

To: _____

From: _____

Dear Mayor, Council Committee,
Re: Important information on Sky Lanterns

To whom it may concern;

Introduction

This letter aims to highlight important observations on sky lanterns and provide a clearer understanding about those concerns associated with this product. The scope is to acknowledge the Council's position on this subject and where necessary, assist Council Committees to take constructive initiatives to appropriately inform and protect members of the public. This was prompted due to the increasing pressure from wildlife organisations and farmers' unions to ban all sky lanterns and forcing some Council to act indistinctly based on indiscriminate and distort views on sky lanterns.

This letter gives for granted that sky lanterns (also known as Flying lanterns, wishing lanterns, etc.) is intended as a generic product name of mini hot-air balloons which fly in the sky and they are used for entertainment purposes. Not to be confused with helium-filled balloon which is a different product all together but often generalised in propaganda contents.

First of all, it is fundamental to acknowledge that sky lanterns are not illegal or banned in UK, Europe, USA or other part of the world. Secondly, it is essential to know the differences between all ranges of sky lanterns available on the market and to distinguish the materials used in assembling the final product. Furthermore, it is important to consider those concerns regarding the potential impact of sky lanterns on wildlife, livestock and the environment, as well as the possibility of fire hazards. Last but not least, this letter urges the Council's attention to safeguard the public and to clamp down on criminals selling widely contaminated and dangerous products via third party websites, including sky lanterns made with rope containing lethal Asbestos. In conclusion, this report gives a rational observation and fundamental guidelines on how to securely use sky lanterns and as DEFRA reported, "with little consideration they can be enjoyed safely".

Sky lanterns are not illegal or banned in UK, EU and USA

Sky lanterns are not illegal or banned in United Kingdom, Europe, and United States of America or in any other known countries. Anyone over 18 years of age and capable of handling a lighter can responsibly release sky lanterns. The confusion is caused by incomplete information spread by few propagandists who are lobbying a distorted opinion based on incorrect facts and misinterpreted news.

The increase traffic of fake news on social media has made difficult to distinguish what is true or fake. However, it is known that some Council and few States in America have limited or banned the use of sky lanterns to all events hosted on public land.

This was prompted due to the pressure of some organisations on Councils with inaccurate information and unclear evidences of facts. Despite this, even in those Councils, it is totally legitimate to release sky lanterns from private gardens or lands and it is freely allowed for anyone who wishes to sell or release sky lanterns without having to ask specific permissions from local Council.

Sky lanterns are not regulated by any legislation. However, it is not clear yet, how Illinois state in America have classified sky lanterns as bottle rockets, firecrackers, sky rockets, buzz bombs, helicopters, missiles and so on. This is also supported by a statement from the Fire Marshal which gives a vague view of the evidences.

Recently, some UK Council Committees have decided to limit the use of sky lanterns to Event Organisers and Charity Organisations, which they would be allowed only if the collective launch of sky lanterns is administered and coordinated by specialist companies. Primarily, this penalises small Charities, wedding planners and families who responsively intend to release a small number of sky lanterns and cannot afford to pay additional costs to hire a professional company to assist them during the launch.

Similarly, few UK Councils have decided to ban all sky lanterns events hosted on public land. (Please note that even in these Councils anyone can legally release sky lanterns from a private property). This means that in UK, EU, USA and any other countries, sky lanterns can be legitimately sold, purchased and released from a private property/garden or provided that you have the permission from the wedding reception or from the land owner where the event is hosted.

Despite this, in 2014 UK DEFRA published a Code of Practice, which set voluntary minimum standards and inform Authorities, Council's Committees, members of the public and all stakeholders about the differences between sky lanterns and with little consideration they can be enjoyed safely. [Code of Practice published in 2014 by UK Trading Standard Institute after an independent study was conducted on sky lanterns by UK Government Authorities DEFRA (Department for Environment Food & Rural Affairs) (Annex: page 15-21)]

The Code of Practice aims to give guidelines and removes the stigma that all sky lanterns are dangerous. This study also helps Council Committees to be on the lookout and when required make an informed and rational decision to allow event organisers and members of the public to release sky lanterns.

Have said that, it is given for granted that any Council and their respective Trading Standard Authorities are doing their very best to keep all of us safe. In fact, they are trying to stop most of dangerous goods and counterfeits to be smuggled by criminals, including sky lanterns containing deadly Asbestos, which is strictly prohibited in UK, EU and US. (Ref. page 29 - Regulation EC No 1272/2008 and No 1907/2008)

Sky lanterns have very low environmental impact

Sky lantern is a generic product name and as per any other product they can be made with different materials. In addition, generalising on any subject is not an appropriate way to criticise anyone or anything. For example, some cars have zero emissions while others are not so clean for the environment. Amongst all, there are some car companies who cheated to show low emission levels.

Therefore, with regards to sky lanterns it is important to highlight that the Code confirms that "High quality branded sky lanterns have very low environmental impact and if used as intended in appropriate conditions, sky lanterns DO NOT constitute a high risk. With little care and consideration they can be enjoyed safely."

All sky lanterns are assembled using paper, bamboo stick, fire-proof string or metal wire and the fuel-cell. The performance and reliability of the final product are strictly related to the materials used to produce each component. (Annex: page 22-23)

Indeed, the paper of sky lanterns can be made from cotton cellulose, rice cellulose or other celluloses. Moreover, the grade of the paper (g/m^2) can vary from 10 g/m^2 to $25+ \text{ g/m}^2$. This implies that the structure of cotton paper has higher heat retention compared to rice paper and higher paper grade improves the stability and performance of the lantern while flying away.

All sky lanterns are made using a very thin bamboo stick to create a ring at the base of the lantern where all facades of the paper are glued together. The bamboo ring has also the function to hold the fuel-cell positioned in the centre of the base.

To hold the fuel-cell at the base of the lantern, some sky lanterns are equipped with fire-proof string, while others use metal wires and others sky lanterns are made with a rope containing deadly Asbestos.

Last but not least, the fuel-cells or combustibles are also made with different materials. In fact, the most innovative fuel-cell is made with cotton cloth while

others are made with compressed cardboard or other low-cost fuel-cells are made with fiberglass.

