



House of Commons

All Party Parliamentary Gas Safety Group

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***Shouting about a silent killer:  
Raising carbon monoxide awareness***

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Published 14 September 2006

## **The All Party Parliamentary Gas Safety Group (APPGSG)**

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### **Purpose**

The All Party Parliamentary Gas Safety Group provides a forum for discussion on issues affecting the gas installation industry and consumers, including: security of installation and supply, skills shortages, fuel poverty, irresponsible landlords, and the effects of social exclusion.

### **Secretariat of the Group**

The All Party Parliamentary Gas Safety Group authored this report with support from public affairs consultancy, AS Biss & Co. The APPGSG receives secretarial support from AS Biss & Co and CORGI.

### **Contacts**

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### **Footnotes**

In the footnotes of this report, references to oral evidence are indicated by 'Or Ev' followed by the witness. References to written evidence are indicated by 'Wr Ev', followed by the evidence source.

### **Website**

Further copies of this report are available at the APPGSG website, where full transcripts of the oral evidence submitted can also be found. The address is: [www.gassafetygroup.org.uk](http://www.gassafetygroup.org.uk)

***Shouting about a silent killer: Raising carbon monoxide awareness***  
**An inquiry by the All Party Parliamentary Gas Safety Group**  
**Executive summary**

This report is a response to the human tragedy of carbon monoxide (CO) poisoning. Too many people continue to be harmed or even killed as a result of this entirely preventable problem.

Since the All Party Parliamentary Gas Safety Group was founded, we have heard from many families affected by CO poisoning. We join them in the conviction that raising CO awareness among consumers is critical to reducing the death toll. In July 2006, we launched the All Party Parliamentary Gas Safety Group's first inquiry, calling for evidence from all stakeholders into how awareness of CO could be increased and improved.

In the course of the inquiry we have heard from the Government, the energy industry, regulators, and CO-safety campaigners. There is consensus that more needs to be done and all agencies have their role to play. The Government must systematically record all data on poisoning incidents to understand better the scale of the problem. The HSE must do more to safeguard the public from illegal installers. And the efforts of all the organisations involved in energy supply, regulation and safety should be joined in co-ordinating a powerful, well-funded, high-profile media campaign to keep CO awareness at the front of consumers' minds.

We welcome confirmation from the Minister and officials that this report's recommendations will be used to inform and influence the current review of gas safety being undertaken by the HSE. We look forward to taking these discussions further.

In taking evidence, it is always the personal stories of loss that resonate most strongly. One death from CO poisoning is one too many. We hope that this report will help build awareness of these tragedies, and galvanise public policy and consumer action to reduce their number in future.

**Barry Sheerman MP**  
**Co-Chair, APPGSG**

**Maria Miller MP**  
**Co-Chair, APPGSG**

The full set of recommendations can be found in the report. However, the All Party Parliamentary Gas Safety Group is calling for action in a number of areas:

### **Enforcement**

There is widespread concern over enforcement action against incompetent, and illegal installers. Failure to enforce these regulations is totally unacceptable. We call on the Government **to heighten enforcement, which will in turn raise awareness of CO amongst consumers. Such measures should include the use of substantial fines to tackle illegal installation work.**

### **Detection**

Improving CO detection by emergency workers and increasing the number of reliable CO detectors in the home is key in the fight to tackle domestic CO poisoning incidents. Every home should have a CO detector with an audible alarm. We call on **mortgage and insurance companies to investigate whether requiring all homes to have such an alarm should be part of granting a mortgage or insurance cover.**

### **Co-ordination**

Across Government and industry, there is currently a lack of joined up working on CO awareness. The APPGSG calls for **a single body to coordinate campaigning on CO. This should include representatives from all energy retailers, regulators, relevant government departments (DWP, DH, Defra, DCLG, DTI), the Health and Safety Executive, charities and consumer groups.**

More can be done in the health service. **The group welcomes the introduction of Gas Work Notification, but urges action to create a systematic record of all CO poisoning incidents.**

### **Industry action**

We are critical of energy retailers for consistently side-stepping the issue of funding a national campaign on CO. **We call for the energy retailers, Government and other relevant bodies such as CORGI, jointly to fund a national campaign to raise awareness of CO.**

Alongside funding support for a national advertising campaign on CO, **all energy retailers should submit to an annual audit of their CO awareness activity, to be made public on the APPGSG website.**

### **Action from the regulators**

The HSE has an important role to play. **We press the HSE to introduce a zero-fatality target on CO poisoning.** The HSE must continue to invest time and energy into gas safety. If this is not possible, relevant powers should be delegated to appropriate bodies to lead in this area.

### **Skills and workforce training**

There is a lack of skilled workers and trainees in the sector. The Group urges immediate government action to tackle these deficiencies. **We call on CORGI, HETAS, Summit Skills (the relevant sector skills council), and manufacturers to work together to develop a clear strategy to tackle this problem.**

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## 1. Introduction

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The All Party Gas Safety Group is “a forum for discussion of issues affecting the gas installation industry and consumers, including safety of installation and security of supply, skills shortages, fuel poverty, irresponsible landlords, and the effects of social exclusion.”

The APPGSG’s current work is a response to the human tragedy of carbon monoxide (CO) poisoning. Too many people continue to be harmed or even killed as a result of this entirely preventable problem. We work to build awareness of these tragedies, and seek public policy and consumer action to reduce the number of incidents in future.

### Timing of the inquiry

Our activity is timely in respect of current public policy debate. The HSE is currently undertaking a review of the gas safety regime arising from the Gas Safety (Installation and Use) Regulations<sup>1</sup>. The review has focused on:

- Determining aspects of the regime that add most value and should be retained
- Addressing those aspects of the regime that require improvement
- Exploring new approaches to gas safety and identifying who is best placed to deliver what is required in terms of sensible risk management
- Targeting HSE resources on a risk basis and where they will deliver gas safety in the most efficient and effective way
- Examining the scale of CO levels in domestic dwellings to inform a sensible risk management approach to controlling the risks

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<sup>1</sup> This review builds on outcomes of the Health and Safety Commission’s (HSC) Fundamental Review of Gas Safety in 2000, whose recommendations can be found at: <http://www.hse.gov.uk/gas/domestic/change.pdf>  
A progress report is available at: <http://www.hse.gov.uk/gas/domestic/fundamentalreview.pdf>

**We welcome confirmation from the Minister and officials that the APPGSG's findings will have the opportunity to inform and influence this review.**

### **The scope of the inquiry**

At the heart of this work is the level of public awareness of the dangers of CO poisoning and what can be done to increase awareness and improve safety.

The inquiry also explored the surrounding influences on consumer safety from CO exposure. Notably, it examined how strongly people recognise key safety messages, and as importantly, how likely and able they are to act safely as a result of this information. This is, of course, an emotive issue and we have received strong views throughout this inquiry. However, we are determined to find realistic solutions to increase awareness and action to reduce CO poisoning. To do this we explore in more detail:

1. The extent of the problem we face
2. The potential to regulate to increase awareness and action
3. The role of campaigning to develop awareness and action

The inquiry was co-chaired by Barry Sheerman MP (chairman of the Education and Skills Select Committee) and Maria Miller MP (Shadow Minister for Families), who also jointly chair the All Party Parliamentary Gas Safety Group.

**The All Party Parliamentary Gas Safety Group authored this report with support from public affairs consultancy, AS Biss & Co. The APPGSG receives secretarial support from AS Biss & Co and CORGI.**

## A. Outline of responsibilities

Throughout this inquiry, we have been overwhelmed by the myriad of responsibilities that exist in CO and we attempt to summarise the responsibilities that exist in this area in the following table.

