



CHILDREN'S ENVIRONMENTAL HEALTH &
PROTECTION ADVISORY COUNCIL

March 27, 2019

The Honorable Kumar P. Barve
Chair, Environment and Transportation
House Office Building, Room 251
Annapolis, MD 21401

RE: **OPPOSE House Bill 70** *Public Safety – Rental Unit – Carbon Monoxide Alarms*

Dear Chair Barve;

The Children's Environmental Health & Protection Advisory Council (CEHPAC) respectfully submits this letter **OPPOSING House Bill 70** *Public Safety – Rental Unit – Carbon Monoxide Alarms*. This bill removes the requirement for a rental dwelling unit to contain a carbon monoxide alarm, unless (1) the unit contains a device emitting carbon monoxide or (2) the unit is attached to an enclosed unventilated garage. The Act would become effective October 1, 2019.

CEHPAC believes it is prudent to keep the requirement for carbon monoxide (CO) alarms as it currently is mandated under Maryland Law and not to remove this requirement for a rental dwelling unit. CEHPAC believes that excluding the requirement for carbon monoxide alarms for a rental dwelling unit would be particularly unfair to people of limited means, as well as the children who reside in rental dwelling units. CEHPAC believes that all rental units in Maryland should routinely be equipped with carbon monoxide detectors which emit an alarm, as there can be no assurances that a device emitting CO may not exist in the immediate area of a rental unit, even if the rental unit itself does not have such a device. CEHPAC is aware that Baltimore City recently started implementing new legislation related to rental registration, which, among other things, requires carbon monoxide detectors.

CEHPAC is concerned about children's exposure to carbon monoxide. The Centers for Disease Control and Prevention [CDC]¹ warns that "Carbon monoxide (CO), an odorless, colorless gas, which can cause sudden illness and death, is produced any time a fossil fuel is burned. CDC works with national, state, local, and other partners to raise awareness about CO poisoning and to monitor CO-related illness and death in the U.S."

According to the CDC, "CO poisoning is a leading cause of unintentional poisoning deaths in the United States; it was responsible for approximately 450 deaths each year during 1999--2004 and an estimated 15,200 emergency department (ED) visits each year during 2001--2003^{2,3}. Health effects of CO exposure can range from viral-like symptoms (e.g., fatigue, dizziness, headache, confusion, and nausea) to more severe conditions (e.g., disorientation, unconsciousness, long-term neurologic disabilities, coma, cardiorespiratory failure, and death)^{4,5}. CO poisoning often is misdiagnosed and under detected because of the nonspecific nature of symptoms (3). To update a previously published report (3) and provide national estimates of CO-related ED visits during 2004--2006, CDC analyzed data from the National Electronic Injury Surveillance System -- All Injury Program (NEISS-AIP) database. During 2004--2006, an estimated average of 20,636 ED visits for nonfatal, unintentional, non-fire-related CO exposures occurred each year. Approximately 73% of these exposures occurred in homes, and 41% occurred during winter months (December--February). **Prevention efforts targeting residential and seasonal CO exposures can substantially reduce CO-related morbidity.**"

HB 70

As defined in statute (Md. Code Ann., Health-General §§ 13-1501 thru 1506), CEHPAC seeks to ensure that the rules, regulations, and standards adequately protect the health of children from environmental hazards. CEHPAC's goal is to enable children in Maryland to grow up in a safe and healthy environment. Our duties include:

- ✓ provide input to the General Assembly on legislation that may impact environmental hazards that affect the health of children;
- ✓ recommend uniform guidelines for State agencies to follow to help reduce and eliminate children's exposure to environmental hazards; and
- ✓ educate others regarding the environmental hazards that impact children's health, the means to avoid those hazards and provide any other relevant information that will assist in protecting children's health.

In establishing CEHPAC, the Maryland General Assembly clearly identified children's environmental health as a priority for the State. CEHPAC is concerned about the impact of HB 70 on children and their environment especially the potential risk of exposure to carbon monoxide. CEHPAC has increasingly seen the need to advocate for basic protections for children from hazardous chemicals, specifically those that are persistent, bio-accumulate, impact water and food, and are toxic. Opposing HB 70 is a means of ensuring that children have a level of protection from involuntary exposure to carbon monoxide in a rental unit.

CEHPAC urges the legislature to adopt policies that require that all rental units routinely be equipped with carbon monoxide detectors. CEHPAC looks forward to working with the General Assembly on this and other issues, and appreciates your leadership on this issue. Please note, that the opinions of the Council expressed in this letter do not necessarily reflect that of the Department of Health or any other State agency.

Sincerely,



Megan Weil Latshaw, PhD MHS

On Behalf of the Children's Environmental Health and Protection Advisory Council

¹ CDC Carbon Monoxide Poisoning, (<https://www.cdc.gov/co/default.htm>) accessed 190207

² CDC. Carbon monoxide--related deaths---United States, 1999--2004. MMWR 2007;56:1309--12. (<https://www.cdc.gov/mmwr/preview/mmwrhtml/mm5733a2.htm>) accessed 190208

³ CDC. Unintentional non--fire-related carbon monoxide exposures---United States, 2001--2003. MMWR 2005;54:36--9.

⁴ CDC. Carbon monoxide: a model environmental public health indicator. The National Workgroup on Carbon Monoxide Surveillance. Augusta, ME: Maine Department of Health and Human Services; 2006. Available at http://www.maine.gov/dhhs/eohp/epht/documents/CO_WHITE.pdf.

⁵ US Consumer Product Safety Commission. The NEISS sample (design and implementation) 1997 to present 2001. Bethesda, MD: US Consumer Product Safety Commission; 2001. Available at <http://www.cpsc.gov/neiss/2001d011-6b6.pdf>.