

Firework Regulations 2004

Consultation response for the consultation beginning on 23 April and ending on 2 July 2004.

1. Introduction and Background

1.1 What follows is DTI's response to the formal consultation - including a summary of consultee responses, amendments made and the Department's thinking in relation to the changes made. The Scottish Executive will issue a separate response.

1.2 The Fireworks Regulations 2004 ("the 2004 Regulations") were made under the **Fireworks Act 2003** ("the Fireworks Act") – an Act of Parliament which originated as a Private Members Bill introduced by Bill Tynan MP and supported by the Government. The Act is an enabling piece of legislation which provides for the Secretary of State to make Regulations ("Fireworks Regulations") for the purposes of either:

- securing that there is no risk that use of fireworks will have the following consequences:
 - (a) death, injury, alarm, distress or anxiety to persons;
 - (b) death, injury or distress to animals; and
 - (c) destruction of or damage to property; or
- securing that the risk that the use of fireworks will have the above consequences is the minimum that is compatible with their being used.

1.3 On 23 April 2004, the Government launched a formal consultation on proposed Regulations to be made under the Fireworks Act to introduce a number of limited prohibitions on the supply, use and possession of fireworks. The principal aim of these Regulations – expressed in more concise and generic language – is to control fireworks in order to curtail misuse by anti-social elements i.e. those whose intentions are malicious, inconsiderate or otherwise. The Regulations are also aimed at improving the welfare of animals – whether domestic pets or working animals.

1.4 The formal written consultation followed extensive preliminary meetings with a range of interested organisations and individuals, which, notwithstanding the truncated period from the usual twelve weeks to ten, were essential to inform the development of the proposals.

1.5 The measures that were proposed in the published draft Regulations were as follows:

- To revoke the Fireworks Regulations 2003 (emergency Regulations) and make them permanent in the 2004 Fireworks Regulations. Those Regulations made it an offence to:¹
 - (a) possess adult fireworks (all fireworks except party poppers and sparklers, etc.) in a public place if the possessor is under the age of 18; and
 - (b) possess category 4 fireworks (professional display fireworks) by anyone other than fireworks professional.

- Suppliers that sell fireworks ***all year round to be licensed*** – having the effect of restricting sales to within certain defined periods. Those periods where sale without a license is permitted were:
 - (a) November 5 (3 weeks before and 5 days after)
 - (b) New Year's Eve (December 26 to 1 January)
 - (c) Chinese New Year (4 Days before, including the Day of Chinese New Year.
 - (d) Diwali (4 Days before, including Diwali)

- The creation of a curfew on firework use – between 11 pm and 7 am (in line with the Noise Act), with the exception of the following nights where the curfew will begin at different times:
 - (a) November 5th - 2 am
 - (b) New Year's Eve - 2 am
 - (c) Chinese New Year - 2 am
 - (d) Diwali - 2 am

- The imposition of a maximum decibel limit - 120 db (AI) - on all category 3 fireworks (in line with the new harmonised European Standard – BS EN 14035)

- Those that supply fireworks be required to display a sign informing customers that:
 - It is illegal to supply adult fireworks to anyone under the age of 18;

¹ For 2003 Fireworks Regulations see:

<http://www.hms0.gov.uk/si/si2003/20033085.htm>

and

- It is illegal for anyone under the age of 18 to possess adult fireworks in a public place.
- Importers to supply information, at the point of entry, as to the destination(s) of their consignments up to the point of retail sale to help ensure they are destined for legal storage and distribution.

1.6 In response to the consultation, the Department received a number of comments and suggestions relating to both technical and policy matters. All of these were of considerable value in our final considerations of the Regulations in their draft form.

2. Responses received

2.1 The Department received 298 responses.² These were sent by a number of mediums, including by post and telephone calls and email. Respondents ranged from enforcement bodies, such as local Trading Standards Offices and members/representatives of the fireworks industry, trade associations, retailers, to various interest groups, such as the Blue Cross, RSPCA, faith groups and many interested members of the general public.

2.2 A large number of responses and views from constituents were received via Members of Parliament who sent out truncated versions of the consultation document or questionnaires to interested constituents. The total number of these responses is 729. These have also been taken into consideration in the consultation.

2.3 The responses, with the exception of those whose authors requested that their response be in confidence, are available in the DTI Library and can be accessed on request by contacting the Information and Library Services of the DTI on **020 7215 6226**. A list of those respondents who were willing to have their names and responses disclosed can be found at Annex A.

² This figure includes responses received after the official consultation end date.

3. Consultation: questions and answers

3.1 Below are the specific questions set out in section 1.21 of the consultation document – together with a generalization summary and analysis of the responses received.

3.2 Possession Offences

(a) Could the current Possession Regulations, that is, those making it an offence to possess fireworks by those under 18 or for members of the public to possess category 4 fireworks, be improved in any way?

