



Unattended Payment Terminals Ltd.

Tower House
Loughnafulla
Thurles
Co. Tipperary
Ireland

31st March 2009

Submission regarding public consultation – Review of Dangerous Substances Acts – updating the regulatory regime applying to petroleum spirits (petrol) and other fuels

Area of relevance: Unattended self-service dispensing of petroleum

Dear Sir/Madam,

This submission is in relation to the consideration of provisions to allow the operation of unattended self-service sites for the dispensing of petroleum. This submission provides, in brief, a proposed way forward with regard to unattended petroleum dispensing.

Unattended Payment Terminals Ltd. (Upay), are an interested party, supplying Chip and PIN card payment systems to retail petroleum stores. Upay developed their credit and debit card "Pay-at-Pump" system in-house and deployed their first system in Ireland in 2007. At present, installed Pay-at-Pump systems in Ireland dispense petroleum while the sites are attended. They do so in accordance of the 1979 RPPS regulations (Dangerous Substances (Retail and Private Petroleum Stores) Regulations, 1979," S.I. No. 311 of 1979).

The provision of unattended self-service facilities for dispensing petroleum has significant benefits for both the consumer and the retailer. Of primary concern is the provision of a convenient service and competitive price to the consumer. Due to the low margin on fuel, operating a filling station with competitive fuel pricing is very difficult, particularly in rural areas. As a result many filling stations have closed down; forcing customers to travel greater distances to obtain fuel. Some remaining filling stations are unable to maintain competitive pricing, again impacting on the customer. Provisions to allow for the unattended dispensing of petroleum can help to alleviate some of these problems. Primarily, such provisions will facilitate low volume, out-of-hours unattended sales from sites that will remain attended during peak times. In addition, these provisions may also allow for the development of fully unattended sites.

Due to Health and Safety concerns, provisions to allow for the unattended dispensing of petroleum require careful consideration. Moreover, unattended dispensing should only be allowed with strict controls. Upay propose that the UK Health and Safety Executive guidelines for the unattended dispensing of petroleum are adopted (PETEL 65/59a Petrol Filling Stations - Dispensing Control Measures," Health & Safety Executive / Local Authorities Enforcement Liaison Committee (HELA), February 2007). Among other provisions, these guidelines propose the following:

- A risk assessment of the site and dispensing activity
- Engineered control measures such as limiting the volume of fuel that can be dispensed, adequate illumination of emergency equipment, instruction notices, etc.
- Provision of emergency equipment on site such as fire extinguishers, a pump isolation switch, etc.
- Management control measures such as the provision of a trained member of staff on call, provision of emergency procedures and equipment inspection procedures, etc.

In addition to the provisions of these guidelines, Upay propose that further provisions should be considered. Additional provisions are required to prevent dispensing of petroleum to minors and to prevent dispensing in an unsafe environment or into unapproved containers. In addition to preventing escalation of risks, these provisions also allow dangerous situations to be dealt with quickly and correctly. Upay propose that remote

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CCTV monitoring is used to control dispensing of petroleum on unattended self-service sites. The proposed CCTV monitoring would operate as follows:

- A trained operator at a remote location has a video link to the site, allowing them to clearly observe all dispensing locations
- The remote operator must authorise the transaction prior to the dispensing of petroleum. The transaction is only authorised after the operator uses the CCTV to ensure that the requirements to allow the dispensing of petroleum are met
- The remote operator has the ability to stop the pump if any situation occurs outside of the requirements to allow dispensing of petroleum
- The remote operator has the ability to isolate all pumps in the event of an emergency
- The remote operator can be contacted via two-way voice communication with the site to report any accident or request assistance
- The remote operator has an approved emergency procedure for contacting the emergency services and/or on call site representative

Upay believe that the suggestions presented in brief in this submission will facilitate the safe operation of an unattended self-service site for the dispensing of petroleum. Upay are happy to provide further, more detailed information on these proposals if required.

For further information please contact

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