and because the process of implementing and registering facilities can involve several actors, the clearer it is, the better to		preliminary hearing, which is not the subject second hearing procedure revert to analyse the issues raised above.

			all the parties involved.		
Other s	CONAIF	Article 03	61. Operation and maintenance management system: In accordance with the provisions of ITC-12, grouping of IT tools and resources that support and systematise the processes for operating and maintaining the assets covered by this Regulation The Confederation considers that, although the definition is correct and taking into account the reference table of UNE standards, this system is limited to ITC-12, we consider that making a clarification such as the proposal is not harmful. The reason for asking for this clarification is that unfortunately our companies have been victims of requests for regulatory requirements taken out of context and because the process of implementing and registering facilities can involve several actors, the clearer it is, the better for all those involved.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Other s	SEDIGAS	Article 03	Editorial error was detected in definition 74, by redundant text, in the following paragraph: 'LPG container filling area: A facility for filling containers, comprising all associated phases and operations, from despalletising to pre-checking, filling, post-checking and final palletising.'	Accepted	The highlighted error is corrected.
Other s	CONAIF	Article 09	On completion of the installation, the installation company or agent that has carried out the installation for those installations outside the scope of the gas installation companies in accordance with the provisions of ITC 09 (ITC-11 and ITC-12) must verify the correct implementation and safe operation of the installation. Where applicable, the tests specified in the	Rejected	The text referred to does not correspond to the text published for the second hearing. This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.

corresponding JT1.

We believe that it is necessary and appropriate to state who is responsible for carrying out the checks on the correct execution of an installation, which for the installations covered by the scope of the

Other CONAIF

Article 11

installation undertakings shall be an undertaking of a sufficient category in accordance with the provisions of ITC 09 and, in the case of installations not included in the capacity of gas installation undertakings, the agent or undertaking which executes them.

We understand that, in another case, the figure of the installation company is diluted by using an impersonal form where it is not identified which agent performs the tests. As a general rule, except as provided for in each ITC, the operator of the installation must provide the company that distributes, retails LPG or has an equivalent status with proof of submission of the corresponding documentation to the Administration, or a self-declaration where established. The documentation shall be sent to the competent body of the Autonomous Community no later than 10 working days after commissioning.

In order for the operator of the installation to be able to request the supply of gas, proof must be provided to the company distributing, retailing LPG or equivalent that it has submitted the relevant documentation to the Administration, or a self-declaration where established, in accordance with the terms of this Article, except in the cases referred to in the relevant ITCs. CONAIF considers that it is appropriate to distinguish between two types of installation, those which store fuel and those which feed from networks, and we understand that, since the Administration does not take a decision on the validity or otherwise of an installation, there may be a lapse of 10 working days between commissioning and communication to the Administration in general.

The aim is to prevent facilities with storage capacity from becoming available for filling after larg or tiem po pploughed because they already had the

This claim has already been rejected at the preliminary hearing stage and is not the subject of this second hearing procedure.

		documentation:		
Other s	CONAIF	Article 11	If the relevant ITC requires an administrative procedure, the operator of the installation shall be responsible for submitting to the competent body of the Autonomous Community the documentation established in each ITC or in the regulatory provisions of the Autonomous Communities and, if not defined, the following: - Identification of the installation indicating the operator of the installation, its location, type and provisional date of commissioning. - Technical documentation - Installation certificate. - Performance test certificate. - Works management certificate, if applicable. - Certificate from the inspection body, where appropriate The wording may give rise to confusion and error and may give rise to an interpretation in an unintended sense. CONAIF is keen to introduce the above clarification.	Rejected This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Other s	Endesa	Article 14 justification:	Accepted	The text is amended, establishing the obligation to provide biennial recommendations only to holders of supply contracts corresponding to toll groups RL.1 to RL.3.
		Article 14 provides that 'The partially marketing undertaking shall provide the operator in writing with recommendations for use and safety measures for the use of its installations whenever requested and, in any event, at least every two years'. It is considered that the referral of these recommendations should be limited to domestic and commercial consumers (belonging to local network toll groups RL.1 to RL.3). The rest of the consumers have very different activities and production processes with very heterogeneous particular characteristics, so the trader does not have sufficient information to provide really useful and applicable advice or recommendations in each case. We also take the view that it should not be the marketer who is responsible for producing these products. recommendations. It is considered that recommendations for use and safety measures should be drawn up by distributors (there		

are distributors who publish them on their web portals), MITERD (there is already a section on 'Recommendable safety measures' on the website of the Ministry for the Ecological Transition and the Demographic Challenge) or the CNMC. This would facilitate common use recommendations for all consumers.

For these reasons, it is proposed to amend the third paragraph of Article 14 in order to limit the obligation of the marketing company to the transmission of information to its customers, which could be considered fulfilled by including the link to the distribution company's website containing these recommendations for use and safety measures in the invoice to its customers using toll groups RL.1 to RL.3.

Proposal:

'In receiving installations, as an annex to the installation certificate delivered to the operator of the gas installation, the authorised installation company shall draw up instructions for the correct use and maintenance of the installation.

These instructions shall in any case include a sketch of the layout of the installation indicating its main characteristics (materials, connections, valves, etc.).

The marketing undertaking shall provide the person holding the supply contracts corresponding to toll groups RL.1 to RL.3, in writing, with the recommendations for use and safety measures for the use of its facilities whenever requested and, in any event, at least every two years. These recommendations and safety measures for the installations shall be easily and immediately accessible by electronic means to the operator and the user of the installation.

Recommendations for use and safety measures

			they shall be drawn up by the distribution companies and published on their website. Retailers shall include the link to this web page of the distributor in the invoices of their customers with toll group RL.1 to RL.3.'		
Others	CONAIF	Article 15	Article 15. Maintenance of installations and equipment. [...] It shall do so using the services of a gas installation company or a helpdesk of the appliance manufacturer, as appropriate. We understand from CONAIF that the Regulation should not mention that a manufacturer's SAT can act on the equipment. We believe that the Regulation must be fair to all operators in the sector and given that a technical support service provided by the manufacturer does not have to be a gas installation company, we consider it harmful to link the manufacturer's TPS to the performance of appliances. The Confederation argues that it is a multi-brand SAT that is a gas installation company that meets the qualification requirements for the equipment on which to act (i.e.: be a gas installer or a gas installer and have APMR).	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	FEDAOC	Article 16	We would like to point out that it would be desirable for Article 16 or 18 to include a paragraph stating that the rules of the UNE 192009 series will apply to the performance of the regulatory inspections required in the respective JTIs. We note that ITC ICG 13 refers to standards UNE 192009-3 for fixed LPG and UNE 192009-4 for LNG, if the above comments are made, the use of the standards indicated would be implicitly required for any JTI.	Rejected	The rules deemed necessary will be incorporated for implementation in the regulation.
Others	CONAIF	Article 17	Similarly, the operator or user of the installation, as the case may be, is responsible for correcting defects and anomalies detected in installations and gas appliances during periodic inspections, using the services of a gas installation undertaking or a helpdesk.	Rejected	The manufacturer's SAT is deemed to be capable of maintaining its equipment. This claim was already rejected during the preliminary hearing procedure, and this second hearing procedure did not cover the following:

			manufacturer's technique, as appropriate. Same justification as in		analyse the issues raised above.
Others	CONAIF	Article 17	All anomalies that can be rectified by the user through the intervention of a company that is not a gas installer limited to ventilations of gas installations (glassware or masonry companies) may be rectified by those companies. Once this has been rectified, the operator will have a gas installation company that certifies that the solution adopted is correct and complies with the regulatory provisions. In some cases, anomalies are limited to ventilation on the façade or on a glass pane, where the installation company does not actually carry out the work. This possibility should be envisaged.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

Others

The text referred to does not correspond to the text published for the second hearing. This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

CONAIF

Article 19 Article 19. Classification of defects in facilities and rejection certificate of inspection.

If defects are found in the installation, they shall be classified as follows:

a) Mild defect: Any person who does not endanger persons or property, does not disrupt the operation of the installations and where the deviation from the regulations is of no significant value to the effective use or operation of the installations.

b) Serious defect: It does not pose an immediate danger to the safety of persons or property, but may do so as a result of a failure in the installation. This classification also includes a defect which may substantially reduce the capacity of the installation to be used.

(c) Very serious or critical defect: Any person who, for reasons or experience, constitutes an immediate danger to the safety of persons or property. Breaches of safety measures that may trigger the hazards that such measures are intended to prevent are considered to be such breaches.