It is noticeable that these materials have different production costs and consequently some are better than others. This is also true for any product assembled with high quality materials have higher performance than those made with economical components.

All the above is to highlight that if sky lanterns have caused some concerns regarding the impact on wildlife, livestock and the environment, the issue cannot be indiscriminately associated to all sky lanterns. Indeed, many reputable suppliers have heard those concerns and invested to develop innovative materials to overcome those concerns and improve users' experience.

It is important to point out that there is no evidence that sky lanterns can kill or injure wildlife or domestic animals. In fact, the only photo used for propaganda reason is a staged Owl tangle in the wire of a sky lantern, which is clearly made-up picture to prove a distorted point. It is unthinkable that a bird of that size does not have the strength to break a delicate bamboo stick which birds are renowned to be masters in building nests with.

Regarding concerns that sky lanterns can cause death to livestock via digestion is totally illogical. Assuming that a cow or a sheep may be attracted by the paper and assuming that animals may eat all paper of the lantern, but anyone who has seen these animals eating grass or hay knows very well that they are able to separate with their lips a single straw from the bunch of hay in their mouth if it is not to their taste. Therefore, it is highly improbable that livestock would attempt to chew a metal wire or even more impractical that the animal would swallow a metal wire. However, must be said that the metal wire may cause some inconveniences to farmers because the metal wire could get stocked in their machineries while harvesting crops and working the land or it could get stacked underneath a car.

It is appropriate to say that sky lanterns made with fire-proof sting are 100% biodegradable, totally safe for wildlife, domestic animals and livestock and given for granted that only sky lanterns made without asbestos are released, they do not cause any environmental issues or polluting the environment.

Nonetheless, thanks to the collaboration of EnergoClub.org which supports that sky lanterns can help to reduce the emission of small Nanoparticles, PM10 and PM2.5, in particular during seasonal holidays and patronal festivals. In fact, good quality sky lanterns are considered to have zero emission, eco-friendly and they are much cleaner for the environment than many other entrainment alternatives widely used at events and festivals. (Ref: page 28)

The solution to minimise the impact of sky lanterns on the environment is to provide correct information on the latest innovations and empower consumers to make the change toward more ethical, ecological and safer sky lanterns.

More importantly, it is necessary that users are very caution to avoid been misled by criminals who are selling poor quality and contaminated sky lanterns. On the other hand, Councils need to acknowledge and communicate correct information rather than prohibiting everyone indiscriminately.

Sky lanterns are safe for birds, wildlife and people

To millions of people, sky lanterns create magical spectacles which release a sense of peaceful energy and a remarkable connection with the spiritual world. As seen in many movies and Disney cartoons, sky lanterns are as beautiful as they look and it is totally inadequate to victimise responsible sky lanterns users using few doubtful incidents.

Sky lanterns do not kill or harm animals and people. This was fully supported by Trading Standard Institute which confirms that "high quality branded sky lanterns have very low environmental impact and if used as intended in appropriate conditions sky lanterns DO NOT constitute a high risk. With little care and consideration they can be enjoyed safely." (Annex: page 15-21)

It is very disappointing to see some organisations and unions encouraging a generalised and distorted opinion on sky lanterns. What is more distressing is that they are appealing on people's sensibility with an oblivious photo of a dead Owl and exploiting misinterpreted news (Annex: page 24). This propaganda is supported by individuals who also seek a momentum and they are lobbying and criticising Charities and event organisers to discourage them from using sky lanterns and often offending and forcing them to opt for apparent harmless alternatives.

It is comprehensible that a photo of a lifeless Owl tangled in the metal wire of a sky lantern has touched the feeling of people's hearts and some reacted impulsively to the "news". However, it is unthinkable that someone can be pushed to do extreme things to support a distorted opinion or view.

From a rational point of view, the photo is clearly man-made by someone who found the Owl and used the dead Owl to set the scenery, so that somebody else could take a close up photo for their propaganda. Hopefully, the Owl died for natural causes and it was not shot for this setup. However, if a closer observation is conducted on the photo, it is noticeable that the bird was carefully selected to have the most devastating impact on people's sensibility.

In fact, a Pigeon or a Crow would not be so appealing to people's sensibility, while evidently a Robin or a Sparrow would be too small to get tangled with the wire. On the other hand, a Duck or a Swan would be too strong and can easily break the delicate bamboo ring to free the part tangled. Besides, a sky lantern is

neither a bullet nor an arrow or a car, which all would kill instantly a bird or fox (Annex: page 24). If hypothetically any animal would get tangled with a sky lantern, they would fight to unleash the part of the body and inevitably they would dismantle the fragile sky lantern.

Furthermore, the photo shows a sky lantern almost intact, however anyone who has handled a sky lantern knows that the thin bamboo ring breaks very easily with little pressure, not to mention the fragility of the delicate paper.

Nonetheless, anyone with minimum knowledge on birds would know that the strength of the Owl's claws would tear off a rigid metal cage. It is strange to think that Owls or other birds with supreme vision can be attracted by a sky lantern. More remarkably unreasonable is to believe that Owls do not have the capability and strength to break a fragile bamboo stick which they are expert to build nests with.

In addition, it is evident that the scenery characterised on the made-up photo does not represent a common concern despite millions of sky lanterns are released every year around the world. Certainly, if any other bird would have been photographed in similar condition it would be immediately embraced by those propagandists. Sadly, birds and other wildlife animals are killed for all sort of unconventional reasons and yet sky lanterns are blamed for few doubtful occasions.

For all those who responsibly enjoy sky lanterns, it is very disappointing that respectful organisations are appealing to ban all sky lanterns with bizarre remarks. It is clear that their propaganda shows lack of knowledge on the real issues and they are spreading incorrect and generalised information to persuade Councils to ban sky lanterns.

Alternatively, a constructive campaign to inform people on the differences between the ranges of sky lanterns available on the market would be more effective to protect the environment. Likewise, simple guidelines on how sky lanterns can be safely enjoyed would eliminate any potential risk while safeguarding wildlife and the environment.

It is fundamental to highlight that as per any product or service, some are good, while others are not so good. Among all, it is inevitable that criminals always exploit every opportunity to cash in easy money, careless to put people at risk or even more unconsidered of the damage they cause to the environment.