Responsibility/ Energy Source	Regulating energy sector	Regulating installation of safe appliances	Boiler/appliance servicing	Inclusion of safety information on boilers/ appliances	Awareness raising	Installer & inspector training	Prosecutions in sector
<b>PIPED GAS &amp; LPG</b>	<p><b>Ofgem</b> is the regulator for Britain's gas and electricity industries. Its role is to promote effective competition, wherever appropriate, and effectively regulate the monopoly companies which run the gas and electricity infrastructure, financed by the licensed energy companies</p> <p><b>Energywatch</b> is the independent watchdog for gas and electricity consumers, financed by the DTI</p>	<p>The <b>HSE</b> oversees safety regulation in downstream gas, through the implementation of the Gas Safety (Installation and Use) Regulations 1998. The HSE is tasked in this role by the <b>DWP</b>.</p> <p><b>CORGI</b> is tasked by HSE to maintain a register of competent gas installers in the UK, Northern Ireland and the Isle of Man.</p> <p>DIY made illegal through the Gas Safety (Installation and Use) Regulations 1998</p>	<p><b>RENTED - Landlords</b> are responsible for ensuring gas appliances and flues are checked for safety every 12 months. Overseen by the HSE.</p> <p><b>PRIVATE - Home owners</b> are responsible for ensuring safety, but there is no requirement to receive an annual safety certificate</p>	No requirement for safety message to be put on boiler by manufacturer.	<p><b>CORGI</b> provides members of the public with details of local registered gas installers.</p> <p>The HSE's 2000 Review of gas safety recommended that a voluntary levy, applied to the gas suppliers, should fund safety-related research, and that a proportion of this should be used to fund publicity initiatives to raise awareness of gas safety. The levy has not, to date, been introduced.</p>	<p>Gas installers need to be in possession of certificates of competence in the areas of gas work they intend to undertake and be able to demonstrate relevant work experience before they can become <b>CORGI</b> registered. Gas operatives are required to demonstrate gas safety competence by successfully completing nationally agreed assessments. CORGI will only accept Certificates of Competence that have been issued through a limited number of certification bodies approved by UKAS to deliver training and or assessment for the Accredited Certification Scheme (ACS).</p> <p>CORGI then monitors installers' ongoing application of competence, with installers having to undergo ACS re-assessment every five years based on changes in technology, legislation and standards,</p> <p><b>Energy &amp; Utility Skills</b> - their brief covers the storage, transmission, distribution, metering, supply and downstream installation of both natural gas and LPG (from beach to burner).</p>	<p><b>RENTED - CORGI</b> investigates gas safety related complaints from the public.</p> <p><b>HSE</b> tasked with prosecuting installer if it deems necessary.</p> <p><b>PRIVATE - HSE</b> tasked with prosecuting installer or landlord if it deems necessary.</p>

Responsibility/ Energy Source	Regulating energy sector	Regulating installation of safe appliances	Boiler/appliance servicing	Inclusion of safety information on boilers/ appliances	Awareness raising	Installer & inspector training	Prosecutions in sector
<b>SOLID FUEL / OIL</b>	The industry operates outside the remit of either Ofgem or Energywatch.	<p>Solid fuel sits within the <b>DCLG</b>, under local authority building control</p> <p><b>Defra</b> has increasingly become involved through its energy efficiency initiatives .</p> <p><b>HETAS</b> is the official testing and approval body for the domestic solid fuel industry. It runs a self certification scheme.</p> <p><b>OFTEC</b> is the official registration body for the oil industry and also runs competent persons schemes for electrical work and heating services.</p>	<p><b>RENTED</b> - The <b>HSE</b> expects landlords to service and maintain any solid fuel appliances in their housing stock and to fail to do so will be an offence under section 3(1) of the Health &amp; Safety at Work Act 1974.</p> <p><b>PRIVATE - Home owners</b> are responsible for ensuring safety, but there is no requirement to receive an annual safety certificate.</p>	<p>Consumer Protection legislation requires products to be sold with adequate information to allow the purchaser to use a product safely. <b>HETAS approved appliances</b> carry the HETAS sticker or label.</p> <p>As part of its Approvals process, HETAS also ensures that manufacturers' literature contains the relevant information and installation instructions adhere to UK Building Regulations.</p> <p>Data is not available however of sales of non-HETAS approved appliances, particularly those imported from outside the EU.</p>	No body is tasked with this responsibility.		<p><b>RENTED</b> - <b>HSE</b> tasked with prosecuting installer if it deems necessary.</p> <p><b>PRIVATE</b> - <b>HSE</b> tasked with prosecuting installer or landlord if it deems necessary.</p>

## 2. Concerns over co-ordination

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We welcome the fact that there has been limited action from some of the key players in the sector to work together. Notably, the decision of the Energy Retailers' Association (ERA), which represents the six major energy suppliers, to work with the Gas Industry Safety Group, the National Grid, and the HSE to help tackle gas-related fatalities is a positive step forward. However, it should also be noted that a number of respondents felt that the ERA has allowed individual member organisations to reduce their own responsibilities for gas safety.<sup>2</sup>

According to the great majority of respondents, more should be done in this area. Commonly, respondents complained about a lack of co-ordination across the sector in terms of awareness-raising activity and other core issues such as the training and development of engineers. This was most acutely felt in terms of a lack of co-ordination between gas and other fuel sectors.<sup>3</sup>

Stephanie Trotter of CO Gas-Safety, one of the charities campaigning on this issue, told us that she thought it was:

*“a game of pass the parcel amongst the regulatory bodies and the government departments and it seems to me that the regulation that was put in was set up when the gas industry was privatised has just quietly crumbled away. Ofgem seems to be under the Office of Fair Trading*

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<sup>2</sup> Wr Ev, ERA CO Working Group

<sup>3</sup> Wr Ev, CORGI

*now; we have urged them to treat us as stakeholders in the recent price supply review, but they do not wish to.*

*“Energy Watch have had their duties changed to powers and they do not want to know about CO. The government departments, HSE is under the Department of Work and Pensions and it is reluctantly admitting, more or less, that it is part of its remit. But there is the DTI, which is to do with solid fuel, and then there is the Department of Health. It just seems to go round and round in a circle.”<sup>4</sup>*

**We call for firm guidance from the DTI and Government in general to ensure that the major energy companies take their responsibilities for safety seriously.**

**The lack of real co-ordination both within individual fuel types and especially between different types of fuel is unhealthy. We also urge key players with a responsibility in these areas to combine to form a single Fuel CO Awareness forum, and call for a cross-departmental Government working group on CO.**

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<sup>4</sup> Or Ev, Stephanie Trotter, CO-Gas Safety, July 4<sup>th</sup> 2006

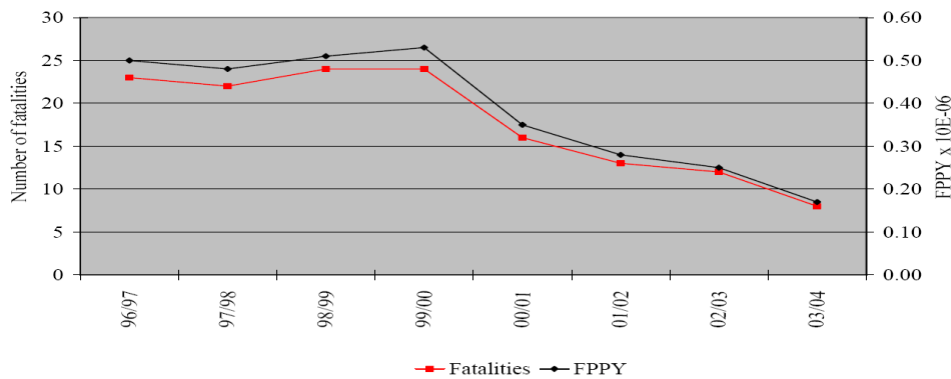
### 3. The extent of the CO problem

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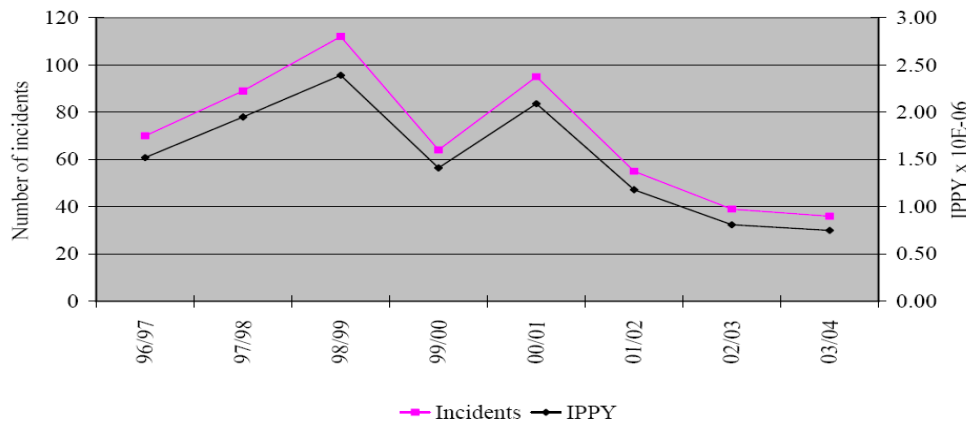
#### a) How many people are being killed or harmed by CO poisoning?

