



Commission for Energy Regulation

An Coimisiún um Rialáil Fuinnimh

**Natural Gas Safety Regulatory Framework for
Ireland**

***Gas Safety Promotion and Public Awareness -
High Level Strategy***

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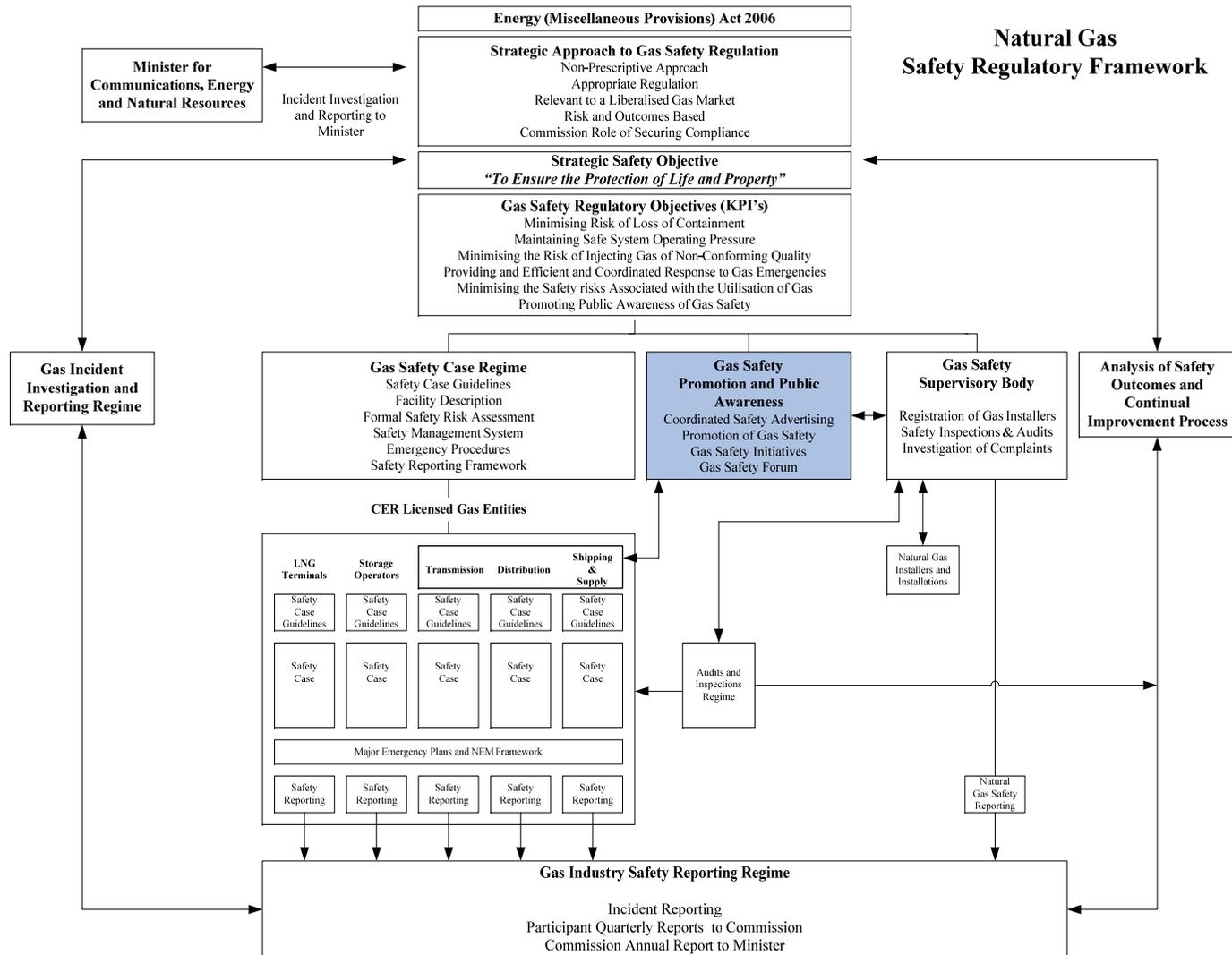


Figure 1: Natural Gas Safety Regulatory Framework (Conceptual Illustration) – Promotion and Public Awareness Element Highlighted in Blue

1 INTRODUCTION

The Commission has significant gas safety promotion and public awareness statutory obligations under the *Energy (Miscellaneous Provisions) Act 2006*. The importance of these obligations is reflected in the fact that *Gas Safety Promotion and Public Awareness* is one of the main components of the Natural Gas Safety Regulatory Framework (the 'Framework'), as highlighted in blue in Figure 1 on the previous page, and represents one of the six key objectives of the Framework as set out below:

Key Objective 6: Promoting Public Awareness of Gas Safety

Increasing the level of gas safety awareness amongst gas customers and the public generally and, in particular, educating on the dangers of carbon monoxide is an important aspect of the Commission's overall objective of promoting the safety of customers and the general public in respect the use of gas. It will also be important that owners/occupiers of premises are aware of their responsibilities in respect to the maintenance of gas fittings downstream of the meter. The proposed gas safety framework places duties and obligations on both individual gas undertakings and the industry generally for the promotion of gas safety awareness. This will involve a combination of both individual and co-ordinated safety promotional activities by undertakings.

This paper outlines the high level strategy for the promotion of public awareness of gas safety. This overall strategy involves safety promotion activities being undertaken by the Commission, individual undertakings and the Register of Gas Installers of Ireland ('RGII')¹ in a co-ordinated manner to achieve the following five outcomes:

1. Increased levels of general public awareness of gas safety issues;
2. Greater willingness among the general public to take preventative actions with respect to gas safety;
3. Greater willingness among the general public to take positive actions with respect to gas safety;
4. High levels of awareness of, and confidence in, the Register of Gas Installers amongst the general public and the installer industry; and
5. Raised levels of general awareness of the Commission's role as the regulatory authority for gas safety matters in Ireland.

This new strategy will commence operation from January 1st 2010. Until that time, individual undertakings, the RGII and the Commission will continue to undertake their individually planned gas safety promotional activities in 2009.

¹ The RGII were formally designated as the Gas Safety Supervisory Body (the 'GSSB') by the Commission on November 6th 2008.

To this end this paper specifically sets out:

- the legislative context underpinning the gas safety promotion and public awareness strategy (Section 2);
- the promotion and public awareness activities carried out by the Commission, natural gas undertakings and the RGII in 2009 (Section 3);
- a detailed description of the five key outcomes which the high level strategy will target (Section 4);
- an overview of how these outcomes will be achieved and the roles and responsibilities of the Commission, undertakings and the RGII within the high level strategy (Section 5); and
- the arrangements in place to fund the identified promotion and public awareness activities (Section 6).

The paper concludes with a brief summary of the strategy (Section 7).

2 LEGISLATIVE CONTEXT FOR NEW STRATEGY

2.1 *Obligations and Powers bestowed on the Commission*

The *Energy (Miscellaneous Provisions) Act 2006* (the '2006 Act') bestows on the Commission the responsibility to regulate the activities of natural gas undertakings and natural gas installers with respect to safety. In particular, section 12 of the 2006 Act states that it is a function of the Commission to:

- (ea) *“regulate the activities of natural gas undertakings and natural gas installers, with respect to safety,*

- (eb) *promote the safety of natural gas customers and the public generally as respects the supply, storage, transmission, distribution and use of natural gas”*

More specifically it states:

- (1H) (a) *In carrying out its functions under paragraphs (ea) and (eb) of subsection (1) the Commission may require natural gas undertakings to regularly advise and provide information to their final customers and the public as respects –*
 - (i) *Best practice in relation to the safe use of natural gas and on the operation and maintenance of natural gas fittings, and*
 - (ii) *The detection and reporting of natural gas leaks and other faults in natural gas fittings*

in such manner as the Commission may, from time to time, direct.

- (b) *Without prejudice to the generality of paragraph (a), the Commission may direct a natural gas undertaking to engage in, either on its own or in concert with any other natural gas undertaking (whether or not such other undertaking operates within the State), campaigns promoting natural gas safety, which campaigns shall take such form as the Commission may specify in its direction and each natural gas undertaking concerned shall comply with any such direction.*

Clearly the provisions of the 2006 Act places significant gas safety promotion and public awareness statutory obligations and powers upon the Commission.

2.2 Enforcement Powers of the Commission

With respect to the enforcement by the Commission of the powers set out in Section 2.1, the following licencing and legislative arrangements for undertakings (Section 2.2.1) and the RGII (Section 2.2.2) should be noted.

2.2.1 Undertakings Enforcement Arrangements

Section 16(1) of the *Gas (Interim) (Regulation) Act 2002* provides that the Commission may grant to any person the licence required to carry out the supply or shipping of natural gas or the operation of a transmission system, a distribution system, a LNG facility or a natural gas storage facility.

All natural gas undertaking licences contain a condition which requires the undertaking to produce and thereafter maintain, in a form approved by the Commission, a Safety Case. The requirements of the Safety Case are laid out in the Commission paper "*Natural Gas Safety Regulatory Framework – Safety Case Guidelines*". These Safety Case Guidelines contain specific requirements for transmission, distribution and shipper/supplier undertakings to set out how they will undertake the promotion of gas safety to raise public awareness of the potential dangers of gas. The Commission only accepts Safety Cases which are consistent with the requirements of the Safety Case Guidelines.

