injury

PREVENTION

Journal of the International Society for Child and Adolescent Injury Prevention

Editorials

Product safety: getting tough or being nice?

For a long part of its history, injury prevention in childhood has been almost synonymous with home safety, and that, in turn, is largely a matter of concern about the safety of products. Pioneering work by our honorary editors among others often involved calling attention to the dangers of various products and urging the authorities to take action. Sometimes this involved educating the public, sometimes it required setting safety standards, and occasionally stiff regulation was needed.

In keeping with this theme, this issue includes some unusual elements. First, there is the Special Feature—a superb overview of the topic by Farquhar, based on the presentation he gave at the ISCAIP meeting in Amsterdam. The feature examines various aspects of product regulation through the eyes of someone who is, by heart and training, a consumer advocate. But like so many in the product safety field, his position with the European Union also requires good judgment and a degree of inventiveness. All are needed to achieve the tricky balance between protecting the safety of consumers, especially children, and satisfying the demands of a myriad of government bureaucracies.

A second unusual element is the link between the feature and this issue's Classics. I chose two papers on children's sleepwear flammability and the use of safety standards (p 313 and 317).^{1,2} This choice was easy because I learned so many useful lessons about the politics of advocacy from this example. I watched while groups in the US struggled to bring this to the attention of Congress and then became involved in a similar, extended, and often bitter battle, in Canada. (Researchers should take heart from these Classics; both are essentially descriptive papers quantifying the problem; but, in the great scheme of things, until this was done and done well, pedestrian as it may seem scientifically, little more was likely to happen by way of action toward prevention.)

Third, to help balance the picture presented by Farquhar, I asked Malcolm Barrow, one of our editors who was formerly an employee of the Department of Trade and Industry in the UK, someone from the Consumer Product Safety Commission in the US, and someone from the Product Safety Branch in Canada, to each write a short commentary describing how they determine a product is dangerous and how they decide whether it requires mandatory or voluntary regulation. Added to this is a contribution describing how a non-governmental standard setting body (the Canadian Standards Association) operates.

The work described in the Classics kept the ball rolling that had been set in motion by earlier papers on this topic. The flammable clothing problem is not, of course, an

American issue alone. In fact, pride of place may well belong to our parent journal, the *BMJ*, that published a paper on this topic in 1956.³ In that paper Colebrook *et al* noted that 80% of all burn deaths among children in England were related to clothing ignitions. Although the US introduced the Flammable Fabrics Act in 1953, one reviewer described it as “a standard that was famous for allowing 99% of all fabrics involved in serious cases to pass”.⁴ The same review of the situation in the US in 1971 concluded that government and industry had responded “slowly (and inadequately)”.

Collectively, these and other publications set in motion the most promising solution—flammability standards and means to enforce them. Oglesbay's paper addressed this problem in 1969 and lauded many countermeasures, but none were evaluated.² Furthermore, as the editor of the issue in which this paper appeared noted, several questions remained unanswered: why had nine years elapsed between the time the problem was first identified and the first legislation; why that legislation was so inadequate as to require amendment; and why this, in turn, took another 13 years!

In the US, it was only in 1973 that a specific standard for children's sleepwear was enacted. The paper published in 1977 by McLoughlin, now a member of our editorial board,¹ showed that since 1973 “and coincident with promulgation of strict ... standards... a dramatic decline in the number of children referred [to a pediatric burn unit] has taken place”. Another publication echoed this conclusion, showing that simply requiring manufacturers to agree to the new standard resulted in a net improvement of nearly 75%.⁵

Despite all the evidence from elsewhere, in dismal contrast, it was not until 1984 that the Canadian Institute of Child Health (CICH) and the Canadian Pediatric Society (CPS) persuaded the Minister of Consumer and Corporate Affairs (CCAC) to convene a committee to examine the need to increase the stringency of the Canadian sleepwear standard by making it similar to that in the US. The manufacturers refused to accept any standard that would eliminate the materials responsible for the most severe burns. In other words, Canadian children were judged to be thicker skinned than American children, which may be true metaphorically, but was never true biologically.

Soon after, Canada's stalwart safety advocate, Stanwick, published a paper documenting that about 21 children under 9 experience the enduring nightmare of a sleepwear burn each year.⁶ Even this failed to persuade, nor did subsequent meetings held with CCAC involving a variety of consumer groups.

