



Report title

Fires in White Goods and Product Recalls: Actions for LFB in 2016/17

Meeting

Strategy Committee

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Report by

Head of Communications

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Summary

This paper deals with two related issues:

- The need for changes in the product recall system: there are concerns that current arrangements can have a detrimental impact on fire safety.
- The need for changes in the manufacturing standards of some white goods, a significant number of which are currently too vulnerable to fire.

Recommendations

That:

1. The LFB runs a year-long programme of activity to increase public understanding of white goods safety issues and to work for the proposed regulatory changes set out below;
2. In relation to product recall, LFB should seek to persuade government and legislators of the need for changes to the recall system including the introduction of a single, publically accessible register for UK product recalls and the publication of risk assessments undertaken once a fault is found in a product; and
3. In relation to white goods safety, LFB should seek changes to manufacturing standards to reduce the risk of fires starting in fridges and freezers.

The full detail of these proposals is set out in sections 28 and 31 of this paper.

Introduction

1. This paper stems from ongoing work to reduce accidental dwelling fires¹ and recommends that these issues should be a priority for LFB communications and public affairs work, and sets out what specific changes we should be trying to achieve and how our objectives might be pursued. In February 2016, there has been renewed interest in the issue following a spate of fires that appear to have been caused by faulty tumble dryers. The Daily Mirror gave front page coverage on calls for tougher safety laws, and published new figures that reported that firefighters in the UK had been called to 3,777 incidents of tumble dryers catching light since 2010, estimating that the figure could be closer to 6,000. The story was widely picked up across national print and broadcast media. Following this coverage, the Retail Ombudsman announced that there would be an independent register for appliances and white goods not affiliated to any manufacturer, although the details were unconfirmed at the time of preparing this paper.

Fires in London with an electrical source of ignition

2. A large proportion of fires in homes have a source of ignition powered by electricity. Over the five years between 1 January 2011 and 31 December 2015 there were 31,374 dwelling fires in London. Of these 16,940 (54 per cent) had a source of ignition that was powered by electricity. Table 1 shows the numbers in London each year. Although there has been a small downward trend in the numbers of fires, the proportion with an electrical source of ignition have been slowly increasing.

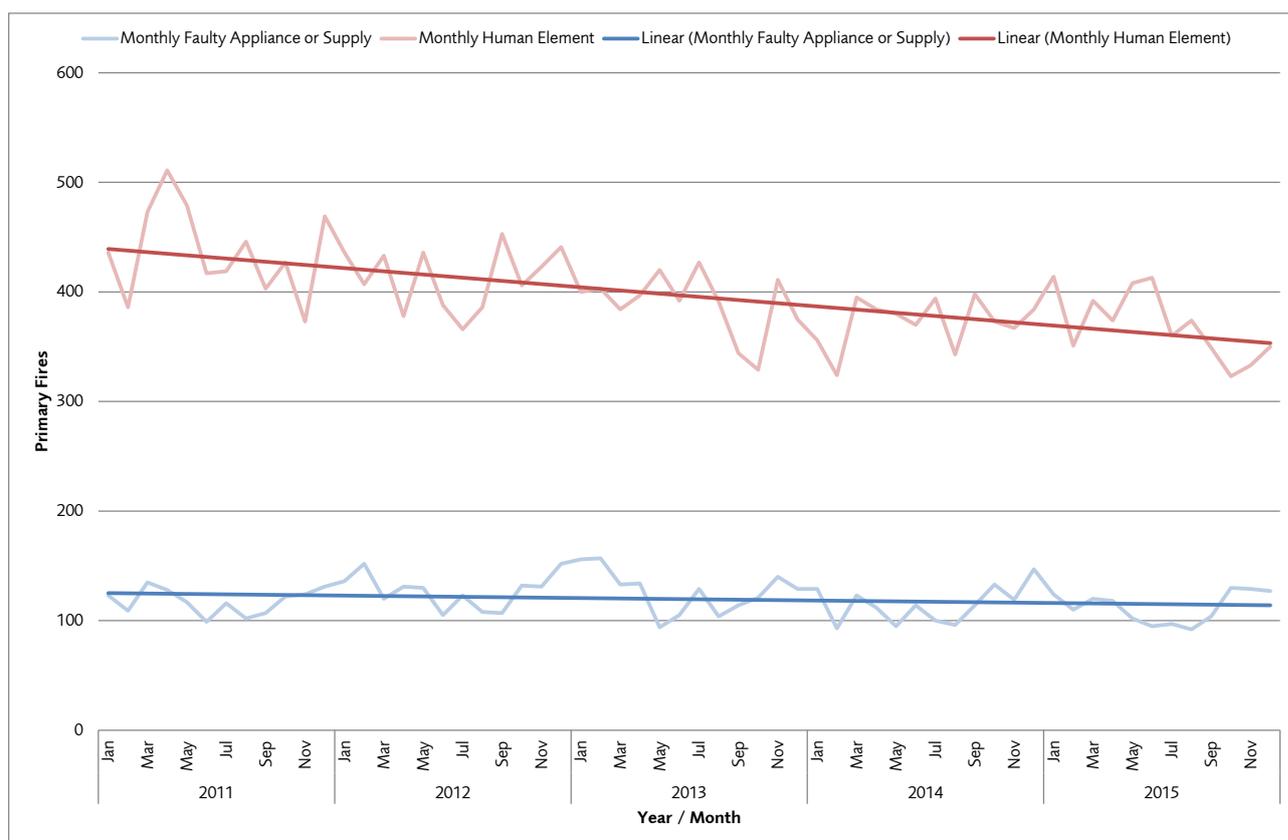
Table 1: Dwelling fires and those with an electrical source of ignition, 2011 to 2015