Where an undertaking is not operating in compliance with its Safety Case, it is deemed a non-compliance with its licence. Under the *Electricity Regulation Act 1999* (the '1999 Act'), the Commission has enforcement powers in respect of the terms of licences, with the ultimate sanction being the revocation of the licence. However the Commission also has the power to apply for a High Court order requiring a licensee/consent holder to discontinue or refrain from specified practices where the Commission has given such a holder a direction under Section 23(2) or Section 24 of the 1999 Act and is of the opinion that the holder is contravening or is likely to contravene a condition or requirement of a licence, consent or other requirement imposed by or under that Act.

This further supports the provisions of Section 12 of the 2006 Act, which requires each natural gas undertaking to comply with the direction of the Commission under 1H(a) as described in Section 3.1.

2.2.2 RGII Enforcement Arrangements

Under the 2006 Act, the Commission designated the *Registered Gas Installers of Ireland (RGII)* as the Gas Safety Supervisory Body (GSSB) to undertake the regulation of installers with respect to safety on November 6th 2008. The Commission oversees the day-to-day operation of RGII and, as specified in the 2006 Act, "*may conduct an*

inspection or audit of the designated body to verify compliance” with the requirements of 2006 Act, the Terms and Conditions of its Appointment and the Criteria Document. The Commission has the power to terminate the appointment of RGII:

- *in accordance with the Terms and Conditions of its Appointment;*
- *with immediate effect if the Commission believes that an act or default by RGII is the cause of serious danger to the public, or*
- *where the Commission believes it is in the interests of consumers that the appointment be terminated (for reasons other than serious danger to the public) on giving 3 months notice to the RGII or such period as is specified in the Terms and Conditions of its Appointment.*

One of the key conditions of the Terms and Conditions of Appointment is that the RGII *agrees to observe, perform and be bound by the Criteria Documentany breach of the requirements of the Criteria Document will be a material breach of these Terms and Conditions and will be a Termination Event.*

To this end, Section 1.2.2 of the Criteria Document sets out the core activities of RGII and specifically highlights “Public and Industry Awareness Activities” as one such core activity. Finally Section 5.4.3 of the Criteria Document states:

“The Body shall be obliged to carry out such activities relating to raising public awareness of the Regulatory System, RGIs and such other issues relating to gas safety, as may be directed by the Commission from time-to-time”.

As is evident from the sections above, the Commission’s enforcement powers are clearly significant.

3 PROMOTION AND PUBLIC AWARENESS ACTIVITIES - 2009

There is a considerable amount of gas safety promotional activity currently being undertaken by the natural gas industry via media advertising (press, TV and radio), customer telephone helplines, gas safety website information and safety promotional literature with relatively high levels of awareness of the dangers of carbon monoxide amongst the general public. These are primarily undertaken by Bord Gáis Networks (BGN). However the suppliers to the domestic customer market, Bord Gáis Energy and Flogas Natural Gas, the RGII and the Commission also currently undertake certain promotion and public awareness activities as set out in following sections.

3.1 *Bord Gáis Networks –Safety Promotion Activity: 2009*

BGN undertakes a comprehensive programme of gas safety promotional activities via its website, numerous safety promotional publications and telephone helplines for carbon monoxide, safety inspections, reporting suspected gas leaks and the 'dial-before-you dig' damage avoidance programme for underground pipelines. BGN, in effect, provides a coordinated gas safety promotional support service to the natural gas industry on behalf of all participants. The costs associated with these gas safety promotional activities are agreed with the Commission in advance and are recovered through BGN's regulated gas transportation tariffs. A summary of these activities are set out in the table on the following page.

Safety Promotional Activity	Detail
1. The Provision of Emergency Telephone Numbers	<p>These are provided by Bord Gáis Networks (BGN) and include:</p> <p>a) a 24-hour emergency number for reporting suspected gas leaks 1850 20 50 50</p> <p>b) a carbon monoxide helpline and safety inspection request number 1850 79 79 79</p>
2. Gas Safety at Home	<p>BGN's website provides details on what actions to take in the event of a smell of gas and includes precautions for turning gas supplies off and on. There is also advice issued on the use of Registered Gas Installers and the appropriate Irish Standard (I.S. 813:2002) for domestic gas installations.</p>
3. Carbon Monoxide (CO)	<p>Information is provided on the conditions which can lead to the formation of CO, the danger signs that may be observed with respect to malfunctioning or improperly installed/serviced gas appliances and the symptoms that arise as a result of CO poisoning.</p>
4. Dial Before You Dig	<p>BGN's 'Dial Before You Dig' service provides information, advice and maps on the pipeline network layout. BGN also provides assistance before and during excavation/development activities and publishes a safety document 'Guidelines for Builders' that contains details of:</p> <ul style="list-style-type: none"> • contact telephone numbers; • general guidelines for designers and builders; • emergency procedures; and • the properties of natural gas <p>The 'Dial Before You Dig' number is advertised as 1850 42 77 47 and is supported by the emergency response number 1850 20 50 50.</p>

Safety Promotional Activity	Detail
5. Safety Awareness Information	<p>BGN carries out safety awareness promotions each year addressing key natural gas safety issues. The campaigns are aimed at raising awareness amongst both natural gas users and the general public about the risks of carbon monoxide poisoning, what to do in the event that someone smells natural gas at home or on the street, the importance of servicing appliances and general best practice in the use of natural gas. Since 2003 BGN has supported a national campaign highlighting the risks of carbon monoxide poisoning. The Safety Awareness Campaigns incorporate:</p> <ul style="list-style-type: none"> • If you smell gas <ul style="list-style-type: none"> ○ TV, Press, Radio and Online Advertisements • Carbon Monoxide Awareness <ul style="list-style-type: none"> • TV, Press and Radio Advertisements • Carbon Monoxide Information Leaflet • Carbon Monoxide Website • Dial Before You Dig <ul style="list-style-type: none"> ○ Press and Trade Advertisement(s) ○ Dial Before You Dig Logo ○ Safety information literature (e.g. ‘Safety advice for working in the vicinity of natural gas pipes’) ○ Educational Briefings • Wheelie Bin Advice <ul style="list-style-type: none"> ○ Wheelie Bin Safety Leaflet
6. Natural Gas Safety Leaflet	<p>The natural gas safety leaflet provides natural gas customers with essential safety advice including what to do if you smell gas, the dangers of carbon monoxide and the importance of always using a Registered Gas Installer. The leaflet is available in 5 languages – English, Irish, Polish, Russian and Simplified Chinese.</p>

Table 1 – Overview of current gas safety promotional activity being undertaken by BGN.

3.2 Bord Gáis Energy - Safety Promotion Activity: 2009

3.2.1 Overview

The safety promotional activities Bord Gáis Energy currently undertakes include:

1. Advising customers to only use registered gas installers;
2. Publicising the 24-hour Emergency number on the Welcome Pack, sent to all new customers, all bills, and on www.bordgaisenergy.ie;
3. The inclusion of sections on the 'Safe Use of Gas' in the Welcome Pack and on www.bordgaisenergy.ie;
4. Assisting Bord Gáis Networks with safety related awareness campaigns undertaken from time to time including distribution of safety leaflets in its bills; and
5. Training its customer facing staffs to deal with customer queries relating to gas safety and how to handle a contact from a customer or member of the public who reports a suspected gas emergency or an unsafe installation.

3.3 Flogas - Safety Promotion Activity: 2009

Flogas Natural Gas Ltd undertakes the promotion of gas safety awareness in accordance with the terms in the Natural Gas Shipper and Supplier licence conditions, and in the documents submitted to and approved by the Commission, specifically its Codes of Practice and Safety Case.

This principally includes:

- the distribution of CER-specified safety leaflets in the Welcome Pack which is sent to each new customer;
- the distribution of safety information accompanying invoices and statements; safety information on the rear of each (2 - monthly) invoice; and
- the provision of safety information on the company web site at the following location - www.flogasnaturalgas.ie/customerinformation.shtml. This includes information on:
 - What to do if you smell gas in the home;
 - Messages on appliance safety;
 - Carbon Monoxide Safety Information; and
 - The Emergency 1850 number.

3.4 RGII - Safety Promotion Activity: 2009

Although the RGII did not become fully operational until June 26th 2009, it has undertaken a number of safety promotion activities in 2009 including:

- Installer Information Seminars have been held in Dublin, Cork, Kilkenny, Limerick and Galway, with the purpose of informing the installer industry how the RGII will regulate gas installers with respect to safety and to encourage installers to join the register;
- The establishment of the RGII website (www.rgii.ie). This provides information relevant to the installer network and the public at large. Currently the website is primarily directed at installers, but it is expected that the emphasis will change as the regulatory regime becomes more established. The site also provides useful consumer links to other sites such as CER, NCA and NSAI; and
- The RGII will undertake the production of the Registered Installer Newsletter, taking over this responsibility from Bord Gais Networks.

3.5 Commission for Energy Regulation - Safety Promotion Activity: 2009

With the assistance of Bord Gáis Networks, the Commission undertook two distinct promotional campaigns in 2009 with respect to the new mandatory gas installer registration scheme (the 'RGI').

The first campaign took place between February and July 2009, prior to the full commencement of the RGI scheme from the 26th of June. The focus of this campaign was to encourage the installer industry to become registered. The key messages of that campaign (which involved national press, national radio, trade magazine and trade counter advertisements as well as bill inserts), were:

1. From June 26th it is a legal requirement that anyone carrying out domestic natural gas works (including installation, maintenance, repair or servicing works on appliances or pipe-work) needs to be a Registered Gas Installer;
2. In the interests of your safety only use a Registered Gas Installer;
3. Home owners and landlords are responsible for the safe upkeep and maintenance of their natural gas installations;
4. After any gas works ensure you receive a Safety Completion Certificate from the RGI; and
5. The RGII Contact details.

