

化学物質問題市民研究会
Citizens Against Chemicals Pollution

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April 12, 2012

Dear Mr Nobuki KAWAMURA,

The International Electrotechnical Commission Technical Committee 108 (IEC TC108) is voting on proposed amendments to International Standards 60065 and 62368 for candle resistance of television enclosures which would substantially increase the use of toxic flame retardants in TVs.

The clauses in question require that televisions withstand a three minute vertical candle flame ignition test. This would have an enormous cost to human health and the global environment without providing a fire safety benefit. Here are some concerns:

- There is no objective fire data showing a fire hazard in TVs from candle ignition.
- The electronics industry will need to use large amounts of flame retardant chemicals, exposing consumers to potentially serious health risks
- This standard will make recycling and electronic take-back systems more difficult, expensive, and in some cases, impossible.
- When televisions treated with these chemicals burn, they can produce dangerous dioxins and furans, which will particularly impact fire-fighting personnel and the environment as a whole.

The adverse health impacts expected from the implementation of these clauses are much larger than any possible threat posed by external candle flame ignition of televisions. Furthermore, these proposed requirements were initiated by the flame retardant chemical industry in order to expand their markets. They were defeated in 2008, but the industry has brought them back again.

The 2012 updated *The Case against Candle Resistant TVs* available [here](#) provides a summary of the many adverse impacts of these standards, the flame retardants used to meet them, and the lack of fire safety benefit.

(or at <http://greensciencepolicy.org/international-electrotechnical-commission-iec-candle-standard-electronics>)

We ask you to act in the defence of public and environmental health, and do all in your power to **make sure that Japan will submit a “NO” vote on 108/479/CDV and 108/478A/CDV, and additionally comment to remove the mandatory candle flame ignition requirement in Clause 11 of IEC 62368-1 Ed 2.0 (108/479/CDV) and Clause 21 of IEC 60065 Ed 8.0 (108/478A/CDV) as well as all related language and references.**

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This standard is unnecessary, harmful, and there is no current fire safety rationale for it. Please pass this important information on to the appropriate members of the national mirror committee. We welcome the opportunity to talk further with you on this issue.

Sincerely,

Takeshi Yasuma

Takeshi YASUMA

Coordinator

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