

# All-Party Parliamentary Carbon Monoxide Group response to Ofgem 2014 consultation, 'Review of the Priority Services Register'

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## About the All-Party Parliamentary Carbon Monoxide Group

The All-Party Parliamentary Carbon Monoxide Group ('APPCOG') is the leading forum for Parliamentarians to discover, discuss and promote ways of tackling carbon monoxide poisoning in the UK.<sup>1</sup> The APPCOG is co-chaired by Baroness Finlay of Llandaff, Baroness Maddock, Barry Sheerman MP and Jason McCartney MP.

In 2011 the APPCOG launched an inquiry, chaired by Baroness Finlay of Llandaff.<sup>2</sup> The report from this inquiry, 'Preventing Carbon Monoxide Poisoning', highlighted Government statistics that suggest as many as 4000 people each year are diagnosed with low-level carbon monoxide exposure, with a further 200 admissions to hospital with serious injuries, and around 40 fatalities every year.<sup>3</sup> In addition to the human tragedy and suffering, a crude calculation in the report<sup>4</sup> suggests that carbon monoxide poisoning could be costing the country as much as £178m each year. Crucially, it is widely thought that the numbers of people affected are far greater than those proven due to underreporting, a lack of awareness and the difficulties in diagnosing poisoning. Many people may be living with low-level poisoning, mis-diagnosing their symptoms, and developing irreversible long-term health problems.

As a result, the report put forward key recommendations to tackle carbon monoxide poisoning through improved detection, increased awareness and better regulation of standards. The APPCOG works to promote uptake of recommendations in the 2011 report as well as other relevant aims resulting from new evidence and developments of relevance to improved carbon monoxide safety.

## Introduction

Ofgem has asked for submissions on a consultation for its review of the Priority Services Register. Given the wide-ranging nature of the Ofgem review, and the APPCOG's focus on preventing carbon monoxide poisoning, the Group's response focuses on those areas in the consultation document that it sees as having most influence on carbon monoxide safety, i.e. Chapter Two, Question 2.

## Overview of recommendations

- Ofgem should recognise the heightened risk to the developing fetus of exposure to carbon monoxide, and so extend eligibility for gas safety services provided under the Priority Services Register to pregnant women that own their own home and are receiving means tested benefits.
- Gas suppliers should be required to provide and install, in households eligible for free gas safety checks, audible carbon monoxide alarms. These should be compliant with BS EN 50291 in accordance with the industry standard BS EN 50292 which gives guidance on the number and location of alarms to be fitted.

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<sup>1</sup> Additional information about the APPCOG can be found at: <http://www.policyconnect.org.uk/appcog/>

<sup>2</sup> 'Preventing carbon monoxide poisoning', A report by the All-Party Parliamentary Gas Safety Group (now the All-Party Parliamentary Carbon Monoxide Group), 2011. Available at: <http://www.policyconnect.org.uk/appcog/research/report-preventing-carbon-monoxide-poisoning>.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

## Response to consultation questions

Following is an outline of the APPCOG's responses in relevant areas, under the relevant question headings provided in the Ofgem consultation document.

### Chapter: Two

*Question 2: Do you agree that we should continue to prescribe a minimum set of services? Do you support the proposed list of services? What additional services, if any, do you think energy companies should be required to provide?*

*Question 4: Do you agree that we should move away from requiring energy companies to provide services to disabled, chronically sick and pensionable age customers to an approach which requires energy companies to take reasonable steps to identify and provide appropriate services to any customer with safety, access or communication needs?*

The APPCOG agrees that Ofgem should continue to prescribe a minimum set of services and supports the proposed list of services, with two recommendations. First, the eligibility for a free gas appliance safety check should be extended to pregnant women that own their own home and receiving means tested benefits. Second, audible carbon monoxide alarms, compliant with BS EN 50291 should be provided and installed with those deemed eligible for a free gas safety check.

While Ofgem highlights reluctance to alter the eligibility requirements for free gas appliance safety checks, it would be sensible to include pregnant women within those considered "most at risk from carbon monoxide." Carbon monoxide is a colourless, odourless gas commonly produced by incomplete combustion of gas and other carbon-based fuels. According to Government statistics<sup>5</sup> this poisonous gas causes as many as 4000 people attending accident and emergency departments in England to be diagnosed with low-level carbon monoxide exposure each year, as well as the accidental death of around 40 people and a further 200 admissions to hospital with serious injuries in England and Wales every year. Sub-lethal poisoning can result in lasting neurological damage.