The second campaign took place after the commencement of the new registration scheme (first burst July 2009) and run again at the beginning of the heating season

(second burst October 2009). The focus of this campaign is specifically on final customers, to encourage them to only use registered gas installers. The key messages of that campaign, which involved national press and national radio advertisements as well as bill inserts, are:

1. It is a legal requirement that anyone carrying out domestic natural gas works (including installation, maintenance, repair or servicing works on appliances or pipe-work) needs to be a Registered Gas Installer;
2. In the interests of your safety only use a Registered Gas Installer;
3. Home owners and landlords are responsible for the safe upkeep and maintenance of their natural gas installations;
4. After any gas works ensure you receive a Safety Completion Certificate from the RGI;
5. The RGII Contact details.

The Commission has also established a number of industry governance groups with respect to gas safety such as Gas Installer Communication Forum, and hosts regular bi-lateral safety specific meetings with licenced undertakings and other regulatory agencies such as the Health and Safety Authority to ensure that industry is fully abreast of developments in the gas safety arena.

3.6 Overview of Effectiveness of Initiatives

The following statistics, collated by Bord Gáis Networks following a sample survey of 1006 individuals (aged 15+) at the end of 2008, provide strong evidence of the level of gas safety awareness of customers in Ireland and by extension the success of the pre-2009 safety promotional activities outlined in the earlier sections. The statistics also provide the minimum benchmark for measuring the effectiveness of the Gas Safety Promotion and Public Awareness Strategy in 2010 and beyond (See Section 5.5).

Summary statistics are provided in the areas of:

- Carbon Monoxide Awareness;
- Awareness of actions to undertake if a gas leak is detected in the house;
- Awareness of actions to undertake if a gas leak is detected in street; and
- Awareness of the Register of Gas Installers and perceived benefits of such.

3.6.1 Carbon Monoxide Awareness

Figure 2 below illustrates the results to the question “*Are you, or are you not aware of the dangers of carbon monoxide?*”

Awareness of the Dangers of Carbon Monoxide - 2008

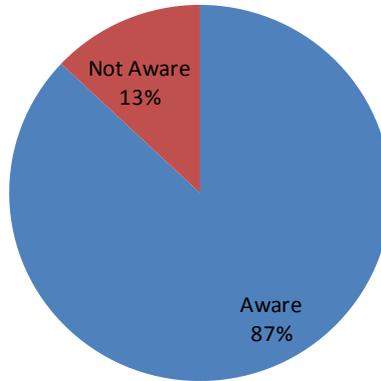


Figure 2 - Response to Awareness of Dangers of Carbon Monoxide

With respect to the knowledge of the warning signs of the Carbon Monoxide, the following reasons were identified by the 1006 respondents², as set out in Figure 3:

Level of Awareness of Carbon Monoxide Warning Signs - 2008

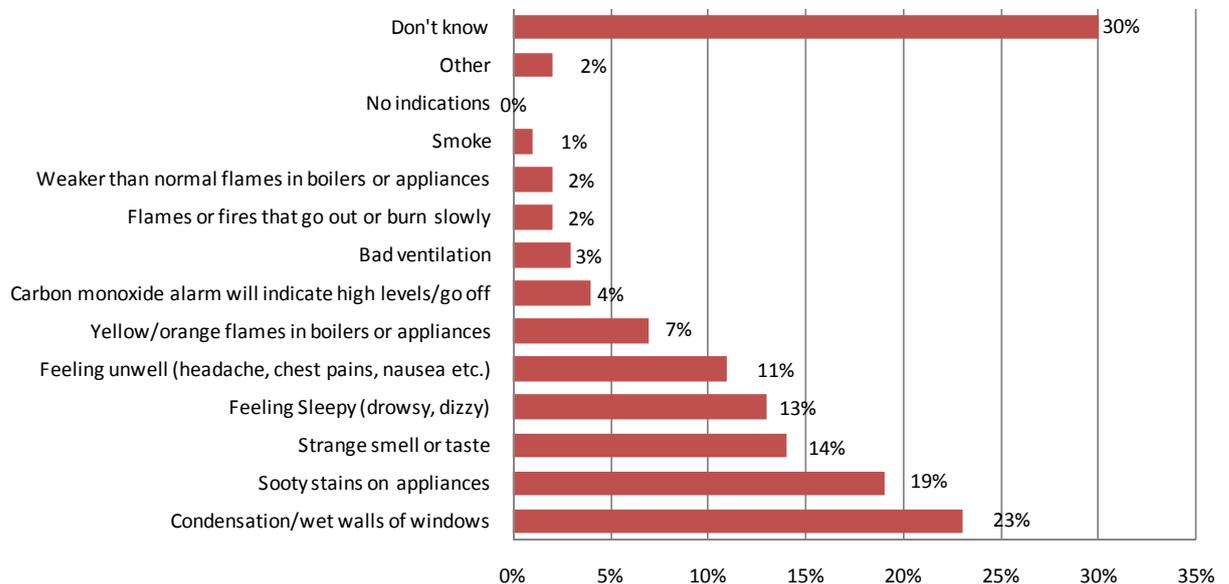


Figure 3 – Level of Awareness of Carbon Monoxide Warning Signs

² The Question asked here was: *Carbon Monoxide is a dangerous gas with no smell or colour. It can come from faulty or badly ventilated heating unit in the house. What warning signs can you think of that might indicate there is carbon monoxide present in a house?*

Figure 4 sets out the actions of respondents in the events of them suspecting Carbon Monoxide in the house³:

What to do if CO is suspected in the house - 2008

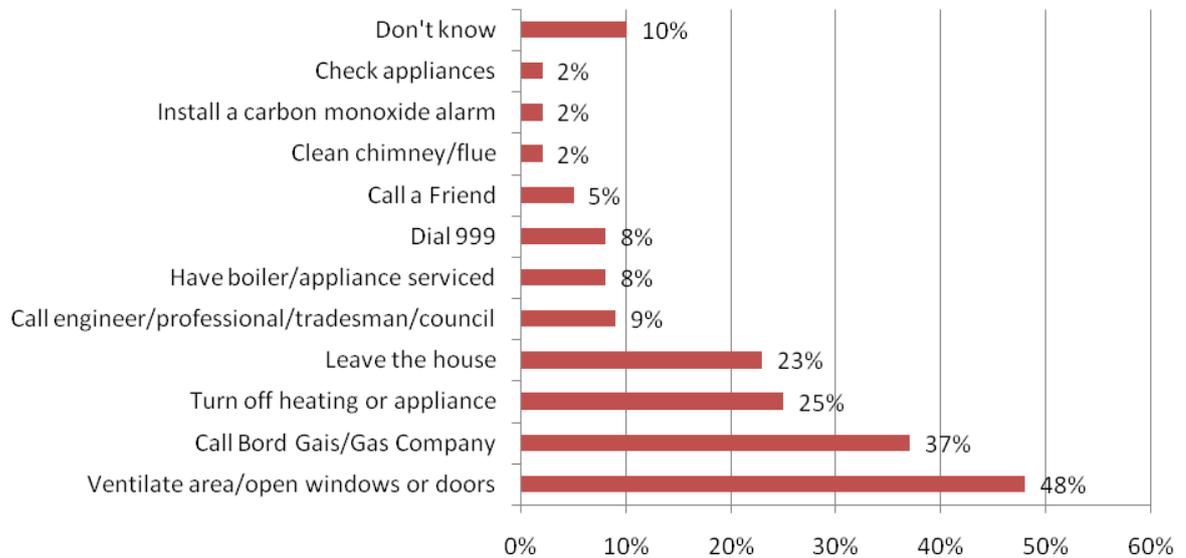


Figure 4: Action of Respondents if they suspect CO in the house

3.6.2 Awareness of actions to undertake if a gas leak is detected in the house

Figure 5 below outlines the responses to the question – *In your opinion, what exactly should people do if they smell a gas leak in a house?*

What to do if Gas Leak is Detected in House - 2008

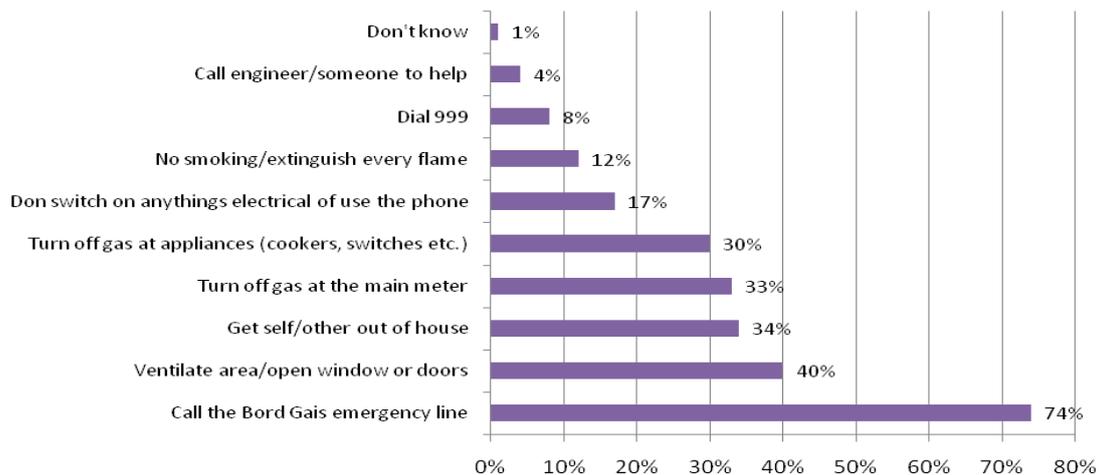


Figure 5 – What to do if gas leak is detected in house

³ The question asked was: *And what exactly should people do if they suspect there is carbon monoxide in a house?*