##### – Piped gas and Liquefied Petroleum Gas (LPG)

According to the HSE's most recent report, the number of fatalities per person per year from CO poisoning incidents that have resulted from piped gas and LPG in the home have fallen steadily since 1996/97. This is reflected by the low point of eight deaths in 2003/04. (see graphs below).<sup>5</sup>



The number of incidents of people being harmed by CO poisoning also appear to be falling according to these figures:



<sup>5</sup> Wr Ev, "A review of carbon monoxide incident information for 2003/04 produced from the full investigation of incidents which had resulted from the use of piped natural gas and LPG within Great Britain", Advantica (for HSE), 2006

The Committee found that international comparisons from gas-related CO poisoning were limited. The most detailed recent study presented to the APPGSG took place in 2001, at a time when the UK had worse figures in terms of fatalities than today. However, it illustrated that the UK had a higher number of gas-related fatalities than any of the comparator countries.<sup>6</sup>

The benchmarking report concluded that: *"Scope exists in GB for improving awareness of carbon monoxide as an issue in the domestic environment."*<sup>7</sup>

### **How reliable is the data?**

For LPG and piped gas, the Joint Industry Programme agreed a CO incident report form (the DIDR) which is the method by which data is collected on CO under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (1995). This information is collated into a report by Advantica and the results validated by HSE, National Grid, British Gas and CORGI.<sup>8</sup>

However, several respondents commented on the reliability of these figures. CO Gas-Safety noted a:

*"Lack of automatic testing of dead bodies and failure to test live bodies by ambulance, casualty and GPs"*<sup>9</sup>

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<sup>6</sup> Downstream Gas Safety Study – Benchmarking Research, Advatica Ltd, June 2001

<sup>7</sup> Downstream Gas Safety Study – Benchmarking Research, Advatica Ltd, June 2001

<sup>8</sup> Wr Ev Terry Williams, Principal Consultant, Advantica Ltd

<sup>9</sup> Wr Ev, CO Gas-Safety

This may create a shortfall in the real number of people found to have suffered as a result of CO poisoning.

Kairen Sanderson of RoSPA made:

*"a plea for good statistics [...]" explaining that "up until about two or three years ago we had the home accident surveillance system that the DTI funded, which did include collecting data on carbon monoxide poisoning, but that was seen to be too expensive to run and now we are working on data going back to 2002.[...] three-year old data, as it is now, is less than useless to anybody, and whenever you try to do something someone will say, "But what is the problem? How many people are dying?"<sup>10</sup>*

**We believe data from hospitals on CO poisoning should be taken again, as it was previously, to enhance the statistical base on CO poisoning incidents.**

### **Where do the risks lie?**

The HSE's review of gas safety is being carried out in context of the Government's better regulation agenda.<sup>11</sup> It is therefore essential to make sure that resources are targeted to effect most change and that, where appropriate, those who are not creating risks are not unduly burdened.

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<sup>10</sup> Or Ev, Kairen Sanderson, ROSPA, 4 July 2006

<sup>11</sup> Or Ev, Lord Hunt, 5 July 2006

As a result of the extensive research into reported incidents and deaths as a result of CO poisoning from piped gas or LPG, a good deal of risk analysis exists. It shows seasonal trends, illustrating a rise in CO poisoning when appliances are used most heavily – ie winter (domestic) and summer (mobile/holiday homes).<sup>12</sup>

In addition, a recent Energy Retailers Association (ERA) CO working group study found the following areas of risk:

- Open flued appliances
- Open flued central heating boilers
- Lack of servicing
- Defective flues, flue inversion and ventilation deficiencies
- Terraced property
- Property 'bought to rent'
- Both the very young and the very old<sup>13</sup>

There does appear to be some cause for optimism that the statistical base will improve in future. Lord Hunt noted that work was currently being undertaken to improve knowledge about the distribution and scale of harmful CO emissions, by way of a representative sample survey of housing. He told us:

*“part of the [Health and Safety Executive] review has been to commission research by [...] University College London to actually take a specified*

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<sup>12</sup> A review of carbon monoxide incident information for 2003/04 produced from the full investigation of incidents which had resulted from the use of piped natural gas and LPG within Great Britain”, Advantica (for HSE), 2006

<sup>13</sup> Wr Ev, ERA CO working group letter to Les Philpott from Chris Bielby

*number of houses and dig down to see whether the scale of the problem is greater or not. That will be fed into the review process and I hope that will help reach some solid conclusions on this matter."*

Les Philpott, of the Health and Safety Executive expanded:

*"We need to drill down and find out what the real issue is here and that is the purpose of the research. I think I can safely say it [ the UCL survey] is representative."*<sup>14</sup>

CORGI argued that the Gas Work Notification (GWN) scheme had the potential greatly to enhance levels of knowledge about CO emissions. They told us:

*"what Gas Work Notification does for us is to allow us independently to go and assess work rather than people pointing us at simple things [...] there is a huge improvement there."*<sup>15</sup>

**We welcome both the introduction of Gas Work Notification and the research being undertaken by the HSE. Interested parties must use this data to allow for better analysis of risk patterns and better targeting of resources.**

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<sup>14</sup> Or Ev, Les Philpott, Health and Safety Executive, 5 July 2006

<sup>15</sup> Or Ev, Mike Thompson, CORGI, 4 July 2006

## **Solid Fuel & Oil**

We received a more worrying picture in terms of the evidence surrounding risk from oil and solid fuel products. In a joint response by the Solid Fuel Association, Approved Coal Merchants Scheme, and the Coal Merchants Federation, it was conceded that:

*"In terms of solid fuel incidents, we are not aware of any 'official statistics'...There are many incidents which are not recorded....We also supply engineers with notices to put on appliances which should not be used until faults have been rectified and have, on occasion, endorsed the engineers findings by writing to the householder ourselves with advice not to use the appliance*

*...We do not log such incidents."*<sup>16</sup>

However, in her oral evidence to the inquiry, Ms Jane Heginbotham of the Solid Fuel Association suggested that the organisation's own data showed that at least eight people had died as a result of poisoning from solid fuel and that *"all of these were preventable."*<sup>17</sup>

Evidence we took from Professor Bill Kaye of HETAS (the approval scheme for solid fuel appliances and installers) and the University of Glamorgan, appeared to confirm the paucity of data on incidents relating to solid fuel. He told us that his organisation had

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<sup>16</sup> Wr Ev, Solid Fuel Association, Approved Coal Merchants Scheme, and the Coal Merchants Federation

<sup>17</sup> Or Ev, Jane Heginbotham, Solid Fuel Association

*"had trouble getting figures once British Coal disappeared. British Coal was the font of all wisdom, as it were, and it had the money and it got the figures. We have had trouble since then in getting figures out of the system [...]"<sup>18</sup>*

We did not receive any evidence of incidents being recorded for CO poisoning resultant from oil. There appears, therefore, to be a statistical vacuum in terms of incidents relating to these parts of the fuel market.