Most respondents believed that the 2003 Regulations were sufficient for the purposes of tackling anti-social behaviour by those under the age of 18. However, some respondents, particularly the police, reiterated their preference for powers of stop, search and seize in relation to those suspected of possessing fireworks – so as to make the offence easier to enforce. The government undertook to look into this possibility - and DTI is working with the Home Office to consider the appropriateness of such powers with a view to including such a measure in a Government Bill in the next session of Parliament.

Many respondents also expressed their support for applying the sanction of fixed penalty notices for those caught in contravention of the regulations – and thought that the maximum penalty of £80 to be an appropriately punitive amount.

3.3 Fireworks Curfew

(b) Is the proposed curfew set at an appropriate time?

While many were in support of the proposed curfew - both in principle and with respect to the proposed prohibition between 11 pm and 7 am, some were of the view that the time should be brought back to an earlier time e.g. 9 pm or 10 pm, etc. A few respondents also suggested that for the darker winter months the curfew should start from 4 pm – to coincide with children finishing school.

There was also considerable concern at the exempted nights to the standard curfew times i.e. where the curfew would begin at 2 am. . While all were in agreement that there should be exceptions for these nights of celebration, 2 am was considered an excessive extension by some respondents . See 4.4 and 4.5.

(c) Do consultees believe the Police and Community Support Officers (CSOs) are best suited to enforce the curfew?

The overwhelming majority of respondents considered the police best suited to enforce the curfew on fireworks use. However, some respondents expressed concern that the enforcement of a curfew might be difficult in certain circumstances – owing to the ephemeral and sometimes sporadic use of

fireworks. The issue of police priorities was also flagged by respondents, including the police.

As stated in the consultation document, we recognise that enforcement in certain circumstances may not be possible. We believe that in practice at certain times an appropriate balance will have to be struck between reports of persons breaching the curfew and reports of offences of a more serious nature. This is a view echoed by the police.

Notwithstanding the above, as stated in the consultation document, the offences of breaching a curfew will be much like other laws whereby presence is required in order to catch a offender (including possession offences). Given the highly visible nature of fireworks use - in both auditory and visual terms – it is likely the very fact that letting fireworks off at this time is prohibited in law will act as a deterrent for not only those that are usually law abiding citizens, but also for those who are perhaps simply inconsiderate.

Additionally, in discussions with HO and the police it was agreed that the Home Office would consider widening the enforcement responsibilities of community support officers. This would further enhance the enforceability of this offence given the numbers of CSOs.³

(d) Do consultees believe that 120 decibels is the appropriate level at which to set a maximum limit for category 3 fireworks?

The generality of answers echoed the RSPCA's campaign for lower levels to be set – at around 95 decibels. The common consideration being that animals were at risk with decibel levels set at 120 decibels (AI). It should be noted, however, that the measurement that has been used in the RSPCA's campaign is not a measurement similar to that of the one used in the European Standard BS EN 14035. The RSPCA measurement of db (A) is more suitable for constant (factory and domestic) noise, whereas db (AI) is more suitable for measuring sporadic bursts of sound (explosions, etc.). As 120 (AI) and 95 (A) are not commensurate, it is therefore misleading to compare the two i.e. under certain conditions 95 decibels (A) may equate to 103 decibels (AI).

One of the benefits of adopting the European Standard is that the issue of fireworks noise has been looked at in some depth by the CEN Committee⁴ - comprised of experts in the field of sound measurement as well as representatives from the fireworks industry. For this reason – and in the absence of other authoritative research in this area, we believe that the imposition of 120 db (AI) on category 3 fireworks represents a first substantiated and progressive step in

³ A further planned development that would improve enforceability was announced in the Treasury's 2004 Government Spending Review in which new money will be invested to help create safer communities. In particular, under the spending plans the Home Office is committed to introducing 20,000 extra CSOs by 2008.

⁴ *Comité Européen de Normalisation* (European Committee for Standardisation).

controlling fireworks noise. As such the Government will keep the noise issue under close review.

(e) Do consultees have views on how best to implement decibel limit for category 2 fireworks given the restrictions in the Fireworks Act 2003 i.e. is the Government's plan British Standard (BS EN 14035) the best approach?

Given that section 5 (3) of the Fireworks Act prohibits the Regulation of category 2 fireworks, the government sought views on how best to overcome this anomaly – particularly by asking what consultees thought of the proposal in relation to referring to the European Standard. Most of the responses received were in agreement that the best way to approach the issue of category 2 fireworks is to reference the European Standard in further regulation made under the Consumer Protection Act 1987.

(f) Are the powers that the Home Office is working to secure for the police sufficient to be able to deal with enforcement of the possession offences? Would these powers be appropriate for Scotland?

See answer to (a), above.

With regard to Scotland – the Scottish Executive are to issue a separate response.

(g) Do consultees, particularly those whose trade includes the sale of fireworks in the context of importation, wholesale or retail, believe that the proposed Regulations will have a negative impact on competition or profitability?

Many respondents - particularly those from enforcement bodies - felt that they were not qualified or in a position to comment in this area.