3.6.3 Awareness of actions to undertake if a gas leak is detected in street

Figure 6 below outlines the responses to the question – *What exactly should people do if they smell a gas leak in the street?*

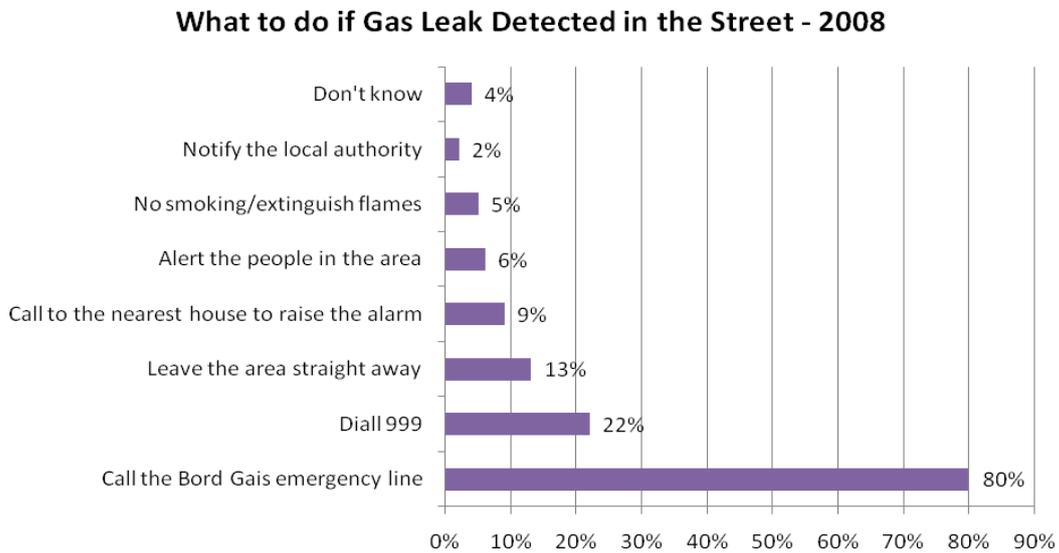


Figure 6 – *What to do if gas leak is detected in the street*

3.6.4 Awareness of the Register of Gas Installers and perceived benefits of such.

Figure 7 below illustrates the results to the question “*Have you heard of the Register of Gas Installers also know as RGI?*”

Awareness of Register of Gas Installers (RGI) - 2008

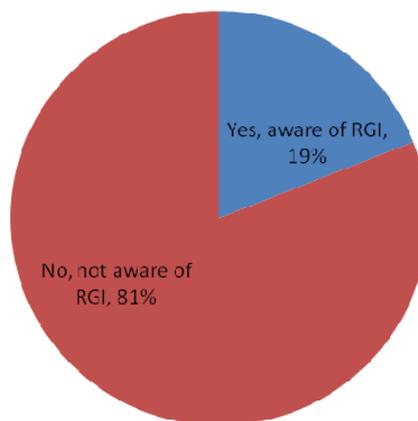


Figure 7 – *Level of Awareness of Register of Gas Installers*

However, the level of awareness of the RGI amongst natural gas customers was 29%.

Finally Figure 8, illustrates the response to the question – *what do you think are the benefits of having gas works carried out in the home using a registered gas installer as opposed to a non registered installer?*

Percieved Benefits of Having work carried out by a RGI - 2008



Figure 8 – Perceived benefits of using a RGI

3.6.5 Assessment of Level of Gas Safety Awareness

The figures on the previous pages clearly illustrate:

- the level of gas safety awareness of customers in Ireland; and
- the differences in awareness levels of certain safety messages, with some messages registering more strongly than others (e.g. Carbon Monoxide awareness as opposed to RGI awareness).

The overall objective of the Commission’s new approach to Gas Safety Promotion and Public Awareness is to at least maintain and subsequently improve upon the existing levels of gas safety awareness among gas customers and the general public through a co-ordinated programme of gas safety promotion undertaken by the Commission, individual undertakings and the RGII. This is discussed further in Sections 4 and 5.

4 KEY OUTCOMES THE PROMOTION AND PUBLIC AWARENESS STRATEGY WILL TARGET

4.1 Overview

As stated in Section 1, key objective 6 of the Framework states:

Key Objective 6: Promoting Public Awareness of Gas Safety

Increasing the level of gas safety awareness amongst gas customers and the public generally and, in particular, educating on the dangers of carbon monoxide is an important aspect of the Commission's overall objective of promoting the safety of customers and the general public in respect the use of gas. It will also be important that owners/occupiers of premises are aware of their responsibilities in respect to the maintenance of gas fittings downstream of the meter. The proposed gas safety framework places duties and obligations on both individual gas undertakings and the industry generally for the promotion of gas safety awareness. This will involve a combination of both individual and co-ordinated safety promotional activities by undertakings.

As outlined in Section 3, initiatives for promoting public awareness of gas safety are chiefly focussed on the areas where gas customers and the public have an interface with natural gas. This includes:

- the utilisation of gas in the home, with a particular emphasis on education of the dangers of carbon monoxide and, to a lesser extent, work undertaken in the vicinity of gas apparatus and below ground pipework; and
- avoidance of damage to pipelines and equipment that convey natural gas.

As set out in Section 3, the Commission's overall objective is to at least maintain and subsequently improve upon the existing levels of gas safety awareness among gas customers and the general public through a co-ordinated programme of gas safety promotion undertaken by the Commission, individual undertakings and the RGII. The importance of ensuring that gas safety information is promoted in a consistent and coordinated manner across all the stakeholders cannot be understated. Primarily it is the intention to avoid situations whereby Commission/undertakings/RGII are promoting differing gas safety awareness messages and information with numerous helpline numbers and multiple points of contact, as this will only serve to confuse gas customers and the general public. Secondly this would not be in the best interest of the industry, either from a safety or an economic perspective.

To this end the Commission has targeted five key outcomes with supporting activities, which, if achieved, will enable the realisation of the regulatory objective of “Promoting Public Awareness of Gas Safety”. The key outcomes are:

1. Increased levels of general public awareness of gas safety issues;
2. Greater willingness among the general public to take preventative actions with respect to gas safety;
3. Greater willingness among the general public to take positive actions with respect to gas safety;
4. High levels of awareness of, and confidence in, the Register of Gas Installers amongst the general public and the installer industry; and
5. Raised levels of general awareness of the Commission’s role as the regulatory authority for gas safety matters in Ireland.

Each of these key outcomes is discussed further below.

4.2 Key Outcome 1: Increased levels of Public Awareness of Gas Safety Issues

The focus here is to ensure that the general public and specific industry groups, such as gas installers and the construction industry, have a high level of awareness of gas safety issues. The key gas safety issues to which they ought to be aware are:

- a. **Carbon Monoxide (CO)** – informing on the dangers of CO that arise from malfunctioning or poorly maintained and installed gas appliances and the symptoms that arise from CO poisoning. Emphasising the importance of adequate ventilation for gas appliances on human health and comfort. It is also important that health practitioners and the emergency services have a high level of awareness of the symptoms of CO poisoning.
- b. **Use of Registered Gas Installers** – encouraging customers to only engage RGI’s for gas works and obtaining a Completion Certificate for that work.
- c. **Gas Appliances (with particular emphasis on servicing)** – informing customers of the importance of purchasing, installing and servicing approved natural gas appliances that are CE-marked and labelled and comply with the Gas Appliance Directive (90/396/EEC)
- d. **Using Gas Appliances Safely** – providing advice on the safe use of different types of gas appliances.
- e. **Gas Escapes** – informing on the dangers of gas escapes and what to do in the event of a suspected gas leak either in the home or outside in the street.

- f. **Avoiding Damage to Underground and External Gas Apparatus** - advising on the dangers associated with working in the vicinity of both underground and aboveground gas plant.
- g. **Undertaking home improvements** - ensuring those who are undertaking home improvements are conscious of ventilation requirements for appliances, service pipes in their garden etc.
- h. **Responsibility downstream of the meter** – Customers/landlords are responsible for the safety of their installation downstream of the meter.

4.3 ***Key Outcome 2: Greater Willingness Amongst the Public to take Preventative Actions with respect to Gas Safety***

The general public can take certain preventative actions which reduce the likelihood of gas incidents occurring. These include:

- a. Ensure appliances are correctly installed by a Registered Gas Installer.
- b. Gas customers **getting appliances serviced on an annual basis** by a registered gas installer.
- c. Customers should know how to turn their gas on and off at the meter and having a meter box key close at hand.
- d. Ensure rooms are properly ventilated and that all chimneys and flues are kept clear. Never block vents. Crow Guards should be fitted on all chimneys with gas fires fitted prior to 1996.
- e. Informing Bord Gais Networks in regard to pre GAD problem appliances such as flueless gas water heaters without spillage devices.
- f. Choosing room sealed appliances.
- g. Only using cookers and hobs with flame failure devices (devices post 2005).
- h. Ensuring Wheeled Bins are kept securely away from gas installations.
- i. Prior to undertaking any work in the vicinity of pipelines and plant and equipment, making contact with BGN to access the appropriate safety promotional literature, pipeline maps and on-site technical advice and support as part of the '**Dial-Before-You-Dig**' programme (tel: 1850 42 77 47).