We recognise the distinct and relatively small nature of these markets. However, even on the basis of unofficial data, the number of deaths and poisoning incidents points to a serious problem. **We urge action to create a systematic record of all CO poisoning incidents that result from solid fuel or oil, and appropriate action to be taken to reduce the worrying number of poisoning incidents in future.**

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<sup>18</sup> Or Ev Prof. Bill Kaye, HETAS/ University of Glamorgan, 4 July 2006

**b) How much focus should the Government place on this issue?**

In comparison to the overall figures for CO poisoning, the number of people accidentally poisoned in the home is relatively modest. The last date for which we were given figures (2002) illustrates that 469 people were killed by CO poisoning in the UK. Just 15 of these deaths were attributed to gas safety incidents in the home. According to a recent Ministerial answer on this issue:

*“The majority of deaths with a nature of injury code of toxic effect of carbon monoxide poisoning are suicides, (75 per cent of carbon monoxide poisoning deaths in England and Wales in 1997; 69 per cent in 2002). Some deaths from carbon monoxide poisoning are also of undetermined intent, homicides or the result of fires. A small proportion are the result of accidental poisoning (7 per cent in England and Wales in 1997 and in 2002).”<sup>19</sup>*

The HSE holds much control over the gas safety regime, with overall responsibility for CORGI, and also for the enforcement of illegal installers. The inquiry sought to establish how important the issue of CO poisoning is to HSE. Gas Safety Minister, Lord Hunt gave some indication that this issue was not at the top of the HSE’s list of priorities:

*“I think the fact is there has been a reduction in fatal injuries over the period and that we are well on the way to meeting the target set of a 20 per cent reduction.”<sup>20</sup>*

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<sup>19</sup> Parliamentary Written Answer, Ruth Kelly MP, 29 Mar 2004

<sup>20</sup> Or Ev, Lord Hunt, 5 July 2006

Lord Hunt went on to say, however, that the priority placed on gas safety by the HSE must be proportionate to risk. He noted:

*“clearly the [Health and Safety] Commission has a lot of balls to juggle in relation to where priorities lie within the organisation and the approach they take is basically a proportionate approach that the greatest priority should be given to the areas of greatest vulnerability in relation to health and safety.”<sup>21</sup>*

The fall in the number of fatalities as a result of CO poisoning is welcome. Knowledge of the number of people affected by CO poisoning short of fatality, is limited and some respondents have suggested the figures may be much higher than current estimates. **We press the HSE to introduce a zero-fatality target on CO poisoning, and the HSE must continue to invest time and energy into gas safety. If this is not possible, then relevant powers should be delegated to appropriate bodies to lead in this area.**

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<sup>21</sup> Or Ev, Lord Hunt, 5 July 2006

**c) What has caused the downturn in the number of CO incidents and fatalities?**

It is possible that these figures do not tell the whole story, and as detailed previously, respondents have cast doubts over the reliability of available statistics. However, it would seem clear that there has been a downward trend in the number of people who have died as a result of CO poisoning from piped gas or LPG.

A number of reasons were offered in explanation for this fall. From the Energy Retailers Association, we heard that the following factors had played a part:

- *“Landlord certification with mandatory safety inspections, particularly in public rented property and in student accommodation*
- *“Increasing penetration of battery/hard-wired CO detectors to British Standard (BS) 7860*
- *“Increasing penetration of room-sealed boilers and appliances with oxygen depletion devices*
- *“Efforts made by industry to raise awareness”<sup>22</sup>*

This view was supported by CORGI, who also highlighted the impact of the more stringent Accredited Certification Scheme (ACS) assessment requirement of registered installers as a reason for the drop in incidents.<sup>23</sup>

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<sup>22</sup> Wr Ev, Energy Retail Association, Carbon Monoxide Awareness: High Level Strategy, May 27 2004

<sup>23</sup> Wr Ev, CORGI

**d) At what level does CO intake have a harmful effect – are low levels as harmful as high levels?**

Several respondents highlighted the fact that the problem of CO poisoning may be much higher than currently felt. Noting that there could be implications for health as a result, one piece of academic evidence illustrated that in 278 homes tested for CO, "18.0% of the total had CO concentrations that exceeded World Health Organisation 8-hour average guideline levels for ambient air."<sup>24</sup>

**CASE-STUDY: Lynn Griffiths**

Lynn Griffiths established the charity CO-Awareness, after her family were exposed to carbon monoxide in their home for almost eleven years.

In 1998, Lynn's gas fire was identified as having a blocked flue which was leading to carbon monoxide spilling into her living room. It is believed that the CO emissions from the fire led to her and her children suffering from a range of symptoms, including continual headaches, dizzy spells and sickness. Lynn says that she and her family still suffer from the side-effects of CO poisoning, which include short-term memory loss. CO may also have contributed to her husband's death in 1999.

The aim of CO-Awareness is to support those who have suffered from carbon monoxide poisoning, their family and friends. It also aims to educate the public and medical staff on how to prevent completely avoidable deaths and injuries from CO. Lynn Griffiths told the APPGSG: "*Knowledge is the key to preventing carbon monoxide poisoning. In most cases of accidental poisonings, victims don't realise that carbon monoxide was being produced or building up in the air they were breathing.*"

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<sup>24</sup> Wv Ev, UCL report, 'Neuropsychological effects of low level exposure to indoor carbon monoxide', produced for Department of Health on October 2005.

Stacey Rodgers, whose 10 year old son died as a result of CO poisoning, also raised the issue of low-level exposure, stating:

*“Allegations [...] have been made, not particularly by Great Britain but certainly by America, Germany and the Belgians, that low levels of carbon monoxide are probably more damaging than somebody being exposed to a large quantity [...] it certainly wants enquiring into. The BMA are obviously doing more research on it and I think that that should be more extended.”<sup>25</sup>*

**We feel it is vital that substantial medical research is undertaken to establish the impact on health of long-term, low level exposure to CO.**

British Gas told us that medical professionals were not always sufficiently knowledgeable about the signs and symptoms of CO poisoning and that there was *“a need within the continuing professional development for a day on carbon monoxide symptoms.”<sup>26</sup>* It is clear that some awareness-raising activities among medical professionals are already taking place– CORGI told us that in 2005 they had *“leafleted every surgery in the country last year, explaining to the medics exactly what to do”<sup>27</sup>* but much more could be done in this area.

**We call for further work between key stakeholders and the Department of Health to ensure that all medical professionals and those being medically treated are aware of the symptoms of CO poisoning.**

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<sup>25</sup> Or Ev, Stacey Rodgers, Dominic Rodgers Trust, July 4<sup>th</sup> 2006

<sup>26</sup> Or Ev, Chris Bielby, British Gas, July 4 2006

<sup>27</sup> Or Ev Mike Thompson, CORGI, July 4 2006

## 4. Regulating for awareness

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### a) Regulating housing standards

Government regulation of housing comes in many forms, affecting everything from the environmental standard of the home, to its level of ventilation. For all homes, in terms of work relating to piped-gas or LPG, no work may be legally carried out by anyone other than a CORGI-registered installer.