	2011	2012	2013	2014	2015	Five year total
All dwelling fires	6733	6544	6270	5941	5886	31374
... with electrical source of ignition	3377	3512	3440	3389	3222	16940
... <i>proportion</i>	50%	54%	55%	57%	55%	54%

3. Recent years have seen a substantial reduction in the number of fires in the home, with 6,733 in 2011 and 5,886 in 2015; a 13 per cent reduction in five years. However, this is not the case for fires with an electrical source of ignition; there were 3,377 such fires in 2011 and 3,222 in 2014, a 5 per cent fall over the period.
4. Looking more closely at fires with an electrical source of ignition, there is a clear downward trend in dwelling fires where a human element was the cause, but that in fires started by faulty appliances or supply, there is hardly any downward trend. This is demonstrated by Chart 1 below.

¹ [Review of Accidental Dwelling Fires and Fatalities, 2014-15 - FEP 2484](#)

Chart 1: Monthly Dwelling Fires – Faulty Appliance or Supply vs Human Element, 2011-2015



5. Breaking this down further, the table below gives figures for the cause of electrical fires (faults/human element/other) started by different types of electrical appliance/installations, showing those caused by human behaviour (e.g. misuse of an appliance) and those due to a faulty appliance/supply.

Table 2: Dwelling fires in London, 2011 to 2015 with breakdown by electrical powered source of ignition

	Cause of Fire			Total (Five years)
	Faulty Appliance or Supply (%)	Human Element (%)	Other (%)	
Cooker	4%	96%	0%	7,159
Electrical distribution	93%	7%	1%	3,479
Kitchen appliances	16%	84%	0%	1,967
White goods	90%	10%	1%	1,510

Lighting	37%	63%	0%	852
Heating appliances	42%	58%	0%	766
Other item	77%	23%	0%	473
Domestic appliances	61%	38%	0%	268
Audio-Visual	88%	10%	2%	174
Other ignition source	74%	25%	1%	167
Not confirmed	73%	21%	6%	81
DIY	3%	98%	0%	40
Vehicle related	75%	25%	0%	4
Dwelling fires with electrical source of ignition	40%	60%	0%	16,940