In our preliminary consultation meetings, we originally discussed with the retail sector / representatives of that sector the possibility that all suppliers of fireworks could be licensed – a proposal which was revised given the extra burden on many retailers and the bureaucracy involved in administering such a regime. We opted to restrict sales by licensing only those who supply all year round.

There were some further comments on the formal consultation – particularly from the CBI EIG who were of the opinion that the draft regulatory impact assessment (RIA) itself was not clear with respect to licensing in that it gave the impression that no licence whatsoever was required if a supplier were to supply during the exempted periods (traditional and multicultural times) – thereby leading to the idea that there would be no cost to retailers. For the purposes of clarity, suppliers

are required to have registered their premises or obtain a licence from a licensing body (local authority, Fire and Rescue Service or HSE) for **storage** purposes.⁵

We accept that there may have been room for misinterpretation of this – and have made sure that this was clarified in the final regulatory impact assessment (RIA) that was issued on the day that the Regulations were made.

(h) Will the proposed Regulations contribute to a reduction in the anti-social use of fireworks and a reduction in firework-related injuries?

The responses received expressed overall support for the measures – and many believed that the measures, taken together, would have a significant impact on the anti-social use of fireworks.

It should be noted, however, that some responses suggested that although a reduction would be the likely result, that reduction would be modest in nature.

4. Amendments made to the draft regulations

4.1 The responses were generally supportive of the proposed measures, although many expressed the need for tighter and more stringent controls on fireworks in order to tackle nuisance and anti-social use – which is what we hope to achieve with the coming into force of the 2004 Regulations.

4.2 As a result of the consultation exercise, a number of changes were made to the draft in relation to both policy issues – such as what is the right time to extend permitted hours of fireworks use at night – and technical issues – such as the efficiency of measures and the correct legal references to enforcement bodies. Most of these changes are listed below.

Regulation 5 – Possession of Category 4 fireworks

4.3 Some representatives of the industry were concerned that the regulation 5 (possession of category 4 fireworks) would mean that haulers/ transporters of category 4 fireworks could be committing an offence in the course of their business i.e. in transporting goods from one place to the next as they could not be regarded as professionals/ manufacturers. We amended this regulation to include such an exemption. See “Exceptions to regulations 4 and 5” under regulation 6 (2).

⁵ Registration and licensing is required under the Explosives Act 1875 – due to be replaced by the Manufacture and Storage of Explosives Regulations - which HSE hope to make in early 2005.

Regulation 7 - Fireworks Curfew Times

4.4 While many were both supportive and enthusiastic about the introduction of a curfew on fireworks use, there was some question as to whether traditional and multicultural exceptions were set at the right time – originally the curfew start was proposed at 2 am on these nights. This was considered too late in the context of New Year celebrations – which led us to change the time to 1 am – bringing the acceptable time for noise emitted from fireworks to 1 am.

4.5 We also received comments questioning the need for Guy Fawkes (5 November) to take place as late as 2 am. Such questions arose given that New Year (which is based on the Western Gregorian Calendar), Chinese New Year and Diwali⁶ are all concerned with the passing of one year to the next. 12 am (midnight) is thus of considerable significance to such celebrations – and where the use of fireworks will usually start at 12 am. The same, however cannot be said to apply to 5 November which is a celebration of the failure of Gunpowder Plot in 1605. Midnight therefore does not have any significance for this celebration.

Regulation 7 - Dispensations to the Curfew

4.6 The need for the dispensation provision, which would have allowed local authorities (at the unitary and district level) to issue permits to professional display operators to let fireworks off after 11pm was questioned in the light of representation from certain parts of the industry⁷ as well as by members of the public.

4.7 We decided to retain the exemption for local authorities putting on a display. Local authorities which put on community events are accountable to the local residents in that authority area – whereas the same cannot be said for private display operators hired by private individuals for events such as weddings and birthdays.

Regulation 9 – Decibel limits for Fireworks

4.8 The original draft regulation 9 did not specify the type of sound measuring device to be used for testing the noise emitted from fireworks. This was remedied by the inclusion of the recommended device in the European Standard – “type one of BS EN 61672 with a free-field microphone”.

⁶ Diwali take place over a 5 period. The night of Diwali, however, is on the 3rd day and this is followed on the 4th day by the 1st day of the New Year (for most Hindus in the UK). The use of fireworks takes place on the 3 day – the “day of Diwali” - as in the Regulations. There is therefore only one night in which fireworks are permitted to be used up to 1 am - the night of Diwali itself.

⁷ The British Pyrotechnists Association’s (BPA) code of practice, for example, recommends that professional displays should take place no later than 11 pm.

Regulation 10 - Licensing of Suppliers

4.9 After meeting with the fireworks industry representatives, it was agreed that the reference to possession under this regulation should be removed. The draft regulation would have also prohibited those selling within the defined periods from possessing fireworks (storing them, for example) outside of these periods without a licence to supply. The reason for removal is that certain retailers may well stock fireworks for the next season – although not supplying or exposing for supply outside of seasonal periods. Possession as a criterion for a licence to supply is not consistent with the original intention of the regulation i.e. simply to restrict sales to within defined periods.