Awareness of the gas registration scheme and the need to use CORGI-registered installers amongst the public is very high (78%).<sup>28</sup> The HSE is currently reviewing an application from another organisation seeking to operate a gas registration scheme, which may lead to multiple registration schemes. One respondent, Stephanie Trotter, felt that multiple-registration schemes would bring in *"another layer of bureaucracy, more talk... and it will not actually produce real improvements."*<sup>29</sup> Similarly, CORGI argued that:

*"The one thing you do not want to see in this business is multi-[registration] schemes. It does not have to be CORGI, we are not precious in that way, but you must have one scheme operator otherwise you will see a rise, we believe, in problems with carbon monoxide and that is on our agenda at the moment."*<sup>30</sup>

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<sup>28</sup> Wr Ev, CORGI

<sup>29</sup> Or Ev, Stephanie Trotter, CO Gas-Safety, 4<sup>th</sup> July 2006

<sup>30</sup> Or Ev, Mike Thomson, CORGI, 4<sup>th</sup> July 2006

**We believe that having only one registration scheme creates a simple framework for consumers. More than one registration scheme for gas would complicate safety messages for consumers and could lead to a rise in CO incidents and fatalities. We therefore call on the HSE to reject the option of multiple registration schemes.**

However there is strong evidence that the CORGI Registration Scheme is in serious need of improvement to make it effective. Amongst those who questioned the state of the current regulatory framework, the Minister for Gas Safety, Lord Hunt said:

*“The general point I would make is this: I would pay tribute to the work that CORGI has done. It has achieved high recognition. We are seeing progress in terms of reduced incidents and fatal injuries. However, looking at the rather complicated regulatory structure - the role of CORGI, the gas works notification scheme, the accredited competence scheme - there does seem to be both duplication of effort, and some of the regulations seem incredibly prescriptively judged, by today’s concept of regulation, as compared to the 1980s where some of those regulations came from.”<sup>31</sup>*

Stephanie Trotter of CO Gas-Safety also raised concerns on this point, noting:

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<sup>31</sup> Or Ev, Lord Hunt, 5<sup>th</sup> July 2006

*"I think CORGI is at the core of this; I think that CORGI needs support and I think that the criteria really needs to be gone over with a fine toothcomb by organisations such as ourselves, by victims, by Harry [Rodgers], by HSE."*<sup>32</sup>

**We are minded that despite much effort, the current registration scheme is not as effective as it could be in delivering gas safety. The burden of responsibility borne out by current regulation needs to be addressed to target risk better. For gas and LPG work, we feel the HSE review should lead to more stringent, goal-setting criteria for the registration body so that it better tackles areas of highest risk.**

Another issue brought to the Group's attention was that of the contracted term that the gas registration body works to. Mike Thompson of CORGI said:

*"We need a contract. We have this criterion that we are supposed to operate in and it is a regime where really a one-year rolling contract for an organisation with a significant job to do is not right. CORGI has a one-year rolling contract that could be pulled from us any minute now and it is difficult to operate under that".*<sup>33</sup>

Les Philpott of the Health and Safety Executive, told us that he was sympathetic to CORGI's concerns about the current length of their contract. He told us:

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<sup>32</sup> Or Ev., Stephanie Trotter, CO-Gas Safety, 4 July 2006

<sup>33</sup> Or Ev Mike Thompson, CORGI, July 4<sup>th</sup> 2006

*“ From the point of view of running a business, having some certainty and investing in the necessary resources to help us deliver improved, even better gas safety competence does require that period of certainty to make that investment. So I do think there is an issue there that we need to address, and it is in the review framework”.<sup>34</sup>*

**The APPGSG supports measures for the gas registration body to have a contract term of longer than one year, as at present. Whoever the registration body may be, it must use this increased business certainty to establish more substantive, long-term investment in awareness raising activity.**

– **Rented vs private housing stock**

There is significant variance in the regulation of private compared to rented sector housing. Respondents noted that the rented sector is kept safer as a result of the demand on landlords to ensure all houses have a CORGI gas safety certificate each year. For some this is not enough. Stephanie Trotter of CO-Gas safety argued for more emphasis on servicing, rather than simply safety checking in the rented sector:

*“the servicing of appliances is important and I think particularly in rented accommodation. This gas safety certificate does not seem to work. Why do we not change it to a full service? I hate to sing British Gas’s praises but they will not undertake a safety certificate unless they have a contract*

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<sup>34</sup> Or Ev, Les Philpott, Health and Safety Executive, 5 July 2006

*for a full service and I think that is very wise. There are lots of cases which we feel the deaths would have been avoided had a full service been undertaken.”<sup>35</sup>*

### **CASE-STUDY: Elisabeth Giauque**

Elisabeth Giauque died in February 2005 as a consequence of carbon monoxide poisoning in her parent's home in Wimbledon.

The six year old was taken to hospital after being found unconscious on the floor beside her bed. She was however misdiagnosed with meningitis and put on a course of antibiotics. Doctors only realised she had carbon monoxide poisoning after Elisabeth's Aunt and Uncle, who had been sleeping in the girl's bedroom while she was in hospital, were admitted with symptoms of carbon monoxide poisoning the following week. Examination of her test results showed that her blood contained abnormally high carbon monoxide results measuring 21.5mg, instead of the 0 to 0.8mg expected.

Westminster Coroner's Court ruled that Elisabeth had died as a consequence of a faulty boiler. The appliance had last been checked in 2003, though no servicing had been carried out. The landlord failed to get a CORGI-registered engineer to carry out a compulsory annual report on the boiler in the following two years.

Since Elisabeth's death, her mother and father have established the Elisabeth Giauque Trust to raise awareness of the dangers of carbon monoxide poisoning. Her parents have particularly stressed the need to have your boiler serviced and have a carbon monoxide detector in your house. The couple have also paid for a new diagnostic system to be installed at St George's Hospital in Tooting.

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<sup>35</sup> Or Ev., Stephanie Trotter, CO-Gas Safety, 4 July 2006

**We recognise that annual servicing would be regarded by some as an added burden on landlords. However, we call for a proper assessment of this option and for landlords to look at the need for a more regular, systematic servicing of appliances in housing stock.**

In the private sector, households are under no obligation to have a gas safety check of appliances each year. In the region of 14% of homes are sold each year and the Government's initial plans for a mandatory Home Information Pack in England and Wales would have placed a requirement on those selling their home to have an up-to-date safety certificates for appliances in the home.<sup>36</sup>

We are concerned by the Government's announcement to change the scope and nature of the Home Information Pack on 18 July 2006.<sup>37</sup> It is our understanding that this will remove the mandatory requirement for home sellers to provide those buying a house with up-to date safety certificates. **The APPGSG is concerned that the Government has removed the mandatory requirement to provide appliance safety certificates to home buyers. This would have a negative impact on safety and we therefore seek urgent clarification from the Government on this issue.**

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<sup>36</sup> Wv Ev, CORGI

<sup>37</sup> DCLG News release:

<http://www.communities.gov.uk/index.asp?id=1002882&PressNoticeID=2207>

## **b) Improving detection levels in the home**

The *“increased penetration of CO detectors”* had been a significant factor in the fall in deaths and other incidents, according to Chris Bielby of British Gas.<sup>38</sup> The Group was pleased to hear that energy retailers are working to increase the number of CO detectors in the home. One retailer, E.ON, noted that it had sent out some 800,000 in one year alone.<sup>39</sup> In addition, we were told that *“British Gas who when they install a new fitting, a new appliance or a new boiler, they routinely, as I understand it, fit a carbon monoxide detector.”*<sup>40</sup>

However, it is vital that the detectors placed in people’s homes are of the correct standards so as not to offer false security. Concerns were raised by some over the effectiveness of the ‘black-spot’ type of detectors which were being given out by E.ON and one respondent noted:

*“When we look at cracking this nut on how we can garner the resources and get effective publicity to address the risk, we have also got to say to people extra protection will come from having an alarm installed and buy one that is to a noted British standard.”*<sup>41</sup>

We were pleased to hear from a detector manufacturer that a number of the leading retailers are running CO detector promotional campaigns in unison with those run for smoke detectors.<sup>42</sup> Stacey Rogers went further, proposing that CO

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<sup>38</sup> Or Ev, Chris Bielby, British Gas, 4<sup>th</sup> July 2006

<sup>39</sup> Or Ev, Garry Worthington, E.ON, 4<sup>th</sup> July 2006

<sup>40</sup> Or Ev, Les Philpott, HSE, 5<sup>th</sup> July 2006

<sup>41</sup> Or Ev, Les Philpott, HSE, 5<sup>th</sup> July 2006

<sup>42</sup> Wr Ev, Colin Mitchell, Ei Electronics

detectors should be a mandatory requirement for all rented accommodation.<sup>43</sup>

The prospect of insurance or mortgage companies requiring CO detectors was also raised:

