

Brussels, 11 September 2008

SUBJECT: IEC 60950-1 ed 2, am 1

To all Members of the National Committee,

I write to urge you to vote **yes** to include subclause 4.7 (“Reducing the risk of ignition and spread of flame”) in the FDIS on October 3rd.

Over the past 10 years, ACFSE has campaigned for the improved fire safety of consumer electronics products in Europe. Many professional fire fighters and burns victims associations share our concerns and objectives. Attached to this letter please find an explanation and summary of our position.

Let me be very clear: the volume of consumer electronics products presenting a fire hazard is growing inexorably in private dwellings around the world and with it the risk of death and injury from home fires. A vote to reduce the fire hazard of these products by the adoption of subclause 4.7 will save hundreds of lives and prevent thousands of injuries every year. Not to adopt it will continue to cause avoidable death and injury. Some victims will inevitably be fire fighters.

I trust that we can count on your support.

Sincerely yours,



Bob Graham MBE
President, ACFSE

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Joint statement of support

We, the undersigned, support the ACFSE position on the adoption of subclause 4.7

Niels Ole BLIRUP

Chief of Fire & Rescue Department of the Copenhagen Fire Brigade, Denmark

Robert BRONS

Chief Fire Officer of The Hague Fire Brigade, The Netherlands

Michael HAGEN

Deputy Fire Chief Officer of the Merseyside Fire and Rescue Service, United Kingdom

René HAGEN

Professor of Fire Safety, Netherlands Institute for Safety Nibra (NIFV), The Netherlands

Tibor KOVACS

Head of Fire Prevention of the Budapest Fire Brigade, Hungary

Pascal LEPRINCE

Assistant Fire Chief Officer of the Val d'Oise Fire Brigade, France
Adviser of the President, French Burns-Victims association ABF, France

Martin MARGODT

Président, Pinocchio Association pour les enfants brûlés de Belgique, Belgium
President of the European Burns Casualties Association, EBCA

Hugh O'NEILL

Chief Fire Officer of the Dublin Fire Brigade, Ireland

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Assistant Commissioner for Service Delivery and Community Safety of the London Fire Brigade, United Kingdom

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Président, French Burns-Victims Association ABF, France
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Ricardo WEEVER

Deputy Chief Officer of the Amsterdam Regional Fire Service, The Netherlands

Bozena WERBART

Head of training of the Swedish Rescue Services Agency – College Revinge, Sweden

Signed in Brussels, 12 September 2008

Why ACFSE supports subclause 4.7

ACFSE'S POSITION

The volume of plastic-encased consumer electronic products presenting a fire hazard in private dwellings is growing everywhere around the world. ACFSE calls for the enforcement of high fire resistance standards for any consumer electronic product with an outer enclosure of 300 grams or more, the minimum amount of material scientists calculate presents a serious risk when burned in a small room. Adoption of subclause 4.7 will be a major step toward this objective.

We are indifferent as to how manufacturers chose to meet the applicable standard. It can be met either by repla-

cing inflammable plastic material with metal or other non-flammable alternatives, or by modifying the plastic with any one of a number of different chemicals.

Adoption of subclause 4.7 will save hundreds of lives and prevent thousands of serious injuries around the world every year from its entry into force. Fire-safe electronics products permanently improve domestic fire safety for all sectors of the community from the moment they enter the home.

THE FIRE HAZARD FROM ELECTRONIC GOODS CONTINUES TO GROW IN PRIVATE DWELLINGS

Televisions, audio and video equipment are today found in most homes and are not limited to living rooms but are present in kitchens, dining areas and bedrooms, particularly children's bedrooms. At the same time, computers, printers, and other information technology devices have moved beyond the workplace, where fire protection, detection and suppression systems are required, and are increasingly commonplace in residential premises where none of these safeguards are present. Labour-saving electronically-controlled appliances such as washing machines, clothes dryers' and refrigerators are likewise commonplace today in most homes, and are increasingly encased in plastic.

The volume of such products in private homes will continue to grow inexorably around the world. By way of reference, in 2007 the US Consumer Electronics Association reported that the average American household owned 25 consumer electronics products.



At the same time, merging technologies have resulted in the development of multifunctional and polyvalent information technology devices and multimedia "entertainment centers". This not only increases the concentration of inflammable material in a single location in the home, but also makes it increasingly difficult to differentiate – for example between a "TV" and a "computer" – for regulatory purposes.