4.10 The draft regulations made it a requirement that a pre-condition to obtain a licence to supply fireworks would be to have a licence under the Health and Safety at Work Act 1974. As the relevant Regulations to be made under this Act (the Manufacture and Storage of Explosives Regulations (MSER)) have not yet been made, this has been amended to refer instead to the current registration and licensing laws:

- (a) a licence under section 5 of the Explosives Act 1875; or
- (b) a registration in accordance with section 21 of that Act.

4.11 Draft regulation 10 (3) (d) stated that a local licensing authority must refuse a licence if the applicant had committed an offence under the following:

- (a) an offence under section 11 of the 2003 Act; or
- (b) an offence under section 12 of the 1987 Act arising from a contravention of the 1997 Regulations;

4.12 We consider that this regulation was too strongly worded as it ignored the personal circumstances of the applicant in question i.e. the period of time between the committed offence and application and the nature of the offence committed under the said Acts. We have amended the draft substituting the word “must” for “may” – thereby giving local licensing authorities the ability to grant, refuse or revoke a licence.

4.13 Additionally, we amended the Regulations to make the grounds to refuse or revoke a licence more extensive with the inclusion of the following offences:

- an offence under sections 4, 5 or 32 of the Explosives Act 1875; or

- an offence in relation to the use, storage or keeping of fireworks under the Health and Safety at Work etc. Act 1974.⁸

4.14 After consultation with fireworks industry representatives, it was agreed to omit regulation 3 (c) which gave local licensing authorities the ability to grant, refuse and revoke a licence on the basis that they were satisfied that none of the consequences listed in section 2 (2) of the Fireworks Act (listed in paragraph 1.1 above) applied. We consider that this is too broad a ground to be able to make a reasonable judgment as to whether a supplier may be granted a licence to supply i.e. difficulties arise in holding suppliers directly responsible for the actions of those using fireworks in an anti-social way. We believe that the list of conditions with regard to offences set out above is both fair and sufficient to determine the suitability of a supplier of fireworks all year round.

4.15 Finally, the fee at which the licence would be set was raised from the original proposal of £200 to £500 – this in part to reflect the Government’s policy to contain fireworks sales to within certain periods and to ensure that the administration and enforcement of the regulation is adequately covered by the cost of the licence.

Importation issues

4.16 Regulation 12 (c) was not satisfactory insofar as it required importers of fireworks to list all of the points of storage to the point of sale to the general public. Such a requirement would have been unreasonable given that importers may not know exactly where consignments are destined for upon importation – and indeed to whom subsequent suppliers would supply up to the point of retail sale.

4.17 We have amended this regulation to require importers to provide information about the destination of consignments at the first point or points of storage following importation i.e. the first storage site or sites after leaving the port.

4.18 Given the amendment of draft regulation 12 (2) (c), in order to enable the tracking of fireworks inland e.g. once they leave the first point of storage, we have instead used section 8 of the Fireworks Act to give local licensing authorities the power to check to whom large quantities have been supplied and where large quantities came from (new regulation 10 (3)). This would enable enforcers to determine whether they have been supplied to (or the fireworks originated from) un-licensed premises or that the premises have exceeded the quantities permitted to store. Licensing Authorities will be able to request to see records of suppliers’/

⁸ The inclusion of this condition is in anticipation of the making of the proposed Manufacture and Storage of Explosives Regulations - which is due to replace the registration and licensing laws of the Explosives Act 1875.

importers' transactions of fireworks exceeding 50kg net explosive content (NEC), including the weights of the transaction (expressed in NEC).

4.19 The final Regulations can be viewed at:

<http://www.legislation.hmsso.gov.uk/si/si2004/20041836.htm>

5. Other issues

A ban on consumer fireworks

5.1 Some respondents expressed their preference for a complete **ban on consumer fireworks**. Notwithstanding the fact that the Fireworks Act does not allow for such a ban i.e. where category 1 and 2 fireworks are exempt from section 5 (3) of the Act, we do not believe that a complete ban at this time is either proportionate or necessary given the extent of the problem. For example, in terms of the amount of fireworks sold to consumers each year, injuries are significantly low, which precludes this as a justification a ban on safety grounds. Additionally, it should be noted that the use of fireworks by consumers has a long tradition in the UK and is enjoyed by the majority of the population. The balance to strike in this regard is to regulate to control fireworks in those areas where the problems identified – as opposed to a sweeping and untargeted approach.

A ban on category 3 fireworks

5.2 Certain Trading Standards Departments – particularly Kingston upon Thames – have campaigned to achieve a ban on the sale of category 3 fireworks to the general public. This follows an unfortunate accident that resulted a serious injury of a person living in the Kingston upon Thames area. The accident was caused by a category 3 rocket.