*"We have approached insurance companies and I think mortgage companies as well in the past and they were not interested. Do not forget, there is no tort of wrongful death; people dying is very cheap to insurance companies and mortgage companies and they do not really care, is how I interpret it."<sup>44</sup>*

Increased regulation in the rented sector has proven effective in lowering CO poisoning incidents, and we have indicated that more could be done to enhance safety standards further. However, it is more difficult to regulate effectively the private housing market in the same manner. **We believe that there are ways of increasing the number of reliable CO detectors in the home and would expect the mortgage and insurance industries to find innovative ways to ensure every home has one which is both audible and approved to British Standard. There should be an expectation that in order to complete a mortgage, or insure a property, both CO and smoke detectors should be a requirement for all homes.**

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<sup>43</sup> Or Ev, Stacey Rogers, 4<sup>th</sup> July 2006

<sup>44</sup> Or Ev, Stephanie Trotter, 4<sup>th</sup> July 2006

– **Emergency service detection**

In addition to detectors in the home, respondents raised concerns over a lack of appropriate detection equipment amongst the emergency services. The HSE recommended in its Fundamental Review of Gas Safety in 2000 that the Gas Emergency Service should carry and use equipment to test appliances for carbon monoxide. This was highlighted by a number of respondents, including the Soldier, Sailor, Airmen, Royal Commando Association who drew attention to this in their ‘Operation Snakebite’ response to the APPGSG. The association stated:

*“We must ask why the National Grid plc (Transco) are limited to using vintage equipment, identifying natural gas only, when carbon monoxide (the silent killer) kills more mothers, children and husbands in their homes in a year than natural gas explosions kill in a decade.”<sup>45</sup>*

**We agree that improving CO detection by emergency workers is key in the fight to tackle CO poisoning incidents in the home. We therefore call on the Government to take steps to ensure that all relevant emergency service workers have CO detection equipment readily available to them.**

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<sup>45</sup> Wr Ev, Soldier, Sailor, Airmen, Royal Commando Association

### c) Enforcement

Enforcing these regulations is essential to maintain public confidence in the standards for gas installation work. Concerns were raised regarding the role that CORGI currently plays in this arena, having responsibility both for securing members, and also for enforcing standards. A number of respondents highlighted this point, including asset management consultant, Wayne Hughes, who commented:

There is a duality of interest where the role of CORGI is concerned. They effectively police the gas safety industry on behalf of the HSE but also rely upon its own membership for income.<sup>46</sup>

CORGI conceded that a “*relatively small*” number of people had de-registered over the last year, *but added that:*

*“ We actually set about working with the installers who we seem to have an issue with, to try to build their competency rather than simply de-register them, because the tendency, if you de-register them, would be that they could operate illegally anyway. So it is very much a last resort to actually take them off the register.”<sup>47</sup>*

The Group understands that the introduction of Gas Work Notification by CORGI will improve the organisation’s ability to inspect installer’s work.

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<sup>46</sup> Wt Ev, Wayne Hughes

<sup>47</sup> Or Ev, Tim Ottridge, CORGI, 4 July 2006

**We are conscious of the problems of CORGI's dual role as registration body and enforcer. However, whilst we recognise that de-registering installers whose work fails to meet appropriate standards should be a last resort we call for the introduction of punitive measures – such as the use of substantial fines – to tackle illegal installation work. Any money collected should be channelled into a central pot for CO awareness raising activity.**

Well publicised enforcement action against non-registered installers can also serve to raise awareness of the potential dangers of CO poisoning, as well as reducing an individual's ability to find alternative/cheaper but more dangerous alternative installers. CORGI said that it reported:

*"something in the order of 1,500 illegal installers to the HSE each year, but enforcement action is very limited indeed. Probably a handful of people actually are prosecuted each year, [...] I think we would also very much support, not necessarily expanding the legislation, but actually enforcing the legislation which exists today, and we would like to work much more closely with the HSE on doing that."*<sup>48</sup>

The Health and Safety Executive admitted that it had problems in this area. They told us:

*"the whole issue of how we might nail unregistered installers is something we are looking at in our review because we do accept that we*

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<sup>48</sup> Or Ev, Tim Ottridge, CORGI, 4 July 2006

*get possibly up to 1,000 or more notifications of unregistered gas work from CORGI and the perception is that it goes into this huge black hole and we do not do anything. That is not good for the impression that people have of the registration scheme and gas safety generally and of us. So we accept there is some work to be done there.”<sup>49</sup>*

Similar concerns were raised about enforcement against illegal installers in the solid fuel and oil-fired sectors. Professor Bill Kaye informed us that in terms of actions taken:

*“there may be one or two, but I just do not hear about these prosecutions. The same problem is with the oil people as well. They have a similar scheme for oil installations, OFTEC, a competent persons scheme, and again their complaint is really that, of nine or ten people in Birmingham, one is registered and the other nine are doing it without caring about what the law says and nobody does anything about it.”<sup>50</sup>*

Sometimes, Professor Kaye told us, faulty solid fuel appliance installations would come to light if reported to the local authority but this relied on action being taken by the occupant. Jane Heginbotham of the Solid Fuel Association also raised the issue of local authority capacity in terms of enforcement, arguing that:

*“some Building Control officers are unaware of the HETAS Competent Persons Scheme to the extent where they will say to a customer who has*

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<sup>49</sup> Or Ev, Les Philpott, HSE, 5 July 2006

<sup>50</sup> Or Ev, Prof. Bill Kaye, HETAS/ University of Glamorgan, 4 July 2006

*had an appliance installed by a non-competent person that they should get that appliance commissioned by a HETAS-registered person in order to get a certificate, but a HETAS-registered competent person is not going to certify the competency of the work of another person. I do not know how they expect that.”<sup>51</sup>*

**There seems to be widespread concern over a lack of enforcement action against incompetent, and illegal installers. Failure to enforce these regulations is totally unacceptable and we call on the Government to look at new measures to tackle this problem, which will in turn raise awareness of the dangers of CO amongst consumers.**

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<sup>51</sup> Or Ev, Jane Heginbotham, Solid Fuel Association, 4 July 2006

## 5. Raising skills levels

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A good availability of trained, competent installers is a pre-requisite to being able to source these tradesman. We were alerted to a possible shortfall in the number of trained installers and inspectors available. Garry Worthington of E.ON, told us:

*"it is just hard work finding the CORGI-registered installers in a marketplace where it is not compulsory and in a marketplace where that industry is a maturing industry in age and there are not many apprentices coming through, so it is a very practical point."*<sup>52</sup>

**We are aware of a lack of skilled workers, and trainees in the sector. The Group urges immediate Government action to tackle these deficiencies.**

Harry Rodgers of the CO Gas-Safety went further, noting that CORGI-registration may not be enough to ensure an adequate standard of training for the work which needs to take place. He argued that:

*"There are very few very good heating engineers and there are no good plumbers that are good at heating. The problem as well is that that has been enhanced because a lot of these plumbers have set up as one-man bands and work for themselves or two or three people and they have had*

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<sup>52</sup> Or Ev Garry Worthington, E.ON, 4 July 2006

*no experience in design, no experience in combustion, but they are being trained on these gas courses.”<sup>53</sup>*

This was an issue addressed by CORGI, whose Chief Executive Mike Thompson, commented:

*“You get the training that is required which is always lagging behind the technology increase, and I think increasingly we have to work closer with the industry. We have not really in the past, and we have to reach out and be closer to the manufacturers and the boiler manufacturers particularly.”<sup>54</sup>*

A lack of joined-up working between manufacturers who are producing increasingly high-tech equipment and those who design the training for operatives is potentially very dangerous. Continuous professional development of installers may be something which is essential in this area. **We call on CORGI, HETAS, Summit Skills (the relevant sector skills council), and manufacturers to work together to develop a clear strategy to tackle this problem.**

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<sup>53</sup> Or Ev, Harry Rogers, 4 July 2006

<sup>54</sup> Or Ev, Mike Thompson, CORGI, 4 July 2006

## 6. Campaigning for awareness

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In addition to the impact of regulation, campaign work by a number of groups has played an important role in raising awareness of CO poisoning. People must be empowered with the information to help themselves, and imaginative and substantive campaigning can therefore help to save lives. The APPGSG welcomes the efforts of industry, the government and particularly the voluntary sector in raising awareness of the potential dangers of CO poisoning.