Nonetheless, certainly these criminals are unconcerned of the loss instigated on industries and their impact on research and new product development, which they play a fundamental part to innovate existing products and solving issues of any kind and sky lanterns are no excluded.

Indeed, it is well known that sky lanterns can be built using different materials and to hold the fuel-cell some are assembled with genuine fire-proof string,

instead other sky lanterns have metal wires, while others have a rope which is made with materials containing deadly substances like Asbestos.

Unfortunately, unscrupulous sellers do not care if birds and animals die or if they pollute the environment or if you and your children get injured. This is true not only for sky lanterns but for anything you can imagine, whether that is a fake iPhone charger or a counterfeit Dyson Hover or an identical copy of Lego toys or even a fake Beef Burger. Governments, Authorities and Trading Standards personnel are doing their very best to limit the importation and distribution of counterfeits and dangerous goods on our markets. However, ultimately customers should be aware of potential risks caused by counterfeits, in particular when the product is aimed to a young target.

It is clear that an indiscriminate ban on all sky lanterns is not only offensive for all those people who responsibly enjoy sky lanterns but more importantly sky lanterns brings great benefit to the environment to reduce the emissions of small particles like PM10 & PM2.5.

Spreading accurate information can help Council Committee, individuals and organisations to prepare a constructive campaign to inform members of the public and ensure that those event organisers who intend to release sky lanterns can responsibly implement this activity at their event. Ultimately, unlike many other products, sky lanterns can be picked up few miles away and they are fully compostable and recyclable.

Sky lanterns are not litter, have zero emissions and help the ecosystem

For definition, littering is the act of intentionally dropping and leaving deposits lying on the public ground, like those seen every day in towns and countryside alike. (Annex: page 27) The principle of Sky lanterns is to be released free in the sky and thinking of a dream while watch them flying away until the light goes off.

Innovative sky lanterns are 100% biodegradable and have zero emissions, unlike many other entertainment alternatives such as F1 cars, Aeroplanes, BBQs, Hunting Guns, Fireworks, Shooting Flames and Film explosions, Hair Spray and Beauty products and so on, which they all release high level of polluting substances, some of which known as Nanoparticles, PM10 and PM2.5, or debris and microbeads flashed via drains and distributed in the environment unconditionally.

People's hobbies and entertainment preferences are vast and subjective, but whether one enjoys more a barbequed beef steak or perhaps prefer to spend hours wearing make-up or reshaping hair style. It is certain that innovation plays a great part in shaping our future world and it is mandatory that industries invest in new technologies to overcome any concern impacting on people, livestock and on the environment.

In fact, Sky lanterns are the least of the littering problem for the environment and assuming that sky lanterns do not contain Asbestos, they will be mostly eaten by snails and they will biodegrade in a very short time and posing no risks for the environment. Besides, it is known that snails and slugs are greedy for cellulose and even if they are not very appealing, they are fundamental for the ecosystem and essential for the diet of many small animals like hedgehogs and frogs. (Annex: page 24)

Moreover, it is inconceivable to ban everything which pollute in our modern world, unless Humanity is reset back to Stone Age. Have said that, we must do everything we can to minimise the impact on the environment of our everyday living activities. When choosing sky lanterns it is important that they are from a reputable supplier (not on Amazon or EBay), made with high quality materials and possibly avoid using those made with metal-wires. This is also supported by the UK Trading Standard Institute in the Code of Practice of sky lanterns.

The true inconvenience of metal-wires is that even if the wire is 100% biodegradable, it will take longer time to rust compared to the fiberglass sting. In addition, these wires could fall on cultivated land and although the paper and the bamboo ring will break down in a short time, whereas the metal wire will blend on crops and it could damage or breakdown farmer's machineries. Likewise, if the wire ends up on remote roads it could get tangle under cars or they could get stacked in bikers' wheels.

To anyone who intends to release a considerable number of sky lanterns, it is recommended to use only premium quality sky lanterns and Council across countries should help ensuring that any event using sky lanterns is responsibly conducted, without the need of banning all sky lanterns events.

Must be said that Authorities around the world are constantly stopping dangerous goods from entering our countries, like product made with asbestos and many other prohibited products which are totally banned in EU but easily available on third party websites like Amazon and EBay. Sky lanterns are not exempted and members of the public are at risk if they get in contact with Asbestos contained in the rope of some sky lanterns. Evidences taken in April 2017 show that 3 out of 5 test purchases made on Amazon resulted positive to the test and confirmed to contain Chrysotile, which is invisible to human eye. (Annex: page 25-26) This does not mean that all sky lanterns are made with contaminated rope but obviously those with it will definitely pollute the environment.

Sky lanterns do not pose a fire risk

Considering that using sky lanterns involves lighting the fuel-cell with a lighter/matches, in the same way as lighting the fire for a BBQ, a woodstove or a wax candle, it is important to point out that these activities should be done by responsible adults while anyone under 18 years of age must be supervised by an adult at all time.

It is fundamental to acknowledge that premium quality sky lanterns are equipped with an innovative cotton-fabric fuel cell which is not only easier to lit compare to these made with compressed cardboard or fiberglass but also ensures that it will crumble in air once the combustible burns out, so that no parts are still alight when the lanterns land back on earth.

Have said that, must also be said that if someone uses petrol or a lighter to set a fire with the intention of burning down people's property or setting fire to woodland, this is an act of crime and so it is true if sky lanterns are used as a weapon to set fire to crops and residual of hay on lands or to burn down a recycling plant.

Therefore, it cannot be excluded that an isolated accident can happen when handling anything which require a bit of attention with live flames like BBQs, wax candles or sky lanterns. Nonetheless, Smethwick fire was an accident which it was one-off occurrence despite the vast number of sky lanterns safely released around the world every year (Ref: page 29). On the other hand, must not be excluded that this isolated accident could have been intentionally conducted by extremists/saboteurs to strengthen their distorted opinion or for other malign interests.