CONSUMER ELECTRONICS PRODUCTS CAN BE HIGHLY INFLAMMABLE

Many – if not most – of today's consumer electronics products use thermoplastics of various types in their construction, particularly for the outer enclosure. Unless modified, these materials are easily ignited and burn rapidly, giving off intense heat and toxic smoke. It is often smoke inhalation which leads to domestic fire fatalities, rendering occupants unconscious and unable to escape, even if they are elsewhere in the house and especially if asleep. There is little time to extinguish such fires before they become uncontrollable.

Fire safety advocates, including ACFSE, have repeatedly demonstrated the fire hazard of these products when exposed to an open flame (candle or equivalent):

Please see for video footage of comparative burns of different consumer electronics organised by ACFSE and/or other organisations the following web link:
www.acfse.org/index.php5?module=articles§ion=7

ACFSE

The Alliance For Consumer Fire Safety in Europe

ACFSE receives financial support from the European Flame Retardants Association (EFRA) which represents all existing flame retardant technologies

FROM SMALL FIRES TO KILLER FIRES: “FLASHOVER”

Firefighters call the critical point in a domestic fire “flashover”. This is the moment when the temperature in the room where the fire originates causes the entire contents of the room to ignite in a ball of flame and super-hot gasses. There is normally no escape from “flashover” – either for occupants or firefighters – and no way for fire fighters to enter past that point. Any occupants already rendered unconscious from smoke inhalation anywhere in the dwelling are now also in mortal danger.

In such crisis situations, minutes save lives. Not only do plastic-enclosed consumer electronics products represent a significant potential source of initial accidental ignition, their growing presence also increases the total volume – or “fire-load” – of highly flammable material, and thereby also the risk of accelerated “flashover”.



ACFSE therefore considers that any consumer electronics product with an outer enclosure of 300gr or more of inflammable material introduces an unacceptable fire hazard in a domestic dwelling.

A CASE IN POINT: TVS

Televisions are one of the major fire hazards in our homes. There are an estimated 325 TV fires per million TVs per year in Europe. This compares with 5 fires per million TVs per year in the US, where a higher fire resistance standard is widely used by manufacturers on a voluntary basis.

The existing European standard has quite simply not proved effective at preventing death and injury. Each year in the EU there are still more than 100 deaths and thousands of injuries due to TV fires.

In the Netherlands, an estimated 8% of all domestic fire deaths and injuries result from TV fires. Independent estimates of the percentage of TV fires from external ignition sources, notably the increasingly use of candles and nightlights on or close to TVs, range from 20% to more than 40% in the EU¹.

Fire Brigades who share ACFSE's concerns and objectives have repeatedly demonstrated the speed and deadly character of “flashover” originating from unmodified thermoplastic enclosures of TVs.

- Television burn by Berlin Fire Brigade, 19 December 2005
www.acfse.org/index.php5?module=articles§ion=7&action=viewmov&id=24
- TV test burn by the Hague Fire Brigade - 3 April 2008
www.acfse.org/index.php5?module=articles§ion=7&action=viewArticle&id=79.

This comparative test burn of nowadays very popular flat screens demonstrated clearly that although the flashover was slow, the amount of toxic smoke developed is enormous.

ABOUT ACFSE

- The Alliance for Consumer Fire Safety in Europe (ACFSE) was founded in 1998. ACFSE's mission is to campaign for high standards to ensure the fire safety of consumer products with dangerous fire load, notably consumer electronics products and upholstered furniture.
- The Executive Director of ACFSE is Bob Graham MBE, former Deputy Fire Chief of Manchester. Mr. Graham led the successful campaign to introduce high fire safety standards for upholstered furniture in the UK in 1988. These regulations are estimated to have saved at least 5,000 lives and prevented 50,000 injuries since their introduction.
- ACFSE benefits from cooperation with many senior fire fighters, fire safety advocates and burns victims associations who share our goals.
- ACFSE is funded by the European Flame Retardants Association (EFRA), an industry group representing all flame retardant technologies. ACFSE has no view and takes no position on specific flame retardant technologies, and is indifferent as to technologies and materials used to meet fire safety standards.

¹ DTI Consumer Affairs Directorate. Cause of fires involving television sets in Dwellings.

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