- j. Builders and designers accessing the appropriate BGN technical and safety documents prior to and during construction activity involving a gas installation.

4.4 *Key Outcome 3: Greater Willingness Among the General Public to take Positive Actions with respect to Gas Safety*

Certain gas safety risk mitigation strategies are highly dependent on the co-operation and assistance of the general public in order to operate effectively. The key areas in which it is highly desirable for the public take positive actions are:

- a. **Always using a Registered Gas Installer.**
- b. **Always request a Completion Certificate for any gas works undertaken.**
- c. **Complaining to the RGII** on the unsafe performance of a registered gas installer.
- d. **Informing the Commission or the RGII of un-registered gas installers** in operation.
- e. Where a customer has a concern with respect to Carbon Monoxide, using the **Carbon Monoxide Helpline and Safety Inspection Request** telephone number (tel: 1850 79 79 79) or website (www.carbonmonoxide.ie).
- f. In the event of smelling gas in the home or in the street, carrying out the appropriate steps and using the **24-hour emergency telephone number for reporting suspected gas leaks (tel: 1850 20 50 50)**.
- g. Where a gas service line or pipeline is hit, informing BGN through the emergency number (1850 20 50 50).

4.5 Key Outcome 4: High levels of awareness of, and confidence in, the Register of Gas Installers amongst the general public and the installer industry

The Register of Gas Installers of Ireland (the 'RGII') was appointed by the Commission as the Gas Safety Supervisory Body (GSSB) on November 6th 2008, with the new regulatory system becoming fully operational on June 26th 2009. The RGII is responsible for the registration and subsequent regulation of registered gas installers (RGI). Given that this is a new body, it is important that there is a specific campaign **to raise the awareness of the RGI scheme generally amongst the public and installer industry**. However for the RGI regulatory scheme to be effective there is also a requirement for both the general public and the installer industry to have a high degree of confidence in the RGII in discharging its responsibilities. The specific messages to be conveyed to each of these target groups are set below.

General Public

- a. The purpose of the RGI regulatory scheme is **to protect the safety interests of final customers with respect to their interaction with registered gas installers** in a fair, professional and comprehensive manner. It is not a representative body.
- b. That the RGI regulatory scheme ensures that **only those gas installers who are insured and have the appropriate level of competency** to undertake gas works **are included on the register**.
- c. That **registered gas installers are subject to ongoing audit and inspection** by highly qualified inspectors to ensure that installers continue to operate in accordance with the national standards and the requirements of the registration scheme.
- d. That the RGI regulatory scheme **will fully investigate any safety related complaint** with respect to a registered gas installer.
- e. That the RGI regulatory scheme will inspect any works carried out by a registered gas installer if so requested by a customer.

Installer Industry

- f. It is illegal to undertake domestic gas works if you are not a registered gas installer.
- g. With respect to each individual registered gas installer, that the RGII **undertakes its responsibilities in a fair, impartial, transparent and professional** manner.

- h. With respect to regulation of the entire gas installer industry, that the RGII undertakes its responsibilities in the most efficient and effective manner possible in order to ensure that the regulatory burden on the industry is minimised.

4.6 Key Outcome 5: Raised Levels of General Awareness of the Commission's role as the Regulatory Authority for Gas Safety Matters in Ireland

The Commission recognises that industry participants, such as domestic customer suppliers, BGN and the RGII have direct contact with the general public and it may confuse and complicate the various safety messages outlined earlier, without any discernible benefit, if the "CER" brand was added to the mix in communicating these messages.

Therefore the Commission will seek to focus its ongoing promotional activities on increasing awareness of its role amongst the gas industry, ensuring that **the industry not only understand but also have confidence in the Commission's role** with respect to the regulation of gas safety. However in certain circumstances and where appropriate, the Commission will allow the CER brand to be employed to endorse certain campaigns (e.g. the CO campaign).

Notwithstanding the above, there are some specific issues which the Commission will specifically target to communicate to the general public and the industry:

- a. **Undertaking** prosecutions of non-registered gas installers by the Commission, **and publicising successful prosecutions**, to ensure the Commission is seen to be enforcing the new regulatory system.
- b. **Acting as a focal point for raising cross industry issues.** For example, with respect to any CO campaigns, the Commission will liaise with the representative bodies of other fuel sources to encourage their involvement and support.
- c. **Publishing and formally launching the Natural Gas Safety Regulatory Framework Annual Report** to demonstrate the comprehensiveness of the Commission enforcement and regulation of the industry and the effectiveness of the system. This should engender confidence in the general public and the industry that the natural gas industry is being regulated appropriately from a safety perspective.

5 HOW WILL THESE OUTCOMES BE ACHIEVED?

5.1 *High level Overview*

Given the number of recent and important changes in the Irish natural gas industry, which include:

- (i) the establishment of the Commission as the safety regulatory authority for natural gas undertakings and natural gas installers;
- (ii) the establishment of the Natural Gas Safety Regulatory Framework;
- (iii) the responsibility and powers bestowed on the Commission with respect to gas safety promotion;
- (iv) the designation and establishment of the RGII as the Gas Safety Supervisory Body for the registration of gas installers; and
- (v) the emergence of new entrant Shippers and Suppliers,

the Commission has taken the view that there is a need to change the way in which gas safety promotional activities are undertaken at an industry level. This new approach will involve individual gas undertakings assuming a level of responsibility for undertaking the promotion of gas safety in a manner that is coordinated at an industry level to ensure that consistent gas safety messages are conveyed to gas customers and the general public to avoid both confusion and unnecessary costs being incurred.

Given the Commission's responsibility to "*promote the safety of natural gas customers and the public generally as respects the supply, storage, transmission, distribution and use of natural gas*", and the need to achieve the key outcomes identified in Section 4, the main role of the Commission is to:

- Ensure that each natural gas undertaking fulfils its gas safety promotional obligations as required via the Framework and specific Safety Case requirements;
- Ensure that the RGII fulfils its gas safety promotional obligations as required via the Framework, the Criteria Document and its Terms and Conditions of Appointment; and
- Ensure that there is a coordinated approach to gas safety promotion at the industry level through (i) the gas safety promotional activities and centralised industry service provided by BGN; (ii) the gas safety promotional activities of the individual Shipper and Supplier undertakings; (iii) the gas safety promotional activities of the RGII; and (iv) the Commission's own gas safety promotional activities.

The Commission will achieve the above through:

- The development of a Promotion and Public Awareness Strategy Document⁴ (this document) which represents a shared understanding amongst industry participants of:
 - the key outcomes the Promotion and Public Awareness Strategy must achieve;
 - how the key outcomes will be achieved;
 - how activities underpinning the Promotion and Public Awareness Strategy will be funded; and
 - how the effectiveness of the Promotion and Public Awareness Strategy will be measured.

- Each year, agreeing an Industry wide Promotion and Public Awareness Activities Programme for the following year. This Programme will outline the nature and timing of specific safety promotional activities that the Commission, each undertaking and the RGII will undertake.

- Reviewing on an ongoing basis:
 - that each undertaking and the RGII have carried out the specific promotional activities as per the Promotion and Public Awareness Activities Programme; and
 - the success of the campaign in achieving the 5 key outcomes through:
 - monitoring key performance indicators (such as number of “Dial-Before-You-Dig” calls received) on a quarterly basis; and
 - conducting an Annual Safety Awareness Survey.

5.2 Gas Safety Promotion and Public Awareness Expert Group

The co-ordinating mechanism the Commission will employ to carry out the above is the Gas Safety Promotion and Public Awareness Expert Group (the “Expert Group”). The Expert Group will comprise representatives of the Commission, the National Standards Authority of Ireland (NSAI), Gaslink, BGN Transmission, BGN Distribution, Suppliers to the domestic market and the RGII.

The Expert Group will provide industry input and support on:

- the Promotion and Public Awareness Strategy Document;

- the Industry wide Promotion and Public Awareness Activities Programme, specifically making recommendations on improvements to coordinated gas safety

⁴ The Promotion and Public Awareness Strategy Document sits under the Natural Gas Safety Regulatory Framework.

promotion at the industry level, primarily through TV, radio and press advertising;
and

- reviewing the effectiveness of Promotional and Public Awareness Strategy and the Annual Activities Programme in achieving the desired outcomes through a critical assessment of the Annual Safety Surveys and quarterly .key performance indicators.

Figure 9 on the following page illustrates how the Promotion of Gas Safety Awareness Strategy operates within the context of the Framework.