Anyone with minimum knowledge on the principle of sky lanterns would know that the lantern keeps rising until the flame still alight. However, if the paper has holes, sky lanterns will descend while the fuel cell is still alight because hot air can escape faster through the holes. In fact, the parabola effect of poorly made and damaged sky lanterns is much shorter (few yards) compared to sky lanterns built with high quality materials which ensure that they will keep flying and rising until the flame is completely extinguished.

Moreover, some propagandists are implying that sky lanterns violate the Fire Prevention Code which stops people from leaving any open heat source unattended. Certainly, anyone who enjoys realising a sky lantern knows that the main drive of this magical experience is to watch the lanterns flying away until the light goes off.

Besides, it would be unthinkable to ban all BBQs simply because a group of villains think that putting a portable BBQ on a wood bench in Morden Hall Park is a diligent option to cook a burger (Annex: page 28). Therefore, it is mandatory that the Council gives correct information to people who intend to use sky lanterns and Authorities across the country are urged to clampdown on sky lanterns containing Asbestos rather than enforcing it indiscriminately on everyone and for all sky lanterns.

Sky lanterns are truly 100% biodegradable

Good quality Sky lanterns made with fire-proof sting are truly 100% biodegradable, totally safe for wild animals and livestock and they do not cause any environmental issue.

Even sky lanterns made with metal wire are totally biodegradable even though it can take a bit longer time to rust compare to sky lanterns made with fire-proof string (Annex: page 28). However, if sky lanterns contain Asbestos in form of Chrysotile than it is not biodegradable and this toxic substance is well known to provoke cancer if inhaled while handling the product.

On the other hand, genuine sky lanterns are absolutely eco-friendly and 100% biodegradable. In fact, it is obvious that if a carton box is left outside in the garden, snails and slugs will eat the cellulose which the box is made of and this speed up the natural decomposition of the carton box in just few weeks.

The same happens when good quality sky lanterns land back on earth which the paper will quickly dissolve and partially eaten, as well as the delicate bamboo stick will soon dismantle and biodegrade as any other wood stick or oak leaf.

Regarding the impact of sky lanterns on the environment, it is like spreading unwrapped sweets for snails and slugs to party with. Consequently, snails and slugs are fundamental to support whole ecosystem and they are a great source of nutrition for many other small animals like Hedgehogs and Frogs.

Have said that, it is appropriate that event organisers collect, where possible, most of the sky lanterns landed few miles from the launching position if a noticeable number of sky lanterns are released all together.

Nonetheless, EnergoClub.org a non-profit organisation highly involved in sustainable alternatives also approves that sky lanterns can help to reduce the emission of particles PM10 and PM2.5, in particular during seasonal holidays and patronal festivals. In fact, good quality sky lanterns are considered to have zero emission, eco-friendly and they are much cleaner for the environment than many other alternatives.

Sky Lanterns Regulations, safety guidelines and instructions

Sky lanterns are not regulated by minimum quality standards and the related Code of Practice is only a voluntary guideline for manufacturers, distributors and consumers. Implementing regulations on a product which effectively do not pose high risks would not justify the huge cost of setting up new regulations and consequently the additional resources required to increase control on something which is visibly safe when used with little care and consideration.

In addition, educational campaigns can be more effective in persuading people to opt for more eco-friendly alternatives and definitely a constructive approach to inform people on innovative products can help them to make an educated decision on the differences of similar products. Besides, imposing regulations does not automatically mean that they will eradicate criminals from selling dangerous goods, as it is true even for currently banned substances or counterfeits products.

Regarding sky lanterns, basic common-sense is sufficient to follow very simple guidelines and straightforward instructions to safely and securely release sky lanterns (Ref: page 29)

Safety Guidelines

Do not launch in conditions that make lighting the lantern difficult, i.e. wind speeds above 8 Km/h / 5mph.

Do not launch a damaged lantern as this may be dangerous and cause injury.

Never launch in an area that could cause a fire such as near crops and hay bales etc.

Obstacles in the lanterns' path such as trees and buildings should be at least 30 meters away.

Do not release the lantern in an area where the glow could be mistaken for a distress signal. (Contact Coastguard)

Prior to use, ensure lanterns are stored in a dry and secure place away from children.

The lantern should not be left unattended at any time. Do not light or release a lantern wearing flammable clothing.

Never launch a lantern within 8 kilometres / 5 miles of an airport or airfield without permission from the CAA.

Launching a lantern in an inappropriate location or manner may cause damage to persons or property which may make you liable for criminal damage and prosecution.

Only responsible adults should use this product. Anyone under 16 should be supervised by a least one Adult

Store in a dry and cool place and keep it away from heat sources over 50°C and sun light.

Instruction for use

To facilitate the launch, it is preferable if one person holds the lantern and another person lights the fuel cell. Remove the lanterns from the packaging and gently swing in the air to unfold/open the lantern. Hold it upside down with the fuel cell at the top. Light two opposite corners of the fuel cell and allow the flame to spread across it.

Once the fuel cell is fully ignited, flip over your sky lantern so that the heat source starts to fill it up with hot air. Using both hands, gently hold the top and bottom of the lantern allowing the warm air from the flame to build up inside.

After around 30 seconds the Sky Lantern should begin to rise. Do not release the lantern too early. At this point keep holding the bamboo ring with both hands and only when you feel the lantern lifting on its own then let it free.

Asbestos can kill you! So too Amazon!

In April 2017, after numerous test purchases of Sky Lanterns sold on Amazon resulted positive to Asbestos tests which show to contain Chrysotile in the rope used to hold the fuel-cell.

It is well known that many renowned brands like Dyson, Lego, Philips, Michael Kors, Ray Ban, and many others brands have the same embarrassment and they have to deploy huge resources to pursuit those criminals who are seriously putting members of the public at risk and in danger situations as well as damaging the brand's reputation.

It is shocking that all sky lanterns sold on Amazon under the brand name Night Sky Lanterns® are all fakes. Even more ethically wrong is that 3 out of 5 test purchases resulted to contain harmful substances like Asbestos which is known to provoke cancer if inhaled while handling materials which are made with Chrysotile.

This is having an impact not only on the environment but also on people unaware of the invisible poison and potentially putting children at risk if they get close to the contaminated rope. Have said that, it is reinsuring that evidences also show that premium sky lanterns made with quality materials do not contain toxic substances and they are totally safe and secure to use (Annex: page 25-26).