6. White goods, which includes dishwashers, washing machines, tumble dryers, fridges and freezers, on average account for over 300 fires in London each year. In 90 per cent of the fires where they are the source of ignition, the cause of the fire was a fault in the appliance or its electrical supply rather than human behaviour.
7. Most homes contain white goods; some of these appliances are necessarily switched on all the time and many of them have highly flammable components. Most fires, where they are the source of ignition, are not down to human factors but are caused by faults which are beyond the control of the householder.
8. White goods, such as fridge freezers, operate 24 hours a day and therefore pose a greater risk to safety as they are on when people are asleep and may not, therefore, be immediately alerted to a fire. Fridges and freezers can make fires worse, even if they are not the original source of ignition, because the insulation used in them is highly flammable and can be a major source of fuel. Additionally, this insulation produces toxic gases when it is on fire.
9. There are some actions that can be taken to reduce the fire risk posed by white goods, such as:
 - making sure white goods are not positioned in escape routes and
 - encouraging people to check their appliances against recall data.

These actions are strongly encouraged by LFB. However, evidence suggests that changes outside the control of individual consumers could make a big difference to how safe electrical goods are in the home. These include changes to the system of product recalls and the standards of manufacture of white goods.

Product recall

10. An opportunity to pursue improvements to the recall system is the review led by the TV consumer journalist Lynn Faulds Wood². The Department for Business, Innovation and Skills (BIS) had been expected to publish the recommendations in November, but that was delayed and the recommendations, together with the Government's response, was published in mid February 2016.³ The Government broadly supported the recommendations and has agreed to set up a Steering Group in order that the detail can be considered and taken forward. LFB submitted written evidence to the review and continue to be in regular contact with Lynn Faulds Wood. Following publication of the review and Government response, officers made contacted with BIS officials to register an interest in being invited to join the Steering Group. The timing of this paper now is to allow us highlight the experience of the LFB on these issues, to step up previous calls for action on the issue by utilising public concern on the dangers of faulty appliances and to lend support to wider calls for changes to the product recall system – particularly on the creation of a single register for recalls.
11. LFB put forward these principal criticisms of the product recall systems:
- There is no single register of products under recall.
 - There are no specified levels of publicity required when a product is recalled.
 - Manufacturers and retailers may not be proactive about recalls, so that if a product is recalled in another jurisdiction – e.g. the United States – identical products are not always recalled in the UK.
 - There is no uniformity of approach (or resources) between different trading standards departments, and trading standards officers may not be accurately briefed by manufacturers and retailers. This could be further impacted by budget considerations, with the Government's own research suggesting that there has been a shift from proactive and preventative work to a reactive approach following a reduction in funding to local trading standards.
 - There is no requirement to have fireproof marking on white goods – such markings should include manufacturer, model and serial number for identification purposes in the event of a fire.
 - LFB has concerns that, despite the regulation, second hand goods that are subject to recall are still being sold.
12. European Union figures show that faulty electrical appliances account for the majority of dangerous products identified on the UK market.⁴ Electrical Safety First – the UK charity that campaigns to reduce death and injury caused by electrical accidents – state that many people associate recalls with 'annoying faults', rather than safety, with two million adults admitting to knowingly ignoring a recall notice. Typically, only 10 per cent to 20 per cent of recalled products are ever returned or repaired.⁵ Therefore, the majority of defective goods are not recalled in practice, including electrical appliances that present a serious fire safety risk.
13. In the USA it is illegal to resell or attempt to resell a recalled consumer product. Although the UK's General Product Safety Regulations 2005 apply to all products (new and second-hand) used

² <https://www.gov.uk/government/news/consumer-champion-lynn-faulds-wood-to-lead-product-safety-review>

³ <https://www.gov.uk/government/publications/consumer-product-recall-review>

⁴ http://ec.europa.eu/unitedkingdom/press/press_releases/2014/pr1404_en.htm

⁵ <http://www.electricalsafetyfirst.org.uk/news-and-campaigns/press-releases/2015/08/leading-electrical-safety-charity-urges-ee-customers-to-put-safety-first/>

by consumers there is very little market surveillance or information on recalled products which are older.