As a result of the inspection, the

		the corresponding certificate showing the result of the inspection, which may be: a) Favourable: Where no very serious or serious defect is established. In this case, any minor defects shall be recorded by the holder, with an indication that they must be rectified before the next inspection. b) Conditional: Where at least one serious defect or minor defect resulting from another previous inspection is detected and has not been corrected. In this case, the time limit for verifying the correction shall be stated and shall not exceed 2 months. c) Negative: When at least one very serious defect is observed. In this case, if immediate correction of the defect is not possible, the installation (s) causing the risk shall be left out of service. In cases where a conditional inspection is carried out and its correction has not been verified within the period indicated and in cases where it is negative, it shall be notified to the competent body of the corresponding Autonomous Community. The Regulation applies to a multitude of installations, this should not be defined in the articles but in each JTI. In addition, it should be borne in mind that technical criteria already exist specifically for reception facilities fed to more than 5 bars (UNE 60620) and less than 5 bars (UNE 60670), which already determine whether a defect is primary or secondary and as appropriate. We understand that this has to be removed from the articles and applied in the ITCs where it is considered that it is not defined. However, one understands the idea of homogenisation, that is to say, although the purpose is positive, it may pose a risk of interpretation and its use should therefore not be general but restricted.	
Other			Accepted partially

The text has been amended to clarify how the procedure should be carried out, where applicable.

March, hereinafter RSCIEI, the procedure of special cases or reasonable accommodations regulated in Articles 5.1.b or 5.3 applied together with the provisions of Articles 10.3 and 11.1.c of the RSCIEI will be followed. In addition to the previous paragraph, the documentation required shall be submitted to the body responsible for gas installations in the Autonomous Community. The proposed solutions shall in any case achieve an adequate level of safety, corresponding at least to that required by the CRISIS, by means of technical and engineering analyses justifying the fulfilment of the fire protection objectives.

We do not understand the reference made and we understand that there is no need for it. We understand the reason for the reference, but it is not appropriate. We consider it more appropriate to mention that compliance with the Gas Regulation does not exempt compliance with other applicable regulations. The main reason is that the ISDS will not apply in all circumstances, but only to industrial establishments, so instead of clarifying it, it may give rise to doubts by following the general criterion of applying in all circumstances. This comment extends to the references made in the Technical Instructions, such as in ITC-03, where reference is made to the Regulation on Fire Safety in Industrial Establishments, whereas in the vast majority of the warehouses covered by the ITC, they fall outside the scope of the Regulation.

Other Nedgia

Article 24

If you want to refer to derogations for a Rejected PCI installation under non-standard solution, i.e. installations not covered by the RIPC1 and its standards One design, Article 6 of the RIPC1's 'single models' should be referred to, as the RIPC1 is fully applicable to gas installations. What is required here is a different question: Article 10 and 11 of the RSCIEI concern projects for industrial establishments necessary to

When the requirements cannot be met in JTIs referring to PCI systems in accordance with the Annexes to the IRISR, the procedure for alternative solutions in this Regulation must be followed.

the register, which according to the scope of Article 2 and for gas installations, as mentioned above, does not apply and therefore this whole paragraph should be deleted from Article 24 of the Gas Regulation.

Proposal:

‘(...) In addition, when an alternative technical solution for fire protection equipment and systems is requested and these are designed and manufactured as a single model for a given installation other than standard ones, the provisions of Article 6 of the RIPC in the Annexes to the Regulation approved by Royal Decree 164/2025 of 4 March, hereinafter RSCIEI, will be followed, the procedure for special cases or reasonable adaptations regulated in Articles 5.1.b or 5.3 applied together with the provisions of Articles 10.3 and 11.1.c of the RSCIEI will be followed. In addition to the previous paragraph, the documentation required shall be submitted to the body responsible for gas installations in the Autonomous Community. The proposed solutions shall in any case achieve an adequate level of safety, corresponding at least to that required by the RIPC RSCIEI, by means of technical and engineering analyses justifying the fulfilment of the fire protection objectives.’

All special temporary facilities (including those supporting temporary events such as fairs, sports events, etc.). Temporary facilities intended to provide continuity of service in the event of breakdowns, maintenance, repairs, preliminary tests, etc., which, due to their characteristics, fall within the scope of this Regulation, must be notified to the competent body of the Autonomous Community at least 1015 days before they are put into service, shall not be considered to be special facilities.

Justification:

Particular care should be taken when defining

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Article 25

This claim has already been rejected at the preliminary hearing stage and is not the subject of this second hearing procedure.

requirements for installations. A unique facility must be one with novel characteristics. A temporary installation is in many cases associated with a breakdown or maintenance that is innumerably unpredictable over time. We understand that a distinction must be made between the definition of temporary installation that can be given, for example, by the REBT, where it is associated with fairs, stands and events. In short, spaces that are assembled and dismantled with a forecast in time. The Confederation therefore calls for the wording to be changed.

Article 25 we believe that, in order to ensure greater consistency in the agreed text developed for Article 25, it would be necessary to amend the location of the 2th paragraph and its addition as the 5th paragraph.

'In general, except as provided in the following paragraph, all temporary installations which, due to their characteristics, fall within the scope of this Regulation, must be notified to the competent body of the Autonomous Community or the State, as appropriate, at least 15 days before they are put into service.

Where the temporary installation is required for a breakdown or emergency remediation operation, it shall be reported no later than 24 hours after its commissioning, together with the report justifying the emergency.

To this end, a draft or report signed by a qualified technical person or authorised installation company, as the case may be, shall be submitted, with justification of the safety measures adopted, giving precedence to regulatory compliance with this and other regulations, UNE, UNE-EN, ISO regulations that apply to it, whether in parts or functional modules of the installation.

The competent body shall issue an acknowledgement of receipt of the communication from that facility, which may require any additional information it deems necessary, authorising the interested party to use the facility in service, without this being the case.

The proposed amendment has been incorporated.

Other
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			involves technical compliance on the part of the administration. Temporary facilities may, as a general rule, remain on site for a maximum of 60 calendar days, after which they must cease operation and be removed from the site. Where the temporary installation is required for a breakdown or emergency remediation operation, it shall be reported no later than 24 hours after its commissioning, together with the report justifying the emergency. Temporary installations installed as a result of an emergency or breakdown shall remain in service for as short a period as possible in order to remedy the reason for their entry into service, subject always to the preceding maximum period of 60 days.'		
Others	SEDIGAS	Article 25	Editorial error is detected in the following paragraph. The term 'state' should be replaced by 'state': 'In general, except as provided in the following paragraph, all temporary installations which, due to their characteristics, fall within the scope of this Regulation, must be notified to the competent body of the Autonomous Community or the State, as appropriate, at least 15 days before they are put into service.'	Accepted	The highlighted error is corrected.
Others	CONAIF	Article 26	General comment: The alphanumeric reference to standards should be unambiguous. The Confederation understands the search for simplicity in order to update the regulation in the future, however, each regulation must have an unambiguous reference. It should also be borne in mind that introducing this reference system adds additional complexity to the daily management of the regulation.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	Article 28	Once the incident has been reported, the identified agents, or the user himself in the cases indicated, shall submit a report on the accident within a maximum period of time.	Rejected	This claim was already rejected during the preliminary hearing procedure, and this second hearing procedure did not cover the following:

			907 days from the date on which it occurred, to the competent body of the Autonomous Community, attaching a copy of the relevant information held by the installation (installation certificates, certificates of inspection or periodic review, reports or maintenance contracts, etc.). We understand that a report within a maximum of 7 days is somewhat disproportionate and disproportionate. Due to the involvement of multiple actors, more time is needed to analyse and identify possible causes.		analyse the issues raised above.
Others	Endesa	Article 28	Justification: Article 28 sets out the agents to be notified of the accident, according to the type of installation. However, it does not stipulate who is to report the accident to the staff member should it occur. It is proposed to include the obligation for the operator of the installation to report the accident to the relevant agent according to the type of installation, as soon as he is aware of it. Proposal: 'When an accident occurs, the operator of the installation shall, as soon as he is aware of it, inform the agents identified below, according to the type of installation. (...)".	Partially accepted	Clarification of the wording concerning the reporting of accidents and the actors involved.
Others	CNI	DF1	Justification: We consider that Article 21(6) of the RSIF needs to be amended. The reason is that the inclusion of standard UNE-EN IEC 60335-2-40 allows the installation of non-compact equipment with category A3 refrigerants with loads lower than those of Article 2, i.e. less than 0.5 kg. We believe that, in the same spirit as in the Regulation, this section should be clarified so that there can be no misunderstandings or interpretations that differ from those currently provided for in the Regulation, for security reasons. Proposal:	Accepted	The proposed text is included.

This would be the proposed amendment necessary to bring it into line with the inclusion of standard UNE-EN 60335-2-40 without

being misleading, since, if it were not included, it could be thought that non-compact A3 refrigerant equipment could be installed and certified by a Tier 1 company, which is not the criterion of the current Regulation.

'Article 21

6. The documentation does not need to be provided for non-compact systems with a lower load than that referred to in Article 2 and absorption installations using Br Li-Water, which must be installed, maintained and repaired by a refrigeration installation undertaking.

However, the undertaking carrying out the installation must provide the operator of the system or installation with the following documentation:

- a) A certificate giving the details of the installation company, manufacturer, model, year, manufacturing number, load, name and group of refrigerant used, as well as the actions taken, in accordance with the model shown in the installation register, Appendix I to IF-10.
- b) Operator' s manual.
- c) In the case of Br Li-Water absorption installations, the refrigeration installation company must also provide documented proof of the suitability of the solutions adopted from an energy point of view (solution with lower energy costs) and must meet the requirements laid down in the current regulations on pressure equipment as regards the design, manufacture, protection and documentation that must accompany such equipment.