5.3 While the government is sympathetic to the spirit of the campaign, the available evidence would suggest that category 3 fireworks are no more of a problem in terms of injuries caused than category 2 fireworks (garden fireworks). Furthermore, injuries of the type publicised by Kingston upon Thames *et al* are fortunately rare occurrences. Most injuries are sustained by the users of fireworks – and not by bystanders or persons going about their everyday business.

5.4 Finally, it should be emphasised that category 3 fireworks must comply with the British Standard BS 7114 which imposes safety requirements in terms of both the products themselves (manufacture standards such as limits on debris weight) and with regard to labelling. Fireworks in both category 2 and 3 must include instructions for safe use – including recommended safety distances.

6. Next Steps

6.1 Regulation 9 and 11 of the Fireworks Regulations 2004 – the licensing of all year round suppliers and importation information requirements respectively will come into force on 1 January 2005.

6.2 Apropos of Regulation 11, DTI, Customs and Excise, LACORS and Felixstowe Trading Standards will continue discussions as to the most effective enforcement and administrative arrangements to set in place . Currently, it is envisaged that the information gathered by Customs and Excise at the port of entry (provided in form C88) will then be passed on to a dedicated Trading Standards Officer in Felixstowe whose responsibility it would be to inform home licensing authorities of consignments heading for their area. This will enable checks to be made and appropriate action taken if required.

6.3 All relevant links in relation to this consultation response are available in Annex A.

Annex A

1. Useful Links

Fireworks (Safety) Regulations 1997

<http://www.legislation.hmso.gov.uk/si/si1997/97229401.htm>

Consultation on Fireworks Regulations 2004 (23 April – 2 June)

<http://www.dti.gov.uk/ccp/consultpdf/fireworkcon2004.pdf>

Fireworks Act 2003

<http://www.legislation.hmso.gov.uk/acts/acts2003/20030022.htm>

Fireworks Injury Data

http://www.dti.gov.uk/homesafetynetwork/fw_stats.htm

DTI website

<http://www.dti.gov.uk/>

Consumer and Competition Policy web pages

<http://www.dti.gov.uk/ccp/>

2. Consultation Respondents

1. Mr N Johnson Member of public
2. Mr W Baker Member of public
3. Mrs P Hislop Member of public
4. Mr J F Lloyd Lloyd & Haynes, Church Pipe Organ Builders
5. Mr A Rawlings Member of public
6. Mrs M R Forrester Member of public
7. Mr S D Elsey Environmental Health Officer, Northampton Borough Council
8. Mr L J Smith 1st Galaxy Fireworks
9. Mr S King Member of public
10. Mr C Hutchinson Member of public
11. Mrs G Ballinger Member of public
12. Mr F Paxton Member of public
13. Mr G D Rider Member of public
14. Miss H Geinson & Mrs M Geinson Members of public
15. Mr R A Joseph Member of public
16. Mrs S Dainty Midlands Animals Rescue Team
17. Miss G M Bennett Member of public
18. Mr J & Mrs C Jenkins Member of public
19. Mr M A & Mrs V R Ball Member of public
20. Mr G Deeker Pains Fireworks
21. Mrs N Mumby Member of public
22. Mr P Williams Member of public
23. Mr W J Cassie Head of Consumer Protection & Support Services, Planning & Environmental Services, Aberdeenshire Council
24. Mrs O Howells Member of public
25. Mr J Duff Member of public
26. Mr E Taylor Member of public
27. Mr B M Walton Member of public
28. Mrs B Willets Member of public
29. Mr A Johnstone MSP North East Scotland Member of the Scottish Parliament
30. Mr J D Higgs Member of public
31. Mrs H Hamer Member of public
32. Mr A R Kirby Member of public
33. Mr M J Duncan Member of public
34. Mr G Lundegaard Sandling Fireworks
35. Ms A Edwards Local Authorities Coordinators of Regulatory Services (LACORS)
36. Mr D P Tilleray Executive Manager, Environmental Services, West Lancashire District Council
37. Mr P Green Member of public
38. Mr J Bennett Editor, Fireworks Magazine
39. Ms W Smith Member of public
40. Mr M J Smith Member of public
41. Ms V Lewis Member of public
42. Mr D King Member of public
43. Mr S Cameron Member of public
44. Ms D Whalley Member of public
45. Ms A Hall Member of public
46. Ms P G Wadl Member of public
47. Mr A G Edney Member of public
48. Mr T Page Member of public
49. Ms L Mitchell Member of public
50. Ms I Cowan Member of public
51. Ms N Dudley Member of public
52. Mr J F Robins Campaigns Consultant, Animal Concern
53. Mr G Urquhart Member of public
54. Mrs H Sharpe Member of public
55. Mr F Ball Team Leader (Pollution), Sedgemoor District Council
56. Mr N Coe Member of public
57. Miss G Morrissey Member of public
58. Miss S Hardy Member of public
59. Councillor Mr D Lovell Warminster Town Council
60. Mr M Atkinson Member of public
61. Ms P Harris Member of public
62. Mr D J Hill Member of public
63. Councillor Ms S Malt Bexley Council
64. Mr J Woodhead Chairman, British Fireworks Association (BFA)
65. Brigadier C Smith Confederation of British Industry Explosives Industry Group (CBI EIG)
66. Mr S P Taylor Chair, Association of Chief Police Officers (ACPO) Administration of Firearms & Explosives Licensing Committee
67. Mr J White Member of public
68. Mr A McWhirter Suffolk Constabulary
69. Mr S Williams Big Bang (Fireworks) Productions Ltd
70. Councillor Mr A Dean Uttlesford District Council
71. Mr T F Hinxman Chairman, The Windermere Campaign for Firework Controls
72. Ms M Freeman Member of public
73. Mr & Mrs G Middlebrook Member of public
74. Mr K Atkinson Assistant Director Public Protection, Development & Environment, Darlington Borough Council
75. Councillor Mr B Richmond Tyne & Wear Trading Standards Joint Committee, Gateshead Council
76. Mrs J R A Jones Parish Clerk, Scaldwell Parish Council
77. Mr & Mrs C MacEachern Member of the public
78. Mr D Smith Team Leader, Trading Standards, North Lanarkshire Council
79. Mr S Laird Member of public
80. Ms J R Hubble Member of public
81. Mrs P Douglas Member of public
82. Mr P Graham Member of public
83. Mr B Marsh Member of public
84. Mr R Morris Member of public
85. Mr J Etough Member of public
86. Mr A Pickering Member of public

