

Until further notice I am unable to accept any referrals where the word 'fumes' is uttered at any time by a consumer, before hands-on work is commenced on any gas appliance. To understand the reasons for this you need to set it against the background of ACS competencies. Lay readers are advised to first read or print the legend on page 4 of this document.

The most recent competence CPA1 (relating to ECGA) is now mandatory if RE wish to retain competencies they already hold for some gas appliances. I have done CPA1 twice. First when the new CPA1 was introduced (before it was mandatory) and again in February 2012 when I renewed all my other domestic gas competencies, so that all my competencies would be in chronological alignment. More convenient for future renewal.

On both occasions when I took CPA1 it was strongly and repeatedly emphasised at intervals throughout formal training (I have never known such strong and repeated emphasis), that CPA1 could not be relied on as a competence for dealing with any referral relating to 'fumes'. The emphasis relating to referrals for 'fumes' was left in no doubt whatsoever. They were obviously instructed to for a powerful reason (CMDDA1), which is precisely what training courses are for.

I recall jesting afterwards that this was the first course and assessment I have taken and emerged from being legally less competent than before I entered the course. In other words I could no longer accept any referral where the word 'fumes' was mentioned by a consumer or in response to Carbon Monoxide (CO) alarm activation etc.

If you need proof, there exists a Gas Safe Technical Bulletin (TB 020) dedicated to CPA1 in which the following (copied and pasted) unambiguous sentence appears early in the text:

**IMPORTANT:** CPA1 does not cover or confirm any competence regarding the investigation of reported fumes from gas appliances. See [Note 4](#).

Note 4 relates to another new competence which *does* cover and confirm competence relating to investigation of reported 'fumes'. That competence is called CMDDA1 and has its own dedicated Gas Safe Technical Bulletin (TB 103). First published September 20 2010, TB 103 refers to the new CMDDA1 competence as having been developed, although it was not commercially available to RE as a course for almost two years after that date <sup>Note1</sup>.

In other words for a significant period of time, no RE could legally investigate a report of 'fumes' from a gas appliance.

I do not have CMDDA1 and will not be undertaking CMDDA1 given the very high cost involved for what will almost certainly deliver no commercial return. Especially now they have *overlapped* the previously distinct boundary with CPA1: RE are increasingly selective in what competencies they hold, to limit overheads.

To complicate matters, TB 020 was inexplicably withdrawn *sine die* from the list on 12.04.2012, shortly *after* I had undertaken CPA1. Why I do not know as I cannot see anything wrong with that document in the context of 2012. Except of course the above sentence quoted from TB 020 which has obviously now returned to haunt them.

It gets worse. Subsequently, in January 2013 TB 103 was also withdrawn and is officially listed as under-review. That was almost 2 years ago. Under-review obviously implies it will return but we will see and that is another reason for waiting. My best guess is that the unconscionable delay is actually deliberate to see if the situation resolves itself without the authorities being seen to make an embarrassing U turn on the *now* confused boundary (it was plain as day before) between CPA1 and CMDDA1 <sup>Note2</sup>. Impossible to define on paper *now* I fully accept but the situation is entirely of their own making and must ultimately be clarified whatever happens.

The current situation therefore is that the boundary has been confused and RE only having CPA1 are operating around that boundary at their peril. From a legal and public liability insurance perspective my CPA1 stands alone as *the only written authority* I can point to for guidance on what I can and cannot do. That must include the related TB 020 and TB 103 which were both current documents then. *There is no other official document available now to state otherwise*<sup>Note3</sup>. Remember, it is illegal to work out of scope as we are constantly reminded (as it should be).

All that said, in November 2012, *before* TB 103 was withdrawn, an incompetent article appeared in the official Gas Magazine (which has no official or legal status whatsoever) stating that RE with only CPA1 *can* attend a report of 'fumes' if it is the 'first' such report.

I say incompetent because notwithstanding the obvious serious conflict with TB 103<sup>Note2</sup> which was not mentioned in the article, I could drive a bus through the article<sup>Note2</sup>. *Ostensibly* produced by EU Skills who I do not recognise in that context. EU Skills has no authority or functions whatsoever under this heading and cannot be cited at a future date. Articles by their nature are in any case very quickly lost in the mists of time.

To further confuse matters, TB 020 is still referred to as a live document elsewhere in Gas Safe Technical Pages online, so the whole situation is obviously in some chaos.

Late 2013 I attended the PHEX-Show in Manchester and raised the subject with an amiable guy from Gas Safe. He assured me it is in effect ratified that RE can attend a first report of 'fumes'. He also promised to send me written proof, which I am still waiting for. I knew I would not get written proof but I have asked.

These people have dug a huge hole for themselves and fallen in. Clearly something has happened that we have not been told about. What greatly concerns me is not the original mess they created but their astonishing, sustained and unethical efforts to cover-up the situation, leaving RE at risk, in order to spare their own blushes: All this sadly, a recipe for ongoing mistrust.

Although TB 020 and TB 103 are no longer in current circulation, CPA1 and CMDDA1 are current. RE would be best advised to stick rigidly to what they officially qualified for (what they can prove on paper) or they may find they are left without a chair if or when the music stops, depending on circumstances, which are carefully loaded by design, in favour of the authorities.

I suspect CMDDA1 was introduced in an effort to give consequence to the relatively new BS 7967 suite of standards but in their sterling efforts to ring-fence themselves, covering all eventualities, the authorities have created an essentially impractical and unworkable competence. Not least, the cost of implementing CMDDA1 in the way envisaged in TB 103 will obviously be prohibitive, thus rendering it virtually redundant anyway for all practical purposes. Hence the astonishing U turn.