UK Trading Standards Authorities and Environment Agency are investigating these issues and despite the lack of resources they are doing an immense work to keep all of us safe and try to stop all dangerous goods to enter in our countries. However, it is comprehensible that the scale of the problem is so enormous that ultimately consumers must be very vigilant when shopping on line.

Conclusion

As initially mentioned at the begging of this letter, despite the persistent pressure of few organisations campaigning for a national ban, instead Governments across continents and in particular the UK who has conducted an in-depth study on those concerns, found no evidences of any fire risk or danger when using good quality sky lanterns and harmless to wildlife, people and the environment.

This is the fundamental reason why Governments cannot prohibit sky lanterns, primarily because there are not concrete evidences on any concerns. Therefore, it is unreasonable to impose a ban once recognising the easiness to use premium sky lanterns.

Indeed, anyone who has used a pre-assembled premium sky lantern would know the simplicity to open, lit and safely release it compared to poorly made imitations. Moreover, at the contrary of uncontrollable shooting missiles or buzz bombs, sky lanterns do not make any noise or striking explosion and the easy controllable flame will gently raise the lantern in the sky following the path of the wind.

It is unthinkable to ban sky lanterns based on assumptions which are partially fuelled by impulse of individuals but also incentivised by organisations who attempt a smarter approach to gain exposure by publishing oblivious remarks and distorting news to criticise sky lanterns and those who use them.

Stereotyping on sky lanterns is inappropriate as it is also inappropriate to criticise responsible people who enjoy sky lanterns and choose them wisely based on the latest innovations to respect the environment and people's property.

Conversely, local Councils as well as Fire Brigade / Marshall have a duty to inform member of the public and find constructive initiative to provide useful guidelines. Furthermore, they should help those who ask their consent and approval instead of rejecting everyone with inaccurate statements based on hypothetical scenarios and attempting to persuade people to opt out the desire to release sky lanterns.

A good starting point is to acknowledge the results of the independent study conducted by UK DEFRA and fundamentally embrace the summary published by Trading Standard Institute and recognise simple common-sense but essential guidelines highlighted in the Code of Practice and also on the product's packaging.

It is also important to appreciate that as mentioned in the Code, sky lanterns made with quality materials which are mainly made of paper and bamboo, it is evident to anyone with minimum knowledge to agree that they are truly 100% biodegradable. Likewise, with little observation of the delicate components of premium sky lanterns, it is obvious that they have very low impact on the environment, if any at all and totally harmless and safe for wildlife, livestock and surely a feast for snails.

Even more logical is to promote premium quality sky lanterns as the eco-friendly alternatives for fundraising Charity events as well as for other public and private events and this would significantly reduce the emissions of small particles in the air and contributing toward the respect of the ecosystem.

Sky lanterns are accused to provoke fires based on fake-news or due to negligence of few individuals who did not use sky lanterns diligently and with inconsiderable behaviour.

For instance, the recent dreadful fire which caused the death of many people, families and residences in the Greenfield Tower block of Kensington and Chelsea Borough could have originated from a faulty fridge, washing machine, heater, toaster, kettle, BBQ, etc. As well as in Portugal where fires have devastated entire communities by these awful tragedy which could be caused by thunderstorm or maybe intentionally started by evil individuals to illegally reclaim forest land or perhaps by irresponsible who after harvesting crops burns

the residuals to quickly clear the land. Amongst these, it is possible that a desperate person intentionally starts a fire hoping to get a job as Fire-fighter or Forest Ranger. Despite this, sky lanterns are blamed for potentially start fires, certainly without any real evidences of a common concern despite millions of sky lanterns are released around the world every year.

It is also very well known that every year a considerable amount of dangerous goods and counterfeits are smuggled through the system into our markets and unscrupulous sellers are taking advantage of renowned third party websites like Amazon and EBay which are facilitating the illegitimate behaviour of these criminals by hiding behind their name.

Despite this, it is unthinkable to ban indiscriminately all products and likewise it is unreasonable to ban all sky lanterns if they are made with good quality materials and truly 100% biodegradable.

As seen for other products, applying regulations to sky lanterns with minimum standards will not solve the issue of counterfeits and dangerous goods sold in our markets. Instead, if users are correctly informed and helped to make an educated decision, consequently it will be harder for smugglers to fool consumers and they will no longer find it profitable.

A recommendation for anyone planning to use a reasonable small number of sky lanterns for a wedding, birthday party or memorial, it is indispensable to source premium sky lanterns from reputable suppliers (not on Amazon, Ebay and other third parties websites which are unreliable and unaccountable) and to make sure that sky lanterns are used in accordance with simple but fundamental safety guidelines.

On the other hand, event organisers who are improvising a launch of hundreds of sky lanterns, it would be appropriate to consult specialised companies to cover all different scenarios and they will make sure that the synchronised launch is securely conducted while minimising the possibility of any accident. For a peace of mind, specialised businesses are also covered with special events insurance to cover any prospect.

To conclude, in particular Councils and Authorities in UK, EU, USA and across the world needs to get a grip to clamp down those criminals smuggling fakes and dangerous goods contaminated with toxic substances which clearly is not just a national problem as these products are easily distributed across Europe, USA and around the world. Simultaneously, Local Authorities needs to better educate members of the public with information related to the characteristics of premium sky lanterns and accommodating those requests to stage events involving sky lanterns organised in a diligent way without the need of strict regulations.

Any comment or suggestions are highly appreciated.

Your sincerely,

Dated: ____/____/____

Annex

Trading Standard Institute - Industry Code of Practice – Sky Lanterns – 2014

This document was produced by industry and approved by TSI Lead Officer for Consumer and Product Safety Christine Heemskerk.

INDUSTRY CODE OF PRACTICE – SKY LANTERNS

This Code is intended as guidance on good practice for those designing, manufacturing, distributing, retailing or using sky lanterns

Product scope

This code is intended for sky lanterns. The products are small hot air balloons made of paper, with an opening at the bottom where a small fire is suspended on a base framework containing an ignition source. They are intended to be launched into free flight, rising by the enclosed hot air.

