

No. 082/2018

13 February 2018

Our Ref: C32/18

Low Level Letter Boxes and Re-Launch of the CWU 'Low Level Letter Box Campaign'

To: All Branches

Dear Colleagues,

Motion 86 (2017 Main Conference) was carried and Motion 116 (2017 Postal Conference) was accepted calling for a re-launch of the CWU 'Low Level Letter Box Campaign' aimed at enshrining the British and European Letter Box Standard Specification in to UK Building Regulations.

Previous LTBs 582/16, 001/05 and 604/04 refer.

The Communications Workers Union has been campaigning to outlaw low level letterboxes for many years. The CWU has been striving for the European Standard (EN13724) to be added to UK Building Regulations - this requires that letterboxes should be positioned at a suitably accessible height, accessible to postal delivery workers, significantly reducing possible injuries such as, dog bites, fingers being trapped or back strain caused when bending excessively to reach ground level boxes.

This issue was first raised by the Union as far back as 1958 when the British Standards Agency deemed it appropriate that letter boxes be at a proper height. Unfortunately it was not enshrined into Building Standards Law. Sixty years later and several high profile CWU campaigns later, the problem still exists and the huge increase in house building over the last decade has in many areas of the country made the problem worse for postal delivery workers.

The Union would stress that it does not expect private householders or businesses to change their doors immediately – our campaigns have always centred on government seeing the merit of our arguments and taking action to minimise the risk of injury to CWU members by passing legislation to cover the manufacture of all new and replacement house doors.

A similar campaign run by the CWU's sister union in the Republic of Ireland resulted in all low level letterboxes being banned back in 2001. Given the fact that Royal Mail has by Law an obligation to deliver to each of the 29,000,000 UK addresses, the CWU feels the time has come to standardise letter box height and safe design well above ground level.

The problem with low level letter boxes is that back injuries to postmen and women occur 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 repetitively to deliver mail items which can cause or exacerbate back strain and back conditions. Low level letter boxes also present an increased

risk of dog bites when the mail is pushed through the aperture at ground level and fingers get trapped.

In 2002 the European Standard EN 13724 was introduced and states that for "ergonomic and safety reasons" the centre line of the letter box aperture should be at a height between 700 mm (2ft 3.5 inches) and 1700mm (5ft 7inches).

The CWU therefore considers that the government should implement the specifications set out in current European Standard (EN 13724) covering private letter boxes. The government has on several occasions rejected calls from the CWU to enact European Building Regulation Standard EN13724 outlawing low level letter boxes by enshrining the standard in law.

The Union has in the past won the support of Royal Mail Group as well as many influential bodies and organisations during its campaign including the HSE, National House-Building Council, the Glass and Glazing Federation (GGF), Local Authorities and Coordinators of Regulatory Services.

Sadly, successive UK governments both Conservative and Labour have rejected our call to amend the regulations. This was despite the fact that both the HSE (Health and Safety Executive) and Royal Mail supported the Union's Campaign and the fact that we gained the support of over 100 MPs from all Parties who signed an Early Day Motion to the government supporting the CWU.

Therefore we were left with a situation whereby we have had to challenge developments piecemeal and the Union has therefore had to make representations to developers and builders locally, regionally and nationally on this matter. The Union's Health, Safety & Environment Department has been able to successfully convince many developers, builders, local authorities and others to change the specifications of front door letter plates and letter boxes when new developments or refurbishments have come to our attention and where the EU Standard was not going to be followed. With the amount of house building going on however it is extremely difficult to track and challenge the builders and regulators in every location and it's where we've been able to act in time that has been crucial in many cases. However this is not an easy task with large scale house building programmes and developments underway across the UK.

Last year the government hit its target of building over 200,000 homes and intends to build 1,000,000 new homes by 2020. In 2016/17, 217,350 new homes were completed, and this is an increase of 75% on four years ago. Government figures show the number of houses built as follows:-

Year	Houses Built
2006-07	214,940
2007-08	223,530
2008-09	182,770
2009-10	144,870
2010-11	137,390
2011-12	134,900
2012-13	124,720
2013-14	136,610
2014-15	170,690
2015-16	189,650
2016-17	217,350

From time to time it comes to the attention of the CWU Health, Safety & Environment Department that the houses being built by developers or housing estates being refurbished, have dwellings that are being fitted with front doors which have low level letter boxes, in breach of the EU Standard and these are challenged. Most get positive, sympathetic responses and many successful outcomes have been achieved with the front door specifications changed, some pre-start and some post-start building.

Despite the Union's great efforts, nationally and locally, with some great work undertaken by local CWU Branches and Area Health and Safety Reps, low level letter boxes continue to be fitted, much to the disadvantage of our Royal Mail delivery members. Therefore would Branches, Officials, Health and Safety Representatives, Regional Committees and members join together in being vigilant in respect of housing development in your areas and regions in order to react quickly to the fitting of low level letter boxes and consider appropriate proactive action that can be taken by way of representations, discussions, meetings and correspondence with local authorities, builders and developers in your areas and regions requesting compliance with the EU letter box Standard.

Let's also hope that Brexit doesn't see this Standard along with many other good standards ending up on a Tory government 'bonfire' of regulations in a couple of years' time when the UK formerly exits the EU.

To assist, please see attached:-

- Summary Document on European Regulation: EN 13724 for Post Boxes
- National House Building Council Technical Newsletter To Members - Giving Direction on Compliance with European Regulation: EN 13724
- Letter sent to the Secretary of State for Housing, Communities and Local Government. (Similar Letters sent to the Minister of State For Housing and other politicians).
- Letter sent to CEO National House Building Council. (Similar Letters sent to the Home Builders Federation and many other National Organisations connected with house/home building).

Branches and Reps can support the campaign by writing to MPs, councillors, local authorities, developers and builders in their branch area.

Yours sincerely



Dave Joyce
National Health, Safety & Environment Officer