



U.S. CONSUMER PRODUCT SAFETY COMMISSION
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October 11, 2006

Mr. James Becker
Chairman, ASTM Subcommittee F15.45 on Candle Products
734 Riva Ridge Trail
Corbin, KY 40701-8541

Dear Mr. Becker:

The U.S. Consumer Product Safety Commission (CPSC) staff* supports the efforts of the ASTM Subcommittee F15.45 on Candle Products and Fire Safety Task Group in the development of candle standards aimed at reducing the fire losses[†] associated with candle products. CPSC staff has maintained direct involvement in the activities of the Subcommittee and Task Group and has actively and consistently participated by providing incident data and technical support.

As a result of the Task Group's efforts, ASTM F2417, *Standard Specification for Fire Safety for Candles*, was published in 2004. The standard establishes performance requirements for candle characteristics identified (by incident data) as contributing factors to candle fires. While the standard represents a significant amount of effort and addresses many of the safety issues identified by an analysis of available incident data and recall information, it does not address many of the fire safety issues identified with candleholders and accessories.

A separate standard for candle accessories, initially addressing the stability of candle accessories and ensembles and the flammability of candle/potpourri (tealight) burners and trim rings, was expected to be finalized by the end of 2006 after completing the ballot process. Although a negative vote was received, it was found *non-persuasive* by the Task Group and presented to the Subcommittee for discussion and vote during the ASTM F15.45 Subcommittee

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

[†] Based on national fire estimates, the four-year average (1999-2002) of total fire department attended candle fires was an estimated 15,300 fires resulting in 130 deaths, 1,500 injuries, and \$303.3 million in property loss annually.

meeting in Memphis, Tennessee on September 21, 2006. The Subcommittee determined that the negative was persuasive by a very close vote, with many members abstaining or not present. CPSC staff is concerned that the result of the meeting has seriously delayed progress on the candle accessory standard and will further delay the development of any performance requirements for candleholders.

Based on the discussions, it appears that the work of the Task Group is not fully understood. The current draft of the balloted standard for candle accessories includes requirements for trim rings. The draft provisions classify trim rings as either *alpha* or *beta*. Class *alpha* rings must meet a flammability performance requirement (burn time measurement) after exposure to an ignition source for up to 60 seconds. These rings can be used with virtually all candle types and designs. Class *beta* rings do not meet the flammability performance requirements. These rings must be labeled in accordance with the draft provisions and are intended for use with only specific candle types that incorporate a barrier or are designed to keep the candle flame from coming in contact with the trim ring. It is intended that the labeling provision will be reviewed by the Task Group in two years. These provisions were developed after careful consideration of the trim ring industry, flame retardant options, available test data, and incident data. While CPSC staff and members of the Task Group acknowledge the potential role of trim rings in candle fires and support the need for adequate performance requirements, there continues to be no incident data specifically identifying trim rings. Based on the currently available information and technologies, and the intention to review the issue in two years, CPSC staff believes that the currently drafted provisions for trim rings are adequate to address the hazard.

CPSC staff urges the Task Group to begin developing provisions for candleholders without delay and to make every possible effort to finalize the current draft standard for candle accessories. According to the CPSC Office of Compliance, there were 118 recalls for fire safety problems, involving over 12.7 million candle and accessory products between January 1993 and May 2006. One of the three most common issues involved the ignition or overheating of candleholders (55 of the 118 recalls involved candleholders). The need for performance provisions for candleholders is clearly identified.

Sincerely,

A handwritten signature in cursive script, reading "Jacqueline Elder".

Jacqueline Elder

cc: Colin Church, CPSC Voluntary Standards Coordinator