



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

Robert J. Howell
Deputy Executive Director
Safety Operations

Tel: 301-504-7621
Email: rhowell@cpsc.gov

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Mr. Ralph Vasami
Executive Director
Window Covering Manufacturers Association
355 Lexington Avenue 15th Floor
New York, NY 10017

Dear Mr. Vasami:

Participating staff of the Australia Competition and Consumer Commission, Health Canada, European Commission Directorate General for Health & Consumers, and the U.S. Consumer Product Safety Commission¹ have reached consensus on a document that describes approaches to addressing the strangulation hazard related to corded window coverings. The approaches presented in the enclosed consensus paper are intended to inform decision making with regard to improving the safety of corded window coverings.

Respectfully,

A handwritten signature in black ink that reads "R. Howell".

Robert J. Howell
Deputy Executive Director for
Safety Operations

enclosure

¹ These materials were prepared by the CPSC staff; they have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

Pilot Alignment Initiative Consensus on Corded Window Covering Safety

1. Introduction/background

The Pilot Alignment Initiative (PAI) was established by the product safety regulators of Australia, Canada, the United States and the European Commission's DG SANCO to examine the obstacles and opportunities for alignment of safety requirements for three widely used consumer product categories, including corded window coverings.

Despite varied approaches to prevent strangulation from corded window coverings, child fatalities have been recorded for decades and continue to be reported in all participating jurisdictions. The safety of corded window coverings is managed by different approaches and mechanisms in each of the participating jurisdictions.

High profile efforts to improve the safety of corded window coverings are underway in the United States and Canada. Australia has a mandatory supply standard for corded window coverings. The European standardisation body CEN is developing a standard based on the European Commission's decision on safety requirements for internal blinds and corded window coverings very recently agreed upon by European Union Member States. The PAI is an opportunity to examine how such current, recent and high-profile efforts can aid or impede the alignment of safety standards across jurisdictions. Each jurisdiction is at a different stage of developing its requirements. It is understood that it may not be appropriate or timely for a jurisdiction to take account of the considerations from this document into current efforts, instead a jurisdiction may consider it at a later opportunity, also based on further experience and technical development.

This document describes the main hazard related to corded window coverings and identifies a hierarchy of available and effective solutions to mitigate the risk of strangulation. Participants used a consensus based approach in discussions and the drafting of this document to take into account the different regulatory practices, available data, and current status of initiatives in each jurisdiction. Jurisdictions may choose to take into account these considerations in drafting their safety requirements subject to their own regulatory procedures or in cooperation with voluntary standards bodies and building on their current set of safety requirements.

2. Scope

This document addresses the hazard of strangulation to young children posed by internal corded window coverings, which are used in environments where young children might have access to them. All types of internal corded window coverings are included in the scope of this document. Examples of such products are horizontal and vertical blinds, roller blinds, roman shades, curtains, cellular shades, roll-up blinds, etc.

There are many different types of cord on window coverings. Assessment of cord accessibility and the strangulation hazard is part of the process that should be applied to all cords on internal corded window coverings; therefore no distinction is made as to the location of the cords on the product, or as to the purpose of the cords.

Other household products outside the scope, corded or beaded door curtains for example, could pose the same hazard due to the accessibility of cords. The most effective means of addressing the hazard for corded window coverings may also be effective if applied to other products outside the scope.

3. Death and Injury History

Strangulation fatalities from corded window coverings have been documented in all participating jurisdictions for several decades, and continue to occur regularly with no discernible reduction in frequency.¹

The home environment is usually a place which caregivers feel is safe enough to allow their children to explore without risk, but the vast majority of incidents occur in the home. The hazard is hidden to children and is not always obvious to caregivers since supposedly safe cords not intended to be touched have also been involved in fatalities. Children interact with windows and window coverings as an integral part of their environment and products should be designed with this understanding. Deaths and near-deaths from strangulations are an ongoing worldwide concern.

