Our Reference: C1/DJ/Imp



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12 February 2018

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Steve Wood Chief Executive From the office of Dave Joyce National Health, Safety & Environment Officer National House Builders Council (NHBC) Email: djoyce@cwu.org | Direct line: 020 8971 7365 or 7308 NHBC House Davy Avenue Knowlhil, Milton Keynes Bucks

Dear Steve,

MK5 8FP

LOW LEVEL LETTER BOXES - BUILDINGS REGULATIONS & EUROPEAN (EN) STANDARD EN 13724

You will be aware of the government's announcement on 1 February that a further 200,000 new homes are set to get off the ground as government confirmed £866 million investment in local housing projects, being the first wave of funding from the £5 billion Housing Infrastructure Fund and that 133 council-led projects across the country will receive funding to support local work that will make housing developments viable and get much-needed homes built quicker. We also note that the government is committed to building 1,000,000 homes by 2020 and 300,000 homes a year by the mid-2020s.

However, there is a basic issue and growing problem connected with this that is being completely forgotten and I am writing to you on behalf of the 200,000 members of the Communication Workers Union seeking your support and assistance to correct this problem.

As this huge house building programme is being announced and launched, it has again brought to the fore, the health and safety risks related to delivering mail to ground level letter boxes and the CWU has requested that government introduce a simple change to the appropriate UK Buildings Regulations, in order to reduce the risk of injury to British postal delivery workers. I am writing to seek your support for the CWU's campaign to achieve the introduction of a new UK legal standard on letter boxes and to ensure that your members comply with the British and EU Letter Box Standard in the meantime.

The CWU, Royal Mail Group and the HSE are at one on this issue and agree that the best way to control the risks to the health and safety of postal workers is to eliminate the risk in the first place and in that respect we have called for Government action.

In 2001 the Irish government changed their Building Regulations, outlawing the so called "mousetrap-type" letter boxes at the bottom of doors, banning them in all new homes. This followed an Irish High Court Case in which a Dublin postman was awarded Civil Damages against the Irish Post Office for back injuries caused on his walk which had a high number of ground level letter boxes.

You may be surprised to learn that in fact as far back as 1958 the Council of Industrial Design and British Standards Institute issued a British Standard specifying letter box/letter plate aperture size, maximum flap spring tension and a recommended height position for the letter plate in the door of between 2ft 6 inches and 4ft 9 inches from the ground with an ideal height being 3ft 6 inches.

In 2002 an updated European Standard was introduced EN 13724 entitled "Postal Services - "Apertures of Private Letter Boxes and Letter Plates - Requirements and Test Methods" was issued. This covers similar dimensions and specifications as the previous BSI standard and specifies that for "ergonomic and safety reasons" the centreline of the letter box aperture should be at a height between 700mm (2ft 3.5 inches) and 1700mm (5ft 7 inches).

However these standards are not compulsory in Law in the UK and the CWU is therefore relaunching the Union's campaign, calling for Building/Planning Regulations to be amended by the government. The Union is obviously not demanding that householders and businesses change their doors overnight but we hope that government can see the merit in starting to influence change and minimise the risk or injury to our delivery staff members in respect of all new and replacement letter boxes in the hundreds of thousands of homes about to be built.

The introduction of changes to the appropriate UK Buildings Regulations, similar to those in Ireland would go some way towards helping to reduce the risk of injury to British postal delivery workers. Bearing in mind that Manual Handling injuries along with Slips, Trips and Falls and Dog Attacks remain key safety issues for Royal Mail staff, this is one change where government could contribute to a reduction in injury risks at a stroke.

Thousands of Royal Mail postmen and women sustain back injuries each year in Royal Mail and delivering to low level letter boxes at the base of a house front door, forces Postal staff to stoop to ground level, whilst carrying mail thereby risking serious back strain, finger traps as well as dog bites. Repetitively bending down to such low level letterboxes on a development when all the new houses have such letter boxes is far worse.

We note from your Corporate Responsibility statement that the "NHBC is committed to providing a safe, stimulating and pleasant working environment." That's what we want for our members also. 95,000 of them delivering to the UK's 29,000,000 addresses daily.

I trust we can count on your support and it would be appreciated if your organisation would ensure that all your members comply with European Standard EN 13724 entitled "Postal Services-Apertures of Private Letter Boxes and Letter Plates" and please feel free to publicise and circulate this communication to your industry contacts.

Yours sincerely

Dave Joyce

National Health, Safety & Environment Officer

Ton communications union

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