

awareness, somewhat less than the 196 who wanted tougher legal controls (bearing in mind that this question was answered in the aftermath of the Larkhall explosion in Scotland, which may have skewed the outcome towards controls). In the MORI survey, where respondents were not asked which of these potential alternatives they might favour, 81% thought that the Government should do more to promote gas safety, and 87% thought that the gas industry should do more, without (66%) gas bills being increased to pay for higher safety standards.

80. Since resources have not been available for a repetition of the successful 1995/96 advertising campaign, there is no direct evidence from the gas field to show what impact sustained annual campaigns would have: subsequent publicity, HSE and DTI, has been relatively small scale (Note: we are examining the impact from successful campaigns in other fields, together with existing data from inspectors investigations on causation, to establish a possible target in terms of lives saved).

81. It has been noted that industry, eg BG, sometimes sponsors TV advertising related to gas safety: but the principal aim of this is not to educate the public about the dangers from using gas and how to avoid them, but sometimes to reassure the public that gas is safe, or to give a competitive edge to the sponsor (eg over other installers).

82. An industry promotion plan, supplemented by an HSC/E plan which takes account of likely gaps, seems to offer a good model for making a real impact on public behaviour and consciousness. The regulator's element could be funded by using a proportion of the levy for the proposed research plan (recommendations 5-7) to finance awareness raising initiatives.

#### Emergency Service Providers

Question 8. What are your views on the current role and level of response provided by Emergency Service Providers (If you believe that changes should be made please give details)? (DD Page 24)

Question 9. What are your views on whether ESP's should legally be required to take reasonable steps to verify that there is a genuine incident (ie by carrying out the necessary examinations/tests), before a report is made under RIDDOR/GSMR? (DD Page 24)

#### Recommendation 12

83. *With regard to mains (natural) gas (duties under GSMR), we understand the argument for extending the role of ESPs to cover appliance repairs (ie by reverting to previous functions under the unified BG regime), but believe that the fundamental reorganisation this would entail, and related implications for competition in the liberalised gas market, would be difficult to justify in terms of any safety benefits. We therefore believe that the current ESP function (ie focusing on action to make safe in an emergency) should be retained.*

84. We consider nevertheless that procedures for operatives, particularly in response to reports of 'fumes', have developed in a way which does not totally reflect original policy intentions (albeit not fully translated into GSMR). In particular, we believe that ESPs should be required to take all practicable steps positively to identify and physically disconnect any dangerous or potentially dangerous appliance emitting 'fumes', including where there may be no obvious visual indication (eg where CO emission from a defective appliance results from intermittent flue reversal, or from an appliance in neighbouring premises). To meet this objective, ESPs should provide suitably equipped and competent operatives to carry out the necessary tests (see Recommendation 33).

85. We also believe that ESPs should be required to notify the consumer in writing of the results of investigative work they do to identify and make safe any dangerous gas fitting/appliance.

86. If these proposals are carried forward, we recommend that OFGEM be invited to amend gas transporter licence conditions accordingly.

87. We further recommend that OFGEM considers amending transporter licence conditions as necessary, to ensure emergency heating and cooking equipment is provided for elderly or otherwise vulnerable consumers, when such appliances have to be disconnected by the ESP. (Recommendation 8 also concerns potentially vulnerable groups.)

88. With regard to liquefied petroleum gas (LPG) emergencies (duties under Gas Safety Installation and Use Regulations (GSIUR)), we recommend that the existing duties on gas suppliers under regulation 37(1) should, for fixed vessel-fed systems be extended in the case of reports of 'fumes', to align with those applicable for natural gas emergencies under regulations 7(5) and 7(17) of GSMR.

89. We understand the safety logic for applying a similar approach to cylinder-fed systems but accept that 'mobility' factors would make this difficult to operate in practice, eg where enforcement problems are encountered because the gas supplier cannot be specifically identified. We therefore recommend that for LPG cylinder-fed systems (as for response to fuel gas escapes for fixed vessel-fed systems) that the existing duties of the Gas Safety (Installation and Use) Regulations (GSIUR) should be retained.

#### **Natural gas - procedures under the Gas Safety (Management) Regulations**

##### **Analysis of responses**

90. Of the total (71) replying to Q 8 the greater number (29) were broadly satisfied with the present role (and performance) of ESPs (one of these was only content on response to gas escapes); 14 had detailed reservations - mostly about performance, eg when measured against current OFGEM licence conditions; 19 (one of which only applied to response to CO emissions) had concerns (which generally seemed more basic, eg on the fundamental purpose of ESPs), and 8 were