14. Fire investigators have visited second-hand shops in London and found dangerous appliances subject to a product recall still being sold. In these instances the shops and the local authorities were informed and the items were removed from sale, but there has been no wider information available on this practice and it is impossible to know how many such appliances are being sold in London, both in shops and using online services such as eBay, Loot and Gumtree.
15. Local authorities are the enforcing bodies for the General Products Safety Regulations 2005, and this function is carried out by Trading Standards Officers (TSOs). Most often, it will be TSOs working in the area of a producer's or distributor's headquarters who would work with them to deal with faulty goods. There is a primary authority partnership scheme⁶ for Trading Standards which means that producers or distributors can enter a legally recognised partnership with one local authority which then provides advice for other councils to take into account when carrying out inspections or dealing with non-compliance. The partnership can be with the local authority where the headquarters of a company is located, but does not necessarily have to be. LFB has been involved in a number of cases where TSOs have been advised by a producer or distributor to agree a corrective action that is not a full recall, which has subsequently had to be revised when LFB has provided more information about the potential for serious outcomes because of a fault. Some examples of LFB engagement with the product recall system are given in Appendix 1.
16. Trading standards departments have faced reductions in funding in recent years. In December 2013 a report from Unison stated that statistics published by DCLG showed that councils budgeted spend on trading standards services had fallen by more than a quarter in the three years between 2010/11 and 2013/14.⁷ The Chartered Trading Standards Institute estimated that, by 2016, most trading standards services in England and Wales will have been cut by an average of 40 per cent since 2010 and so this pressure looks set to continue.⁸
17. It is clear that any improvements to the current system should not generate significant additional burdens on trading standards departments, who, by their own admission have increasingly limited resources. An improved system would ensure that the public is better informed about the risks posed by products, allowing them to take action to reduce that risk or seek further advice.
18. It follows that improvements to the system should focus on:
 - Improving and standardising the publicity given to product recalls, including recall notices issued in other jurisdictions.
 - More consistent guidance on risk assessment.
 - Better surveillance of the secondhand market.

These principles will work hand-in-hand to increase public safety.

19. In cases of fires (and other incidents) leading to substantial insurance claims, the insurance industry may conduct its own investigations. This should be an important source of information to enforcement authorities. However, if an insurance company investigation finds a potential defect

⁶ [The principles of primary authority are set out in the Regulatory Enforcement and Sanctions Act 2008](#)

⁷ <http://www.unison.org.uk/media-centre/loan-companies-preying-on-public-in-tough-times>

⁸ <http://www.tradingstandards.uk/extra/news-item.cfm/newsid/1464>

with an appliance, producers may have the opportunity to settle the claim in full on the basis that no liability is admitted and that there is a non-disclosure agreement. It is therefore possible that there are product safety defects known about by insurers and producers but not necessarily by Trading Standards officers or fire investigators. In addition to producers and distributors, any other organisations such as insurance companies, that have evidence that a fire has been caused by a faulty appliance should have an obligation to inform Trading Standards.

20. It is not uncommon for fires to involve white goods which are 20 years old or more. The public listings of recalls for older appliances are extremely poor, even on voluntary pages and websites. This means that it is extremely difficult for consumers to check if appliances they have in their home are subject to product recall. In turn this makes it difficult for bodies like LFB to give clear public safety messages to the public about checking whether their product is under recall as there is no clear simple action to promote. The advice LFB always gives if people think there might be a problem with their appliance is that they should unplug it and contact a qualified technician or the manufacturer. There are no specified levels of publicity for product recalls. When a safety notice or recall is instigated the wording used may not be the most appropriate which may lead to consumer confusion. An example might be suggesting that an appliance 'may overheat' or has a risk of a 'thermal event' rather than 'may be a risk of fire'.

