

Thank you to the respondents to my Carbon Monoxide (Safety and Detection) Bill consultation. Here are a summary of responses (duplicated or similar responses have been removed).

We received sixteen completed responses and interaction through a Facebook post on the House of Commons page.

Do you agree with the general aims of the proposed bill, that is, to make carbon monoxide detectors mandatory and improve awareness about carbon monoxide safety?

I do believe that CO fatalities are entirely preventable and therefore action should be taken

Carbon monoxide exposure causes brain injury by interrupting the oxygen supply to the brain (cerebral anoxia). Typically, when the oxygen supply is cut off, consciousness will be lost within 15 seconds and anoxic brain injury begins to occur after about four minutes without oxygen.

There is often an assumption that exposure to carbon monoxide is fatal, or there are no lasting effects. Headway wants to ensure that as well as saving lives, efforts to fight carbon monoxide poisoning also reduce the number of people each year who are left with life-changing disabilities after exposure to CO.

I lost my daughter to CO, we have been campaigning for 10 years for this

Simple fix to a HUGE, yet silent issue

Little public knowledge about CO

We have worked to prevent deaths and injuries from unintentional carbon monoxide poisoning since 1995 and have talked to many victims, families and agencies. CO alarms are not the whole answer but they will greatly assist in saving lives at least. The CO alarms themselves will also raise awareness although we submit that the increased presence of CO alarms will increase the desire for identifying which appliance is emitting CO and proving how many parts per million of CO that the victim was exposed to.

A sensible low cost measure to save lives - a no brainer

I have been in the gas industry as an engineer nearly for 23 years and have now moved in to being a manger for a heating team . Anything we can do to help protect people from co poisoning is a great move and I think co alarms should be mandatory in every building which burns a fossil fuel from gas solid fuel and oil.

Carbon monoxide is a silent killer which many people are unaware of. All residential properties, both social and privately owned should be fitted with them by law. I also wish to see mandatory fitting of smoke detectors in all properties.

I have reservations about the performance of CO detectors in the longer term (some have up to 10yrs during which performance is guaranteed). The manufacturers do not have sufficient evidence that such a long term is justified. Also, siting guidelines for CO detectors and smoke detectors is different.

There will be a problem with implementation where there is a gas hob or gas oven in the kitchen, some CO emission being inevitable. There will also be a problem in location of the detector where there is simply a gas fired heating appliance. What this means is that the regulations and codes following any Bill must be extremely carefully and competently written to avoid attempts for a one-size-fits-all solution.

Could the aims of this proposal be better delivered in another way (without a Bill in the UK Parliament)?

For the gas sector, enforcement of landlord legislation for tenants via servicing and maintenance of appliances would be more productive. In the solid fuel sector, more regulation should be considered to ensure the servicing and maintenance of solid fuel appliances in rented properties takes place.

Industry led and/or voluntary approaches have been employed previously but failed to achieve their objectives, therefore it is time to address this issue using legislation

Unlikely that private sector will ever make it mandatory and better for a Bill to act now before a major disaster occurs on top of what is already occurring

Funding for public education and enforcement should be provided if this bill is passed.

Legislation will make things happen - as long as it is backed up with enforcement

Could there be an extension to the Building Regulations? Post Grenfell it seems that other "areas" covered by them will be revised and hopefully better methods of enforcement including penalties for false information will be included.

Unsure if it could be delivered in another way but making CM and Smoke detectors installation by law in all properties is possibly the best way.

The bill needs backing by parliament to in force it

No probably not in the present political climate. However it is very strange that a decent PR campaign has not even been tried to raise awareness of the dangers of CO from all fuels, (gas to wood) all appliances (boilers to barbecues) and in all types of accommodation,(bungalows to boats) persuade everyone to find out about CO and prevent dying or being injured by CO or other products of combustion. We just cannot understand how this has been ignored for so long despite many appeals by victims and victim groups.

Needs to be brought into the public domain by official pressure.

What do you think would be the main advantages, if any, of requiring fire and rescue authorities (sometimes known as the fire service) to have a duty to promote carbon monoxide safety in their area?

Wider official recognition of the risk.

The main advantage is that firefighters are trusted members of the community. One to one explanations are probably the best way to explain a difficult topic. However, having said that an

assumption is being made that firefighters who fight fires know all about the silent killer, carbon monoxide poisoning from cooking and heating appliances and they don't.

The fire service in some regions, for example Coventry and Merseyside, is already proactive in this respect. Carbon monoxide safety, as opposed to an out and out endorsement of CO detection, would be a positive outcome for the fire service.

These services are trusted messengers and can alert residents in their communities more credibly to the dangers of CO poisoning than any other messenger could. They would also be aware of specific local circumstances, allowing them to speak to groups at risk as a matter of priority.

