**Submission to Ofgem re review and RIO3 from CO-Gas Safety**

**Ofgem**

**Ofgem has specific statutory duties**

1. To protect the interests of consumers in relation to gas conveyed through pipes.
2. Ofgem also has a specific duty with regard to vulnerable customers.

Ofgem has agreed that all customers, however wealthy or adequate, are vulnerable to CO.

We also rely on the submission (sent by email dated 07.09.2020 with attachments) to Ofgem for RIIO-2 including a submission with regards to a reply by Ofgem to CO-Gas Safety’s FOI request. Please refer in particular to the summary. Ofgem had concluded that there was insufficient justification for extending the role of the gas emergency service. CO-Gas Safety is extremely grateful to Ofgem for reconsidering this conclusion and providing increased funding for the GDNs.

We submit that further funding for the GDNs is almost certainly required, although perhaps it might be enough if less restrictions on the need for the GDNs to justify the use of their ‘use it or lose it’ funding.

The reason CO-Gas Safety states this is that in the opinion of the charity there is still a huge need to raise public awareness of carbon monoxide and how to prevent it, to provide incentives for more and better qualified Gas Safe Engineers and to fund a free test for CO in the home and workplace to all consumers in order to protect their health and prevent exposure to CO.

Please note that even very low levels of CO have been found to cause brain damage in older adults. Please see <https://www.coresearchtrust.org/media-information/three-year-project-looking-at-risk-of-co-to-older-people-reveals-concerning-findings>

**About CO-Gas Safety**

CO-Gas Safety is an independent, registered charity, launched at the House of Commons on the 25th January 1995. This was founded by the late Molly Maher, the late David Jenkins of RoSPA and Nigel Griffiths, then an MP. Molly’s son, Gary died from carbon monoxide and her daughter, Sheree was severely injured becoming a wheelchair user, in Tenerife in 1985.

I agreed to run the charity as a volunteer, helped by other voluntary trustee/directors, mainly victims/survivors and their family members with one industry member.

We have sought to work with the fuel industry and government departments to reduce deaths and injuries from unintentional carbon monoxide poisoning & other gas dangers and to help victims and their families.

**Summary**

1. **Everyone is vulnerable to carbon monoxide (CO)**

CO cannot be sensed using human senses and is deadly at less than 2% in the air in under three minutes.

CO-Gas Safety is grateful to Ofgem for providing the GDNs with £171 million enabling some testing for CO, but the GDNs seem to be confining the testing to those consumers in vulnerable situations. Yet all are vulnerable to CO, however healthy, wealthy or wise.

Ofgem seems to be allowing the GDNs to decide whether or not a customer is in a ‘vulnerable situation’ for themselves although Ofgem recognises that customers can be temporarily vulnerable and unless testing for CO is undertaken, nobody can know whether or not a customer is vulnerable at that time.

It is almost impossible for even the most wealthy and competent person, let alone a tenant, to obtain a test of the air in the home and emissions from appliances powered by any carbon-based fuel for carbon monoxide. British Gas does not offer this.

Although a service of the appliances will hopefully make a person safe from CO, such a service will not first test for CO.

Testing a survivor is unreliable because CO leaves the breath and blood of a person breathing fresh air or oxygen quickly but often causes injuries days, weeks months or even years after exposure. This means there will have been no finding of parts per million of CO for the medics to help them make a diagnosis and so distresses patients with unnecessary tests and wastes NHS resources.

1. It follows that surely all consumers must be able to obtain a free test of the air in their homes and in the emissions from appliances as soon as possible.
2. Where CO is found parts per million (PPM) of CO must be given to those exposed in writing/digitally for their medics and the source of the CO made safe. This will aid diagnosis and save NHS funds.
3. Data is now being collected and collated by the GDNs, but we are not sure if the fields will include the most vital matters such as: -
4. PPM of CO found,
5. Where found and
6. Identify the appliance.
7. Many other data fields could easily be gathered at the same time mainly through automatic use of instrumentation and already existing data recording e.g. address of property, name of engineer, appliances at the property, when last serviced etc.

A golden opportunity to make the most of the £171 million exists. We have been collecting, collating and publishing data on deaths from unintentional CO since 1995 and have considerable experience which we have provided to the GDNs but we are still unconvinced that even the vital data is being collected. This vital data may also be helpful for prevention.

**Further funding may be necessary** to make sure all consumers can obtain a test for CO whenever they are concerned about CO.

Without testing there is no proof and without proof, there is no data.

However, research by NGN shows that testing for CO only adds 5 to 7 minutes onto the time at the property. <http://www.northerngasnetworks.co.uk/wp-content/uploads/2015/10/Giving-carbon-monoxide-nowhere-to-hide.pdf>

As well as the confirmation of CO, consumers who do not have a CO problem can have their anxieties about CO relieved to hear from an engineer that they do not have a CO problem. We think it’s important that the engineer be named or identifiable.

1. **There should be increased awareness of the dangers of CO and how to prevent it.** A film could be made and shown on TV and social media. British Gas advertise on prime-time TV all the time. On the 26.02.25, while watching Location, Location, Location I saw several British Gas advertisements.