A typical incident involves a 20-month old child climbing onto a sofa to look out a window, exploring the window sill, finding an accessible cord and accidentally getting it wrapped around his/her neck, resulting in a fatal strangulation. Another incident involves a 12-month old child getting caught in a cord which was hanging into a crib, resulting in a fatal strangulation. Yet another incident involves a tension device that was not attached to the wall, exposing a hazardous loop that strangled a 12-month old child.

4. Risk group

The group most at risk from corded window covering strangulations are children aged 12 months to 36 months old, who account for about $\frac{3}{4}$ of all fatalities, though older and younger children have also had fatal incidents. The risk is present for any child who has the physical ability to touch cords within their reach or by climbing on furniture to touch them, but who is not able to recognize or respond to the dangers the cords pose to them.

¹Regulating agencies within each jurisdiction should be contacted for further details on incident data.

5. Interventions

In various jurisdictions, past strategies used to reduce fatalities from corded window coverings have had limited success.

Warnings and labels should be present on any product with cords of any type. Visible and obvious warnings should be on the product, on the packaging, and in the instructions. Warnings should describe the strangulation hazard posed by the corded window coverings and instructions should be provided on the appropriate installation to mitigate the risk of strangulation.

Despite clear and present warnings and instructions, fatalities continue to be reported in all jurisdictions. The principal reason for continued fatalities is that a caregiver's awareness of the hazard does not prevent children from being able to access and reach cords.

6. Status and scope of existing performance standards

Canada and the United States participate in the meetings of the Window Covering Manufacturers Association, an industry group in charge of the ANSI standard for window covering safety. Both countries have asked for strong improvements to the standard. Canada also participates in the technical task groups that feed into the standard writing process. The WCMA standard is made up of product and component categories, each with particular requirements, and seeks to avoid restricting the freedom of product design.

Canada has a regulation that references the CSA standard for Corded Window Coverings under the *Canada Consumer Product Safety Act*.

Australia has a mandatory supply standard dealing with warnings, instructions and the provision of safety devices. The national uniform standard, effective from July 2010, expanded coverage from loops to all cords. The standard requires that safety devices be provided with the product if a specified length of cord or loop is within 1.6 metres from the floor.

The EU has a voluntary standard EN 13120:2009 which is currently being revised following a Commission Decision of 27 July 2011 to increase the safety of corded window coverings.

7. Considerations

When each jurisdiction next revisits its safety requirements for corded window coverings, these considerations should highlight certain consensus points and are intended to inform decision-making. It is understood that current safety requirements already in place or being discussed in each jurisdiction may not make use of all of these considerations, and that it may not be immediately appropriate to take them into account in those jurisdictions.

A hierarchy has been established to compare the relative safety of available solutions, recognizing that different solutions may be necessary for making different types of products safe.

To achieve the greatest permanent reductions in strangulations from corded window covering products, the product designs should eliminate exposure to the hazard or eliminate the hazard entirely. At the top of the hierarchy of safe solutions for window coverings are the following:

- The product has no accessible cords under any conditions of foreseeable use or misuse.
- The product has accessible cords that cannot form a hazardous loop under any conditions of foreseeable use or misuse, including failure to heed warnings or incorrect installation.

The following approach provides for the next level in the hierarchy of solutions to reduce strangulation hazard:

- The product is provided with safety devices to be installed ensuring that accessible cords cannot form a hazardous loop. Instructions and warnings are provided for correct installation.

Due to variable factors, such as a consumer's diligence and ability to follow all installation instructions and heed all warnings, there is a difference between this approach and the approach providing the highest level of safety.

Finally, relying solely on warnings that the product contains hazardous loops that could strangle a child is considered insufficient to prevent fatalities.

Warnings and instructions for safe use however should continue to be present on all corded window coverings, their packaging, and their instructions. Public education efforts should encourage the use of safe window coverings and removal of products with accessible cords that can form hazardous loops.

8. Conclusion

Recognizing that each jurisdiction varies in its policy decision making and regulatory processes, the considerations presented above are intended to be used, as appropriate, with other possible considerations, in such policy making and regulatory processes. Each of the jurisdictions may have a different and valid view on what solutions should be mandated and in what time frame.