87. Ms A T Jones Acting Head of Public Health & Protection, Rhondda Cynon Taf
88. Ms P Rawlins Member of public
89. Mr S Smith Small Business Service (SBS)
90. Mr G P Woodhouse Head of Housing Health & Community Care, Rochford District Council
91. Mrs B Potts Member of public
92. Doctor J F White Member of public
93. Mr G Alderson Head of Environmental Services, Mid Beds District Council
94. Ms C Mackay Rothwell Town Council
95. Ms H Picton Trading Standards Officer, Caerphilly County Borough Council
96. Mr P Hale Greater Manchester Police
97. Councillor T Neville Cabinet Member for Environment & Street Scene, Enfield Council
98. Mr M Brunton Member of public
99. Mr A Compton Member of public
100. Mrs B Taylor Member of public
101. Mrs F Parkinson Member of public
102. Mr D Gray Member of public
103. Ms C Wright Member of public
104. Mr D Dixon Environmental Protection Team Leader, Environmental Health, Barrow-In-Furness Borough Council
105. Mrs H Exley Member of public
106. Mr N B Harding Member of public
107. Mrs C Mathews Member of public
108. Mr A C Bunn Association of Greater Manchester Authorities (AGMA)
109. Mr G Evans Fire Safety Adviser to The Fire Brigades Union
110. Ms J Bowie Transport, Environmental & Community Services - Highland Council
111. Mr A C Bunn Trading Standards North West *including 22 Local Authorities returns*
112. Mr M Dhaliwal Principal Trading Standards Officer, Coventry City Trading Standards
113. Mr D Norton Member of public
114. Dr G Thomas Member of public
115. Mr G Bown Member of public
116. Ms M Blythin Member of public
117. Mr D H Audsley Member of public
118. Mr C Pearce British Pyrotechnists Association (BPA)
119. Ms L Kyle Member of public
120. Mr D Morrison Member of public
121. Mr D Holland Cardiff County Council
122. Mr R C Oliver Member of public
123. Ms A Symes Member of public
124. Ms A Pritchard Trading Standards Institute
125. Ms M Stevens Project Manager, NSCA
126. Mr I Johnston Rural Valley Community *Including 79 responses*
127. Mrs D Atkins Member of public
128. Mr T Hardy Member of public
129. Mr & Mrs J Reader Member of public
130. Mr D Hutchinson Member of public
131. Ms S Harber Principle Trading Standards Officer, Worcestershire County Council
132. Mr K West Member of public
133. Mr P Arrowsmith, FCA National Insurance Consultancy
134. Mr J Smith Assistant Divisional Environmental Health Officer, Wycombe District Council
135. Mr G Nickels Town Clerk, Rhyl Town Council
136. Mr G Haire East Dunbartonshire Council, Trading Standards Group
137. Mrs P Hewitt Member of public
138. Mr P J Wilson & Mrs B Finch Restrict Fireworks Campaign
139. Mr S J Bruce, B.S.c, M.E.I.E.H., M.I.O.S.H. Head of Environmental Health & Environment, Borough of Oadby & Wigston
140. Ms R Brookbank Information Officer, Chadwick Library
141. Mrs H Prior-Sanke Somerset County Council, Communication Protection Department
142. Mr E Howarth Member of public
143. Mr A Nicolson Environmental Services Committee, Comhairle Nan Eilean Siar
144. Mr A Miller Health & Safety Executive
145. Councillor Alison Hay COSLA Spokesperson, Environment, Sustainability & Community Safety
146. Mr D Roderick Trading Standards Institute, North Lanarkshire Council Planning & Environment
147. Ms J Trigwell Member of public
148. Ms H Prajapati Regional Co-ordinator, Midlands Co-ordinating Group on Trading Standards (MidCOTS)
149. Mr L Johnson Member of public
150. Helen Southworth MP Warrington South *Including 13 individual returns*
151. Mr C Kisko The Kennel Club
152. Mr J Battle MP House of Commons *Including 33 individual returns*
153. Mr M S Welds Member of public
154. Ms K Harlow Southwark Council
155. Mr M J Mannings RIBA RIAS Member of public
156. Mr K Hutchens Chairperson, Kincardine & Mearns Community Safety Committee
158. Mrs D Wright Small Business Service
159. Ms E Smith Soroptimist International of Kettering
160. Mr M Webster, LLB Chief Executive, Legal & Administrative Services, Sheffield City Council
161. Mr K Livingstone Great London Authority
162. Ms C McCutcheon Fife Council, Trading Standards Service
163. Councillor J Sutcliffe Cabinet Member for the Environment, Oldham Metropolitan Borough