They are known by a variety of names including:

Sky lanterns, Chinese lanterns (fàng tiān dēng (放天燈 or 放天灯)), Fire lanterns, Thai lanterns, Kong Ming, Khoom Fay, Khom Loi, Wish lantern, Chinese Flying Lanterns, Thai Sky Lanterns, Wedding Lanterns, Flying lanterns, Floating Lanterns, Paper lanterns, Japanese paper lanterns, Sky candles, Glow lantern, Chinese flying glowing lantern and Paper hot air balloons.

Note: Static paper lanterns or paper lanterns designed to float on water are not included within the scope of this Code.

Who is this Code for?

The guidance is primarily intended for those in the supply chain such as manufacturers, importers and retailers who have a responsibility to place safe products on the market. Some parts of this guidance may also prove useful to market surveillance authorities and also to those wishing to use sky lanterns or stage events where lanterns are used.

It is applicable to products being sold or used in the United Kingdom.

Introduction

Sky lanterns have given rise to a number of safety concerns including:

- Risks to livestock and animal health (including marine animals);
- Fire risk and damage to crops and property;
- Impact on the environment, including littering on land and at sea;
- Risks to aviation;
- Risk to coastal rescue services;
- Risk to consumer safety.

These topics are described in more detail in a 2013 report from ADAS: “*Sky lanterns and helium balloons: an assessment of impacts on livestock and the environment*”¹.

It is an offence to place on the market or supply any product which is not a safe product². Distributors have a duty to report any information about safety risks they are aware of in respect of their products and to co-operate with enforcement authorities.

¹ Available from http://randd.defra.gov.uk/Document.aspx?Document=11133_AC0229-DefraWAGReportFinal.pdf

² General Product Safety Regulations 2005 (SI 1803) Part 2

This Code is intended to mitigate the risks from sky lanterns by promoting good practice in their design, manufacture and use.

It is structured in four parts:

1. Design and manufacture;
2. Safety checks;
3. Warnings and instructions for use;
4. Responsible sale.

1. Design and manufacture

Sky lanterns float up into the air and remain airborne for as long as they are filled with hot air. In practice, evidence suggests lanterns sometimes drift back to land whilst still alight. They should therefore be of a design and construction to ensure that they only fall back to the ground when the fuel cell flame is extinguished and that, once the lantern has landed, any impact on animals or the environment is minimised.

It is not possible to define precisely every design option and there are no national or international product standards for these items, so a risk assessment of any proposed product should be carried out before it is marketed. As a minimum, the assessment should cover consideration of design aspects relating to:

- (a) Size and shape of lantern;
- (b) Construction;
- (c) Packaging and labelling;

and more detail on this is given below. It should also include trials of the product's behaviour in practice. This assessment should be documented and supplied on request to others in the supply chain.

(a) Size and shape of the lantern

- Very large lanterns may travel further and rise higher. The size of lanterns should therefore be limited to a maximum of 90cm in height and have a maximum diameter of 75cm.³
- The shape should be such that the flame can warm the air inside the lantern without risk of setting the paper on fire or restricting in any way the lantern's launch.
- Complex shapes and those likely to restrict air flow, such as hearts, have been known to present an increased flammability risk. Any unusual shapes should be subject to testing to assess their suitability for commercial production.

(b) Construction

Materials

Materials used in the lanterns should not be harmful to animals or the environment and be biodegradable. In particular:

- No metal should be used in the products.
- Asbestos and other materials classified as hazardous must not be used.

³ This is consistent with recommendations from the Netherlands authorities

<http://www.vwa.nl/onderwerpen/consumentenartikelen/dossier/wensballonnen/nieuwsoverzicht/nieuwsbericht/24841/wensballon-moet-veiliger>

- Colour – Sky lanterns should not be red or orange in colour as these may more easily be mistaken for distress flares.
- Paper used in the construction should be of sufficient thickness because very thin paper is likely to tear and does not contain the heat effectively. Paper should be a minimum of 18 gms double ply and should be rolled/dipped evenly in EU-approved fire retardant solution.
- Paper should be free of holes (including pin holes) or tears, as this can affect the performance.
- The paper should be clean and dry when packaged as dirty paper can tear during transport. It is recommended that the lanterns are packed with desiccant sachets of silica gel.
- The seams of the lantern should be well glued and not have holes or gaps. Use the minimum number of seams consistent with the design.
- Materials used in the construction of the lantern should either be flame retardant or not support combustion. Any fire retardant used should be legal for this use and will need to meet the chemical requirements of the REACH⁴ regulations. Manufacturers, importers and others in the supply chain will need to be aware of their obligations concerning any chemicals used.

Ignition source

- The ignition source should not release burning debris when lit. Suitable designs usually incorporate paper or textile impregnated with a fuel source and do not have a separate fuel cell such as a wax block. There should be supported protection around the ignition source and the fuel cell design should be such that it prevents dripping of burning debris.
- Protection should be provided as a precaution in case an ignited lantern falls to the ground. In particular, the ignition source should be protected to reduce the risk of the lantern igniting the surface on which it lands. This may take the form of an additional wood or bamboo hoop at the base of the lantern or a protective layer suspended under the ignition source.

Biodegradability

- Materials used in the construction should be biodegradable. This may not be practical for the string used to hold the fuel cell but if biodegradable options are available they should be used. There are a number of recognised Standards for biodegradability. It is recommended that materials comply with BS EN 13432 "Packaging: requirements for packaging recoverable through composting and biodegradation"

(c) Packaging and labelling

- Lanterns should be sold in a fully assembled form. This reduces the risk of misassembled products being sold.
- Each lantern should be individually wrapped. The wrapper should allow the item to be stored so that the sky lantern is kept in good condition and can be easily opened up without damage.
- Each package should bear a product code and the name and address of the manufacturer - if in the EU - or importer. A retailer's name may also be included.
- Each package must contain suitable warnings and instructions for use (see section 3 for more detail). Packaging graphics should not show any inappropriate use of the

⁴ [European Parliament and Council Regulation \(EC\) No 1907/2006](#) on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

product - for example use by children, use by the coast, large numbers of lanterns released simultaneously in a single location.

