

Consumer Federation of America · Consumers Union · Parents for Window Blind Safety

May 16, 2012

Dear Representative,

As organizations dedicated to protecting children from unsafe products, we write to urge you not to sign onto a letter being circulated by Representative Nunnelee on window blind safety. The letter seriously mischaracterizes important facts about window covering safety and the ineffectual voluntary standards adopted by the Window Covering Manufacturers Association (WCMA).

Window coverings pose a persistent and preventable strangulation threat to children. According to data from the U.S. Consumer Product Safety Commission, an average of one child per month has died for the last twenty seven years from strangulation caused by window blind cords. Further, CPSC has a record of 140 incidents since 1999 that resulted in serious injuries to children. This rate hasn't changed since 1983, despite what representatives of the window blind industry claim are ever-improving safety standards. In fact, statistics show that many window blind-related deaths were caused by window coverings that complied with the industry's weak safety standards. The problem is so pervasive that last year, the U.S. Consumer Product Safety Commission, Health Canada, and the EU's DG Sanco all called on manufacturers to address the strangulation risk caused by corded window coverings.

Unfortunately, the voluntary standard effort led by WCMA has failed. The process, which is not yet final despite WCMA statements to the contrary, has been highly flawed. WCMA's efforts to develop the standard have not been transparent. Moreover, WCMA has withheld information from consumer participants and some small business representatives in the process and has refused to consider their recommendations. The process has been so defective that, in a highly unusual move, consumer groups withdrew from it last September. The fundamental failure with the standards is that they ignore the strangulation hazard posed by window covering cords. Although the voluntary standards process is ongoing and WCMA must consider the negative ballots submitted by consumer organizations, this consideration has been wholly inadequate to date.

In refusing to address the strangulation risk posed by cords, WMCA claims that "there is no universal technological solution to eliminate corded products." This misses the point entirely. It is not necessary to have a single "universal" solution that works for every window blind, in order to significantly reduce death and injuries cause by window blinds. In reducing strangulation risk, different solutions can be applied to different products. Importantly, the technology to eliminate cords on window coverings already exists. Fixes for stock products and custom products

exist and are being sold in large retail stores today and several manufacturers currently offer cordless window coverings.

Another mischaracterization in the Nunnelee letter is that the U.S. Consumer Product Safety Commission attempted to promulgate a mandatory window blind safety rule. This is false. The CPSC joined with the European Union and Canada to encourage WCMA to develop an adequate voluntary standard that addresses strangulation risk. CPSC also recalled millions of window coverings that pose serious risks to children.

Consumers, retailers, and international government safety agencies are right to demand a solution that solves this problem. Instead of spending time and money to thwart necessary safety improvements, window blind manufacturers should develop innovative solutions that prevent window cords from strangling infants and toddlers. A document dispelling many of the myths repeated by the window covering industry is attached.

We urge you not to sign onto Representative Nunnelee's letter to the U.S. Consumer Product Safety Commission. **Instead, we urge you to call on the WCMA to support solutions that will protect our nation's children from the known and preventable strangulation risks posed by cords in window blinds.** Encouraging a flawed voluntary standards process that has resulted in dangerously inadequate consumer protections does not support small businesses or create jobs. It retains the status quo that continues to put children at risk.

Sincerely,

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