In the case of the above-mentioned systems, which are charged with refrigerants of group L1 or group A2L, the installation, maintenance, repair and drawing up of the installation certificate may be carried out by a level 1 installation company. For the other systems subject to this paragraph, these tasks may only be performed by Level 2 companies, signing the

			certificate, in these cases the qualified technician competent for the certificate. “		
Others	CONAIF	DT2	(3) valid periodic inspection certificate issued by the entity applying it depending on the type of installation, verifying the safety conditions of the installation in relation to the regulations applicable to it. CONAIF considers it appropriate to point out that the periodic inspection certificate should be the last valid one.	Accepted	The proposed text is included.
Others	CONAIF	DT4	II. If the project is not approved or no project is required, the date of application for an administrative licence or the date of submission of the declaration of compliance or the date of acceptance of the budget, where applicable, shall be taken into account before the competent administrative body and shall be accompanied by an electronic signature with a timestamp. CONAIF considers it appropriate to indicate this alternative as currently included in ITC 11 of RD 919/2006.	Rejected	It is considered necessary for these documents to have a traceable date.
Others	CONAIF	DT6	Delete the transitional provision. We do not understand the need for registration of these devices as they have been registered with the facility that feeds them.	Rejected	It is not the subject of the hearing procedure and these are different JTIs.
Others	SEDIGAS	DT6	Editorial error is detected, by repetition, in the following paragraph: ‘Existing gas appliances that are not subject to Regulation (EU) 2016/426, from appliances burning gas, that have been certified by the unit verification procedure and that were put into operation prior to this Regulation, must submit to the corresponding Autonomous Community within 5 years, together with the periodic inspection, together with either the initial inspection or the simplified design document of the appliance to be registered, indicating the date on which it was put into operation and the safety conditions of the appliance, to the corresponding Autonomous Community within 5 years for inclusion in the corresponding register of the Autonomous Communities from the	Accepted	The highlighted error is corrected.

			entry into force of this Regulation.'		
Other S	SEDIGAS	ITC ICG-01 — Paragraph 4.1	It is considered appropriate to use the term "reference" before "GAS_019" in the following paragraph: 'Installations for the distribution of gaseous fuels by pipeline shall be tested in accordance with GAS_019.'	Accepted	The proposed text is included.
Other S	SEDIGAS	ITC ICG-01 — Paragraph 5.3	Editorial error is detected, by repetition, in the following paragraph: The operator of the network, direct line or isolated pipeline shall check the watertight nature of the installations in accordance with reference GAS_003 of the table of standards or, where appropriate, the applicable table of standards, using a proven system.'	Accepted	The proposed text is included.
Other S	CONAIF	ITC ICG-02 — Paragraph 3.2	Containers with a safety valve shall always be placed upright and placed in cages if stored at more than one height. Containers without a safety valve shall always also be placed upright. We believe that it should be made clear that this is the case for packaging that does not have a safety valve.	Rejected	The text of the Regulation currently in force is maintained.
Other S	CONAIF	ITC ICG-02 — Paragraph 6	Containers with and without a safety valve, whether filled or empty, shall always be transported upright in their corresponding transport cages or properly stowed. New or repaired gas-free packaging transported from factory or workshop to the plant may be horizontal. We believe that it should be made clear that this is the case for packaging that does not have a safety valve.	Rejected	The proposed text is maintained, the suggestion is not perplexing as it is already specified in the following paragraph.
Other S	CONAIF	ITC ICG-03 – Change of location of an existing deposit is considered Rejected Paragraph 1. For all purposes, a new installation shall not, however, require the submission or preparation of a new project; the issuing of a technical report by the installation undertaking shall be valid. We, CONAIF, understand that a change in the location of a deposit within the same			Compliance with safety requirements should be verified following a change of tank location.

			parcel or the same storage centre may be justified with a technical memory.		
Others	REPSOL	ITC ICG-03 — Paragraph 3	Justification: Royal Decree 164/2025 and Royal Decree 513/2017 do not apply to this type of installation since they are not industrial establishments in accordance with the definitions and scope laid down in Royal Decree 164/2025 or in Law 21 of 1992 on Industry. These paragraphs are transferring requirements that are not directly applicable. Most of the bulk installations carried out are for residential, commercial or agricultural use. In addition, the means of fire protection for these facilities are already defined in standard UNE 60250 as specific applicable regulations. On the other hand, installations falling within the scope of RD 164/2025 should comply with it without the need for an express mention in this Royal Decree. Proposal: Delete the last two subparagraphs of paragraph 3. Design and implementation of the facilities. The facility must have fire protection appropriate to the risk, in accordance with the provisions of Annexes I to IV to the Regulation on Fire Safety in Industrial Establishments, approved by Royal Decree 164/2025 of 4 March 2004. With regard to the design, installation and maintenance of active fire protection facilities, the provisions of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May 2004, must be followed.	Partially accepted	An error has been identified in requiring an ICP system that cannot be applied to these installations.
Others	CONAIF	ITC ICG-03 — Paragraph 3.1	Introduce a new category of surface reservoirs. This category would be category A-2,5 and would include deposits of more than 1 m³ and less than 2.45 m³. Similarly, it is proposed to create an E-2,5 category. We believe that introducing a new category will make it possible to gasify installations that are currently required operations do not need or do not have the space for such a large reservoir as the A-5.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

Other s	CONAIF	ITC ICG-03 — Paragraph 3.2	Amend the distance table with the new category A-2,5 and E-2,5 Distances A-2,5: RL: 2.25 m, RE: 4.5 meters Distances E-2,5: RL: 1.5 m, RE: 3 meters In line with the comment above.	Rejected	In line with the above comment, this claim was already rejected at the prior hearing stage, and this second hearing stage did not cover any further analysis of issues previously raised.
Other s	CONAIF	ITC ICG-03 — Paragraph 4.4	Third indent: The first time that the temporary deposit is used, the same documentation must be submitted to the competent body of the Autonomous Community as for the putting into service of a fixed deposit. It shall require the production of a technical report and a certificate from the authorised installation company stating that the container does not leak or pose a risk to the safety of persons, property or the environment. Because of the very essence of an interim deposit, documentation cannot be required as if it were a new installation, that is to say, if a deposit is installed in order to maintain the service, it is a matter of urgency, it is not logical to request documentation such as a project, which requires time to prepare.	Rejected	This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.
Other s	CONAIF	ITC ICG-03 — Paragraph 4.7	Once the submission has been made to the competent body, the operator of the installation may proceed to request the first filling of the LPG tanks, after the completion of this operation (filling), shall have a period of 10 working days to submit the documentation to the competent body of the Autonomous Community. The company responsible for this first filling must verify that the required documentation for the facility has been submitted to the competent body of the Autonomous Community and that it will be part of the facility's documentation file. CONAIF considers that generating documentation and submitting it to the Autonomous Community before the first filling may cause a problem. The reason is that the Administration does not check the suitability of the installation only registers it, and it may happen that an installation is	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

			record, but do not fill for a reason x, leaving an installation with the capacity to fill even if it spends an indeterminate time. In addition to the documentary check that it will generate.		
Others	CONAIF	ITC ICG-03 — Paragraph 5.1	There shall be a fixed element for safe access to all valves and openings in the shell allowing their handling without mobile mechanical means such as portable stairs. In existing facilities, it shall be the responsibility of the wholesale LPG operator or the bulk LPG marketing company or the user, failing that, who shall be responsible for installing such means through the company maintaining the facility. CONAIF wants the installations to have homogeneous criteria and given that it is the installation companies that carry out the maintenance considered essential to also include existing installations in this obligation and that it is the fuel suppliers that ensure compliance.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-03 — Paragraph 5.2	5.2. Inspections Periodic reviews Periodic inspections of installations shall be carried out in accordance with the provisions of reference GAS_002 of the table of standards. The operator of the LPG storage facility shall be responsible for having the LPG storage facility inspected every five years. This inspection must be carried out in all cases by an inspection body authorised by the installation company with which the licence holder has signed the maintenance contract and must include the whole of the common reception facility in those cases where it is not considered to be a distribution network. Their correct tightness and fitness for use must be checked. To this end, the following points will be checked: [...] The inspection body The installation undertaking shall issue the relevant inspection review documentation, which it shall hand over to the operator of the installation and shall act as required. laid down in Article 20 of the Regulation.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

If the inspection reveals that the conditions have changed in relation to the documentation submitted for the commissioning of the facility, the body that carried out the check shall immediately inform the competent body of the Autonomous Community. The Autonomous Community's competent body for industrial safety may, in its powers of inspection and control, carry out inspections of facilities using its own resources or the services of the control bodies authorised to ensure proper compliance with the obligations laid down in this Regulation.

The holder must always be in possession of a copy of the certificate of the last inspection carried out, this document being available to the retail seller of bulk LPG supplying LPG at the facility concerned and to the competent body of the Autonomous Community.