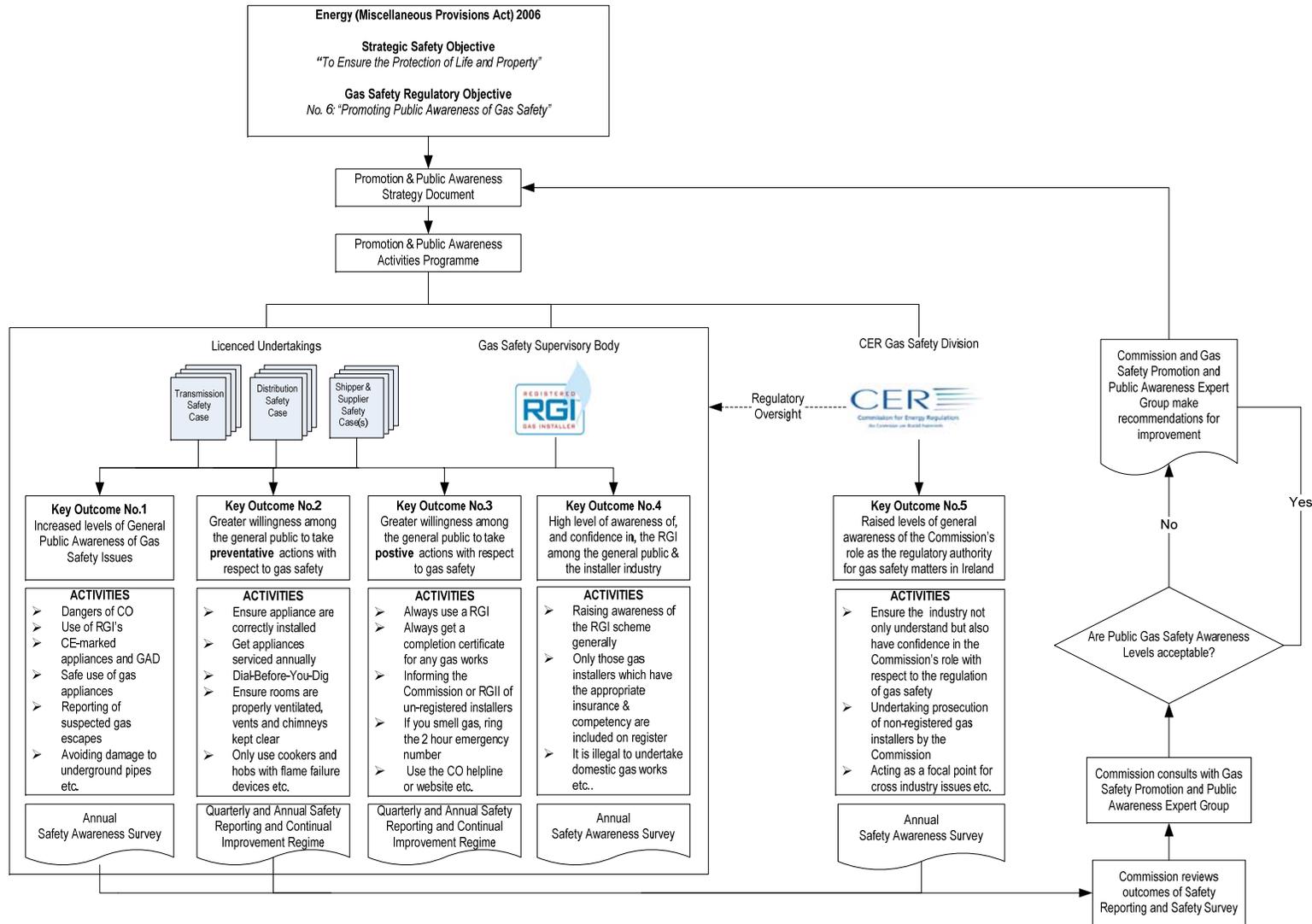


Figure 9 – Conceptual illustration of Operation of Gas Safety Promotion and Awareness Strategy

5.3 High Level Responsibilities of the Commission, Undertakings and the GSSB under the Strategy

As set out in Section 5.1, the Commission's main responsibility with respect to promotion and public awareness is to discharge an oversight and co-ordination role with respect to the full implementation of the Promotion and Public Awareness Strategy and specifically the Annual Promotion and Public Awareness Activities Programme which underpins it. If necessary the Commission will enforce this co-ordination in line with its powers described in Section 3.2.

Notwithstanding this, the Commission also has a responsibility to promote awareness of it being the regulatory authority for gas safety matters in Ireland.

The Commission's view on the responsibilities for gas storage, LNG, transmission, distribution and shipper and supply undertakings and the RGII for gas safety promotion is described in Sections 5.3.1 to 5.3.6 below.

5.3.1 Gas Storage Undertakings

The only gas storage facility in Ireland is the offshore Southwest Kinsale field which has been operated until recently by Marathon Oil Ireland Limited (MOIL)⁵, prior to its sale to Petronas. Given the location and nature of the operation of this facility the Commission does not consider that there is an impact on gas customers and the general public with respect to the promotion of gas safety awareness and the gas storage operator is considered exempt from any requirements in this respect. All site specific safety promotional activities are enshrined in the Gas Storage Operators Safety Case.

5.3.2 LNG Undertakings

There is no LNG facility in Ireland at this time. Should the proposed Shannon LNG terminal be constructed in the future, the Commission considers that any site specific safety requirements will be addressed through the LNG Terminal Operators Safety Case and the Pre Operation Safety Report (as required under the Control of Major Accident Hazard Regulations Involving Dangerous Substances Regulations 2006). The LNG Terminal Operator is considered exempt from the requirement to undertake the promotion of gas safety awareness activity outside the boundaries of its site.

⁵ The facility is now operated by PSE Kinsale Energy Limited, a subsidiary of Petronas.

5.3.3 *Transmission Undertaking*

In compliance with Irish legislation implementing EU network “unbundling” requirements Gaslink Independent System Operator Limited (“Gaslink”) has, since July 4th 2008, taken up responsibility for the operation, maintenance and development of the network owned by Bord Gáis Éireann (“BGÉ”).

Under Statutory Instrument (SI) No. 760 (December 2005), Gaslink are required to use BGÉ to carry out work and provides services at the direction of Gaslink in respect of the development, maintenance and operation of BGÉ’s network subject to an Operating Agreement that has been approved by the Commission. In the case of the responsibilities set out in this document, Bord Gáis Networks (BGN) will execute the work on behalf of Gaslink as set out below.

Gaslink operates long lengths of high pressure gas transmission pipelines and above ground installations (AGI’s) across Ireland. The public, developers and utilities, may from time to time come in close proximity to these pipelines and AGI’s and BGN has a responsibility to ensure that the risk of damage to plant and equipment conveying gas is minimised via a damage avoidance programme – i.e. ‘dial-before-you-dig’ – and providing technical support and advice to third parties who work in the vicinity of transmission pipelines and AGI’s. Additionally, BGN also has a responsibility to ensure that the 24-hour emergency telephone number is effectively promoted to gas customers and the public for the reporting of suspected gas leaks. The responsibility upon BGN to provide these gas safety promotional activities is enshrined in Gaslink’s Transmission Safety Case.

5.3.4 *Distribution Undertaking*

As set out above, Gaslink has, since July 4th 2008, taken up responsibility for the operation, maintenance and development of the network owned by BGÉ.

Gaslink operates low and medium pressure gas networks across Ireland and through BGN provides first call emergency response service for gas emergency reports in the street and in the home. These distribution networks are highly prone to damage from third parties and relatively low level of leakage due to joint failures and/or corroded, leaking pipes. Additionally, gas installations downstream of the meter in the home can leak gas and poorly installed or maintained gas appliances can produce carbon monoxide (CO) with potentially fatal results. As the centralised, first call response to such emergency events, BGN is required by the Commission to carry out gas safety promotional activities involving: (i) third party damage avoidance to underground pipes; (ii) reporting gas leaks in the street or in the home; (iii) reporting situations where the presence of CO is suspected; and (iv) safety inspection requests. The responsibility

upon BGN to provide these gas safety promotional activities is enshrined in the Gaslink's Distribution Safety Case.

5.3.5 *Shipper and Supplier Undertakings*

There are two categories of Shipper and Suppliers in Ireland. Category 1 Shipper and Supplier undertakings procure, ship and supply gas to end customers. Category 2 Shipper and Supplier undertakings procure and ship gas to their own premises only and not to other end customers (ref: CER/07/226 Safety Case Guidelines – Part F)⁶.

Category 1 Shipper and Supplier undertakings are the main interface and point of contact with gas customers and the Commission requires that certain gas safety promotional activity is carried out in order to both “*raise gas customers’ awareness of gas safety issues*” and “*influence gas customers to take positive action with respect to gas safety*”. This safety promotional activity is particularly focused on the domestic customers market and specifically on the provision of basic gas safety advice via leaflets, providing the BGN helpline numbers, providing the BGN 24-hour emergency telephone, advising gas customers to always use an RGI, having gas appliances regularly serviced and ensuring that all staff who may have contact with gas end customers, or the public, on gas safety matters are competent to deal with the query in a manner that does not compromise safety in any way. It is therefore very important that all gas safety messages conveyed by Shippers and Suppliers are consistent and are coordinated through the centralised safety promotional support service provided by BGN. Given that Category 2 Shipper and Suppliers procure and ship gas to their own premises only and not to other end customers, they are considered exempt from the Gas Safety Promotion and Public Awareness requirements.

5.3.6 *Register of Gas Installers of Ireland*

The Register of Gas Installers of Ireland (RGII) has been appointed by the Commission as the Gas Safety Supervisory Body and is responsible for registering gas installers and regulating their activities with respect to safety. This function is undertaken on behalf of the Commission, and in essence the RGII represents the public face for both gas installers and customers with respect to safety issues. The promotional activities for which the RGII are responsible include:

- The provision of a register of gas installers;
- Informing the gas installer industry that they must be registered to undertake gas work (and other activities aimed at increasing the membership of the body);
- Notifying the public and the industry of safety issues or trends identified in the course of their work;

⁶ The ongoing consultation process with respect to the proposed modification of Category 1 and 2 Shipper and Supply Licences into separate Supply Licences and Shipping Licences is noted. The outcome of that process should not impact the Commission proposals with respect promotional responsibilities upon suppliers to domestic customers.

- Informing customers that:
 - It is illegal to undertake gas work if you are not a Registered Gas Installer;
 - They should always use a Registered Gas Installer;
 - They have a right to obtain a completion certificate for all works undertaken; and
 - If they have a complaint about a registered gas installer they can communicate it the RGII.

