



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

October 13, 2016

Mr. John Wade
Chair, UL Standards Technical Panel 1370
Underwriters Laboratories Inc.
12 Laboratory Drive
Research Triangle Park, NC 27709
Email: John.Wade@ul.com

RE: *CPSC Staff Request for STP 1370 to consider proposal for Unvented Liquid and Gel Fuel Burning Portable Devices*

Dear Mr. Wade:

U.S. Consumer Product Safety Commission (CPSC or Commission) staff requests that Underwriters Laboratories Inc. (UL) Standards Technical Panel (STP) 1370 convene an in-person meeting to consider the working group proposal for unvented liquid and gel fuel-burning portable devices. The proposal was sent by working group chair, Jarrod Kuhn, of Sterno Products on September 14, 2016.

This working group was formed in August 2015, following a request from CPSC staff to UL in May 2015¹ to re-form a working group to develop a proposal for requirements for these devices. The working group began meeting in October 2015, and the group continued to meet regularly until September 2016, when all members of the working group, including CPSC staff, agreed to the final proposal. CPSC staff believes that the requirements in this proposal will reduce the risk of death and injury to consumers using these devices.²

I ask that you forward the proposal, and this letter, to all current members of STP 1370. CPSC staff strongly supports this proposal and encourages STP 1370 to consider and adopt this proposal as an addendum to UL 1370, or as a new voluntary safety standard specifically for unvented liquid and gel fuel-burning devices. Requirements in this proposal include:

- Limiting the use of flammable liquid fuels to disposable canisters or devices with separated fueling and flame locations, thereby eliminating the potential of pouring flammable liquid fuels over open flames;
- Requiring fuels safe for indoor use to demonstrate acceptable carbon monoxide and nitrogen dioxide generation;

¹ <https://www.cpsc.gov/PageFiles/182039/UL-Letter-Portable-Fireplaces.pdf>

² These views are those of CPSC staff, and have not been reviewed or approved by, and may not necessarily reflect the views of, the Commission.

- Ensuring that all devices have a basic level of stability, minimizing the risk of fuel spills; and
- Labeling all devices appropriately so that consumers are aware of the risks from their use and foreseeable misuse.

CPSC staff strongly supports this proposal and believes that an in-person would be the best way to convey the importance of the risks that unvented liquid and gel fuel-burning devices pose and the benefits that the proposed requirements provide.

Thank you for the opportunity to work with UL and the STP on this very important consumer safety issue. If you have any questions or need additional information, please contact me at sayers@cpsc.gov, or 301-987-2030.

Sincerely,



Scott Ayers, P.E.
Technical Lead, Portable Fireplaces
Rulemaking

Cc: Patricia Edwards, CPSC Voluntary Standards Coordinator
Angela Heggs, CPSC Office of the Secretary, Docket Manager
Gillian Ottley, UL Project Manager for STP 1370 (Gillian.Ottley@ul.com)
Jarrod Kuhn, Sterno Products Director of Logistics, Regulatory & Product Safety
(JKuhn@SternoProducts.com)