164. Mr W Roe Chief Constable (Hon. Secretary)
Association of Chief Police Officers in Scotland
165. Mr J Barrett MP MP for Edinburgh West, House
of Commons
166. Mrs E Mathews Member of public
167. Mr P Moyes Thornby Parish Meeting
168. Mr P Woods Chief Fire Officer, Nottinghamshire
Fire & Rescue Service
169. Mr G Edwards Member of public
170. Mr F Bain Project Officer, East Renfrewshire
Council, Environment Dept
171. Mr P Deponio Headteacher, Gracemount
Primary School
172. Ms S Copley Support Officer, London Trading
Standards Authorities
173. Mr G Hunter Dundee City Council
174. Mrs A Dixon-Greaves Member of public
175. Mr G Wynn Assistant Director, Consumer &
Regulatory Policy – British Retail Consortium
176. Ms R Geisler Director, Development Services,
Trading Standards, Falkirk Council Development
Services
177. Mr G Goody Chairman, Animal Welfare
Charities Fireworks Coalition
178. Ms S McIsaac MP House of Commons *Including*
467 responses
179. Mr J Smallman Public Relations Officer, National
Federation of the Blind of the United Kingdom
180. Ms A Coffey MP House of Commons
181. Mr S Metcalf Member of public
182. Mrs M Edwards Member of public
183. Ms J Moorhouse Chair, Brighton & Hove Older
People's Council
184. Ms M Sutherland Orkney Islands Council
185. Ms M Emus Member of public
186. Ms M Willis Member of public
187. Mrs J Ribgy Member of public
188. Mr K Wardle Assistant Director, Environmental
Health & Trading Standards, Wigan Council
189. Mr K Macintosh MSP Scottish Executive
Including 27 responses
190. Mr P Sherry SCOTSS Chairman
191. Mr H Adie Assistant Firemaster, Director of
Community Safety, Strathclyde Fire Brigade
192. Ms J Lightbrown Head of Democratic Services,
London Fire & Emergency Planning Authority
193. Mr J F Crawford Head of Protective Services,
Department of Neighbourhood Services, East Ayrshire
Council
194. Ms S MacGregor Member of public
195. Ms S Essex AM Ministers for Finance, Local
Government & Public Services, Welsh Assembly
196. Mr J H Potts Chief Trading Standards Officer,
Lancashire County Council
197. Mr T Reader Member of public
198. Mr P Roberts Member of public
199. Mrs J Elkington Member of public
200. Mr C Smith Member of public
201. Mr I C Wilson Head of Consumer & Trading
Standards, Glasgow City Council,
202. Mr T J Lay Member of public
203. Mrs S Littell Principal Trading Standards
Officer, London Borough of Sutton. Group
response from SW London CTSO Safety Group
on Fireworks – Croydon, Hounslow, Kingston,
Merton, Richmond, Sutton & Wandsworth
204. Mr G Gibb Member of public
205. Mr T Archer Managing Director, Excelsior
Fireworks Limited
206. Mr A R Blake Environmental Health &
Trading Standards Manager, West Lothian
Council
207. Mr B Jackson Democratic Services Manager,
East Riding of Yorkshire Council
208. No name Scottish Society for the Prevention
of Cruelty to Animals (SCPA)
209. Ms J Ballantyne Member of public
210. Mr W Scarff Member of public
211. Mr D Campbell Chief Trading Standards
Officer, London Borough of Camden
212. Mrs M Colley Member of public
213. Ms S Goff Member of public
214. Ms M Anderson Member of public
215. Mr J D Sinclair Divisional Trading Standards
Officer, South Lanarkshire Council
216. Mr & Mrs P A McCoy Member of public
217. Mr C Pearce Managing Director, Jubilee
Fireworks Limited
218. Mr D McCulloch Section Head, Trading
Standards Section, West Dunbartonshire Council
219. Mr M Clapham MP House of Commons
Including 1 response
220. Mr C Kay HQSS, Community Safety, North
Yorkshire Police
221. No name Hambleton District Council
Environmental Health Section
222. Ms Y Adamson Senior Solicitor, Department
of Corporate Services, Renfrewshire Council
223. Mr G Strange Cleveland Police
224. Mr M J Dakin Member of public
225. Mr P Aiken Member of public
226. Watch Chairman (No name) Birds Nest
Neighbourhood Watch
227. Mr ADO N Earnshaw, Lancashire Fire &
Rescue Service
228. Mr B Rush Monega Association
229. Mr B G Whittaker Clerk to the Council,
Windermere Parish Council
230. Ms J Kennedy Head of Trading Standards &
Licensing, Birmingham City Council
231. Mr W Fraser (Central) Neighbourhood
Service, Trading Standards Service, Aberdeen
City Council
232. Mr S C Tibbetts Head of Trading Standards
& Licensing, Solihull Metropolitan Borough
Council
233. Mrs J Farnworth Member of public