Risk assessments

21. The key piece of legislation governing product recalls is the General Product Safety Regulations 2005, which implements the General Product Safety Directive into UK law. In addition to the UK regulations, there is also an EU-wide system called RAPEX, a rapid alert system designed so that information about dangerous products withdrawn from the market and/or recalled from consumers anywhere in Europe is circulated between Member States and the European Commission. If TSOs believe the requirements of a RAPEX notification are fulfilled (there is a serious safety risk from a product marketed in several Member States), the local authority must send a RAPEX notification to BIS for onward transmission to the Commission, which then sends it to all the Member States.
22. The European Commission has supported the publication of Guidelines for Businesses to Manage Product Recalls and other Corrective Actions (EU Commission guidance) which is designed to provide general advice about what producers or distributors should do if they have evidence that one of their products is unsafe.
23. The guidelines include a risk assessment process which producers or distributors can apply if a product of theirs is faulty. Part of this assessment process looks at the type of consumer that might be affected by any fault. Vulnerable people are categorised by their age, by physical, sensory or mental capabilities or by lack of experience or knowledge. What the assessment does not take into account is the possibility that the person involved could be asleep.
24. If there is a risk assessment being carried out for a defective fridge freezer, which by its nature is left on 24 hours a day, then there is a risk that people present in the building when a fault occurs could be asleep. Crucially, it is also reasonably foreseeable that someone might die because a fire breaks out in their fridge freezer while they are asleep. In London between 1 January 2010 and 4 September 2014, seven people died in fires where the ignition source was a fridge or freezer. The evidence suggests that all seven were asleep at the point when the fires started.
25. Therefore, LFB wishes to see the risk assessment process improved, so that the following matters are always taken into account:

- Sleeping risk
- The most serious reasonably foreseeable consequences of a product failure i.e. in the case of fire, serious injury or death
- The potential long term physical and psychological impact on people involved in fires (e.g. burns injuries, trauma, PTSD).

26. Once a risk assessment is complete a decision needs to be made about what action a distributor or producer has to take. Currently there are inconsistencies between the guidance provided on corrective actions by the EU Commission Guidance and the guidance from the Association of Manufacturers of Domestic Appliances (AMDEA), the UK trade association. The AMDEA guidance says that if the outcome of the risk assessment is that there is a 'moderate' risk the producer or distributor is not required to notify trading standards but the EU Commission guidance says that a 'moderate' risk outcome requires the distributor or producer to notify trading standards. This difference in the guidance makes it difficult for producers and distributors to consistently apply guidance and carry out their notification obligations. LFB therefore wishes to see changes to the AMDEA guidance to bring it in line with the EU Commission Guidance and hence make the obligations on producers and distributors clearer.

27. In addition, publication of risk assessments would provide a more transparent system and help enforcers and consumers make their own decisions about the safety of electrical products.

28. It is therefore recommended that LFB should advocate the need to revise Regulations as follows:

- A single register for UK product recalls, which should be readily accessible to the public online.
- An obligation on producers and distributors to include in the public register any product recall notices issued in other specified jurisdictions (e.g. the United States) and products notified to the European Commission under the RAPEX system.
- Producers and distributors can be required by a recall notice to use their best endeavours to organise the return of products from consumers. However, there should be agreed, appropriate guidelines about what a producer or distributor has to do to meet the requirements of the recall notice. Such measures should be agreed with the relevant enforcement authorities and summarised in the public register.
- An obligation on producers and distributors to make publically available the risk assessments (in redacted form if necessary for commercial sensitivity) they undertake once a fault is found in a product.
- An obligation on organisations, such as insurers, that have evidence that a fire has been caused by a faulty appliance to inform Trading Standards. Better regulation to control the second hand selling, or offering for sale, any product subject to a UK recall notice.

29. It should be noted that LFB may need to develop its evidence base on the benefits (and costs) of revised regulations to help make the case to Government any new draft Regulations now require an 'Impact Assessment', produced by officials in the relevant Department, which is scrutinised by the Regulatory Policy Committee.⁹ The RPC, acting on advice from the Better Regulation Executive (which is part of BIS). The RPC gives Impact Assessments a traffic light rating, with green meaning proceed, and red meaning inadequate. Ministers can ignore such ratings and persist with proposed Regulations, but this is rare.