5.4 Responsibilities per Outcomes and Activities

To further illustrate the *who is responsible for what* with respect to the promotion of gas safety in Ireland, Table 2 below shows the outcomes, activities and the areas of responsibility of the relevant undertakings, the RGII and the Commission for promoting gas safety⁷.

The organisation with lead responsibility for the area is characterised with the letter L.

⁷ **Key:** T&D: Transmission & Distribution; SUP: Domestic Suppliers; CER: Commission for Energy Regulation; RGII: Register of Gas Installers of Ireland

Key Area:	Key Safety Issues to be Addressed	T&D	SUP	RGII	CER
1) Increased levels of general public awareness of gas safety issues	a. Carbon Monoxide – informing on the dangers of CO that arise from malfunctioning or poorly maintained and installed gas appliances and the symptoms that arise from CO poisoning. Emphasising the importance of adequate ventilation for gas appliances on human health and comfort. It is also important that health practitioners and the emergency services have a high level of awareness of the symptoms of CO poisoning	L	✓	✓	
	b. Use of Registered Gas Installers – encouraging customers to only engage RGI's for gasworks and obtaining a Completion Certificate for that work	✓	✓	L	
	c. Gas Appliances (emphasis on servicing) – informing customers of the importance of purchasing, installing and servicing approved natural gas appliances that are CE-marked and labelled and comply with the Gas Appliance Directive (90/396/EEC).	L	✓	✓	
	d. Using Gas Appliances Safely – providing advice on the safe use of different types of gas appliances.	L	✓	✓	
	e. Gas Escapes – informing on the dangers of gas escapes and what to do in the event of a suspected gas leak either in the home or outside in the street.	L	✓	✓	
	f. Avoiding Damage to Underground and External Gas Apparatus - advising on the dangers associated with working in the vicinity of both underground and aboveground gas plant.	L			
	g. Undertaking home improvements – ensuring those who are undertaking home improvements are conscious of ventilation requirements for appliances, service pipes in their garden etc.	L	✓		
	h. Responsibility downstream of the meter – informing customers/landlords that they are responsible for the safety of their installation downstream of the meter.	L	✓	✓	

Key Area:	Key Safety Issues to be Addressed	T&D	SUP	RGII	CER
2) Greater willingness amongst the public to take preventative actions with respect to safety	a. Ensure appliances are correctly installed by a RGI	✓	✓	L	
	b. Gas customers getting appliances serviced on an annual basis by a registered gas installer	L	✓	✓	
	c. Customer should know how to turn their gas on and off at the meter and having a meter box key close at hand	L			
	d. Ensure rooms are properly ventilated and that all chimneys are kept clear. Never block vents. Crow guards should be fitted on all chimneys with gas fires fitted prior to 1996.	L	✓	✓	
	e. Informing BGN in regard to problem appliances such as flueless water heaters without spillage devices etc.	L	✓	✓	
	f. Choosing room sealed appliances	L	✓	✓	
	g. Only using cookers and hobs with flame failure devices	L	✓	✓	
	h. Ensuring Wheeled Bins are kept securely away from gas installations	L			
	i. Prior to undertaking any work in the vicinity of pipelines and plant and equipment, making contact with BGN to access the appropriate safety promotional literature, pipeline maps and on-site technical advice and support as part of the ' Dial-Before-You-Dig ' programme,(tel: 1850 42 77 47)	L			
	j. Builders and designers accessing the appropriate BGN technical and safety documents prior to and during construction activity involving a gas installation	L			
3) Greater willingness among the general public to take positive actions with respect to Gas Safety	a. Always use a Registered Gas Installer	✓	✓	L	
	b. Always request a Completion Certificate for any gas works undertaken	✓	✓	L	

Key Area:	Key Safety Issues to be Addressed	T&D	SUP	RGII	CER
	c. Complaining to the RGII on the unsafe performance of a registered gas installer	✓	✓	L	
	d. Informing the Commission of the RGII of un-registered gas installers in operation			L	✓
	e. Where a customer has a concern with respect to Carbon Monoxide, using the Carbon Monoxide Helpline and Safety Inspection Request telephone number (tel 1850 79 79 79) or the website (www.carbonmonoxide.ie)	L	✓	✓	
	f. In the event of smelling gas in the home or in the street, carrying out the appropriate steps and using the 24-hour emergency telephone number for reporting suspected gas leaks (tel: 1850 20 50 50) .	L	✓	✓	
	g. Where a gas service of pipeline is hit, informing BGN through the emergency number	L	✓	✓	
4) High levels of awareness of, and confidence in, the Register of Gas Installers amongst the general public and the installer industry	a. The purpose of the RGII is to protect the safety interests of final customers with respect to their interaction with registered gas installers in a fair, professional and comprehensive manner. It is not a representative body.			L	✓
	b. That the RGII ensures that only those gas installers who are insured and have the appropriate level of competency to undertake gas works are included on the register			L	✓
	c. That registered gas installers are subject to ongoing audit and inspection by high qualified inspectors to ensure that installers continue to operate in accordance with the national standards and the requirements of the registration scheme			L	✓
	d. That the RGII will fully investigate any safety related complaint with the respect to a registered gas installer			L	✓
	e. That the RGII will inspect any works carried out by a registered gas installers if so requested by a customer			L	✓

Key Area:	Key Safety Issues to be Addressed	T&D	SUP	RGII	CER
	f. It is illegal to undertake domestic gas works if you are not a registered gas installer			L	✓
	g. With respect to each individual registered gas installer, that the RGII undertakes its responsibilities in a fair, impartial, transparent and professional manner.			L	✓
	h. With respect to the regulation of entire gas installer industry, that the RGII undertakes its responsibilities in the most efficient and effective possible in order to ensure that the regulatory burden on the industry is minimised			L	✓
5) Raised Levels of General Awareness of the Commission's role of the Regulatory Authority for Gas Safety Matters in Ireland	<ul style="list-style-type: none"> • Ensuring that the industry not only understand, but also have confidence in the Commission's role with respect to the regulation of gas safety a. Undertaking prosecutions of non-registered gas installers by the Commission and publicising successful prosecutions, to ensure the Commission is seen to be enforcing the new regulatory system b. Acting as a focal point for raising cross industry issues. For example, with respect to any CO campaigns, the Commission will liaise with the representative bodies of other fuel sources to encourage their involvement and support c. Publishing and formally launching the Natural Gas Safety Regulatory Framework Annual Report to demonstrate the comprehensiveness of the Commission enforcement and regulation of the industry and the effectiveness of the system. This should engender confidence in the general public and the industry that the natural gas industry is being regulated appropriately from a safety perspective 				L
					L
					L
					L

Table 2: Gas Safety Promotion Activities and Responsibilities

5.5 Overview of the Specific Promotional Activities that may be employed

The specific promotional activities that will be employed to address each of the specific messages set out in Section 4 will be set out in the Annual Gas Safety Promotion and Public Awareness Activities Programme. Among the promotional activities that may be employed under the strategy and incorporated in the Annual Gas Safety Promotion and Public Awareness Activities Programme include:

1. National television advertisements;
2. Radio Advertisements, at both a local and national level;
3. Press Advertisements, at a national, local and trade level;
4. Internet Advertisements;
5. Gas Safety Website(s) and issue-specific websites (e.g. CO website) as reciprocal linking arrangements between websites;
6. Press launches, Promotional launches;
7. Performance Publications – such as Annual Reports;
8. Customer telephones helplines;
9. Industry roadshows;
10. Presentations at Industry trade events;
11. Safety leaflets in customer bills;
12. Direct marketing/posters to customer, installer, industry trade databases/ mailing lists;
13. Provision of technical and informational literature;
14. Specifically targeted campaigns (e.g. posters with CO symptoms to GPs, Dial-before-you-dig mugs/pens/stickers etc to construction industry);
15. Industry workshops, governance groups; and
16. Strategic relationships with other safety bodies and their campaigns (Health and Safety Authority, Health Service Executive etc.).

To strengthen the delivery of key safety messages and to ensure a high level of consistency, there will be a specific emphasis on brand reinforcement and cross-referencing of messages through the various specific promotional activities where appropriate. For example the use of the RGI logo and the “always use a registered gas installer” message in the CO television advertisement

5.6 Measuring the Effectiveness of Gas Safety Promotion

As discussed earlier, the effectiveness of many of the safety promotional activities carried out under each of the 5 identified outcomes will be determined through the use of a “Annual Safety Awareness Survey” as appropriate. The outcomes of the Safety Awareness Survey will be used to ascertain the level of awareness on gas safety issues amongst the general public and will enable a year-by-year trend analysis to be undertaken, which will assist in the targeting of gas safety promotional activities.