CONAIF in no way shares the spirit of the current wording. We understand that maintenance companies are legally entitled to carry out a periodic review of the installation of fixed tanks. Including this change de facto undermines the professional powers of category A gas installation companies, which we do not understand to be justified given that to date there have been no industrial safety problems attributable to the installation companies. We also consider that this limits the professional competences of legally authorised installation companies, which certify under their responsibility.

We understand the position of the Administration when wanting an independent agent, and we understand that the Administration has the power to require documentation and to inspect on-site, and in case of negligence, to sanction agents.

			punishable. Finally, and by way of illustration, from the point of view of free competition, the number of category A installation companies registered in the Integrated Industrial Register stands at 7934 compared with 14 inspection bodies authorised in the regulatory field of inspections of fixed LPG storage tanks.		
Others	CONAIF	ITC ICG-03 — Paragraph 6	The closure of LPG storage facilities in fixed tanks shall require administrative authorisation, if required when it was put into service, when provided for in Law 34/1998 of 7 October. The wholesale LPG operator or the bulk LPG marketing company shall notify the competent body of the list of installations that have not recorded any consumption in the last two years so that it can issue a deregistration decision, authorising the installation companies designated by these communities to put this installation into safety. This case does not apply to reservoir installations supplying back-up equipment as generators provided that they are regularly maintained in accordance with the Regulation. CONAIF considers that the wording should be clarified, and only those installations that required it to be opened should be required to obtain authorisation for closure. In addition, we consider that the installation company must have special legal cover in order to put these installations in safety, since in many cases they encounter installations that are difficult to access and that have to pass through restricted passageways.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	SEDIGAS	ITC ICG-03 and 04 – Paragraph 3.2	We consider that it is not appropriate to name the requirements of the RSCIEI for LPG and LNG plants in this section, since the specific regulation on fuel gases, ITCs and one already defines the fire protection measures and the means of extinguishing them.	Partially accepted	An error has been identified in requiring an ICP system that cannot be applied to these installations.

adequate and specific to the risks of the gas installation. For certain activities and installations, the RSCIEI does not apply as indicated in the very scope of Article 2. In addition, Article 1.2 of the RSCIEI states that 'Fire protection measures laid down in the provisions in force governing industrial, sectoral or specific activities or installations shall take precedence over

			those laid down in this Regulation, which shall apply only in complementary cases and for those aspects not provided for therein'. Therefore, no other general regulation may be imposed in relation to a sectoral regulation. sectoral legislation, creating overlapping legislation and potentially conflicting criteria to the detriment of the objective and infrastructure, with specific risks, which already have pursued which is safety in passive and active fire protection comprehensive, comprehensive and self-sufficient sectoral and self-protection measures mentioned above industrial safety regulations, basically contained in: • ITC ICG-3 and 04 are precisely specific safety rules, and therefore, according to the basic principles of the hierarchy of norms, it should take precedence over general rules such as ITC ICG-03 and 04 (LNG and LPG storage facilities). • RSCIEI the purpose of which is to regulate conventional technical regulations and associated regulations. industrial establishments without specific industrial safety legislation, not energy installations regulated under industrial legislation are excluded from the CRISE in so far as that safety regulations. legislation already regulates, such as: • We propose to delete the following text: • Cuberos, spillage control, ATEX zoning. • “(-) The facility must have fire protection appropriate to the risk, in accordance with the provisions of Annexes I to IV to the Regulation on Fire Safety in Industrial Establishments, (Thermal insulation systems and intrinsic safety. • Passive protection (PCI equipment, minimum safety distances, blankets, fire-fighting, etc.) • approved by Royal Decree 164/2025 of 4 March 2004.” • Active protection (leak detection and shutdown, existence of 24/7 control centres and emergency centres, brigades and emergency procedures...) Inspection of PCI means of LNG and LPG plants must be carried out in accordance with Royal Decree 512/2017 only, with reference to Article 22. Periodic inspections of the BIPCI. risk classification, construction criteria and, consequently, inspections of industrial establishments legalised under the active protection provisions, would entail double regulation of RSCIEI (not applicable in our case) should not be confused with inspections of PCI installations reflected in the RIPCI. ‘The inspection of fire protection measures required under Article 22 of the RIPCI in accordance with Annexes I to IV to the Regulation on Fire Safety in Industrial Establishments (RSCIEI) shall be carried out in accordance with Article 13 thereof, at the same time as the inspection of the gas installation referred to in this paragraph.’
Others	SEDIGAS	ITC ICG-03 and 04 — Paragraph 5.	
Others	CONAIF	ITC ICG-04 — Paragraph 1	The purpose of this Supplementary Technical Instruction (ITC) is to lay down the essential technical requirements and minimum security measures to be observed by the

This claim was already rejected at the preliminary hearing. Partially by system as this was not the subject of further hearing accepted installations.

			design, construct and operate the LNG satellite plants referred to in Article 2 (1) (e) of the Technical Regulation on the Safety of Gaseous Fuels Infrastructure and Installations (satellite plants up to 1.500 m³). Same justification as for comment # 1.		analyse the issues raised above.
Others	CONAIF	ITC ICG-04 — Paragraph 3.1	Satellite plants shall be classified according to the joint storage capacity as follows. According to UNE 60210 Same justification as for comment # 1	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-04 — Paragraph 3.2	Assembly shall be carried out by an IG-A authorised company specialising in cryogenicity in the performance of cryogenic works and in pressure equipment. Permanent joints in these facilities shall comply with the Pressure Equipment Regulation on the procedures and professionals conducting these joints. This point suggests that an IG-A company specialising in cryogenicity will also have to be an installation company for pressure equipment. We do not consider such a circumstance to be necessary, especially where a pressure equipment company, as the sole personnel requirement, is that of a qualified technician with competence in the workforce. We understand that, as it is carried out in accordance with a project, it must contain all the requirements, if it is true, that in the execution of the work, the premises of the Pressure Equipment Regulation will be respected, in the same way as in the Industrial Cold Regulation where the refrigeration company is not obliged to be a pressure equipment company.	Rejected	This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.
Others	CONAIF	ITC ICG-04 — Paragraph 4	Description of the installation and supporting calculations, in addition the report shall contain a specific section stating under the responsibility of the designer whether or not the installation to which the project relates is subject to the regulation of major accidents and, where appropriate, the level of impact. This shall include a report justifying whether or not the installation is affected by the regulation of measures to control the risks inherent in accidents.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

Other s	CONAI F	ITC ICG-04 — Paragraph 4.4	serious involving dangerous substances and, where appropriate, the level of concern. In CONAIF's view, the statement that a supporting report is required may give rise to controversy, since, in some cases, some of the agents involved may require it to be certified by another party. We understand that the regulation of major accidents establishes a clear and circumscribed scope of application, which is why we do not consider it necessary to draw up any report, but rather, within the implementation project and in accordance with the responsibility of the designer, to decide whether or not to apply that regulation to him, as is the case in other industrial safety regulations. Once this authorisation has been obtained, if required, in accordance with Article 11 of the Regulation, the following documentation shall be submitted to the competent body of the Autonomous Community prior to the date of first filling: - Construction project for the facility. - Installation certificate from IG-A authorised undertaking specialising in cryogenesis. - Certificate of inspection. - Works management certificate. - Documentation and certification of all pressure receptacles in the installation and their accessories. - Maintenance contract. Once the installation has been first filled, the operator must submit the related documentation to the competent administration within less than 10 working days. Submission to the competent body of the Autonomous Community shall entitle the person concerned to put the product into service, and in no case shall the submission of the documentation imply technical compliance with it by the competent body of the Autonomous Community.	This claim has already been rejected at the preliminary hearing stage and is not the subject of this second hearing procedure.
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			Once the submission has been made to the competent body, the operator of the satellite plant may request the first filling of the LNG tanks. CONAIF considers that there should be flexibility in the case of installations storing fuel, and that the first filling should be permitted and the documentation recorded after that within 10 working days. We understand that if this is not the case, it can lead to installations that are registered not being filled and the current deadlines for withdrawals or similar tests being exceeded and being able to be filled without major problems.		
Others	CONAIF	ITC ICG-04 — Paragraph 5.2	5.2. Inspections Periodic reviews The operator of an LNG satellite plant shall be responsible for having the facility inspected every five years. This inspection review shall include the tests and verifications set out in reference GAS_001) of the table of standards and must in all cases be carried out by the installation company IG-A specialising in cryogenicity with which the licence holder holds the maintenance contract with an authorised control body. The inspection body shall issue the relevant inspection documentation, which shall be handed over by the operator of the installation and shall act in accordance with Article 20 of the Regulation. The administration in its inspection and control powers may carry out inspections of facilities using its own resources or that of authorised control bodies. If the inspection reveals that the conditions of the project have changed, the body that carried out the check shall immediately inform the competent body of the Autonomous Community. A pneumatic pressure test must be carried out every fifteen years to avoid introducing moisture into the tank, in accordance with the criteria laid down in reference	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

GAS_001 of the Standard Table. The test will be carried out by a control body, assisted by an IG-A authorised undertaking specialising in cryogenicity, which will have to issue a test report once the operation in question has been successfully completed. CONAIF in no way shares the spirit of the current wording. We understand that maintenance companies are legally entitled to carry out a periodic review of the installation of fixed tanks. Including this change de facto undermines the professional powers of category A gas installation companies, which we do not understand to be justified given that to date there have been no industrial safety problems attributable to the installation companies. We also consider that this limits the professional competences of legally authorised installation companies, which certify under their responsibility. We understand the position of the Administration when wanting an independent agent, and we understand that the Administration has the power to request documentation and inspect on-site, and in case of negligence, sanction the punishable agents. Finally, and by way of illustration, from the point of view of free competition, the number of category A installation companies registered in the Integrated Industrial Register stands at 7934 compared with 11 inspection bodies authorised in the regulatory field of inspections of fixed LPG storage tanks.	
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Other CONAIF

ITC ICG-04
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Paragraph
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The process of inertisation will be carried out using nitrogen or another inert gas and must be carried out by the authorised undertaking IG-A specialising in cryogenicity that maintains the plant and supervised by an inspection body that will issue a certificate that the operation has been successfully completed, which must be handed over to the competent body of the Autonomous Community.