⁹ <https://www.gov.uk/government/publications/how-the-regulatory-policy-committee-scrutinises-impact-assessments>

White goods and fire safety

30. Between 1 January 2011 and 31 December 2015 there were 31,374 dwelling fires in London. Of these 16,940 (54 per cent) had a source of ignition that was powered by electricity. White goods, which includes washing machines, tumble dryers, fridges and freezers, account for on average over 300 fires in London each year. In 90% of the fires where they are the source of ignition the cause of the fire was a fault in the appliance or its electrical supply rather than human behaviour.
31. It is therefore recommended that LFB should seek changes to manufacturing standards. LFB has already sought these changes previously, most recently at the inquest in 2014 into the tragic death of Mr Santosh Benjamin Muthiah, as follows:
- The polyurethane insulation used in fridges and freezers, which is highly flammable and when on fire produces toxic gases, is protected from becoming involved in a fire.
 - When capacitors are used in fridges and freezers it is done in a way that prevents them starting fires, even if they do fail.
 - All appliances are marked (with model/serial no.) so that they can be identified after a fire.
 - The risk assessments that producers or distributors carry out on their goods should be improved, to specifically take into account sleeping risk, the most serious possible consequences of a fault and the potential human impact of fires.
 - The guidance about what producers or distributors need to do following a risk assessment is consistent between industry and regulators.
32. White goods often operate in homes and without requiring supervision (unlike a hob or a cooker), sometimes 24 hours a day, seven days a week and often in situations where there is a risk that people present in the building when a fault occurs will not be aware of it, and could even be asleep. In the case of fridges and freezers this is exacerbated by the fact even if they are not the initial source of ignition for a fire, they can play a major role in a fire which has started elsewhere in the home as the insulation used in them is highly flammable and can be a major source of fuel. Additionally, this insulation produces toxic gases when it is on fire.
33. The polyurethane insulation material used in most refrigeration appliances represents a high fuel load, is highly flammable and when on fire burns to create dangerous gases. There is no legal requirement or industry standard that this insulation material is isolated from or protected from ignition by a failure in another component within the appliance, which represent a risk of ignition, such as the compressor, capacitor or ancillary components. This represents a serious risk to the safety of consumers. Polyurethane insulation should always be properly protected from becoming involved in a fire.
34. LFB press office and fire investigation team worked with the BBC TV programme Watchdog Test House to increase awareness of the dangers of unprotected polyurethane insulation in fridges and freezers. LFB helped set up a test burn, where the programme makers witnessed and recorded a controlled test where a plastic backed and metal backed fridge were ignited alongside each other in controlled conditions. The results were striking, with the plastic backed fridge becoming heavily involved in fire within three minutes of a flame being applied, and the metal backed fridge burning in a much more controlled manner before self extinguishing. The plastic backed fridge conformed to current international standards and was typical of many fridges and freezers which exist in homes across London. This test, along with the full investigation by Watchdog Test House was broadcast on BBC One in March 2015.

35. Even if a fire starts somewhere other than the fridge or freezer, because of the lack of protection around the flammable materials in them they could catch alight and become involved in the fire. Again, because of the high fuel level they represent and the dangerous gasses they can emit this can lead to a much more dangerous and devastating fire than would otherwise have occurred. The plastic materials which are used for filling, strengthening and insulating refrigeration appliances are highly flammable and increase the fuel load of these appliances posing a continuing risk to consumers. It is possible to use alternate, non-flammable or less flammable materials. It is also possible to better contain such combustible components or insulation. There is currently no such requirement to do this, which LFB believes creates an unnecessary risk to the safety of consumers.
36. LFB therefore wants to see changes to fridge and freezer manufacture that would mean that the highly flammable polyurethane insulation is isolated from components in the appliance, such as the compressor, capacitor or ancillary components, which could ignite the insulation if they fail. To achieve this, we are calling for a new standard which would mean that fridge and freezer compressor compartments and the entire back panel of a fridge or freezer have to have a suitable level of flame retardance.
37. The standard in question is currently being looked at by the BSI committee CPL/61 (safety of household and similar electrical appliances)¹⁰ of which LFB, along with Electrical Safety First and the Association of Manufacturers of Domestic Appliances (AMDEA) is a member. The Chairman of BSI committee CPL/61 presented an amendment to the international standard on fridges and freezers to the annual general meeting of the International Electrotechnical Commission (IEC) in Japan on 13 November 2014. The IEC is a global organisation that publishes international standards for electric and electronic products, including fridges and freezers. His presentation included news footage of the fire at Sonia Gardens in North London, involving a chest freezer, where six people died in 2012. He also showed video of tests carried out by LFB Scientific Advisors on different types of insulated panels from fridges and freezers. There was discussion on the amendment to the international standard that he presented and a positive vote for the amendment to go to the next level of the approval process.
38. An amended international standard would mean that materials used within 150mm of the compressor compartment, and the whole back panel of the appliance (apart from 50mm nearest the top surface), would need to meet tougher fire safety standards. This standard was published as a draft International Standard and all international members had to vote 'yes' or 'no' before 28 August 2015. If the new international standard had been agreed, regional standards such as the European EN60335-2-24 would be expected to change shortly afterwards, with all products using the standard for compliance with European Safety Legislation meeting the requirements in around 2018. However, LFB was informed in September 2015 that the final draft International Standard vote failed to reach the minimum acceptance level by just 1.2%. Since then, members of BSI committee CPL/61 have since been attempting to reach a compromise by putting forward new proposals. Officers are meeting BIS in February to discuss whether something could be specifically incorporated into UK law. This issue was initially addressed by the IEC three years ago when a draft amendment to the international standard was rejected and LFB is concerned that international consensus has still not yet been reached.