There is also a huge need to make the medical profession more aware of CO, particularly the long term effects of CO on survivors some of whom have told us their injuries are so serious, they wish they had died.

1. **CO-Gas Safety is the only body to provide specific help and advice on death or injury from CO** and other gas dangers, yet, apart from the small company, Kane International, and some small amounts of funding in the past, we are unfunded by the hugely wealthy fuel industry.

We all volunteers apart from some very part time help from home for our data collection, collation and publication.

I am 75 years old and have done this work continuously since January 1995.

Please will Ofgem make sure there is funding for another properly funded organisation with more staff to take over. We would be happy to help with this.

1. **Legal changes are needed.**

Being a barrister (not practising at the moment) with my experience of trying to help survivors etc., I would be delighted to help. I have written many articles and drafted regulations etc.

I have recently been asked by Paul Davies MP, chair of the All Party Parliamentary Group to draft some Gas Regulations, because there is a need to impose a legal duty on the gas emergency service and indeed all Registered Gas Engineers to test for CO, whenever practicable. It is now easier and cheaper to do even than in 2011 when it was shown in research (see 1 above) that it would only add 5 to 7 minutes onto a visit as four rooms can be tested at once.

Ony 2% of gas safe engineers have the qualification CMDDA1 which seems to be considered necessary to undertake a test. This information was provided to us from Mark Rolfe of the Gas Safe Register.

**B Main submission**

1. **£171 million provided for RIO2.**

This was a large uplift from the original £60 million. We are grateful to Ofgem for the sums allowed for VCMA, but more may be needed. Alternatively, perhaps a different emphasis on the use of those funds is required for the basics of testing for CO for everyone to enable them to be safe and if CO found, for the parts per million of CO to be provided for that person exposed and their medics.

**Catch 22**

However, the problem with carbon monoxide is that it is a ‘Catch 22’ situation; to prove CO you have had to prove CO. However, everyone is vulnerable to carbon monoxide, however healthy, wealthy or wise and the GDNs and Ofgem are beginning to recognise this.

Testing a survivor is not reliable because CO leaves the breath and blood of the person exposed quickly especially if taken to fresh air or given oxygen. However, sadly the ill effects can continue days, weeks, months or years later.

So, anyone and everyone is vulnerable to exposure to CO and also to the anxiety of being exposed to CO, particularly for those who feel unwell with vague symptoms, that could be CO or many viruses or other diseases etc.

Because neither the gas emergency service nor registered gas safe engineers have a mandatory duty to test for carbon monoxide, proof of exposure or indeed being safe from CO, is an obvious gap. This is particularly so, when only 2% of Registered Gas Safe Engineers have the qualification CMDDA1. Most RGEs with CMDDA1 wrongly think they cannot test in homes of tenants without the landlord’s permission. There is also a high cost both in terms of human health and also costs to the NHS for endless, pointless and often distressing tests etc.

British Gas does not offer this much needed service of testing the home and emissions from gas appliances for CO, even on a chargeable basis. We have asked many members of the staff of British Gas to supply this test for CO including Chris O’Shea, CEO of British Gas.

Without testing there is no proof and without proof, there is no data.

**Testing for carbon monoxide**

However, thanks to the VCMA funding some testing for carbon monoxide (CO) has now been carried out, particularly by Cadent and NGN. SGN has been using an outside firm to undertake tests, which although we think this is being done reasonably well, we consider not to be ideal. The reason is because in our opinion, the GDNs do seem to us to be more impartial, but also because it’s better for the customer to have a ‘one stop shop’ for customers who may also have other vulnerabilities. Wales & West Utilities is the last GDN to join in with this vital safety initiative.

CO-Gas Safety is very grateful to Ofgem for making this funding available and this has been to us the light at the end of a very long 30 years of the existence of CO-Gas Safety and is making a huge difference to attitudes within the industry and hopefully soon, government too.

However, we have some concerns.

1. **Data**

Our main concern is the data that is being collected and hopefully collated and published. We hear that the GDNs are now at last working together and sharing data.

The most important data for victims/survivors and family members are the parts per million (PPM) of CO found. In our opinion the PPM of CO found must be given to those exposed or could have been exposed in writing/digitally for their medics. Medics take notice of PPM of CO in writing from a named engineer because this means patients are not distressed and NHS funds are not wasted on tests that are not necessary.

It’s important that these readings show where the CO was, e.g. in the air in the living space or in the flue. It’s also vital that the appliance emitting the CO is identified so it and the consumers can be made safe.

Consumers often overlook appliances powered by fuels other than gas particularly wood burners and generators.

Because CO-Gas Safety is the only body to provide specific help and advice to survivors and families, we have considerable experience in suggesting where the CO could be coming from, when the obvious candidates have been ruled out.

CO-Gas Safety has continually pressed for involvement in deciding what fields of data should be specified over several years, yet we have been denied inclusion in any detailed meetings on the fields to be collected. Yet CO-Gas Safety has collected, collated and published data of deaths from unintentional CO since 01.09.1995 and ongoing so we have 30 years of experience. We have provided some fields and offered to discuss these further but have not succeeded in being included.

