



Consumer Federation of America

ISC



November 15, 2018

The Honorable Ginette Petitpas Taylor
House of Commons
Ottawa, Ontario
Canada
K1A 0A6
Sent via email: [Ginette. PetitpasTaylor@parl.gc.ca](mailto:Ginette.PetitpasTaylor@parl.gc.ca)

The Honorable Scott Brison
House of Commons
Ottawa, Ontario
Canada
K1A 0A6
Sent via email: Scott.Brison@parl.gc.ca

Dear Minister Petitpas Taylor and Minister Brison,

We are writing to reiterate our strong support for Health Canada's Corded Window Coverings Regulations. Consumer Federation of America (CFA) is a non-profit association of approximately 280 pro-consumer groups that was founded in 1968 to advance the consumer interest through advocacy and education. Parents for Window Blind Safety is a non-profit organization that protects children from unsafe play environments that contains lethal window covering cords, educates consumers on exposed window covering cord dangers, assists in creating safer product standards in the Industry, and tests window covering products for safety.

Independent Safety Consulting is a consulting practice that advocates for safety of consumer products.

Our organizations have prioritized window blind safety for many years through participation in the WCMA/ANSI voluntary standards process, through petitioning the U.S. Consumer Product Safety Commission to ban unsafe corded window coverings, and through educating the public and decision makers about the strangulation hazards posed by corded window coverings.

We strongly support Health Canada's proposed regulations and applaud Health Canada's leadership on window blind safety.

We support the broad scope of the standard. The proposed Corded Window Covering Regulation would update regulatory requirements for corded window coverings and provide stronger protection to children and other consumers in Canada. The Regulations would,

- (1) restrict the length of accessible cords and the size of loops that can be created to help eliminate the risk of strangulation,
- (2) require that any cord that can be reached must be too short to wrap around a one-year-old-child's neck (not more than 22 cm in length) or form a hazardous loop that can be pulled over a one-year-old-child's head (not more than 44 cm in perimeter),
- (3) require that cord that cannot be reached would have to remain unreachable throughout the useful life of the product,¹ and
- (4) require a warning on the product, packaging, instructions, and on associated advertisements that speak to the hazards and specifications outlined above, with instructions to immediately remove the product should those hazards become present.²

We support that the Regulation includes all window covering products. Importantly, our organizations have stated for many years that the most effective way to reduce the strangulation risk posed by corded window coverings is to limit the length of accessible window covering cords for all window coverings in the market. An effective standard that addresses the strangulation hazard posed by window coverings is necessary because the current voluntary standards in both the U.S. and Canada have failed to address the key hazard pattern associated with corded window coverings.

For almost 20 years, the U.S. (WCMA/ANSI) voluntary standard has repeatedly failed to address the issue in an effective way. The reason it has failed has been the same throughout this period of time – the standard still permits long cords capable of strangling children. Until this is no longer allowed, strangulation incidents will continue as they have. While the U.S. voluntary standard bans corded window coverings for stock products, it continues to allow them for custom

¹ Government of Canada, Proposed Regulation for Corded Window Coverings, available on the web at <http://www.gazette.gc.ca/rp-pr/p1/2017/2017-06-17/html/reg7-eng.php> at 4.

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products. New two day ship rate models for custom products allow online shoppers to purchase hazardous products for their homes as fast as stock products. Ineffective warnings are often overlooked, leaving new parents surprised that a costly deadly product was purchased for their home. We support the significantly more protective scope of Health Canada's proposed regulation as it includes all corded window coverings and creates safe environments for future children.

Educational efforts by window covering manufacturers, the U.S. Consumer Product Safety Commission, and public interest organizations to warn consumers about the risks posed by corded window coverings have not significantly reduced the risk to consumers. Window coverings are highly familiar products and thus, consumers are not in an "information-seeking mode" as it relates to these products. Decades have passed since this deadly hazard was first made known to industry, and due to their inaction, strangulation deaths and permanent injuries have persisted.

In addition, this Regulation is consistent with what is technologically feasible for window covering manufacturers. Currently, across every window covering category, there are products on the market that do not pose strangulation risks to children. The research and technology already exist to design products without strangulation risks. Manufacturers know how to do this. In fact, manufacturers have stated to the U.S. Consumer Product Safety Commission that cordless options are available in every product category.³ Although safer designs are available on the market worldwide, manufacturers currently sell some of them at premium pricing, making them cost-prohibitive for many families. If there is a mandatory standard, the price will decrease, making safe blinds more affordable and more accessible to all consumers.

We appreciate Health Canada's leadership on window covering safety. Health Canada's proposed Regulation is a strong standard that will ensure that a level of safety is applied to all products for sale in the market. For the first time, this will effectively protect consumers and strengthen the market for companies who want to innovate to protect children.

Thank you for your consideration.

Sincerely,

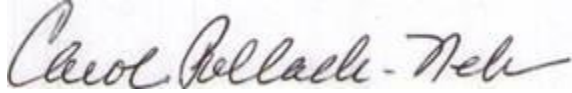
A handwritten signature in black ink that reads "Rachel Weintraub". The signature is written in a cursive, flowing style.

Rachel Weintraub
Legislative Director and General Counsel
Consumer Federation of America

³ Statement of Tom Merker, Director of Engineering at Springs Window Fashion, Inc, at a CPSC public meeting with WCMA on May 27, 2015.



Linda Kaiser
President
Parents for Window Blind Safety



Carol Pollack-Nelson, Ph.D.
Independent Safety Consulting, LLC