

**Manager**  
MCE Secretariat  
Department of Resources, Energy and Tourism

Dear Sir/Madam:

**Re: Gas Appliances (Carbon Monoxide) Safety Strategy**

Thank you for the opportunity to lodge a submission on this important project.

We have read the *Terms of Reference* and the *Draft Strategy*, and consider that the project will be conducted by the *Gas Technical Regulators Committee* in an eminently professional manner.

It would be greatly appreciated if we could be kept informed of any thoughts/actions that they might come up with in regard to RV installations, and we would be happy to work with the *Committee* on these issues on behalf of our Members to ensure that any recommendations can be practically implemented.

We are considering amending our *Codes of Practices and Compliance Standards*, for both motorised and towable RVs, to strongly encourage the fitment of an approved CO detector/alarm to each vehicle.

Our prime contribution to this project will be to inform RV Manufacturers, Dealers, Owners, and Camping Parks of the dangers of CO poisoning.

We will add a more-detailed *Warning* in our *Handbook*, and also forward it to all other RV Industry bodies for their circulation.

Yours truly

Colin G Young  
Executive Officer  
(CPEng – MIEAust)

Recreational Vehicle Manufacturers Association of Australia  
*Supporting the Australian Caravan & Motorhome Manufacturing Industry*  
*Endeavouring to provide the best possible technical assistance.*

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*Demanding: 100% compliance Striving For: Zero-defect product quality*

## **Notice to all RV manufacturers, dealers, owners, and camping park operators:**

The *Ministerial Council on Energy* is having the *Gas Technical Regulators Committee* develop a **Gas Appliances (Carbon Monoxide) Safety Strategy**.

Details are at: <http://www.mce.gov.au/gassafetystrategy/default.html>

The aim of the project is to develop ways to promote greater safety awareness, alerting all Australians to the dangers and symptoms of carbon monoxide poisoning, and the need to regularly service recreational vehicle gas appliances.

It is suggested that you peruse the *Terms of Reference* and the *Draft Strategy*. If you have any comments or suggestions, please promptly advise the RVMAA, so that they can be forwarded to the MCE Secretariat for consideration.

### **Carbon Monoxide – Warning**

**Carbon monoxide (CO)** is produced to some extent in virtually all instances where carbon-containing fuel is burnt. Where the combustion is “good” (sufficient aeration and in the absence of flame impingement or other abnormality) the levels are very low. However, where “poor” combustion occurs (for example due to the factors described above) relatively high concentrations of CO can occur. **CO is poisonous** and, in its pure state, odourless. When produced by “poor” combustion, however, it usually occurs with formaldehyde and other compounds that have a strong odour; hence the smell of “poor” combustion.

The “National standards for criteria air pollutants in Australia” sets an upper limit of 9.0 ppm (parts per million) for carbon monoxide “measured over an eight hour period” for ambient air. The USEPA National Ambient Air Quality Standards (NAAQS) set the same (9 ppm) standard for an 8 hour averaging period, but also include a one hourly average standard of 35 ppm. At high concentrations **CO is highly toxic**, as may be seen from the site quoted in:  
<http://www.lni.wa.gov/Safety/Topics/AtoZ/CarbonMonoxide/>

The NEPC standard and WHO guidelines are based on the relationship between carbon monoxide uptake and carboxyhaemoglobin formation. In order to protect non-smoking middle-aged and elderly people with documented or latent arterial disease from acute myocardial ischaemia, and to protect foetuses of non-smoking women from hypoxic effects, a carboxyhaemoglobin level of 2.5% should not be exceeded.

For more information on Carbon Monoxide, please refer to:  
[http://www.health.gov.au/internet/main/publishing.nsf/Content/F764F6AF98AA0A6CCA2573AF007F7D0D/\\$File/unlfued%20gas%20heater%20use.pdf](http://www.health.gov.au/internet/main/publishing.nsf/Content/F764F6AF98AA0A6CCA2573AF007F7D0D/$File/unlfued%20gas%20heater%20use.pdf)

It is recommended that all gas appliances are inspected by a trained technician at least every two years. However, always be conscious of all gas appliances, and if you suspect there could be a problem, immediately have it checked out.