This would ensure a baseline level of effort across England to share best practice and work with the public to increase awareness of the dangers. This could also help raise awareness among healthcare professionals about the importance of considering CO poisoning in many more cases. Because the symptoms of CO poisoning can be non-specific, varied and mimic other conditions/illnesses, it can be difficult to diagnose – if it is even suspected. It would also be helpful, as part of the work of the fire and rescue services, to raise awareness about the recommendation to replace CO alarms every five years, and smoke alarms every eight years.

People take notice of them, very few people don't have fire alarms, CO alarms should be the same
raise awareness

They already have the knowledge and influence in terms of fire alarms and are well trusted

They would probably carry out the inspections conscientiously, and are popular with most communities.

Logical as they are the front line as are gas and heating engineers

I think the fire service also the manufactures of these appliances should promote this and why don't we make it law that when a fossil fuel appliance is sold it comes with a co alarm unless the qualified person who is purchasing states they do not need one as there is already one in the property also with boilers you should could make it part of the bench mark form also when registering the appliance with gas safe it is part of the criteria .All other fuel types should be governed as much as gas is as the other fuel types are not regulated as much and enforced.

People are more inclined to listen to advice from Fire & Rescue Authorities than if the same advice was promoted by Government & Local Council.

What do you think would be the main disadvantages, if any, of requiring fire and rescue authorities (sometimes known as the fire service) to have a duty to promote carbon monoxide safety in their area?

It depends upon what is meant by 'to promote carbon monoxide safety'. Education would be welcome but a reliance upon CO detectors would not.

Giving the correct information

More duties on overworked staff

CO is definitely more of a public health than a fire risk problem, so logically the responsibility should be given to the LAs EHO, as are chimneys for instance.

Possibly the extra workload to promote safety advice during the time when they have less funding available.

Information will only be given on request so won't reach everyone. In any case not everyone would have the time or inclination to listen to a firefighter. It would also be very labour intensive and costly. Surely other methods such as a proper PR campaign consisting of prime time TV warnings backed up by websites etc. should be undertaken as in the 'Fire Kills' campaign? Firefighters could then also make their contribution.

What do you think would be the main advantages, if any, of making audible carbon monoxide alarms mandatory in all private rented and social rented properties that contain a gas, liquid or solid fuel burning combustion appliance?

There is some evidence (in the gas sector) that CO detectors have sounded to warn occupants. However, I would repeat that no evidence has been forthcoming to support the long term reliability of all detectors given they do not test sensor calibration, only the condition of the electrical system used. So if CO detectors could be declared accurate throughout a stated period, I would be more supportive. The prospect of protection for all tenanted properties using such detection (ie proven over the long term) would be positive but costs to buy and install and guaranteed performance of the devices are negative factors. The question needs to be asked whether a properly maintained and serviced appliance would need CO detection and I do not believe it would (for all sectors).

This would be a vital step in simplifying current legislation and address the shameful fact that people in lower quality accommodation are more at risk from CO poisoning.

The main advantages would be: • To reduce risk in private rented and social rented properties. • To raise awareness of the risks of CO poisoning among landlords, tenants and others working in the housing sector. Alarms need to be audible to ensure people notice when they are activated, particularly if they have a visual impairment. For people with hearing loss, consideration should be given to additional ways of making them aware the alarm has been activated, such as vibrating pads, flashing strobe lights.

It would ensure the safety of people some from the poorest parts of our communities who cannot afford detectors or do not know about them, especially people with a possible language barrier

Hopefully more CO alarms will reduce deaths and hopefully, (but not necessarily due to the levels set), will also reduce injuries.

Will prevent or at least significantly mitigate the chance of death or serious illness from carbon monoxide poisoning

There should be no distinction between the type of landlady/landlord and rental agreement. There might be a case for distinguishing between unfurnished and furnished so long as there is a clear statement in the leasing agreement. This last would allow for changes in the type of cooker and/or heating system instigated by the either the tenant or owner/letter.

Save lives

Prevent needless deaths More reassurance for tenants and landlords

Residents would hopefully feel safer in the properties.

To make the general public aware of the dangers most people are unaware of.

What do you think would be the main disadvantages, if any, of making audible carbon monoxide alarms mandatory in all private rented and social rented properties that contain a gas, liquid or solid fuel burning combustion appliance?

Check they respond to all of the alarm thresholds in the way standards require for the entirety of their stated performance period - I am highly sceptical. Ensure 'rogue' alarms do not get installed (the industry has had a significant number of 'fake' devices. Have evidence that CO detectors and smoke detectors can be sited together to be effective (this is doubtful). What happens when a CO detector in a rented property alarms but is known to be a faulty device? The battery v mains power debate would need to be talked through. I would be happier if in situ checking of CO detectors on an annual basis took place (over each alarm setting).