¹⁰ <https://standardsdevelopment.bsigroup.com/Home/Committee/50001507>

Communications campaign

39. LFB communications team therefore propose to run a year long programme of activity to try and raise the profile of these two related issues – changes to the product recall system and changes in the manufacturing standards of some white goods – to increase public understanding and ultimately reduce the number of fires with an electrical powered source of ignition where the cause is faulty appliance or supply. As the greatest changes needed are outside the control of consumers, the primary focus will be on producers, distributors and regulators. The key campaign aims would include:

- highlighting the work of the fire investigation team and the valuable evidence it provides.
- calling on government and retailers to improve the recall procedures they have in place and to help promote recalls of goods which are causing fire risks when those recalls occur. These changes are set out in paragraph 27.
- actively pursuing the changes that producers, distributors or regulators could make to reduce the risk that white goods in the home present and make people safer. These changes are set out in paragraph 30.
- promoting these safety messages directly to the public, such as making sure white goods are not positioned in escape routes and encouraging people to check appliances against recall data.

40. To deliver the campaign, LFB's communications team will draw on the tactics used in the Know the Plan campaign¹¹ and use the full mix of communications platforms and a full range of media activity to engage and educate media, retailers, producers and the public about these two key issues – changes to the product recall system and changes in the manufacturing standards of some white goods.

41. This will include a timed series of media releases supported by social media activity and stories based around the campaign's key aims and public information elements targeted at all London, national and trade media. All media releases will be supported by social media activity using the Brigade's social media platforms on Twitter, Facebook and YouTube.

42. The media campaign will seek to work with stakeholders and partners such as Electrical Safety First and Trading Standards to deliver its messages to retailers. The campaign will seek to maximise the Brigade's involvement with the Faulds Wood review and its subsequent recommendations to deliver its aims.

43. LFB will also look to develop alliances around the campaign likely to include: consumer organisations; landlords, to encourage them to check that white goods provided in rental accommodation are not subject to recall; NGOs speaking for people in groups known to be at particular risk of fire, including tenants in poor standard private rented accommodation, older people and people with disabilities; organisations representing enforcement authorities; and public safety organisations.

44. LFB envisages an active role for Members in helping to deliver the campaign recommendations which could include: publicising the issue through local and London-wide media, social media and newsletters; working with colleagues in Local Authorities, such as the Cabinet Member for Community Safety to help ensure awareness of the issue among key audiences such as local retailers. The issues that the campaign aims to address also formed part of a LFB event for Councillors in November 2015.

¹¹ [Know the Plan - Campaign Results - FEP 2486](#)

Head of Legal and Democratic Services comments

45. The Head of Legal and Democratic Services has reviewed this report and his comments have been incorporated in to the body of the report.

Director of Finance and Contractual Services comments

46. This report recommends that the LFB communications team run a year long programme of activity to raise the profile of issues with product recall systems and manufacturing standards of some white goods. All costs incurred on this programme will be contained within existing Communication Department budgets.