### **Stacey Rodgers**

In February 2004, Stacey Rodgers' ten year old son, Dominic, died from carbon monoxide poisoning from the house next door. The gas was produced from a faulty boiler and wrongly-sited flue, which led to carbon monoxide building up during the night and seeping in through the walls of Dominic's bedroom.

Following the death of her son, Stacey established the Dominic Rodgers Trust, to raise awareness of carbon monoxide poisoning. Since establishing the Trust, Stacey has appeared in a joint RoSPA-CORGI television campaign which focused on the dangers of carbon monoxide. She has also won two Huddersfield Home FM Local Hero awards.

Public knowledge of CO poisoning generally seems to be low. Indeed, a number of respondents stressed that there is not enough awareness amongst the public of the potential dangers of CO. Comments ranged from total ignorance: "*the public basically do not know that there is a problem*"<sup>55</sup>, to complacency: "*our*

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<sup>55</sup> Or Ev, Kairen Sanderson, RoSPA, 4 July 2006

*more recent research tends to suggest that the British consumer has a very high assumption that what they buy from a reputable brand is pretty safe.”<sup>56</sup>*

However, as described earlier, we have some evidence that awareness of the role and responsibilities of CORGI is fairly substantive, resting at some 78%<sup>57</sup>. This is a welcome result of their campaigning activity. However, again there was a concerning lack of evidence about the level of awareness of the oil and solid fuel installer registration schemes. Indeed, Jane Heginbotham of the Solid Fuel Association, noted that even:

*“some Building Control officers are unaware of the HETAS Competent Persons Scheme to the extent where they will say to a customer who has had an appliance installed by a non-competent person that they should get that appliance commissioned by a HETAS-registered person in order to get a certificate, but a HETAS-registered competent person is not going to certify the competency of the work of another person.”<sup>58</sup>*

We recognise that there are economic constraints on the ability of these smaller organisations to mount major publicity campaigns, and monitor the resultant levels of consumer awareness.<sup>59</sup> **We therefore call on the Government to fund research into awareness of Oftec (the Oil Firing Technical Association) and HETAS (the Heating Engineers Technical Association), within the auspices of its work to support Competent Person Schemes.**

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<sup>56</sup> Or Ev, Andrew Ford, Calor, 4 July 2006

<sup>57</sup> Wr Ev, CORGI

<sup>58</sup> Or Ev, Jane Heginbotham, Solid Fuel Association, 4 July 2006

<sup>59</sup> Wr Ev, Solid Fuel Association, Approved Coal Merchants Scheme and the Coal Merchants Federation

### **a) Some key areas to address**

Taking note of some of those groups who are most at risk of CO poisoning, the Group was keen to establish what action has taken place, as well as exploring how this might be improved.

#### **– The very old and young**

Respondents talked of the dangers of misdiagnosis by healthcare professionals, which may exacerbate the problem of CO poisoning amongst the very old and very young. Dr Terrance Ritter of Calor Gas, commenting on his belief in the current statistics, noted that the "*misdiagnosis of people feeling unwell is where there is less certainty*"<sup>60</sup> in terms of LPG incidents.

The Group heard that action is underway in this area. We were heartened to find that CORGI and the HSE "*leafleted every surgery in the country last year, explaining to the medics exactly what to do.*"<sup>61</sup> We welcome this measure but the case of Elisabeth Giauque emphasises how important it is to continue to pursue campaigning activity to raise awareness amongst the medical profession and patients. **We call on the industry and registration bodies to work energetically with the Department of Health to maintain and enhance awareness raising activity amongst healthcare professionals in future.**

#### **– Defective appliances**

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<sup>60</sup> Or Ev, Dr Ritter, 4 July 2006

<sup>61</sup> Or Ev, Mike Thompson, 4 July 2006

One issue raised surrounding appliance failures, was the danger of people deciding to install equipment themselves. This tendency to DIY was raised by CORGI, whose managing director, Tim Ottridge advocated a more heavily policed approach to the sale of appliances. He told us:

*“At the moment, anybody can go and buy a gas appliance from a retailer and, in the fullness of time, we would like to see the sale of gas appliances being limited to CORGI-registered installers. In that way, you can ensure that people are not buying them and installing them on their own or using some cowboy to do their installation for them.”<sup>62</sup>*

We agree with this ambition, as a clear direction to aim for. However, the Group recommends further action to tackle the problem of people putting themselves and their families at risk by DIY-ing with appliances. **The APPGSG will therefore host a summit on DIY.**

– **Rented accommodation**

Amongst the rented sector, the Group heard about the potential dangers to students who are often entering their own homes for the first time. This is an important group and we welcomed the imaginative public awareness campaign introduced by British Gas, who used beer-mats in student unions to highlight key safety messages.<sup>63</sup>

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<sup>62</sup> Or Ev Tim Ottridge, CORGI, 4 July 2006

<sup>63</sup> Wr Ev, CORGI

To increase awareness amongst the rented sector, Les Philpott of the Health and Safety Executive said that they had been working on novel ideas for increasing awareness among the public, in addition to more traditional advertising and PR methods. He told us:

*"[m]ost people have mobile phones and people give their mobile phone numbers to all parts of the gas industry at some point. Can we not send out a text message? It is not that expensive and it is quite effective. It is a modern way of getting to people."<sup>64</sup>*

**Whilst we welcome the kind of innovative campaigns established by British Gas and others to highlight the dangers of CO poisoning, much more needs to be done.**

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<sup>64</sup> Or Ev Les Philpott, Health and Safety Executive, 5 July 2006

## **b) Finding the right vehicle**

Views on which type of campaign tool is most appropriate for raising awareness differed widely from one respondent to another. Measures used could be generally described as falling into one of three categories:

1. Public relations and targeted media activity
2. Direct / customer information
3. Advertising

We received a good deal of information from industry regarding the importance of the first two forms of communication. The APPGSG recognises that these forms of contact can be effective in targeting specific groups in a cost-effective manner.

However, we also acknowledge the limits of this form of contact, something that was vociferously tackled by Stephanie Trotter of CO Gas-Safety, who was critical of the efforts of industry, in this instance, in terms of direct customer contact:

*"I have been handed this by a colleague who wants me to mention this – putting a leaflet in all gas customer bills. I am sure this has been done already and, frankly, I do not think it worked terribly well. It is very, very cheap but of course you miss the most vulnerable people – the foreigners, people who cannot read, et cetera – so we are not very keen on that because of that reason. But it is extraordinarily cheap."*

The case for advertising, and specifically advertising on television, was certainly amongst the most contentious issues raised. The Group received claims from industry representatives that television advertising was not the most effective way of channelling resources to raise awareness. However, the majority of respondents were highly sceptical of this claim. Colin Mitchell of domestic smoke and CO alarm manufacturers, Ei Electronics, commented:

*“Hard-hitting awareness campaigns on the TV and in the media have proven in the case of fire safety to drive home the message to the consumer, quicker and more effectively than regulations alone.”<sup>65</sup>*

The Group cannot support claims that television advertising is ineffective, and the high level of advertising of products across the energy retailers would suggest that claims by industry to the contrary are disingenuous. The issue of whether to advertise on television rest on funding. **Energy retailers have consistently failed to respond to the need for an integrated television, radio and wider media campaign on CO. We call for immediate action from energy retailers, Government and other relevant bodies such as CORGI, to jointly fund an integrated media advertising campaign to raise awareness of the dangers of CO poisoning.**

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<sup>65</sup> Wr Ev, Colin Mitchell, Ei Electronics

One possible source of funding for such a campaign is the CORGI Trust, a charitable body created by CORGI. However, we have received criticism from some respondents about the amount of time the Trust is taking to deliver funding following its creation in 2005.<sup>66</sup>

CORGI responded to concerns from campaigners about the time it had taken to get its Trust functioning, saying that, "*[t]he reason why people are looking a little bit jaundiced as to what is happening is because we have taken a long time to get it right.*"<sup>67</sup> Furthermore, they reported that they were conducting a review, due for completion in September, which would form the basis for decisions about future funding allocations.