This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

			In no way do we agree with CONAIF that the process of inertitisation must be re-certified by a control body. De facto, it entails a limitation of the competences of legally established and qualified installers. Moreover, we do not understand why an IG-A company specialising in cryogenicity should be required to have higher CR insurance than IG-A companies, with more training, but, on the other hand, the ability to act should be limited. It is clearly our understanding that installation companies are very adversely affected by the very partial increase in their capacity to act, in exchange for a significant increase in requirements.		
Others	CONAIF	ITC ICG-05 — Paragraph 3	LPG service stations shall respect a minimum distance of 3 metres from the openings in the tanks to the storage vents or vents of other hydrocarbons. We believe that CONAIF should remove all references to safety distances that may conflict with the applicable UNE standards. It is not appropriate to refer to an implementing provision and introduce some similar provisions in the regulation itself that could give rise to conflicting interpretations.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-05 Paragraph	After passing the tests referred to in paragraph above, the commissioning of the installation may this will involve an initial inspection. During this inspection, the tests and verifications provided for in the above standards shall be carried out, as appropriate. The initial inspection may or may not be ordered by the competent body of the Autonomous Community where the facility is located. To that end, it may use its own resources or the services of an inspection body. These operations shall be carried out by an inspection body. The inspection, if carried out, shall be attended by inspection staff assisted by the installation company and the site management. During the tests,	Rejected	This claim was already rejected at the hearing preliminary hearing, which is not the subject second hearing procedure revert to analyse the issues raised above.

			the site management and the installation company must take all necessary precautions to ensure that they are carried out safely in accordance with the standards they apply for each of the fuels and their storage. In CONAIF's view, the initial inspection should not be an additional step in the process of bringing the facilities into service, but rather a check on the sample of facilities put into service, i.e. random inspections will be required of some facilities before they are put into service. The reason is simple, we understand that the execution of a USSR is associated with a project, which is prepared by a qualified technician who is also competent, the installation company certifies that it has carried out the actions in accordance with the project and finally there is a work management that again certifies that everything has been done in accordance with the project or in accordance with the changes approved by that work management. We do not understand why installation companies will be required to provide more civil liability insurance, along with more specific training so that their actions are finally certified by a new agent.		
Others	CONAIF	ITC ICG-05 — Paragraph 4.4	The gas installation company shall send the relevant installation certificate to the operator of the installation. Furthermore, once the tests have been completed with a favourable result, the inspection body or the competent administration where the initial inspection is required shall issue an inspection certificate, which it shall send to the operator of the installation, the installation company and the site management. In line with justification for comment #40	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-05 — Paragraph 4.5	In accordance with Article 11 of the Regulation, it shall be submitted to the competent body of the Autonomous Community prior to the date on which the	Rejected	This claim was already rejected during the preliminary hearing procedure, and this second hearing procedure did not cover the following:

the distribution company carries out the first supply of the following documentation:

- Installation certificate,
- Certificate of inspection (if applicable)
- Construction project for the facility.
- Works management certificate.
- Maintenance plan, either by external contract or by own means.

The documentation shall be submitted no later than 10 working days after the first filling of the installation. The submission of such documentation does not under any circumstances imply technical compliance with it by the competent body.

Submission to the competent body of the Autonomous Community shall entitle the person concerned to put the product into service, and in no case shall the submission of the documentation imply technical compliance with it by the competent body of the Autonomous Community.

Once the submission to the competent body has been made, the facility shall be deemed to be serviceable, at which point the operator of the facility may contact the marketing or distribution company to request the first supply to the facility.

As they are reservoir facilities, we understand that submitting a request for filling may give rise to a problem that has not been taken into account, namely that there are facilities that are never filled and when they are filled they do not present the relevant evidence of retimbrations in force.

Maintenance and periodic inspections of service stations shall be carried out in accordance with the provisions of the standards referred to in paragraph 3 of this ITC, as appropriate... The operator of the service station shall be responsible for:

Other CONAIF

ITC ICG-05
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Paragraph
5

analyse the issues raised above.

This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

request a periodic inspection of the installation every five years from an installation company authorised by the inspection body authorised for the type of fuel in question, which shall issue the corresponding inspection review certificate.

That periodic inspection shall include all the elements forming part of the service station, including storage tanks.

Irrespective of the above, at the discretion of the competent administration, the latter may order an inspection after 5 years of a random number of installations. This inspection may be carried out by inspection bodies or by the administration using its own resources.

The Confederation considers that the USSs must be subject to regular checks, but by installation companies and not by inspection bodies.

If the Administration so wishes, it may order inspections of facilities.

In any event, we do not share the view that a control body must intermediate in order to certify the correct maintenance or otherwise of an installation, on the understanding that an installation company and a gas installer of a sufficient category are qualified for this purpose in accordance with ITC-09. In addition, due to an issue that is a fundamental pillar of the European Union, due to a question of competence, this system of inspections would be carried out by only 11 authorised officials.

IRG-1: Delete the 5-year guarantee paragraph.

IRG-2: Delete the 5-year guarantee paragraph.

IRG-3: Delete the 5-year guarantee paragraph.

We do not understand why installations should have a higher minimum guarantee than the one established by law and therefore we believe that it should only be governed by the provisions of Royal Legislative Decree 1/2015.

ITC ICG-07 – Consideration of IRGs models: add the following

Rejected

This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.

The data required according to the type of

Other
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ITC ICG-07
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Annexes

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ITC ICG-07 – Consideration of IRGs models: add the following

		Annexes	facts. Type of supply (channelled, bulk or packaged) Type of packaging (s), if any. Type of Gas Installation reference standard for common and individual installations (60670 or 60620)		installation is specified in each IRG model.
Others	CONAIF	ITC ICG-07 — Paragraph 3.2	In the case of ventilation yards in new buildings, the minimum floor area shall be equal to 1 NT and always greater than 6 m². We, CONAIF, are not sure whether this paragraph is appropriate, since we understand that current legislation requires combustion products to be covered in new buildings.	Rejected	Rejected as compromising security conditions.
Others	CONAIF	ITC ICG-07 — Paragraph 3.3	Gas-fired boilers for heating or hot water with an effective output of more than 70 kW shall be installed in accordance with reference GAS_005 (UNE 60601) of the table of standards, as regards the safety requirements applicable to premises and enclosures housing hot-water or steam boilers. Likewise, direct flame equipment for absorption cooling, as well as equipment for electricity generation or cogeneration, provided that their combined rated effective output is greater than 70 kW, must be installed in machinery rooms or integrated as stand-alone equipment in accordance with the requirements set out in reference GAS_005 (UNE 60601) of the table of standards. Ventilation requirements for industrial process equipment shall be governed by the Pressure Equipment Regulation. Not all engine rooms are covered by standard 60601, which excludes industrial process equipment. In fact, a contradiction between the requirements of the standard and those of the Pressure Equipment Regulation should be avoided.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	ENI	ITC ICG-07 — Paragraph 4.4.1	Justification: The Ministry has accepted the comment we sent in the March consultation regarding the lack of clarity about who it is responsible for the commissioning of a gas receiving facility connected to a unclient natural gas satellite plant, amending the	Accepted	The proposed amendment is included.

text to clarify it.

In this regard, they have also included a specific model IRG-7.2 Certificate of prior testing and commissioning of gas installations not fed from a distribution network. However, this model refers only to LPG installations and sellers, and not to other possible installations receiving gaseous fuels not fed from distribution networks (uniciient natural gas satellite plant, for example) and to undertakings supplying fuel to the installation (natural gas seller in the same example), which we consider to be inconsistent with the amendment made to the wording of paragraph 4.4.1.

We therefore suggest revising this IRG-7.2 model to make it more generic, and not restricting it to LPG installations and sellers only.