As the cost of CO alarms has declined significantly since the cost benefit analysis of the 2015 legislation has been conducted, the economic burden to landlords is now marginal, in particular given the increased risk of CO poisoning that result from failing to install CO alarms in all rented properties.

None

Cost

Landlords will try and circumvent the law

As noted before, the problem is location? Where would the detector have to be to pick up all emission sites? and/or should there therefor be sounders in all rooms? A bit OTT?

Enforcement and ensuring they then work!

If they were battery operated the residents would not always be able to afford batteries and may even remove them for use in other equipment.

Cost but surely overwhelmed by savings re deaths and injuries.

Onerous on landlords but obviously needed.

Possibility this measure will encourage more homes towards becoming electric only. However, we think CO alarms should be in all properties because of the possibility of being killed by CO from next door as occurred tragically to Dominic Rodgers aged 10 in 2003.

What do you think would be the main advantages, if any, of making audible carbon monoxide alarms mandatory in all new build properties that contain a gas, liquid or solid fuel burning combustion appliance?

New build properties should have regular servicing and maintenance programmes in place by law (particularly in the gas sector). I would consider CO detection to be superfluous here and not advantageous. My comments regarding servicing and maintenance in the solid fuel sector may well be an issue (less regulation here) so CO detection could help - as does the current law already.

This would enshrine best practice in all newly built dwellings and create a level playing field wherein all property developers are faced with the same standards to comply with.

The main advantages would be: • To reduce risk in newly built properties. • To raise awareness of the risks of CO poisoning among developers, builders and contractors, estate agents and homeowners, as well as others in the housing sector. Alarms need to be audible to ensure people notice when they are activated, particularly if they have a visual impairment. For people with hearing loss, consideration should be given to additional ways of making them aware the alarm has been activated, such as vibrating pads, flashing strobe lights.

Can see no reason why not, it will save lives.

Save lives

As before, mitigates the risk of carbon monoxide poisoning

This would allow for most changes in services and cooking appliances.

Save lives and easy to legislate for.

Residents should feel safer in the knowledge that the detectors are fitted.

Main advantages of putting CO alarms in new homes with gas, liquid or solid fuel burning appliance is to save lives. But what of CO from next door so why not all new homes or indeed all homes and workplaces too?

What do you think would be the main disadvantages, if any, of making audible carbon monoxide alarms mandatory in all new build properties that contain a gas, liquid or solid fuel burning combustion appliance?

Main disadvantages are that they are only being put in new homes with gas, liquid or solid fuel burning appliance. It would be better and easier just to put CO alarms to EN 50291 (or subsequent replacement standard) in all new homes or even all homes and workplaces.

As before, I have reservations about the long term reliability of CO alarms. Enforcing the requirement for regular safety and maintenance in the gas sector should ensure safety although policing has to be properly conducted. The current requirement for the solid fuel sector does tend to already be covered although policing need to be tight (hence comments on regulation).

Cost

House builders kicking up a stink and passing on what is a very minor cost to the consumer

As noted before, the problem is location? Where would the detectors have to be to pick up all possible emission sites? All rooms would clearly be OTT but would be the only way of ensuring future coverage.

What do you think would be the main advantages, if any, of requiring licence holders of houses in multiple occupation or houses licensed under Part 3 of the Housing Act 2004 to install an audible carbon monoxide alarm in any room with a gas, liquid or solid fuel burning combustion appliance?

HMOs are a specific case where the lives of many living separately could be put at risk. I have covered the safety and maintenance issue for the gas sector. I believe the use of CO detectors, which some have labelled a fall-back practice, would only serve its purpose if the gas obligations had not been met. In the solid fuel sector, I consider the current legislation (when properly policed) to be adequate.

The main advantages would be: • To reduce risk in HMOs etc. • To raise awareness of the risks of CO poisoning among license holders and tenants, as well as others in the housing sector. Alarms need to be audible to ensure people notice when they are activated, particularly if they have a visual impairment. For people with hearing loss, consideration should be given to additional ways of making them aware the alarm has been activated, such as vibrating pads, flashing strobe lights.

Every room should have them in HMOs because of the number of people involved all living individually, in fact HMO should be banned anyway but that's another problem

Save lives

The onus should be on any type/all types of owner, letting agent or similar proxy.

Residents should feel safer with the knowledge that these alarms are fitted.

Main advantages of putting CO alarms in HMO homes with gas, liquid or solid fuel burning appliance is to save lives. Hopefully this would also possibly raise awareness of the dangers and ideally mean appliances were serviced more frequently and would almost certainly also be more efficient and less polluting.