2. Safety checks

It is important that safety information is available and safety checks are carried out on each design and batch of sky lantern sold. Any distributors within the supply chain should assure themselves that the checks have been carried out by their suppliers, or they should take responsibility to undertake the checks themselves.

Visual checks

There are recognised Standards such as ISO 2859⁵ which describe how many products need to be evaluated to achieve a statistically valid conclusion. It may not be necessary to follow the detailed requirements but the number checked should be based on a rational risk assessment. It would be expected that more products of a new design or from a new supplier would be checked until consistent reliability has been established. The Evaluation checklist below lists aspects that should be considered in the visual checks as a minimum.

Performance checks

It is recommended that, in addition to the visual check, simple performance checks (see Evaluation checklist below) are carried out on one sample of each design. The performance checks should be carried out by two operators to ensure that burning lanterns can be quickly extinguished. Points to note in conducting the performance checks:

- Carry out the checks in a safe place with ready access to the means to extinguish any fire;
- Light the lantern following the given instructions;
- Gently restrict the lantern to prevent it flying away (wearing protective gloves) and observe the performance of the lantern;
- Extinguish the lantern if there are safety concerns and as soon as an evaluation has been made

Evaluation checklist

The table below indicates a suitable checklist of assessment parameters that could be used by those in the product supply chain such as manufacturers or distributors. It is not meant to be a restrictive list and users can add or modify criteria as appropriate. The table below is an example of a format that could be used to record details and be kept to confirm that products have been evaluated for safety.

	Criteria	Add detail here	Satisfactory (y/n)
1	General		
	Is a risk assessment available?		
	Does the product show manufacturer's / distributor's details?		
	Is there a product code?		
	Are warnings and instructions present and correct?		
2	Documentation		
	Is there a bill of materials?		
	Is there evidence of biodegradability?		

⁵ ISO 2859 Sampling procedures for inspection by attributes: Parts 1-4

	Is there information about fire retardant used?		
3	Visual checks		
	Is the product clean and dry?		
	Are there any visible holes or tears?		
	Are all seams glued with no gaps?		
	Does the product match the specification – colour/ size/ shape?		
	Is the ignition source well attached?		
4	Performance check		
	Did the product perform as intended? (note any deviations)		
	Was there any flaming debris?		
	Did the lantern fill with hot air easily?		
	Did the flame come into contact with the material of the lantern envelope at any stage?		
	If there was any contact – does the paper burn rapidly / out of control?		

3. Warnings and Instructions for use

Each Sky lantern must be accompanied by warnings and instructions for use.

Warning notice

WARNING!

Fire hazard

For use by adults only

Read instructions carefully before use

**Risk of injury to people and animals
and damage to property and the
environment if used incorrectly**

The warning notice should be printed in a panel at least 10cm x 15cm and be separate from any other text. The border and word "warning!" should be in red and the text should be as shown in the example above.

The warning notice should have immediate impact and be positioned prominently on the lantern packaging. It is recommended that the warning be repeated on each lantern. If possible, the warning should be printed on the lantern itself. Care should be taken that any warning notice does not increase the fire risk. Any notice not printed on the lantern itself should bear a clear instruction to remove it prior to launching.

Instructions for use

Each and every sky lantern should be accompanied by more detailed warnings and full instructions, clearly printed in an easily legible format using at least font size 14.

Where possible pictures, diagrams etc. should be used in addition to the written text to make understanding easier. It is also helpful to refer users to a website or video link to assist their understanding.

'Instructions for use' should include at least the following :

READ AND FOLLOW THESE INSTRUCTIONS CAREFULLY

CAUTION

- *This product is not suitable for children under 16 and is not a toy*
- *Do not launch whilst under the influence of alcohol*
- *Do not launch if you have any doubts about the weather conditions or the condition of the lantern*
- *Launching a lantern in an inappropriate location or unsuitable weather conditions, or in any manner that results in damage to persons or property may make you liable for criminal charges or civil claims for damages*

Before launch

- *Store lanterns in a cool dry place;*
- *Check the lantern and do not launch if any part is damaged;*
- *At launch location ensure there is access to a fire extinguisher or water nearby;*
- *Preferably launch when it is dry and the air is still. Do not launch if there is more than a very light breeze;*
- *Check the wind direction and do not launch within 30 metres of obstacles such as trees or buildings;*
- *Launch only in open spaces. Do not launch within 100 metres of crop fields, haystacks or power lines;*
- *Inform Air Traffic Control at any airfield or airport that is within 10 miles of the launch place;*
- *Avoid launching where the lantern might be mistaken for a distress signal. Inform the local Coastguard prior to launching at the coast;*
- *Launch with two people present - one to hold the lantern and one to light the fuel cell.*

Launching

- *Make sure any children are supervised and kept away from lantern or naked flame;*
- *Remove lantern from packaging and unfold it completely. Handle very carefully to avoid damage;*
- *Never tie sky lanterns together – always launch individually;*
- *Make sure the lantern is fully open and hold the top;*

- Light the fuel cell and continue to hold as it fills with hot air. Note that it will not launch immediately;
- After about 1 minute, the lantern will start to rise. Once it is lifting release it and watch it rise;
- If the lantern fails to rise, extinguish quickly with water or fire extinguisher and do not attempt to re-use.

Use at events

In addition to the general instructions above

- Contact the venue before the event to establish their policy on use of sky lanterns
- Contact the relevant local authority, or fire and rescue service for a risk assessment on the proposed location of the launch and other advice⁶
- Confirm the weather conditions and check that the wind speed is less than 5mph. Websites such as www.bbc.co.uk/weather or www.metoffice.gov.uk may be useful
- If in any doubt about location of the nearest airport and to inform about a launch contact the Civil Aviation Authority <http://www.caa.co.uk/docs/33/cap736.pdf>
- If in doubt about use near the coast check with the Marine and Coastguard Agency www.mcga.gov.uk
- Consider the number of lanterns being released. Large numbers of lanterns pose a litter problem that is difficult to control. Limit the use to a small number. Only a few lanterns are needed for an impressive effect.