Proposal:

IRG-7.2. CERTIFICATE OF PRIOR TESTING AND COMMISSIONING OF GAS INSTALLATIONS NOT FED FROM A DISTRIBUTION NETWORK

It should contain the following information:

a) Details of the LPG marketing company:

1. Name.
2. Steering.
3. Helpline.
4. Company representative.

b) Details of the gas installation:

1. Policy number for LPG installations, if applicable.
2. Type of installation.
3. Type of gas.
4. Steering.

c) Details of the holder or representative:

1. Name.
2. National Identity Card (DNI) or National Identity Number (NIE) (or, failing that, passport number).
3. Steering.

			d) Other data: 1. Date. 2. Signature of the technical person and stamp of the LPG marketing company. 3. Signature of the client or representative. e) A statement as follows: 'The company placing LPG on the market, which is responsible for bringing the installation into service, certifies that the tests and checks indicated by the legislation in force have been carried out, that the results of those tests and checks are correct and that the installation remains in service.'		
Others	CONAIF	ITC ICG-07 — Paragraph 5.2	2. In the case of a pipeline gas distribution company, by its own staff or under contract to the distribution company. Both contracted and own staff must have the corresponding qualifications as indicated in the previous section (b.1) or be duly certified for this activity by an entity accredited for the certification of persons in accordance with Royal Decree 2200/1995 of 28 December. Similarly, the staff recruited must work within an authorised installation company. Since CONAIF considers that this regulatory anomaly should be resolved. The Regulation requires the personnel carrying out the inspection to be a qualified gas installer. Insofar as the certification of the person referred to in the paragraph does not lead to the qualification as a gas installer, this option should not be allowed as it is not subject to any regulatory point or provision.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-07 — Paragraph 5.2	1. The pipeline gas distributor shall send a communication to the owner of the point of supply stating the obligation to carry out the periodic inspection, using the services of an installation company or the distributor. This communication shall state the date from which the customer will be deemed to carry out the inspection with the distribution company. The time	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

Others	Endesa	ITC ICG-07 — Paragraph 5.2	this must be given by the distributor so that the customer can express his opinion for at least 6 months. If the pipeline gas distribution company carries out the inspection at the customer's choice, it shall give at least 5 days' notice of the date of the inspection visit and request access to the installation on the day indicated. [...] Since CONAIF we have long been calling for an effective liberalisation of the inspection market. One of the main problems is that with the current legislation it is a very complicated task for an installation company to carry out inspections, the reason: Communications do not always reach the customer but the time to carry out the inspection by the installation company starts to count. There are only 45 days for the installation company to upload the inspection certificate, so we propose that there should be at least 6 months and that the system for notifying the obligation to inspect should be a system that certifies receipt by the customer.	Accepted
Justification: Section 5.2 (d) of ITC ICG-07 defines the general procedure for action by the piped gas distribution company when it carries out the periodic inspection. At least five days in advance, the distribution company shall inform the operator of the installation of the date and time of the inspection. If this is unsuccessful due to the holder's absence, the distribution company shall notify the holder of the date of a second visit. This procedure is currently regulated in DA1a of RD 984/2015, which includes the obligation for the distributor's communication to include a free customer service telephone to which the operator of the installation may turn.				

The draft Royal Decree does not provide for the inclusion of a telephone number in the notification of the distribution company to the owner. It is considered that it may be useful for the holder to have a telephone number from the distributor that he can call in case he has any doubts about the periodic inspection or wishes to change the date of the periodic inspection, and it is therefore proposed to keep the obligation for the distributor to inform a free customer service telephone available to the holder for matters related to the periodic inspection.

Proposal:

'4. In the event that the pipeline gas distribution company does not receive the periodic inspection certificate or the installation anomaly report by the deadline indicated in the communication from the pipeline gas distribution company, it shall be understood that the operator wishes the inspection to be carried out by the pipeline gas distribution company itself, which shall communicate the date and time of the inspection at least five days in advance to the operator. That communication shall include a free customer service telephone number so that the operator of the installation can contact the distribution company in order to agree on an alternative date and time in the event of the operator's unavailability.

5. If it is not possible to carry out the inspection because the operator is absent or, failing that, the user, the undertaking distributing the piped gas shall notify the operator of the date of a second visit. A free customer service telephone number shall be provided so that the operator of the installation can contact the distribution company in order to agree on an alternative date and time in the event of the operator's unavailability.'

5.4. Correction of anomalies

(a) Main Anomalies (including all leaks): they must be rectified immediately. If the

Other CONAIF
ITC ICG-07
—
Paragraph
5.4

total or partial interruption of supply, the maximum period for cure shall be 15 analyse the issues raised above.
working days from the date of the review or inspection.

In the event that a major anomaly is detected, the gas supply shall be interrupted and the affected part of the installation or equipment, as appropriate, sealed.

All leaks detected in gas installations lighter than air shall be considered as a major abnormality, except:

- In individual reception facilities, those produced outside without risk.
- In common reception facilities, those that occur on an external airside with a leak flow of between 1 and 5 litres per hour.

All leaks detected in gas installations heavier than air shall be considered as a major abnormality.

(b) Secondary anomalies:

- Lack of watertight: they must be remedied within 15 working days.
- Other anomalies: they must be remedied within six months.

[...] Major anomalies must be rectified within 15 working days. Secondary anomalies shall be rectified within 6 months.

Once the deadlines for remedying the anomalies have passed, the supply will be suspended, and each Autonomous Community may regulate the specific terms. The Autonomous Community will have 2 years to regulate the cut-off procedure. If this is not the case, the company distributing the piped gas will cut off the supply, indicating this to the competent body of the Autonomous Community.

Facilities that are not inspected should be required to have the possibility to discontinue supply; facilities that are not inspected should not be allowed not to be verified;

			have no consequences of any kind.		
Other s	CONAIF	ITC ICG-08 — Paragraph 2.2	When gas appliances are placed on the market via supermarkets, the internet or similar, the marketer shall be required to deliver the gas appliance start-up certificate to the end user and inform him that he must return it signed by a gas installer within a maximum period of one year. The placing on the market of equipment should be restricted in similar terms as the placing on the market of pre-charged F-gas equipment, in the interests of the safety of installations, the environment and people.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Other s	CONAIF	ITC ICG-08 — Paragraph 5.1	Gas appliances not connected to a receiving installation must be connected in accordance with the above reference and may be connected by the user, unless otherwise specified by the manufacturer. Similarly, gas appliances not connected to a receiving installation are covered by the provisions of the same reference as regards the requirements for their location and for the ventilation of the premises where they are used. In the case of connections using elastomeric flexible tube with clamp, the maximum length of the tube may not exceed 1.5 metres, except in the case of mobile heating appliances, which may not exceed 0.6 metres. We believe that this paragraph does not provide more clarity and may cause serious damage. The first paragraph is already sufficiently clear.	Rejected	This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.
Other s	CONAIF	ITC ICG-08 — Paragraph 5.2	(a) For the technical assistance of the manufacturer, provided that he has a certified quality system, or for gas installers meeting the requirements of paragraph 4 of ITC ICG-09, for conducted gas appliances (type B and C appliances) of more than 24.4 kW of effective power or covered fire gas vitroceramic. (b) For the manufacturer's helpdesk or a gas installation company, for the rest of the appliances. We, CONAIF, understand that the requirements for action	Rejected	The text referred to does not correspond to the text published for the second hearing. This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.

			they should be comparable, we understand that there are several access routes for the qualification of gas installer, but we do not share the view that a quality management system is a prerequisite for starting an appliance when a gas installer is required to undergo additional training.		
Others	CONAIF	ITC ICG-08 — Paragraph 5.2	(c) For appliances intended for the thermal comfort and well-being of persons who are also covered by the Thermal Installations Regulation, the operator who starts the appliance may work within a thermal installation company but the installer must meet the following requirements: 1. For IG-A gas installers. Be a gas installer Possess a thermal installation operator's licence. 2. For IG-B or IG-C gas installers Be a gas installer Possess a thermal installation operator's licence. Hold the APMR or APMR – AD rating in case the appliance has to be adapted due to a change of gas family. It shall not be mandatory for the undertaking to register with the competent body of its Autonomous Community as a gas installation undertaking, and its activities shall be limited only to equipment intended for the well-being and thermal comfort of persons. The aim is to harmonise the current rules along the lines of the RSIF.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-08 — Paragraph 5.2	The operator who starts up a gas appliance must issue and deliver to the holder, where appropriate, a start-up certificate in accordance with the model in Annex 4 to this ITC. The owner shall also keep this documentation in the documentary file and make it available to the competent body of the Autonomous Community. The holder	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

			you must send the above-mentioned certificate to the point of sale where you bought it. It must also inform the gas distribution company or LPG marketing companies that keep it with the plant documentation throughout the lifetime of the appliance. In the event of a fuel switch and adaptation of the gas burner, the gas installation company shall issue a certificate of action. An inspection body shall be required to certify that maintenance has been properly carried out. CONAIF considers that, even if a good measure is taken, it is practically impossible for the licence holder to keep the documentation for the useful life, if we consider that the commissioning of the equipment is notified to the distributor or supplier. On the other hand, we do not understand that a control body is not intermediated to certify an action of a gas installation company.		
Others	CONAIF	ITC ICG-08 — Paragraph 5.3	Favourable certificate of inspection by a control body indicating the place where it is set up We do not understand why a monitoring body should not be used to certify the actions of a gas installation company.	Rejected	This claim was already partially accepted during the preliminary hearing procedure, and this second hearing procedure does not cover the re-examination of issues previously raised.
Others	CONAIF	ITC ICG-08 — Paragraph 6	The holder of gas-fired appliances not subject to Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016, which have been certified by the unit verification procedure, shall be responsible for contracting every five years, and within the calendar year, the performance of the periodic inspection of the gas-fired appliance to a gas installation undertaking in category IG- A inspection body, which shall issue the relevant inspection review certificate. We understand that an IG-A company is able to	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