Sustainable development implications

47. Greater awareness of white goods safety and improvements to the product recall process, is expected to improve fire safety, thus reducing fires and the negative social, environmental and economic impacts of fire.

Staff Side consultations undertaken

48. None.

Equalities implications

49. The actions recommended in this report will benefit all people at risk of fires arising from faulty white goods; this includes, but is not restricted to, people with protected characteristics. Older people are less likely to engage as fully with social media campaigns or other on-line information and they, as well as private tenants in poor standard accommodation, are more likely to have older or second-hand appliances, and it is therefore essential that the actions as described in paragraph 42 are undertaken. These campaigns could also be supported through existing LFB activities such as Home Fire Safety Visits, Local Partnerships and Schools Team interventions.

List of Appendices to this report:

1. Case studies

Case studies

Best practice

There was an investigation into a fault on printed circuit boards (PCB) in washing machines which is the suspected cause of a number of fires. Four fires involving these washing machines had been confirmed by November 2014 and two more are currently under investigation by the fire investigation team. The fire investigation team are liaising with the producer.

This issue was addressed at director level and the scale of the issue was ascertained – there are 130,000 appliances sold which could have this fault. A review of hazard notifications was carried out, resulting in 14 fire related incidents in total being identified.

The company accepted that they needed to address the issue and offer affected consumers a solution as quickly as possible. It was agreed that the most practical solution was to replace the PCB in the machines in situ in the consumers' homes.

Of a total 130,000 machines manufactured, Argos had sold 22,505 of these Trading Standards considered the risk assessments conducted by the independent technical consultant in March 2014, to be acceptable and it was agreed that Trading Standards issue a recall notice, which happened on 27 March 2014.

Following this all Argos customers were written to twice, to inform them of the risk and the repair action. The recall was reported in the public domain the following websites: EU RAPEX, Argos.co.uk, RecallUK, Electrical Safety First, Which? and the Trading Standards Institute. As of 28 June 2014, of 22302 units sold in the UK (32.75 per cent of the machines in the UK) had been accounted for.

Bad practice

In London in 2010 there were three incidents of fires in dishwashers in close succession. Although the appliances were badged in two cases as manufacturer X and in one cases as Manufacturer Y, it was apparent to LFB investigators that the appliances were identical.

Basic desktop research by fire investigators showed that in the USA Y had issued a recall of dishwashers manufactured between 1999 to 2005. The USA Consumer Product Safety Commission (CPSC) announced a voluntary recall in co-operation with the producer, setting out that an electrical component in certain model dishwashers can overheat and which can pose a fire hazard to consumers. There were thought to be up to half a million units in circulation. It also set out that the producer has received numerous reports of incidents, including reports of fires resulting in property damage.

The fire investigation team contacted CPSC about the failure and after discussions between officers it became clear that the fault in the UK appeared to be identical to that found in the USA, but that it had not been acted upon in the UK or Europe. Following requests from the LFB for information, Y were quick to make contact and met fire investigation team officers at Dowgate Fire Station. Their initial response was that they were aware of only 103 incidents of fire in the UK and that they did not consider this a large quantity. They confirmed that the appliances in the UK were the same as the models that had been recalled in the USA. It then took six months of meetings and conversations with Y for them to recall the appliance in the UK. It was almost 30 months between the USA recall

and the UK recall of identical and equally dangerous products. It took even longer in some other countries, as the timeline below shows:

Date	Where Y issued same recall for Y and X model dishwashers
Jan 2009	USA
July 2011	UK
Nov 2012	Australia
Aug 2013	Ireland
Aug 2013	Europe

Further to all this, X dishwashers of a certain model were made by Y from 1999 to 2003 and there was evidence in London that they were failing in the same way. Trading Standards initially believed that the problem had been resolved and stated that X had assured them that all their affected models would have been scrapped by now. An LFB fire investigator found 20 for sale on eBay and shared information about fires involving them in London. This evidence did persuade X's home authority Trading Standards to act. Eventually, in September 2013 X recalled the Y machines in Ireland and two months later in November, they issued a safety notice for the UK.