In its present form CMDDA1 will obviously be a barrier to *some* people seeking access to routine gas safety at an affordable cost. The real tragedy is that CMDDA1 cannot possibly discover anything *relating to gas appliances* which cannot be discovered by diligently applying the long established basics including checking:

- the supply of combustion air
- the operating pressure of the appliance (or heat input or both where required)
- its operation so as to ensure its safe functioning
- the effectiveness of any flue

*Some* appliances now *require* ECGA for performance (not safety) testing and CPA1 was created to serve that specific and *now* essential purpose. I have absolutely no quarrel with that. No more is needed on gas except clarity.

CMDDA1 is *not just about gas appliances*. Far from it. It clearly does not belong to gas or any other fuel given its much wider remit in the search for rogue sources of CO, including any number of external causes outside the home and sources of CO not necessarily arising from any form of combustion. It is a stand-alone area of expertise which is currently and ironically threatening access to basic gas safety at an affordable cost.

Note 1:

The first CMDDA1 course was trialled at SGAS.co.uk in August 2012. An inaccurate EU Skills website-published excel spreadsheet at that time pointed to only one college where CMDDA1 was available. A college in fact where the course was not available.

Note 2:

Any report of 'fumes' under CMDDA1 (TB 103) *must* be approached in a strict sequence in order to establish first whether the 'fumes' have 'affected' anyone. If so to what extent. Should the latter apply it is then essential to determine the cause(s) and preserve the evidence of that. However should unconsciousness or death be reported, the situation is automatically escalated beyond CMDDA1.

For understandable reasons, it is essential not to touch any appliance which may be implicated until the above circumstances have been fully explored. In some cases, as stated in TB 103, criminal proceedings may follow and rules-of-evidence apply.

All this demands a meticulous forensic approach, which is what CMDDA1 is *essentially* about. CPA1 is emphatically about performance testing of appliances, not safety testing. RE undertaking CPA1 are told little of CMDDA1 other than its existence but it is referred to in TB 020. They are told in TB 020 that CPA1 "does not cover or confirm any competence regarding the investigation of reported fumes from gas appliances".

No definition or clarification is offered for the words 'fumes' or 'affected' in TB 103. None at all.

The extraordinarily incompetent article referred to, suggests RE may attend a *first* report of 'fumes' but made no mention of TB 103, still current at that time and which in turn referred to TB 020 as a live document. The article makes no mention whatsoever of RE enquiring if anyone has been 'affected' by the 'fumes', which is fundamental to and pivotal in 'fumes' investigation and CMDDA1.

It is therefore self-evident that a RE attending a first report of 'fumes' could unwittingly compromise what should be a matter for CMDDA1, given CMDDA1 is still current. I have no reason to suppose the content of CMDDA1 now differs in any way from that originally described in TB 103.

It is now incumbent upon the authorities to clarify the situation for RE holding only CPA1. That must be on an official published stand-alone document in plain English. It absolutely must be in writing, made available in permanent form; I am not here concerned about CMDDA1 *per se*.

It must also be clarified beyond any doubt on paper in the Gas Safety Training Manuals supplied to RE during ACS training for CPA1. Anything less will not be acceptable, particularly in the face of all the manoeuvring that has taken place to disguise the confusion arising from these proceedings.

Anyone with CPA1 (only) attending a report of 'fumes' today is still at risk if they encroach on the overlapped boundary and may wish to discuss that first with their legal adviser and/or public liability insurance company. It is highly likely that work identified in the recent past as applicable only to CMDDA1 requires professional indemnity insurance rather than public liability insurance.

Note 3:

The permanent withdrawal of TB 020 does not in any way lessen the validity of the document insofar as my own CPA1 competence is concerned (and many other RE of course). If the authorities wish us to disregard the TB 020 document as though it had never been written then they need to say so, also in writing. The same applies to TB 103, the provisions of which remain legally valid until amended and re-published or formally withdrawn *sine die*.

LEGEND

ACS

Refers to the Accredited Certification Scheme for Registered Gas Engineers (RE) which has many separate competencies (categories). For example boilers, gas fires, cooking appliances, warm air heating, electronic combustion gas analysers, domestic, commercial, LPG gas, boats, caravans etc etc. Gas registration is a licence, not a qualification and re-testing takes place every five years.

RE

Gas Safe refer to Registered Gas Engineers simply as Registered Engineers.

CPA1

Is a relatively recent competence and refers to Combustion Performance Analysis. Please note performance analysis and not safety analysis.

CMDDA1

Carbon Monoxide/Dioxide Domestic Atmosphere and Appliance Testing is another relatively recent competence.

ECGA

Electronic Combustion Gas Analyser sometimes referred to historically as Flue Gas Analyser (FGA)

FUMES

Fumes could mean anything but the authorities using the word under this heading have made no attempt at clarification or definition in any document, past or present. If a consumer uses the word 'fumes' at any time, then in the absence of any clarification or definition by the authorities this must be accepted as having the same meaning as that used by the authorities in CPA1 and CMDDA1: It needs to be remembered that Carbon Monoxide (CO) is colourless and odourless.

NB: Copies of all documents referred to are available on demand

In Conclusion

It seems to me astonishing that something like this could happen unchecked. Time this catalogue of maladministration was referred to an independent ombudsman with a view to forcing a coherent response in the best interests of common sense and gas safety.

Les Gradwell

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