4. Responsible sale of sky lanterns

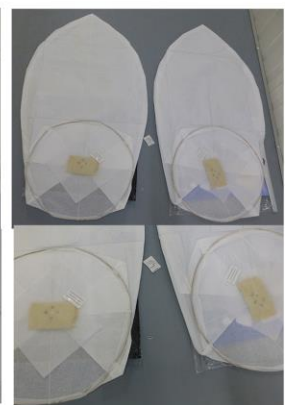
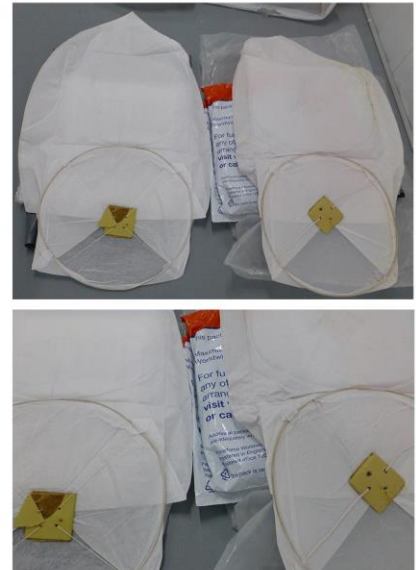
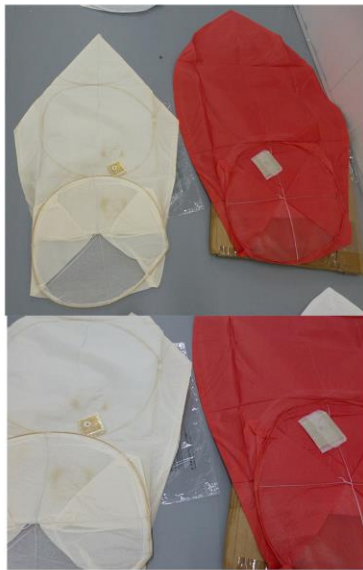
When used as intended in appropriate conditions and in small numbers, sky lanterns do not constitute a high risk. With a little care and consideration they can be enjoyed safely. The following guidance may be helpful to distributors and retailers:

- Consider the number of lanterns sold in a package. Items sold singly or in small numbers are preferable.
- Large orders should only be carried out with established trade users or event organisers.
- Review any complaints received and analyse the cause of the complaint. If the issue points to poor design or manufacture this may need to be discussed with the supplier with a view to potential corrective actions being taken and possible withdrawal from sale.
- The guidance in this Code of Practice is of general applicability but is intended for products being sold on the UK market. Several other countries have restrictions on the sale of these products and anyone intending to sell outside the UK is advised to check with the country of intended sale.
- Any warnings and instructions for use must be easily understood by users.
- Consider applying an age-restriction policy, e.g. photo ID age verification including prompts on EPOS systems when sky lanterns are scanned at checkouts.

⁶ Some local authorities do not allow sky lanterns to be used in public areas and/or land owned by the local authority

Visual differences of few Sky lanterns available on the market
 Sky lanterns build with different materials. Try to spot those containing Asbestos





Dead Owl used for propaganda purposes – Source RSPCA



Photos of wildlife killed for unconventional reasons



Snails and slugs eating sky lanterns



Asbestos Certificates

IST Risk Management
Chorley Business Centre
East Terrace
Euxton Lane
Chorley
PR7 6TE



CERTIFICATE OF ASBESTOS ANALYSIS

NS Ref. : J004273
Date Received : 15/03/2017
Samples Analysed By : Paul Lee
Date Analysis Completed : 15/03/2017
Date Reported : 15/03/2017
Site Address : Unit Y72, 61 Morden Road, London, SW19 3BE
Samples Taken By : IST Risk Management
Client Ref (if required) : Not required

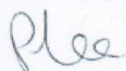
Client Sample Ref	Location	Description	Lab Ref	Asbestos Identification	Comments
1	Brad-Night Sky Lantern	Rope	BS003923	N.A.D.I.S	
2	None Given	Unkown Brand Rope	BS003924	Chrysotile	

*N.A.D.I.S = No Asbestos Detected In Sample

The laboratory cannot be responsible for inaccurate or unrepresentative sampling. All sample descriptions and locations are provided by the client, the laboratory cannot be held responsible for inaccurate information

Analysis for asbestos in bulk materials using dispersion staining was carried out in accordance with our documented in-house method NSTM4 which is based on the methodology set out in HSG 248

For and on behalf of
North Star Environmental Ltd



Paul Lee
Lab Manager

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Company No. 7948744
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IST Risk Management
Chorley Business Centre
East Terrace
Euxton Lane
Chorley
PR7 6TE



7691

CERTIFICATE OF ASBESTOS ANALYSIS

NS Ref. : J005249
Date Received : 24/04/2017
Samples Analysed By : Paul Lee
Date Analysis Completed : 24/04/2017
Date Reported : 24/04/2017
Site Address : Unit Y72, 61 Morden Road, London, SW19 3BE
Samples Taken By : IST Risk Management
Client Ref (if required) : 158

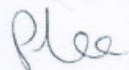
Client Sample Ref	Location	Description	Lab Ref	Asbestos Identification	Comments
1	Not Given	Amazon Test Purchase 4719	BS004936	Chrysotile	
2	Not Given	Amazon Test Purchase 7914	BS004937	N.A.D.I.S	
3	Not Given	Amazon Test Purchase 5947	BS004938	N.A.D.I.S	
4	Not Given	Amazon Test Purchase 6361	BS004939	Chrysotile	
5	Not Given	Ebay Test Purchase 1788	BS004940	N.A.D.I.S	
6	Sky Lantern	PMS Int Group 061/222	BS004941	N.A.D.I.S	

*N.A.D.I.S = No Asbestos Detected In Sample

The laboratory cannot be responsible for inaccurate or unrepresentative sampling. All sample descriptions and locations are provided by the client, the laboratory cannot be held responsible for inaccurate information

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Lab Manager

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info@northstarenvironmental.co.uk

Company No. 7948744

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[illegible]

Photo of the wood bench used as BBQ holder at National Trust Morden Hall Park



Sky lanterns naturally decomposed



References (Last Updated 03/04/2019)

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www.nightskylanterns.co.uk

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www.Energoclub.org

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<http://www.bbc.co.uk/news/uk-england-28900374>

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<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1907-20170302&qid=1498309896315&from=EN>