Many of the initiatives under outcomes 2) “Greater willingness among the general public to take preventative actions with respect to gas safety” and 3) “Greater willingness among the general public to take positive actions with respect to gas safety” lend themselves to be measured by means of high level key performance indicators (KPI’s) that will be reported by Gaslink, Suppliers and the RGII to the Commission on a quarterly basis. These high level KPI’s include:

Subject	High Level Indicator
Emergency Reports	<i>No. of emergency calls received via the 24-hour emergency telephone number (1850 20 50 50)</i>
Carbon Monoxide Reports	<i>No. of CO-related calls received via the ‘Carbon Monoxide Helpline and Safety Inspection Request’ (1850 79 79 79) No. of CO website visits</i>
Third Party Damage	<i>No. of calls received via the ‘Dial-Before-You-Dig’ telephone number (1850 42 77 47)</i>
Registered Gas Installers	<i>No. of visitors to the ‘RGI Listings’ website search engine</i>
Gas Safety Website Visits	<i>No. of visits to various gas safety website pages</i>
Completion Certificates	<i>No. of completion certificates issued No. of servicing certificates issued</i>
Unregistered Installers	<i>No. of unregistered installers complaints received</i>
Advertising Metrics	<i>Opportunity to See (OTS), Opportunity to Hear (OTH) and Television Rating Points (TVRs)</i>

Table 3: High Level Safety KPI’s for Gas Safety Promotion

The above KPIs are described further below:

- **Emergency Reports**
The number of calls received via 24-hour emergency telephone number is an indicator of the public's awareness of BGN as the emergency response service provider for gas emergencies.
- **Carbon Monoxide Reports**
The number of calls received via the 'Carbon Monoxide Helpline' is an indicator of customers' awareness of the mechanisms of the Carbon Monoxide strategy with respect to reporting Carbon Monoxide suspicions and getting safety inspections of suspect appliances to be undertaken. The number of visits to the CO website is a similar indicator.
- **Third Party Damage**
The number of calls received via the 'Dial-Before-You-Dig' telephone number is an indicator of the effectiveness of BGN safety promotional activity in this area.
- **Registered Gas Installers**
The number of visits to the Registered Gas Installer Listings website search engine is an indicator of the public's awareness of the need to engage a registered gas installer for undertaking gasworks.
- **Gas Safety Website Visits**
The number of visits to the gas safety web pages or websites of the various undertakings is an indicator of the level of interest in gas safety issues amongst the general public and also an indicator of how and where they obtain this information.
- **Completion Certificates**
The number of completion and servicing certificates issued is an indicator of the success of the messages of "always request a Completion Certificate for any gas works undertaken" and "Gas customers should get their appliance serviced on an annual basis by a registered gas installer".
- **Unregistered Installers**
The number of complaints received by the Commission or the RGII with respect to unregistered installers is an indicator of the success of the messages of "always use a Registered Gas Installer", "Informing the Commission or the RGII of un-registered gas installers in operation" and "It is illegal to undertake domestic gas works if you are not a Registered Gas Installer".

- **Advertising Metrics**

Awareness levels can also be measured through analysis of the advertising metrics for the various promotional campaigns carried out such as Opportunity to See (OTS), Opportunity to Hear (OTH) and Television Rating Points (TVRs).

These high level KPI's are supported and informed by other complementary high level KPI's that will be used to measure effectiveness in achieving the Commission's other regulatory objectives and will be reported on a quarterly basis to the Commission by undertakings and the RGII. This is to ensure that the key objective of "*Promoting Public Awareness of Gas Safety*" is being achieved consistently and that a review is undertaken such that any improvements or changes that are considered necessary are undertaken to achieve a continuous improvement. This may involve the addition of new high level KPI's and/or the refinement of existing KPI's.

6. FUNDING OF THE PROMOTION OF GAS SAFETY AWARENESS

6.1 High level Options

The options available for funding the promotion of gas safety awareness include:

- a) Individual undertakings fund their own costs – i.e. Gaslink, BGN, Shipper and Suppliers and the RGII carry out their own safety promotional campaigns and bear the costs of such campaigns;
- b) BGN carries out all gas safety promotional activity on the part of all undertakings and the RGII and recovers its costs via the transportation tariffs; and
- c) Some combination of a) and b) above whereby the 'core' gas safety promotional activities are carried out by BGN on behalf of the industry, the costs of which are recovered through the regulated transportation tariffs, whilst other undertakings and the RGII carry out a basic level of gas safety promotional activity at their own cost but coordinated by the Commission.

The Commission considers that there are important underlying principles for the funding of the promotion of gas safety awareness. These are:

- i. Many gas safety promotion and public awareness activities can be deemed a "public good" and therefore it is equitable that the public should share the costs of these activities insofar as is possible. This is particularly relevant with respect to the promotion of the use of registered gas installers.
- ii. The costs associated with the promotion of gas safety awareness should not be unduly onerous or unnecessarily duplicated across the gas industry;
- iii. Gas safety messages should be consistent and coordinated by a central body wherever possible;
- iv. For public safety policy reasons, the costs of gas safety promotion with respect to the RGII should be minimised, or avoided altogether, so as to reduce the financial burden on registered gas installers. This is to ensure that gas installer registration charges are kept as low as possible and do not act as a disincentive to installer registration. This also reflects the fact that registered gas installer specific advertising is a public good.
- v. Shippers and Suppliers are the primary interface with gas customers and therefore must carry out a basic level of gas safety promotion but in a consistent and coordinated manner.

With the above principles in mind, it is the view of the Commission that:

- Option a) would result in unnecessary duplication of costs, potentially confused safety messages and would be a significant cost burden on the RGII.
- Option b) removes any responsibility from Suppliers for gas safety promotion and excludes the important influence of the RGII on gas installer safety matters.
- Option c) represents the preferred option as it respects each of the 5 principles identified above. The weighting of the combination between option a) and option b) will be heavily weighted toward option b) to reflect the “public good” nature of such activities.

6.2 Operation of the ‘Combination’ Option

Under this approach, the Gas Safety Promotion and Public Awareness Expert Group will provide industry input and support on:

- the Promotion and Public Awareness Strategy Document; and
- the Industry wide Promotion and Public Awareness Activities Programme for the forthcoming year.

Before the start of each year, the Commission will formally approve the high level Strategy Document and the detailed Annual Promotion and Public Awareness Activities Programme. All gas safety promotional activity carried out by the Commission, undertakings and the RGII must be in line with that approved Strategy Document and Annual Promotion and Public Awareness Activities Programme.

With respect to the funding of these activities and the recovery of costs:

- BGN will undertake all core safety promotion on behalf of the industry and will recover such costs via the regulated transportation tariffs. With respect to the recovery of these aforementioned costs, under existing arrangements BGN’s safety advertising costs are agreed with the Commission and recovered via the regulated transportation tariffs. This arrangement will continue for the remainder of this 5-year regulatory period 2007-8 to 2012-13 at the agreed level and BGN will continue in its current role as the centralised service provider for the core gas safety promotional activities. Post 2012-13, it is the Commission’s view that BGN will continue in its current role and gas safety promotion and safety advertising costs will be subject to review and agreement by the Commission. Cost recovery will continue to be via the regulated transportation tariffs.
- The vast majority of promotional costs relating to the RGI safety messages will be recovered via BGN’s regulated transportation tariffs;

- The basic level of Shippers and Suppliers gas safety promotion at the interface with the gas customer will be part of their business operating costs as is currently the case; and
- The Commission will recover any of its costs through the industry levy.

7. SUMMARY

The Commission has significant gas safety promotion and public awareness obligations and powers under the 2006 Act. The importance of these obligations is reflected in the fact that the Gas Safety Promotion and Public Awareness Strategy is one of the main components of the Natural Gas Safety Regulatory Framework, and represents one of the six key objectives of the Framework as set out below:

Key Objective 6: Promoting Public Awareness of Gas Safety

Increasing the level of gas safety awareness amongst gas customers and the public generally and, in particular, educating on the dangers of carbon monoxide is an important aspect of the Commission's overall objective of promoting the safety of customers and the general public in respect the use of gas. It will also be important that owners/occupiers of premises are aware of their responsibilities in respect to the maintenance of gas fittings downstream of the meter. The proposed gas safety framework places duties and obligations on both individual gas undertakings and the industry generally for the promotion of gas safety awareness. This will involve a combination of both individual and co-ordinated safety promotional activities by undertakings.

In order to realise this regulatory objective, the Commission has devised an approach which involves safety promotion activities being undertaken by the Commission, individual undertakings and the RGII in a co-ordinated manner to achieve the following five outcomes:

1. Increased levels of general public awareness of gas safety issues;
2. Greater willingness among the general public to take preventative actions with respect to gas safety;
3. Greater willingness among the general public to take positive actions with respect to gas safety;
4. High levels of awareness of, and confidence in, the Register of Gas Installers amongst the general public and the installer industry; and
5. Raised levels of general awareness of the Commission's role as the regulatory authority for gas safety matters in Ireland.

This new approach, that is coordinated at an industry level, will ensure that consistent gas safety messages are conveyed to gas customers and the general public to avoid both confusion and unnecessary costs being incurred. The key elements of the approach are:

- The development of a Promotion and Public Awareness Strategy Document which represents a shared understanding amongst the natural gas industry of the objectives of the strategy and the outcomes it expects to achieve.

- Each year, agreeing an Industry wide Promotion and Public Awareness Activities Programme which specifically outlines the nature and timing of specific safety promotional activities that will be carried out by the Commission, each undertaking and the RGII.
- Reviewing on an ongoing basis:
 - that the industry is adhering to the Annual Promotion and Public Awareness Activities Programme; and
 - the success of the campaign in achieving the 5 key outcomes through monitoring key performance indicators on a quarterly basis and conducting an Annual Safety Awareness Survey.
- Utilising the Gas Safety Promotion and Public Awareness Expert Group as co-ordinating mechanism to provide industry input and support on achieving the objectives and outcomes of the strategy.

The funding for these activities will be obtained via:

- ‘core’ gas safety promotional activities being carried out by BGN on behalf of the industry, and the costs for such being recovered through the regulated transportation tariffs;
- suppliers and the RGII carry out a basic level of gas safety promotional activity at their own cost but coordinated through the Annual Promotion and Public Awareness Activities programme; and
- an industry levy with respect to any gas safety promotional costs incurred by the Commission.