We have had some funding from the Department of Health in the past, so this seems a waste of public money when we are ready, willing and able to help.

Please see our data: -

<https://www.co-gassafety.co.uk/data-menu/>

<https://www.co-gassafety.co.uk/data/>

<https://www.co-gassafety.co.uk/data-menu/deaths/>

<https://www.co-gassafety.co.uk/wp-content/uploads/2025/01/Summary-stats-sheet-in-work-2023-24-after-ST-26.01.25.pdf>

<https://www.co-gassafety.co.uk/wp-content/uploads/2025/01/All-Graphic-Charts-in-work-2023-2024-after-ST-26.01.25-JW-27.01.25-002.pdf>

We also publish case studies please see <https://www.co-gassafety.co.uk/case-studies/> both about fatalities and from survivors.

Please see quotes from survivors <https://www.co-gassafety.co.uk/case-studies/quotes-from-survivors/>

I will copy just two: -

**From Debbie**

‘I just don’t understand why it’s so hard when people know that this gas can kill you. Perhaps they think just because you didn’t die, you should be glad. But this is a dreadful poison, and the after-effects are worse than dying because you have to live the rest of your life with them and if the effects are bad, it’s very hard. I don’t understand why people don’t understand this, knowing this gas can kill.

I’ve never felt so bad since I was poisoned and never had so many health issues since then.’

**From Sophie**

‘When I discovered that my children’s ill-health had been caused by a carbon monoxide leak, I was filled with dread. As a parent your instinct is to protect your children, and yet here was this near-lethal danger, hiding in plain sight.’

Also quotes from others please see <https://www.co-gassafety.co.uk/case-studies/quotes-from-others/>

**Quote from Roland Johns, expert investigator and trainer British Gas (retired)**

‘Everyone is vulnerable to carbon monoxide (CO) – we’ve been saying this for years. After all CO is a deadly gas that can’t be sensed using human senses. It follows that testing for CO on every visit by registered gas installers is the only way forward.

Visual signs can be very subjective and confusing, especially for those with little experience, so turning the appliances back on and testing for CO using a Flue Gas Analyser provides a positive yes or no.’  
*From Roland Johns, Over 30 years of experience as a British Gas Investigator & Trainer, now retired. Inventor of a course about CO from fuels other than gas see* [*https://www.co-gassafety.co.uk/information/gas-installers/*](https://www.co-gassafety.co.uk/information/gas-installers/)*. Now trainer of bike riders delivering blood and raiser of funds for the Air Ambulance.*

1. **We would like everyone to be able to access a test from the GDNs for CO whenever they considered they were at risk and ideally that there be a legal duty on the gas emergency service and all registered engineers to test for CO whenever practicable.**

We accept that this may well increase the work of the GDNs considerably so the GDNs may need more funding. However, the research by NGN in 2011 published 2015 shows that testing for CO only added 5 to 7 minutes on to the time normally taken on a visit by the gas emergency service. Please see <http://www.northerngasnetworks.co.uk/wp-content/uploads/2015/10/Giving-carbon-monoxide-nowhere-to-hide.pdf>

1. **Awareness of the dangers of carbon monoxide and how to prevent exposure to this deadly gas.**

Despite the funding no enthusiasm from the GDNs for a film to warn about CO based on the Hardest Day in a domestic setting.

During the past year we have undertaken considerable work and approached the GDN CO group with a request for them to join with us to make a warning film about CO based upon the idea in the warning film for Gas Safe Registered Engineers, ‘The Hardest Day’ see <https://www.youtube.com/watch?v=PvTaYFf0aOM> but using a domestic setting.

Sadly, we received a negative response. This warning film would have underlined the importance of preventing carbon monoxide poisoning by having carbon fuelled appliances installed and serviced by qualified people, chimneys/flues swept, ensuring adequate ventilation and, as an extra safeguard, buying and installing a CO alarm to EN 50291.

We are told TV is old fashioned but British Gas advertises on TV for most of the year.

1. **There should be funding for a body to provide victim support** which would also be able to research incidents and learn from them and recommend important improvements as we have been doing for the past 30 years. I am 75 years old and have been doing this as a volunteer on a shoestring for over 30 years. It is high time I stopped.

**4. Legal changes are needed** **but although recommended by HSE in 2000, no action has been taken to implement them**

(a) Landlord’s gas safety checks still don’t require a mandatory test for CO or a service. There is a continuing duty on the landlord to keep the gas appliance and flue in a safe condition, but the law is not made as clear as it could be, with some landlords considering their duty is simply to get the check done and certificate obtained.

(b) A simple change to the Gas Regulations to make it mandatory for all Registered Gas Safe Engineers to test for CO mandatory practicable and where CO is found results given in PPM to those exposed/suspected to have been exposed would, in our opinion, dramatically improve safety.

Stephanie Trotter, **OBE**

**President & Director on behalf of all the directors of CO-Gas Safety**