So CICH and CPS began a letter writing campaign to the minister, and a few months later, *voilà*, a communiqué

appeared announcing “tougher flammability regulations planned for children’s nightgowns and robes”. But, typically, the needs of the corporate sector won out over those of children; the same communiqué added that the revised regulations would not come into effect for another two years “to ensure that industry has time to adjust to these new requirements and minimize adverse impact”. No one bothered to ask how the children burned during this period were supposed to adjust. In the interim, no doubt to salve guilty consciences, CCAC and CPS began a joint venture to notify parents of the dangers by putting posters in pediatrician’s waiting rooms. The messages were classic blame-the-victim genre: requests for parents to select the right sleepwear, to keep matches away from children, not allow them to climb on stoves, and, best of all, to teach the children what to do if they caught on fire!

Although this editorial has focused on clothing burns, this is only as one example. The issue of product safety and the possible need for regulation is, of course, much broader. By sheer coincidence, after planning this issue, I received the latest edition of *Hazard* (March 1998), that exemplary publication from the Victorian Injury Surveillance System.⁷ It features reports on the enforcement (or lack thereof) of legislative and regulatory injury prevention strategies in Australia. The examples given relate to dog bites, pool fencing, a ministerial request for voluntary withdrawal of babywalkers from the market, and the enforcement of helmet laws. A common pattern was evident: little or varied enforcement and little compliance

with voluntary measures.⁷ Notably, an editorial comment after the concluding piece in which the Australian Competition and Consumer Commission (ACCC) is described, adds: “Unfortunately, most safety standards in Australasia are voluntary and are therefore outside the jurisdiction of the ACCC. Action is therefore required to increase compliance with important voluntary standards or to mandate them”.

Personally, I remain convinced that in most instances mandatory regulations, strictly enforced, with appropriate penalties, are, in the long run, the best way to ensure product safety. But my convictions rest on few data and I may be wrong. The case for voluntary standards may be more compelling than I realize. Those who disagree are urged to present their views. I suspect that, as in most matters, some mixture will be the answer. We will never know until further research is conducted. The *Hazard* report is a large step in this direction but many more such studies are needed.

1 McLoughlin E, Clarke N, Stahl K, *et al.* One pediatric unit’s experience with sleepwear related injuries. *Pediatrics* 1977;60:405–9.

2 Oglesby FB. The flammable fabrics problem. *Pediatrics (Suppl)* 1969;44: 827–32.

3 Colebrook L, Colebrook V, Bull JP, *et al.* The prevention of burning accidents. *BMJ* 1956;i:1379–86.

4 White WV. Flammable fabrics and the bum problem: a status report. *Am J Public Health* 1971;61:2057–64.

5 Knudson MS, Bolieu SL, Larson, DL, *et al.* Children’s sleepwear flammability standards: have they worked? *Burns* 1980;6:255–60.

6 Stanwick R. Clothing burns in Canadian children. *Can Med Assoc J* 1985;132:1143–9.

7 Ashby K, Routley V, Stathakis V. Enforcing legislative and regulatory injury prevention strategies. *Hazard* 1998, No 34 (March).

A Christmas “bumper bundle”

Alert (and regular) readers will quickly discover that this issue is unusual in several other respects. Apart from the product safety theme, there are more pages than usual, and a wider selection of original articles—a veritable “bumper bundle”. (For readers who did not grow up in the 1940s, a “bumper bundle” was a special, fat version of a comic book, usually appearing around Christmas.)

To a great extent, the large number of papers is a tribute to authors who either write succinctly, or accept, graciously—or otherwise—cuts recommended by the reviewers or the editor. What impresses me about these papers is the diversity of topics and countries represented. They epitomize what the journal strives for—a truly broad and international perspective on injury prevention.

Finally, this issue marks a special occasion in the journal’s history, the publication of its first supplement, *Action on Injury: Setting the Agenda for Children & Young People in the UK*. This part of your bumper bundle is extremely important. The papers presented in it were prepared for a conference in conjunction with the Royal College of General Practitioners, the Royal College of Paediatrics and Child Health, and the Faculty of Public Health Medicine. Importantly, the conference was sponsored by the Department of Health in England. The title is

symbolic. It suggests that the UK is now poised to take action on the prevention of injuries, much as Sweden did over 40 years ago, and other countries, such as the US, Australia, and New Zealand have done more recently.

At the time of writing the conference had not yet taken place. Consequently, it is impossible to predict what specific reactions the policy makers will have to the proceedings. I am confident, however, that they will be positive.

The importance of this publication and the conference that prompted it do not apply only to the UK. Similar conferences should be held in every country that does not now have a concerted plan to prevent childhood injury. For such plans to work, health authorities must cooperate with all the other parties involved in this noble goal. This must be a concerted effort; one that involves all the key sectors in the world of safety. We will be watching the developments in the UK with great interest and fervent hope. For now, we thank those who took the initiative to bring this about and to the health authorities that supported it.

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Editor