**The CORGI Trust could provide a seed-corn fund for awareness raising activity. We call for the CORGI Trust to expedite its review and deliver funding for awareness raising activity at the soonest available time.**

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<sup>66</sup> Or Ev, Stephanie Trotter, 4 July 2006

<sup>67</sup> Or Ev Mike Thompson, CORGI, July 4<sup>th</sup> 2006

### **c) Co-ordinated action**

Campaign activity works best when each constituent part complements the other. The recent example of anti-smoking bodies working together to seek a total ban on smoking in enclosed public places is a good example of how this can work well.

The Group notes that there has been a concerted effort amongst members of the Energy Retailers Association (ERA) to develop a more consistent approach in this area, and a more detailed summary of activity from individual members companies. We welcome this initiative.<sup>68</sup>

**The six main energy retailers – British Gas, Powergen, E.ON, Scottish Power, EDF Energy, Scottish and Southern Energy, and npower – have too often hidden behind the limited action of the Energy Retailers’ Association. Alongside funding support for a national advertising campaign on CO, we call for individual companies to submit to an annual audit of their CO awareness activity, to be made public by the APPGSG.**

Respondents also highlighted a variety of other forums that work in this area. However, the prevailing sense was that there is a lack of co-ordination at present, particularly across fuel sectors. Lord Hunt argued this point, stating that what was really missing in terms of promoting awareness of gas safety was:

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<sup>68</sup> Wr Ev, ERA letter to Jon Trickett MP, 1 March 2006

*"a proper co-ordinating body across the industry that can look at these sorts of issues and speak for the industry with one voice. We do not have that at the moment. We have a number of competing voices."*<sup>69</sup>

The feeling seems to be reflected back from stakeholders to Government.

CORGI told us that their:

*"engagement has been through the HSE and has been reasonable over the years, but latterly has started to fragment because of the resource issue within the HSE. So we see a lack of engagement from our..., partners, the government and the HSE, and we need that back on track."*<sup>70</sup>

The APPGSG feels that a lack of co-ordination is a definitive feature that has resulted in a serious reduction in the effectiveness of campaigning to raise awareness of the dangers of CO. **The APPGSG calls for a single co-ordinating body taking in representatives from industry, government and charities, and working across all of the fuel types, to co-ordinate campaigning on CO.**

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<sup>69</sup> Or Ev, Les Philpott, HSE, 5 July 2006

<sup>70</sup> Or Ev, Mike Thompson, CORGI, 4 July 2006

## Recommendations and Conclusions

1. We welcome confirmation from the Minister and officials that the APPGSG's findings will have the opportunity to inform and influence this review.
2. We call for firm guidance from the DTI and Government in general to ensure that the major energy companies take their responsibilities for safety seriously.
3. The lack of real co-ordination both within individual fuel types and especially between types of fuel is unhealthy. We also urge key players with a responsibility in these areas to combine to form a single Fuel CO Awareness forum, and call for a cross-departmental Government working group on CO.
4. We believe data from hospitals on CO poisoning should be taken again, as it was previously, to enhance the statistical base on CO poisoning incidents.
5. We welcome both the introduction of Gas Work Notification and the research being undertaken by the HSE. Interested parties must use this data to allow for better analysis of risk patterns and better targeting of resources.
6. We urge action to create a systematic record of all CO poisoning incidents that result from solid fuel or oil, and appropriate action to be taken to reduce the worrying number of poisoning incidents in future.
7. We press the HSE to introduce a zero-fatality target on CO poisoning, and the HSE must continue to invest time and energy into gas safety. If this is not possible, then relevant powers should be delegated to appropriate bodies to lead in this area.
8. We feel it is vital that substantial medical research is undertaken to establish the impact on health of long-term, low level exposure to CO.
9. We call for further work between key stakeholders and the Department of Health to ensure that all medical professionals and those being medically treated are aware of the symptoms of CO poisoning.
10. We believe that having only one registration scheme creates a simple framework for consumers. More than one registration scheme for gas would complicate safety messages for consumers and could lead to a rise in CO incidents and fatalities. We therefore call on the HSE to reject the option of multiple registration schemes.
11. We are minded that despite much effort, the current registration scheme is not as effective as it could be in delivering gas safety. The burden of

responsibility borne out by current regulation needs to be addressed to target risk better. For gas and LPG work, we feel the HSE review should lead to more stringent, goal-setting criteria for the registration body so that it better tackles areas of highest risk.

12. The APPGSG supports measures for the gas registration body to have a contract term of longer than one year, as at present. Whoever the registration body may be, it must use this increased business certainty to establish more substantive, long-term investment in awareness raising activity.
13. We recognise that annual servicing would be regarded by some as an added burden on landlords. However, we call for a proper assessment of this option and for landlords to look at the need for a more regular, systematic servicing of appliances in housing stock.
14. The APPGSG is concerned that the Government has removed the mandatory requirement to provide appliance safety certificates to home buyers. This will have a negative impact on safety and we therefore seek urgent clarification from the Government on this issue.
15. We believe that there are ways of increasing the number of reliable CO detectors in the home and would expect the mortgage and insurance industries to find innovative ways to ensure every home has one which is both audible and approved to British Standard. There should be an expectation that in order to complete a mortgage, or insure a property, both CO and smoke detectors should be a requirement for all homes.
16. We agree that improving CO detection by emergency workers is key in the fight to tackle CO poisoning incidents in the home. We therefore call on the Government to take steps to ensure that all relevant emergency service workers have CO detection equipment readily available to them.
17. We are conscious of the problems of CORGI's dual role as registration body and enforcer. However, whilst we recognise that de-registering installers whose work fails to meet appropriate standards should be a last resort we call for the introduction of punitive measures – such as the use of substantial fines – to tackle bad installation work. Any money collected should be channelled into a central pot for CO awareness raising activity.
18. There seems to be widespread concern over a lack of enforcement action against incompetent, and illegal installers. Failure to enforce these regulations is totally unacceptable and we call on the Government to look at new measures to tackle this problem, which will in turn raise awareness of CO amongst consumers.
19. We are aware of a lack of skilled workers and trainees in the sector. The Group urges immediate government action to tackle these deficiencies.

20. We call on CORGI, HETAS, Summit Skills (the relevant sector skills council), and manufacturers to work together to develop a clear strategy to tackle this problem.
21. We call on the industry and registration bodies to work energetically with the Department of Health to maintain and enhance awareness raising activity amongst healthcare professionals in future.
22. The APPGSG will host a summit on DIY.
23. Whilst we welcome the kind of innovative campaigns established by British Gas and others to highlight the dangers of CO poisoning, much more needs to be done.
24. Energy retailers have consistently failed to respond to the need for an integrated television, radio and wider media campaign on CO. We call for immediate action from energy retailers, Government and other relevant bodies such as CORGI, to jointly to fund an integrated media advertising campaign to raise awareness of the dangers of CO poisoning.
25. The CORGI Trust could provide a seed-corn fund for awareness raising activity. We call for the CORGI Trust to expedite its review and deliver funding for awareness raising activity at the soonest available time.
26. The six main energy retailers – British Gas, Powergen, E.ON, Scottish Power, EDF Energy, Scottish and Southern Energy, and npower – have too often hidden behind the limited action of the Energy Retailers' Association. Alongside funding support for a national advertising campaign on CO, we call for individual companies to submit to an annual audit of their CO awareness activity, to be made public by the APPGSG.
27. The APPGSG calls for a single co-ordinating body taking in representatives from industry, government and charities, and working across all of the fuel types, to co-ordinate campaigning on CO.