It is widely documented that the developing fetus is particularly at risk to carbon monoxide poisoning. Indeed, the Government's own guidance identifies pregnant women and their unborn children amongst those at increased risk of poisoning (along with older people, children and those with breathing problems or cardiovascular disease)<sup>6</sup>:

*"Avoiding exposure to CO is of particular importance to pregnant women as fetal blood has a much higher affinity for CO than an adult's. This means that not only is CO more readily taken up by the fetus, but it also releases CO much more slowly, therefore prolonging exposure of the fetus even after the pregnant woman is herself no longer being exposed. Exposure to CO reduces the amount of oxygen available for the growing fetus and has been linked to birth defects and other poor pregnancy outcomes including fetal and infant mortality."*

Public Health England is working on updating and developing new tools to aid the diagnosis of CO poisoning amongst healthcare professionals. In recognition of the increased vulnerability of the fetus, these include a tool for midwives to use during antenatal checks to aid diagnosis of poisoning from environmental exposure to carbon monoxide.<sup>7</sup> These developments followed the launch of a similar flowchart written for emergency department physicians and GPs,<sup>8</sup> another for healthcare professionals running smoking

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<sup>5</sup> [www.hse.gov.uk/gas/domestic/cross-government-group-1213.pdf](http://www.hse.gov.uk/gas/domestic/cross-government-group-1213.pdf)

<sup>6</sup> [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/260211/Carbon\\_Monoxide\\_Letter\\_2013\\_FinalforPub.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/260211/Carbon_Monoxide_Letter_2013_FinalforPub.pdf)

<sup>7</sup> [www.hse.gov.uk/gas/domestic/cross-government-group-1213.pdf](http://www.hse.gov.uk/gas/domestic/cross-government-group-1213.pdf), p. 9.

<sup>8</sup> [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/260211/Carbon\\_Monoxide\\_Letter\\_2013\\_FinalforPub.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/260211/Carbon_Monoxide_Letter_2013_FinalforPub.pdf), pp. 10-11.

cessation clinics which pregnant women might also attend, and a similar tool for environmental health professionals (in which the increased risk of pregnant women is also highlighted).<sup>9</sup> Similar recognition of the vulnerability of the developing fetus to carbon monoxide exposure should be made in provision of gas safety services under the Priority Services Register, by extending eligibility to pregnant women that own their own home and are receiving means tested benefits, in order to protect the health and development of future generations.

An additional service that could have benefits for gas safety is the provision and installation by gas suppliers of audible carbon monoxide alarms in those households in receipt of a free gas safety check under the Priority Services Register. The correct fitting of such alarms should not be regarded as a replacement for being aware of the dangers of carbon monoxide poisoning, or as a substitute for the proper servicing and use of carbon-fuel burning appliances. Audible alarms manufactured to British (European) Standard BS EN 50291 will activate at specified thresholds that could contribute to acute-level poisoning and so provide a valuable second-line of defence should appliances malfunction.

So far as we know, there has never been a death from carbon monoxide poisoning in the UK when an audible alarm has been present. There are no verified figures for how many UK homes have carbon monoxide alarms, but industry estimates suggest it could be lower than 10 per cent.<sup>10</sup> This is compared to around 82 per cent that have a smoke alarm following high-profile campaigns; a well-recognised and effective level of protection against death and injury by fire. The apparent low uptake of carbon monoxide alarms in homes suggests that multiple push factors are needed to improve uptake, including through mandatory installation. In addition to the households covered by this consultation, APPCOG supports mandatory installation across different tenures, including the private rented sector where carbon monoxide safety is a particular concern.

The costs to suppliers for providing and installing carbon monoxide alarms, compared to the benefits of helping to provide households already recognised as vulnerable to the effects of unsafe gas work with an additional level of protection from the death, injury and the suffering caused by from poisoning, is very low. Alarm technology has improved to the extent that the batteries can be 'sealed in' and last the life of the sensor, and modern alarms contain sophisticated technology which discounts for insignificant atmospheric spikes. According to the Council of Gas Detection and Environmental Monitoring, the average cost of a BS EN 50291-compliant, audible carbon monoxide alarm is £20, with an expected alarm life and warranty (under normal conditions) of between seven and ten years.

- **Recommendation:** Ofgem should recognise the heightened risk to the developing fetus of exposure to carbon monoxide, and so extend eligibility for gas safety services provided under the Priority Services Register to pregnant women that own their own home and are receiving means tested benefits.
- **Recommendation:** Gas suppliers should be required to provide and install, in households eligible for a free gas safety check, audible carbon monoxide alarms. These should be compliant with BS EN 50291 in accordance with the industry standard BS EN 50292 which gives guidance on the number and location of alarms to be fitted.

## September 2014

The All-Party Parliamentary Carbon Monoxide Group

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<sup>9</sup> <http://www.cieh.org/uploadedFiles/Core/Policy/Housing/COResidential.pdf>.

<sup>10</sup> British Gas research: <http://www.britishgas.co.uk/blog/articles/are-you-at-risk-from-carbon-monoxide-poisoning>