Competition and Markets Authority: Strategic Review of CMA Markets Remedies

Liquid Gas UK response

March 2026

About Us

Liquid Gas UK is the trade association for the Liquefied Petroleum Gas (LPG) and renewable liquid gases (RLGs) industry in the UK, representing companies who are LPG and RLG producers, distributors, equipment and service providers, and installers. It is dedicated to the safe and effective development of LPG and RLGs. Member companies cover 99% of the total LPG and 100% of the total RLGs distributed in the UK. Our members have a collective turnover of over £1.7bn and plan to invest around £1billion across this decade, with £335 million of planned investment into LPG and renewable liquid gases between 2025 and 2026.

The Liquid Gas industry is a key contributor to the British economy, directly supporting over 4,600 jobs – a figure which is projected to rise to 12,500 by 2045[1] provided the industry is included as part of a mixed technology approach to decarbonising homes and businesses across the UK. By creating employment opportunities as well as goods and services, the RLG industry is furthermore expected to make a positive contribution to the UK economy. Analysis suggests that the gross value added (GVA) could reach around £1.3 billion in 2050.[2]

Executive Summary

Liquid Gas UK is of the position that the two orders referenced within the review that are pertinent to our sector (Domestic Bulk Liquified Petroleum Gas (LPG) Market Investigation Order 2008; Domestic Bulk LPG Market Investigation (Metered Estates) Order 2009) remain suitable and fit for purpose and therefore should **remain as they are.**

We have concerns that removing the Orders may risk consumer harm, with potential issues around failed/unsafe transfers, opacity around eligibility, and renewed barriers at renewal points.

We would like to see some further clarification around specific points within the Order – most notably:

– **Incomplete SSN2 outcomes** (piecemeal reasons, repeated rejections). Our suggested solution: require the gaining supplier to list **all** valid known rejection reasons upfront to minimise repeats and customer frustration.
– **"Available paperwork"** ambiguity driving stand-offs and extra testing. Our suggested solution: clarify "available" and allow **valuation adjustments** where paperwork is missing, rather than default rejection.

[1] Gemserv and Liquid Gas UK: The Industry's Journey to 2050 (2024)

[2] Ibid

Additionally, we would like to see the option of **Digitising the Orders' communications**. Recognising email/e-signature for SSN1/SSN2; codify the existing "pre-12:00 = day-1" convention.

Conclusion

The LPG Orders continues to provide sector-specific support for households in the process of switching supplier, that give practical effect to general consumer rights in the unique context of bulk LPG. Other regulatory instruments remain relevant (consumer law, HSE, ADR) and provide broader protections complement but are not a substitute for the safeguards. The Orders therefore act as the applied, sector appropriate means of ensuring consumers can exercise their rights without facing disproportionate risk, delay or financial detriment. If the CMA seeks modernisation, targeted maintenance — digital communications and clarified rejection grounds — will lock in consumer protection and competitive pressure at renewal while preserving the proven safety framework.

For more information or to discuss this submission further, please contact Francesca Kirtley-Paine, Public Affairs Manager at Liquid Gas UK on [✂]