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ATTN: MCE Secretariat

Re: Gas Appliance (Carbon Monoxide) Safety Strategy

My name is Alan Conley and I manage a business unit for Honeywell Ltd that is primarily concerned with gas safety in appliances and industry, we are also a supplier of Carbon Monoxide detectors.

I write this letter to highlight some issues that I have found in a recent report written by the Gas Technical Regulators Committee issued on the 1st of July 2011. The report was commissioned, I believe, in response to the Private members motion made by Dr Sharman Stone on the 3rd of March 2011.

I am concerned that the report is not properly addressing the issues of the 4.2 million existing dwellings that contain gas appliances with the potential to generate Carbon Monoxide. I also have some concern that the terms of reference were not strictly adhered to. The report is certainly accurate in its assessment of the impact of negative pressure in modern buildings and I certainly concur that both building and gas installation regulations should be structured to mitigate the potential for negative pressure situations. I readily accept the methodology of risk mitigation techniques that was used in the report as valid, however it appears to only focus on the one conclusion that is based around adverse flow. In my experience exhaust fans are very rarely run for extended periods of time and most existing installations are not air tight. Leading me to the conclusion that existing installations are somewhat ignored by this report. I would also vehemently argue that the instances of poor installation, operation and maintenance of gas appliances would far outweigh the instances of adverse flow in existing dwellings.

In my humble opinion and based on my experience in the gas industry I believe that the most important issue here is training of the gas fitters nationally to be able to determine that an installation is appropriate and safe including the possibility of adverse flow conditions. This training could also include specific instruction on the appropriate installation of Carbon Monoxide detectors in existing installations. I also feel that public awareness is paramount in avoiding potentially lethal situations

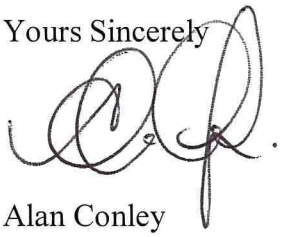
from eventuating by way of the residents being able to recognise the importance of regular servicing and correct operating conditions for appliances. Neither of these actions will have an immediate impact , however the correct installation of an accredited CO Alarm will be effective immediately.

The GTRC report is incredibly biased against the use of Carbon Monoxide detectors and although it references a UK report on Domestic Carbon Monoxide Alarms (reference 32 in the report) any references are somewhat negative. The same report states in its executive summary "*CO alarms are widely recommended as one of a number of important measures to protect against health risks associated with CO leaks from fuel appliances*" yet this statement does not make it into the GTRC report.

In the interest of public safety I would implore you to seek additional professional input and to look at legislation internationally with respect to CO poisoning. I am certainly not advocating that CO alarms be compulsory but would simply highlight that the GTRC report depicts them in a very poor light. The documented fact is that when CO alarms are properly installed and maintained in existing dwellings they save lives.

I would be happy to discuss my view point on this situation in person if that is required, please feel free to contact me.

Yours Sincerely



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