What do you think would be the main disadvantages, if any, of requiring licence holders of houses in multiple occupation or houses licensed under Part 3 of the Housing Act 2004 to install an audible carbon monoxide alarm in any room with a gas, liquid or solid fuel burning combustion appliance?

HMOs in the gas sector are covered by the requirement for annual servicing and maintenance of appliances (when properly enforced). HMOs in the solid fuel sector are covered by existing CO detection requirements. Only inadequate application of the current regulations would place someone at risk (as would be those in the gas sector) so I am sceptical that an extension of CO detection regulations would increase safety especially as there is scope for detection equipment to be ineffective in certain situations.

Cost

Landlords trying to circumvent law

Very few, as it would allow for tenants bringing in equipment of a type not originally considered when multiple occupation was started.

If the detectors are battery operated landlords may expect the residents to supply and change batteries when it should be a requirement of the landlord.

Cost but cost is to the landlord not to government.

Enforcement – this will not be easy. Of course all landlords could be licensed and so enforcement would then be easier. Such licensing could also be used to make sure appliances were properly installed and maintained in the first place as well as chimneys and flues swept and adequate ventilation provided.

Do you have any further comments on the proposals in the draft bill?

consider the current legal framework that exists to protect tenants from the dangers of CO are adequate. Only landlord negligence, engineer incompetence and a lack of suitable tenant diligence tend to render such regulations ineffective.

As well as leading to fatalities, carbon monoxide poisoning can and does leave people with life-long, permanent and severe disabilities. Even mild exposure to carbon monoxide can have a permanent effect on people. Headway welcomes efforts to reduce the incidence of carbon monoxide poisoning.

Good luck with the proposed bill

I think this needs to happen and is long overdue

I fully support the draft bill. I also feel that carbon monoxide and smoke detector equipment should be fitted by law into every residential property throughout the UK.

CO alarms are extremely helpful but are more death alarms than health alarms because they are designed to sound only at high levels. This is not to say they are not well worth having but this should be borne in mind and the public made aware of this.

CO alarms however good will only protect against CO and not the other products of combustion.

The CO alarms specified in our opinion must be to EN 50291 or subsequent replacement standard. All efforts should be made to make sure people purchase the alarms from reputable sources, not from an unknown manufacturer using the Internet. We suggest a public information programme of warnings about this, ideally using real people.

There is still a lack of awareness about CO. Even those who should know often don't.

We are very concerned about the knowledge of firefighters and whether such a personal one to one project will reach everyone or be acceptable to all of us – most of whom are extremely busy.

While helpful it cannot possibly reach everyone. Why not undertake prime time TV warnings backed up by videos, social media, websites etc. – in other words a proper PR campaign?

The real problem is that two excellent recommendations made in 2000 by the Health and Safety Commission (now Executive) have been ignored. One was a levy to raise awareness and for research and the other was that the gas emergency service carry and use equipment to test gas appliances for CO at least to identify which appliance was emitting the deadly gas. These were both made after an exhaustive gas safety review.

The known deaths are from the Office of National Statistics and also HSE and the Gas Safety Trust. This means they are somewhat lacking in detail e.g. fuel, appliance, why it happened, how similar incidents could be prevented in the future.

There may be a far higher number of unknown deaths and also injuries from unintentional CO. See <https://www.newscientist.com/article/mg18424765-600-the-killer-with-no-name/> 3,500 people between the ages of 16 and 64 die in the UK every year from unexplained causes and they are not tested for CO.

There is no victim support other than what this small unfunded charity offers and this bill does not address this. Victim support not only helps victims and families but is also a vital research resource which is again ignored.

Feedback through House of Commons' Facebook post

Commenters welcomed the proposal to make alarms mandatory in new-build properties. One also suggested additional education around the issue through an advertising campaign. There seems to be some regional differences with one commenter saying that their landlord had installed a carbon monoxide alarm for them on the recommendation of their local council.

Awareness

The post was seen by **3,739** accounts between 30 November and 18 December 2017.

Engagement

There were **200** post clicks and **110** engagements including reactions, comments and share.

Example Posts

Lisa George: "After nearly dying from carbon monoxide poisoning in a council rented property 14 years ago I welcome this law. The device costs next to nothing and could possibly save a life! They should be mandatory in the same way that smoke alarms are. I also believe more should be done around the awareness of this silent killer with an advertising campaign on television and across printed media."

Rachael Little: "My landlords paid for us to have one when we moved in she told us it was in accordance to the locals council recommendations that was 2 years ago so I think in some boroughs they already inform any landlord and letting agents of the crucial need for them x"
Nicky Parry: "I agree they should be mandatory, they are as important as smoke alarms."

Carol Onslow: "I would welcome this."