			carry out the periodic review of these gas-fired appliances.		
Other s	C. Madrid	ITC ICG-09	Our claim proposed to remove the access path set out in paragraph 2 (c): Have passed a theoretical and practical examination in an Autonomous Community on minimum contents as set out in Annex 1 to this JTI. As this does not seem possible, it is proposed to include this access route so as to make it clear that the Autonomous Communities do not have an obligation to organise these examinations every year.	Accepted	The text has been amended.
Other s	C. Madrid	ITC ICG-09	Our claim proposed to amend paragraphs 3.1.a.1 and 3.1.B.1 in the same vein, to include the two new ones category A specialist qualifications: however, it has been amended in section 3.1.a.1 but not in section 3.1.b.1 Proposal: Include the same amendment in section 3.1.b.1 as in section 3.1.a.1	Accepted	The text has been amended.
Other s	CONAIF	ITC ICG-09 Annex 1	General comments are provided below: Remove any reference to the lead pipe, be it welds and transitions. Remove petrol lamparilla equipment. The disposal proposals respond to the fact that these materials are no longer used in industry or manufactured.	Rejected	This claim was already rejected at the hearing of preliminary hearing, which is not the subject of second hearing procedure revert to analyse the issues raised above.
Other s	CONAIF	ITC ICG-09 Annex 1	Include new materials from reception facilities such as: multi-layer piping. Adaptation to new materials in force and in use.	Accepted	This claim was already accepted at the hearing preliminary hearing.
Other s	CONAIF	ITC ICG-09 Annex 1	Remove within the requirements the practical knowledge part related to polyethylene welding. This comment is subject to the acceptance or not of the comment #66. If the proposal of the comment #66, this comment is null and void. If applicable, on the contrary, it is requested that this be taken into account. Polyethylene welds are excluded from the scope of competence of gas installers A.	Rejected	This claim was already rejected at the hearing of preliminary hearing, which is not the subject of second hearing procedure revert to analyse the issues raised above.
Other	CONAIF	ITC ICG-09 Annex 1	Enter the following qualification for the installer of category B: ITC ICG-06 “Liquefied gas packaging facilities of the	Rejected	The list in Annex 1 sets out the exclusions. for the higher category. With the text currently, they are not required to be aware of

			petroleum (LPG) for own use' Enter the following qualification for the installer of category C: ITC ICG-06 "Installations for own use of liquefied petroleum gas (LPG) containers", only for containers containing up to 15 kg. The category C installer's knowledge does not include containers of more than 15 kg of LPG, but is required as a theoretical knowledge by linking all of Instruction 6 without limiting its scope to containers of less than 15 kg.		ICG 06 to category C installers. Section 2 of ITC-ICG 09 limits the actions of installers.
Others	CONAIF	ITC ICG-09 — Annex 1	We consider that the minimum basic knowledge of science such as mathematics, chemistry or physics included in the knowledge of category B and C installers should be removed as this knowledge was considered to be possessed by installers themselves. We understand that implicitly maintaining this basic knowledge means indicating that a category B or C installer is a second-level technician, as his access routes require a series of basic training content not linked to the activity itself but to the academic background of the person.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-09 — Annex 2	Delete point 10 and replace it with: 10. Handling and measurement of electrical quantities: Handling of an amperimetric clip. 2.1.1. In gas installations — Multi-meter operation (a) Assembly, modification or extension, overhaul, maintenance and repair of: The content removed has no direct impact on the daily work of the APMR installer, but the proposed content if relevant. Proposal for a regulation final text 150 (b) Start of gas appliances, maintenance and repair of regulating stations and of connections to the gas network. Editorial error is detected, by redundant text in the following cases: installation of appliances (type B and C appliances) was paragraph 2.1.1.1. In gas installations, covered by installers of category A gas installers operating LPG or hydrogen facilities shall have civil liability insurance or other equivalent guarantee covering any damage that may occur in the installation and in paragraph 2.1.1.2. In gas installations of category B and C, the knowledge required for the APMR installer. CONAIF this states that the knowledge is not linked to the welding and bonding of polyethylene is required, but then the installer is not able to execute them. We understand that this misalignment needs to be addressed.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	SEDIGAS	ITC ICG-09 — Paragraph 3.2	Paragraph 2.1.1	Accepted	The highlighted error is corrected.
Others	CONAIF	ITC ICG-09 — Paragraph 2.1.1	Paragraph 2.1.1	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Other s	CONAI F	ITC ICG-09 — Paragraph 2.1.2	Paragraph 2.1.2	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

Others	CONAIF	ITC ICG-09 — Paragraph 3.2	d) Undertakings in category IG-A that operate CNG, LNG and this type of facilities must have a technical manager of the undertaking holding a university degree or with specific complete and complete a course of the minimum duration set out below, the subject of which is listed in this section. For hydrogen specialist (IG-A), the training shall be permitted by law. CONAIF does not agree that there is a need for a technical manager in IG-A to H2 plants (CNG) LNG and hydrogen facilities. H2 sub-specialties (have) been established with APMA AB training are covered within the knowledge of an IG-A installer. Additionally specific H2 training for workers and pressure safety has also been extended. There is a direct link between the qualifications of a company and the possession of a university degree. and professionals and the possession of a university degree, and we clearly believe that this approach is flawed.	Rejected
Others	CONAIF	ITC ICG-09 — Paragraph 3.2	The gas installation company IG-A shall be responsible for training its staff to work.	Rejected

This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

- H2 production: hydrogen production system, distributed facilities (2 hours).
- Evaluation (1 hour)

In the case of LNG (GI-A cryogenic specialist), the training shall be at least:

- Specific materials and connections for cryogenic temperatures. Welding approval. (4-hour)
- Working pressures of LNG facilities. (3-hour)
- Welding in materials working at cryogenic temperatures (3 hours)
- Welding practices for materials for work with cryogenic systems (5 hours)
- Evaluation (2 hours)

Courses shall be given in schools which must notify the said competent authority two months before the start of each course, specifying the training programmes to be followed in their school. The following are considered to be valid centres for the provision of these courses:

- a) Centres within the administrations responsible for vocational training for employment and public entities or undertakings that are accredited or registered to provide training leading to the qualification of gas installer.
- b) Private training centres and entities accredited or entered in the relevant register to provide professional training leading to professional certificates related to the gas installations industry
- c) Education centres authorised by the education administration to provide the training courses leading to vocational qualifications related to the gas installations industry.

In CONAIF's view, in order to ensure the equality of all installation companies, courses must have a fixed minimum duration and be given in training centres that have requested that they be given. We understand

			that the model laid down in Royal Decree 115/2017 should be followed.		
Others	CONAIF	ITC ICG-09 — Paragraph 3.3	— To guarantee, for a period of five years to be determined by the legislation in force on guarantees and consumer protection, the shortcomings attributed to improper performance of the operations entrusted to them, and the consequences thereof; The Confederation does not agree that the guarantee for a gas installation is by regulatory requirement greater than the general guarantee provided for in consumer protection legislation.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-10 – Annex	Remove the 5-year guarantee from the certificate. We do not agree with this obligation on installation companies, as it provides greater guarantees than any other professional or manufacturer. In addition, this entails an extra cost for the US by extending the scope of liability so that their CR insurance premiums would increase proportionally to the longer term of the guarantee imposed.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-10 — Paragraph 1	Vehicles equipped with LPG installations other than for domestic use shall also be subject to the provisions of this ITC. As long as there is no UNE or international standard applying to such vehicles, the provisions of normative reference GAS_016 of the table of standards shall apply. CONAIF considers that this ITC must accommodate under its umbrella the installations of foodtrucks and similar vehicles where the use is not domestic.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-10 — Paragraph 4.1	The operating pressure of gas-consuming appliances shall be 30 mbar. We, CONAIF, propose to delete it by limiting and contradicting standard UNE EN 1949. There are standard gas appliances 3P (37), 3P (50) and 3B/P (50) which are excluded from installation, although permitted in other States	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

