

Dear Chris

I refer to the Coroner's Concerns as set out in Regulation 28 Report concerning the tragic death of Peter Richard Dolan aboard a narrowboat at Lymm Cheshire in March 2024.

The Coroner's Concern is that, recognising that hire boats must have at least one smoke alarm, a legal requirement of BSS that privately owned boats be fitted with smoke alarms may reduce the likelihood of further fatalities arising from smoke inhalation and/or burns.

The difference is that Boat Safety Standards exist to support the duties of care of the navigation authorities and in regard to boats in private ownership and use, those duties are to 'third parties, i.e. people and property beyond the confines of the boat such as other visitors to the waterways, neighbours of the waterways, and the staff and volunteers working on our waterways.

Ultimately, on private boats, it is the boat owner who bears the responsibility for the safety of those aboard. Conversely, following the principles of the Visitor Safety Group and National Water Safety Forum, people aboard a boat let out for hire fall within that third-party category and thus hired craft must meet several higher standards, including having suitable working smoke alarms.

Currently the BSS continues to promote our strongest recommendation to private boat owners to fit smoke alarms since the time we successfully lobbied the alarm industry to include certification standards appropriate for marine use. Our promotion of smoke alarms with the support of UK fire and rescue services and others has had some success, according to our most recent filed survey, around half of private boat owners enjoy the protection of a working smoke alarm on their boats.

Notwithstanding all of the above, and more aligned to your recommendation, the BSS is committed to a public consultation by the end of this year on the commendation to research if evidence exists to introduce a mandatory requirement for all boats on waterways participating in the BSS, to be fitted with a smoke alarm.

The evidence we are tasked with seeking is to support the argument that working smoke alarms also provide protection to those aforementioned third-parties. Our difficulty in finalising the consultation document, is achieving sufficient and supportable evidence of that protective mechanism.

We can see the theoretical routes aimed at reducing the risk of boat fires spreading (one of our roles), but finding tangible examples to support the theories is difficult as Fire and Rescue Services are not routinely providing such information, albeit we have sought and had agreement from the National Fire Chiefs Council for the sharing of fire incident data.

In case you harbour a question, the introduction of the mandatory BSS requirement for carbon monoxide alarms on boats in 2019 was grounded on evidence of carbon monoxide produced on one boat potentially entering adjacent boats and so third parties were at risk.

All this stated, we still remain confident that we can present a supportable argument for increasing the regulation in this area and as soon as we have it collated and marshalled, I will inform you at the time the smoke alarm BSS public consultation is launched.

Related to what I stated earlier about fire incident information, I would be grateful for a copy of the full report from the Coroner, in order that we may assess any wider safety lessons from the

tragic circumstances and how actions and activities and may help prevent fires occurring which is our ultimate goal.

Kind regards



Communications Manager

Boat Safety Scheme

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