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Ofgem
Consumer Affairs,
Ofgem,
Commonwealth House,
32 Albion Street.
Glasgow, G1 1LH

**RE: The Consultative Document regarding RII02 and the responses to CO-Gas
Safety's Freedom of Information Request (FOI)**

Dear Ofgem,

As a relative of a victim of carbon monoxide poisoning, I have been asked by CO-Gas Safety to write a letter in support of a submission to the Consultative document regarding RII02 and the responses to CO-Gas Safety's FOI request. This FOI request stated, 'Ofgem does not consider there is sufficient justification to extend the scope of the existing gas emergency service.' This lack of 'sufficient justification' for the gas emergency service to test gas appliances for carbon monoxide (CO) is despite the fact that there had been no consultation with the Health and Safety Executive (HSE) as required under the Memorandum of Understanding (MOU).

I feel a sense of despair that more justification is needed to make the gas industry safer, when about 60 lives are lost every year due to accidental poisoning*, a preventable cause. Little has changed in the 12 years after my father's death and in 25 years of CO Gas Safety's lobbying.

In 2008, my father, aged 52, died of carbon monoxide poisoning in a hotel in Newquay, Cornwall. He was a larger-than-life man who seemed immune to health complaints. He hadn't visited a doctor in 8 years. He had gone on a business trip and mistook the signs of carbon monoxide poisoning for the symptoms of flu. He never suspected his symptoms to be caused by carbon monoxide; thus, increased awareness of the dangers of carbon

monoxide (CO) poisoning is crucial. If he had been more aware of the signs of poisoning or if the gas emergency services were able to test the air immediately, he could still be alive today. Therefore, if we are looking at this issue from moral and preventative perspectives, there is adequate justification on both counts.

We can also look at the issue from a regulatory perspective. Proposals were made by the Health and Safety Executive in 2000 to improve the gas industry. Recommendation 7 called for the gas supplier to supply a levy to pay for awareness campaigns and improved research. Recommendation 34 called for gas emergency services to carry and use equipment to test emissions from gas appliances for carbon monoxide. These recommendations were made after an exhaustive gas safety review and with the support of stakeholders. Please see CO-Gas Safety's submission.

Additionally, we could examine the economic benefits. Preventing and detecting chronic carbon monoxide poisoning would save the taxpayer £178 million a year**. This estimate is derived from potential savings from *known* deaths and injuries. Many more illnesses can unknowingly be traced back to CO poisoning. Now, more than ever, is a crucial time to improve awareness of CO poisoning, especially when the symptoms of CO are like those of any virus, including Covid-19.

Additionally, there have also been unintended consequences of Covid-19 which have undermined gas safety; for example, a reluctance to have engineers to homes to service faulty boilers and refusals by Registered Gas Engineers to visit homes, confusing CO poisoning symptoms with Covid-19. This happened to Council tenant Ms Reid in March in Scotland when after her CO alarmed and her gas was cut off leaving her without central heating suffering from pneumonia, she couldn't obtain the services of a RGE to service her boiler but to the fear the RGEs had that she had Covid-19. With the potential for further self-isolation of vulnerable people in their homes, using gas appliances throughout the winter, this problem will inevitably get worse. It is paramount that we improve awareness of CO poisoning immediately as both Covid-19 and CO poisoning cause respiratory issues that, when taken together, increase the risk of neurological issues and death exponentially.

Furthermore, I would like to draw your attention to the inadequacies of your discussions. I argue that it is very difficult to find justification for change when the issue has neither been discussed in detail nor appropriately researched. For example, the Freedom of Information request revealed that you have had 'informal discussions internally' regarding whether the role of the gas emergency service should be extended. It is difficult to believe that a matter of such importance could be concluded with an informal discussion. The fact that these discussions were kept 'internal' indicates passivity and a lack of desire to find justification as opposed to the false conclusion that there is not 'sufficient justification.' It is also indicative of a lack of consultation with experts and stakeholders, who would undoubtedly have further evidence of the need to make the gas industry safer.

Finally, I would like to ask how much more 'justification' Ofgem needs to fulfil its duty to protect consumers. What evidence needs to be submitted to reverse this decision? After all, the justification I have outlined includes empirical evidence, the recommendations from

an exhaustive gas safety review and the social impact of a shock bereavement through carbon monoxide poisoning.

Thank you for taking the time to read this letter. I look forward to a response at your earliest convenience.

A handwritten signature in dark ink, appearing to read 'Emma Jackson-Phillips', is positioned above the printed name.

Emma Jackson-Phillips

*<https://www.nhs.uk/conditions/carbon-monoxide-poisoning/>

**<https://www.publications.parliament.uk/pa/cm201314/cmselect/cmcomloc/50/50iii132.htm>

***<https://www.eveningtelegraph.co.uk/fp/mum-recovering-from-pneumonia-claimed-angus-council-initially-refused-to-fix-gas-because-they-believed-she-had-coronavirus/>