234. Mr J Cox Member of public
235. Mr D Crausby MP House of Commons *Including 7 responses*
236. Mrs M Rogers Member of public
237. Mr M Guest Black Cat Fireworks
238. Mrs A Brown Member of public
239. Mrs M L Tahernia Member of public
240. Ms U Morris Clerk to Creaton Parish Council
241. Mr A Stirzaker Member of public
242. Mr G Allen MP House of Commons
243. Councillor Mrs J Bromby Cabinet Member for Neighbourhood Services, North Lincolnshire Council
244. Mr W G Hughes Member of public
245. Mr M Mearns Member of public
246. Mr M Lancaster Kimbolton Fireworks Limited
247. Mr T Smith British Pyrotechnists Association (BPA)
248. Ms M Cameron Member of public
249. Mr J L Walls Morningside Community Council
250. Ms E Duffy Democratic Services Branch, London Fire & Emergency Planning Authority
251. Mr K Searle Chief Trading Standards Officer, Milton Keynes Council
252. Ms A Crowther Member of public
253. Mr B Tynan MP House of Commons
254. Ms B Pedder Member of public
255. Mr D Finlayson Which
256. Mrs V Noble Member of public
257. Ms R Atherton Policy & Campaigns Officer, Guide Dogs for the Blind Association
258. Ms A Senior Peterborough City Council
259. Mr R Cranston MP Dudley North Constituency
260. Ms J Helks Staffordshire County Council
261. Mr A Russell Service Director (Public Protection), Environment Regeneration & Development Dept, Leicester City Council
262. Mr A Hubble Bracknell Fireworks Limited
263. Ms K Angus RSPCA
264. Mr R Lake Director of Social Services, Staffordshire County Council, Social Services
265. Councillor Mr H W G Jebb Staffordshire Moorlands District Council
266. Mr S Clover Wiltshire Trading Standards
267. Ms H Matthews Noise & Nuisance Policy Adviser, DEFRA
268. Mr D Finlayson (Secretary to the Feuars) & Ms J Peacock (Secretary to the Amenity Association) Waverley Park Feuars Committee & Waverley Park Amenity Association
269. Mr A Scallan Manchester City Council
270. Ms W Wrigley Director of Corporate Affairs, The Co-operative Group
271. Mr D Bowles Head of External Affairs, RSPCA
272. Mr & Mrs D Arthur Member of public
273. Ms A Foster Kent Police
274. Mr G Humphreys Member of public
275. Mr & Mrs T Smith Member of public
276. Mr S Brennan Public Affairs Executive, Association of Convenience Stores (ACS)
277. Mr K Wilson Head of Environment, Regeneration & Housing Directorate, North Tyneside Council
278. Mr G Marwick Director, Community Services, Midlothian Council
279. Ms E Gooderham Planning & Organisational Development Officer, Gwent Police
280. Mr B Laxton MP House of Commons *Including 29 responses*
281. Ms M Smith Strategy & Governance Corporate Services, Stirling Council
282. Mr M Hagen Deputy Chief Fire Officer, Merseyside & Fire Rescue Service
283. Mr H Barnes MP House of Commons
284. Mr M Clapham MP House of Commons *Including 2 responses*
285. Ms H Southworth MP House of Commons *Including 46 responses*
286. Mr P J Wright MBE Member of public
287. Ms E Gooderham Gwent Police
288. Ms S Hunter Head of Legal Services, Angus Council
289. Mr E R Forsyth Chief Trading Standards Office, Royal Borough of Kingston upon Thames *Including numerous newspaper campaign responses*
290. Linda Gilroy MP House of Commons
291. Chris Case Chief and Assistant Chief Fire Officers' Association (CACFOA)
292. Mr H Price Chartered Institute of Environmental Health
293. Mr R Ash ACPO
294. Mr N Chawla Devco Fireworks
295. Ms S Kincaid Home Office – Anti-Social Behaviour Unit
296. Mr N Tobin National Campaign for Fireworks Safety
297. Mr A Winter Suffolk Trading Standards
298. Mr T Mough Member of public