			States.		
Other s	C. Madrid	ITC ICG-11	Paragraph 5.12.1 already includes, as should be done in general, the fire protection that has been amended in accordance with the comments included in our submissions, and we therefore consider that the following should be deleted, which still appears at the end of paragraph 5.12.9: 'In addition, in operational areas, and exclusively for areas without the presence of gas, the provisions of Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments shall be followed.' In addition to referring to repealed legislation, as already explained in the claim, this type of installation does not fall within the scope of the CRISE and therefore the correct approach is that indicated in section 5.12.1 of the General Rules. Proposal: It is proposed to delete the last paragraph at the end of paragraph 5.12.9 which states: 'In addition, in operational areas, and exclusively for areas without the presence of gas, the provisions of Royal Decree 2267/2004 of 3 December approving the Regulation on fire safety in industrial establishments shall be followed.'	Accepted	The text has been amended.
Other s	GASIB	ITC ICG-11 — Paragraph 5.3	The distances between tanks, spheres or between tanks and spheres have not been included in this JTI. Proposal: Distances between tanks, spheres or between tanks and spheres. The minimum horizontal distance between the LPG pressure tanks or between an LPG pressure tank and any other pressurised storage tank for hazardous or flammable materials shall be as follows: Between two spheres, between two vertical axis reservoirs, between two horizontal axis reservoirs or between a sphere	Accepted	It is included as a note to the distance table.

			tank, half the diameter of the largest container, at least 1.5 metres. Distances shall always be measured from the horizontal projection of the end of the container (spheres or reservoirs).		
Others	CONAIF	ITC ICG-11 — Paragraph 6	The installations shall be built under the responsibility of the owner of the installations, who shall instruct an IG-A installation company to carry out the installation personally or externally, ensuring the safety of the staff involved in the work and taking appropriate precautions to avoid affecting other buried installations. We believe that, in accordance with the qualifications of an installation company set out in ITC-09, it should be included that the installations subject to ITC-09 are carried out by IG-A installation companies.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.
Others	CONAIF	ITC ICG-11 — Paragraph 7.1	Before the installation is put into service, the installation company IG-A responsible for carrying out the installation shall carry out the stress and leakproofness tests, in the presence of a control body provided for in standard GAS_30 of the table of standards as appropriate depending on the type of installation.	Rejected	This claim was already rejected at the preliminary hearing stage and was not the subject of this second hearing procedure.

A mechanical strength test shall be carried out at the site certified by a control body when the tanks are changed from their site or if a defect or anomaly caused by transport, installation or handling is observed at the discretion of the site management.

During the preparation and execution of the stress and leakproofness tests, the absence of persons from outside the stress and leakproofness tests shall be ensured in the working area affected by the risk.

Upon completion of the tests with a positive result, their description and results shall be incorporated in the certificate of

		project management. We understand that the installation company IG-A has sufficient capacity to perform and certify the tests performed, therefore we propose the amendment introduced.		
Others	C. Madrid	ITC ICG-12 In the new text, the section 'Accepted' has been amended. 2.19 of Chapter IV according to our arguments, but this does not apply to paragraph 2.11 of Chapter III, which has remained the same and should be amended in the same way as paragraph 2.19 of Chapter IV has been amended for that point. The initial text provided: CHAPTER III: PRESSURE MONITORING STATIONS, MEZCLA-INYECTION, MEASURING AND SEPARATING FOR INLET PRESSURES GREATER THAN 16 BAR 2.11. Fire-fighting and other safety measures (page 242 of the initial text) "The evacuation requirements laid down in the regulations applicable to installations must also be complied with." CHAPTER IV: COMPRESSOR STATIONS 2.19. Fire-fighting and other safety measures (pages 247 and 248 of the initial text) 'The facility must have fire protection appropriate to the risk, as laid down in Royal Decree 2267/2004 of 3 December. (...) The evacuation requirements laid down in Royal Decree 2267/2004 of 3 December shall also be complied with.' Proposal: Amend the evacuation requirements in Chapter III, paragraph 2.11 along the same lines as those already changed in Chapter IV, paragraph 2.19. The new text states: CHAPTER III: PRESSURE MONITORING STATIONS, MEZCLA-INYECTION, MEASUREMENT AND SEPARATION FOR		The proposed amendment is included.

			INPUT PRESSURES GREATER THAN 16 BAR; 2.11. Fire-fighting and other safety measures (page 263 of new text) 'The evacuation requirements laid down in the regulations applicable to installations must also be complied with.' CHAPTER IV: COMPRESSOR STATIONS 2.19. Fire-fighting and other safety measures (page 269 of new text) 'The installation must have fire protection appropriate to the risk, in accordance with the provisions of Annexes I to IV to the Regulation on Fire Safety in Industrial Establishments, approved by Royal Decree 164/2025 of 4 March 2004. With regard to the design, installation, maintenance, commissioning and periodic inspections of active fire protection facilities, the provisions of the Regulation on fire protection facilities, approved by Royal Decree 513/2017 of 22 May 2004, must be followed. (...) The evacuation requirements laid down in Royal Decree 164/2025 of 4 March 2007 must also be complied with.'		
Others	SEDIGAS	ITC ICG-12 — Chapter I — Paragraph 4.2	An editorial error was detected in the following, as the text that existed in the first version for its last paragraph was retained and, at the same time, the new wording proposed for that paragraph was included: 'The commissioning of an installation shall be carried out by qualified personnel authorised by the pipeline gas distribution company or the operator of the distribution installation and with the knowledge of the management of the works. The commissioning of an installation shall be carried out by qualified personnel authorised by the infrastructure operator or the operator of the installation.	Accepted	The suggested paragraph has been deleted.
Others	SEDIGAS	ITC ICG-12	In the text of this second hearing, we have	Accepted	The proposed amendment is included.

		Chapter II – Paragraph 2.7	the content of the last subparagraph of paragraph 2.7 has been amended to include a description or request that we consider to be incorrect, since the text of the first hearing was correctly defined. We therefore consider that it should be specified in this section that the cathode protection system that may be required must be temporary in nature (as specified in the text of the first hearing). The reason is that the objective of this measure is to ensure the protection of the buried pipeline against possible risks of corrosion, during the construction phase of the pipeline, before it is put into service. Once the main cathode protection system is activated in operation (which will be permanent) temporary protection is no longer needed and should be withdrawn. Proposal: 'Based on the assessment of the probability of corrosion, a temporary permanent cathode protection system may be required that would be installed when the pipes are buried and prior to the activation of the main (permanent) cathode protection system.'		
Others	SEDIGAS	ITC ICG-12 – Chapter II – paragraph 4.2	An error is detected in the following paragraph, referring to 'commissioning' of a pipeline instead of 'commissioning': 'Between the third month and the year of commissioning of the pipeline, a coating analysis should be carried out in order to detect any defects caused during burial of the pipeline.'	Accepted	The highlighted error is corrected. A similar error is corrected in Chapter V, paragraph 4.6, and Chapter V, paragraph 4.4.
Others	ENAGES	ITC ICG-12 – Chapter III – Paragraph 2.11	In the text of this second hearing procedure, the content of the detection and alarm of fires by the detection and leakage of gas included in section 2.11 has been amended. Media fire fighting and other safety measures. We consider that the content of the text of this second hearing is incorrectly defined in comparison with the text proposed in the first hearing of	Partially accepted	The second point on the list has been amended.
			hearing. In the first hearing, it was stated: 'The installation must have fire protection appropriate to the risk. At least the following		

fire-fighting means shall be installed:

- Fire extinguishers: fire extinguishers shall be installed in such a way that the maximum horizontal travel from any point of the installation to the fire extinguisher does not exceed 15 metres.
- Fire detection and alarm: a fire detection system shall be installed in the boiler room and control room. A fire control and alarm unit shall be provided."

The second hearing procedure states: "The installation must have fire protection appropriate to the risk. At least the following fire-fighting means shall be installed:

- Fire extinguishers: fire extinguishers shall be installed in such a way that the maximum horizontal travel from any point of the installation to the fire extinguisher does not exceed 15 metres.
- Detection of gas leaks: a gas leak detection system shall be installed in the boiler room and control room acting on a manual rearmament shut-off valve located outside."

The new wording contained in this second hearing replaces the detection and fire alarm with the detection of gas leaks, the latter not corresponding to a fire protection system, but to a safety measure for the detection of gas leaks, which is already provided for in the following paragraph of this section 2.11, which states:

Regulation buried or located within rooms shall have a suitable gas detection system that allows the early detection of gas leaks inside the installation.';

Proposal:

Keep the text proposed in the first public consultation

			with regard to clause 2.11. Fire and other safety measures, which stated: 'The installation must be provided with fire protection appropriate to the risk. At least the following fire-fighting means shall be installed: — Fire extinguishers: fire extinguishers shall be installed in such a way that the maximum horizontal travel from any point of the installation to the fire extinguisher does not exceed 15 metres. — Fire detection and alarm: a fire detection system shall be installed in the boiler room and control room. A fire control and alarm unit shall be provided. Furthermore, the regulating stations shall have an adequate gas detection system to enable the early detection of gas leaks within the installation. The evacuation requirements laid down in the regulations applicable to the installations must also be complied with."		
Others	NEDGIA	ITC ICG-12 — Chapter III – Index	"CHAPTER III: PRESSURE MONITORING STATIONS, MEZCLA-INYECTION, MEASUREMENT AND SEPARATION AND REVERSE FLOW INSTALLATION FOR INLET PRESSURES GREATER THAN 16 BAR'	Accepted	The proposed text is included.
Others	UNITES	ITC-ICG-13	An updated list of standards and some additional comments are indicated from UNE.	Accepted	The proposed text is included.