

Mr Andrew Walker
Senior Coroner
HM Coroner for the Northern District of Greater London
North London Coroner's Court
29 Wood Street
Barnet
EN5 4BE

22 December 2014

Dear Mr Walker

Response from the Association of Manufacturers of Domestic Appliances

Further to your report dated 5 November 2014, AMDEA wishes to reply to the points 2 to 4 of your report as follows.

We accept that there are difficulties in identifying products and components that fail but in most cases the fire officers with specialist knowledge (such as are found in the London Fire Brigade) with assistance from company specialists can overcome the difficulties presented when a product is burnt out and only a carcass remains. Over the past few years industry and the fire service have held regular meetings at AMDEA and we ensure that the fire services are supplied with contact details for all our members.

The idea of marking the product in some way that will survive a fire has been discussed in this group. It is accepted that such a marking would have to be a separate marking in the steelwork at the base of the product, whereas the rating plate needs to be at a level easily accessible to the consumer. This marking would only have value in event of a catastrophic fire which is an extremely rare event. The location would have to be known to the fire services and with the manufacturing products being sourced throughout the world this would need world-wide agreement. Also the metal structure of these appliances can be used across a range of appliances and a range of brands, some of which are retailers own brands and some of which are the brands of other manufacturers. It would be very difficult to set up a standard for this with international acceptance since it would not be considered to be a safety matter by IEC.

LFB have argued that manufacturers who provided such a marking would also avoid the situation of their products being misidentified, as has happened in the past. This is now understood and discussions are continuing both in UK and European industry fora.

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With reference to the construction of refrigeration appliances (36 to 40):

[REDACTED] the Technical Manager on Refrigeration within AMDEA, together with industry safety specialists prepared a basic proposal for change to the international standard IEC 60335-2-24 to cover these points. This work arose because of a previous fire incident. This proposal was placed before the BSI committee CPL61 and, was accepted as a UK proposal for change at international level in 2014.

[REDACTED] in his role as Chairman of BSI committee CPL/61 and UK delegate at the recent International Electrotechnical Commission (IEC) meeting in Tokyo, Japan, presented the UK proposal which was subsequently accepted by the meeting.

Full details of this standards activity are contained in the correspondence to yourself from the BSI. We have included an extract from [REDACTED] report for completeness.

With regard to point 39 the insulation material used in refrigeration appliances: whilst this is highly flammable it has been successfully used for at least 30 years and is currently the only way to meet the performance requirements of the Ecodesign Regulation as part of the industry's commitment to reduce greenhouse gas emissions. We believe that their continued use, with slight changes in the materials used to contain them, will be satisfactory.

It is vital that any change to refrigeration products is accepted at international level since there is no major manufacturing of household refrigeration products in the UK.

We believe that we have taken note of the recommendations in the Coroner's report and will continue our dialogue with industry colleagues worldwide to address these concerns.

Yours sincerely

[REDACTED]

Douglas Herbison
Chief Executive