

28 January 2025

To Mr P. Straker,
Assistant Coroner,
North London Coroner's Service
Barnet Coroner's Court
29 Wood Street.
London. EN5 4BE

Re: AMDEA Response to Coroner's Report

Dear Mr Straker,

Thank you for your regulation 28 report to prevent future deaths, dated 6 December 2024, concerning the fire incident involving a domestic appliance and resulting in the tragic deaths of Messrs and Mses Champagauri and Dipak Bhatt. We appreciate the thorough investigation, and the concerns raised in your report.

We have carefully reviewed the content of the findings and address below each point of concern in turn. AMDEA remains committed to collaborating with industry stakeholders to enhance product safety and will continue to share insights at national and international standards development committee meetings. These ongoing efforts aim to drive continuous improvement, enhancing information management, sharing best practices, and upholding the highest safety standards across our sector.

We value the opportunity to contribute to the prevention of future deaths and are committed to working closely with the Office of Product Safety Standards (OPSS), the London Fire Brigade (LFB), and other relevant bodies to implement effective solutions.

Please do not hesitate to reach out if further clarification is required.

Yours sincerely,



CEO, AMDEA

(1) That ingress of moisture into condensate pumps may result in tracking faults causing resistive heating and fire.

AMDEA and its membership are committed to promoting product safety and addressing potential hazards such as moisture ingress into condensate pumps, which may lead to tracking faults, resistive heating, and fires. AMDEA and its members are also committed to promoting product safety and sharing of hazard-related information through our Safety Liaison Panel (SLP) function.

Our membership actively investigates public usage data, service feedback and field findings to continuously improve product designs. These efforts include considerations for all components within a product. The condensate pump is called out specifically within the coroner's report. However, members design teams consider all component positioning and seal and enhance moisture protection for all components and therefore mitigate water ingress risks. Manufacturers rigorously test products to ensure compliance with safety standards outlined in legislation such as the ['Electrical Equipment \(Safety\) Regulations 2016'](#) under Schedule 2, where the technical documentation held by the manufacturer "must make it possible to assess the electrical equipment's conformity to the relevant requirements and must include an adequate analysis and assessment of the risk(s)."

In practice, our members are working iteratively and continuously risk assessing, then revisiting design based on ongoing life testing, user findings and field feedback allowing manufacturers to enhance the sealing and protection of said components. Furthermore, they are conducting rigorous testing to ensure that products continue to meet and even exceed the safety standards they are aligned too and ensuring any tracking faults are reduced and handled in the risk assessments therefore reducing likelihood of any resistive heating and fire.

It is worth noting that manufacturers recommend that large appliances be repaired by qualified professionals, unless otherwise stated. Adherence to manufacturer specification spares is important for maintaining the safety and performance of appliances, as improper servicing or the use of non-approved parts can compromise product integrity and increase safety related risks.

We would be interested in learning more about this specific issue to ensure our efforts remain aligned with emerging safety concerns and will be adding this as a topic of discussion at our Safety Liaison Panel meetings.

AMDEA's members incorporate comprehensive design procedures, including DFMEA (Design Failure Modes Effects and Analysis) and adaptive risk assessment processes, which are continuously re-evaluated as new findings emerge. Our members adhere to the latest versions of the EN IEC and BSI standards, including 60335-1 for general appliance safety and IEC 60335-2-11 specific to tumble dryers. These standards include clause 15, which focuses on moisture resistance with tests simulating real world conditions to prevent electrical hazards related to moisture ingress. Additionally, IEC 60529, which defines the internationally recognised IP (Ingress Protection) code and used across multiple industries, guides manufacturers in designing enclosures that withstand environmental factors, such as water exposure.

AMDEA and its membership remain committed to collaborating with industry stakeholders to enhance product safety and share insights at national and international standards development committee meetings. These efforts aim to drive continuous improvement, share best practices, and uphold the highest safety standards across the sector.

(2) That changes in information management would result in better analysis of, and learning from, white goods fires.

AMDEA is strongly in favour of effective information management, which allows for detailed analysis and continuous improvements in mitigating white goods fires. Members rely on a variety of data sources including reports from consumers, Fire Services, and regulatory agencies to inform their own risk assessments and design processes. As appliances become increasingly connected, this data is also shared directly with the manufacturer to further feed into these processes.

AMDEA holds monthly meetings with LFB and OPSS to discuss areas of concern and emerging trends. Additionally, through our bi-annual Safety Liaison Panel meetings, we collaborate closely with our members, Fire Services, Trading Standards and OPSS's data team. These meetings focus on identifying trends and staying informed about changes in product and fire safety.

To further strengthen our efforts, we have recently implemented an annual comprehensive data management collation system. This system collates data from a variety of sources including OPSS and anonymised data from our membership. This collected data enables us to further analyse and disseminate safety related information related to specific appliances. This exercise has already proven instrumental in identifying trends, supporting targeted incident analysis, and driving safety enhancements at International IEC standards level.

AMDEA remains committed to refining the system annually to ensure it continues to serve as a valuable tool in improving safety outcomes and reducing the risk of white goods fires.

(3) Manufacturers to give the Office of Product Safety Standards (OPSS), as the regulator, and London Fire Brigade (LFB), information to support their fire prevention work data on parts replaced on warranty for condensate pumps and RFI filters.

We fully support the efforts of the Office of Product Safety Standards (OPSS) and the London Fire Brigade (LFB) in enhancing fire prevention and recognise the importance of sharing relevant data to enhance safety outcomes.

One of our key initiatives, AMDEA's "Register my Appliance" campaign and website [Home - Register My Appliance](#) supported by Fire Services and other stakeholders enables homeowners to register their appliances, supporting manufacturers to maintain customer records for warranty purposes, manufacturer record support for communications on vital communications for recalls and safety enhancements through improvements, traceability, and accountability for potential issues. Additionally, the website includes a detailed section that lists all relevant recalls across AMDEA's membership for simple consumer reference.

When manufacturers identify issues related to defective parts that pose risks under the '[Electrical Equipment \(Safety\) Regulations 2016](#)'. Regulation 12 (2) requires that they "must immediately inform the market surveillance authority". Similarly, the UK '[General Product Safety Regulations](#)' (GPSR) 2005, clause 9.(1) mandates obligations of producers and distributors to "notify an enforcement authority in writing" if a product on the market poses risks incompatible with the general safety requirements. This obligation is reinforced through the OPSS '[Product Safety and Noncompliance Notification Guidance](#)' and the [PAS7100:2022](#) code of practice for Product Recalls and other corrective actions for businesses and regulators.

Through our Safety Liaison Panel, we facilitate discussions within our membership and other stakeholders on topics relevant to safety issues. These ongoing collaborations reflect the industries commitment to supporting consumer safety, promoting sustainability and collaboration between AMDEA, our members, OPSS and LFB to improve product and user safety.

(4) Working group CPL / 61 to look at standards of manufacture of mains and sub-mains- operated condensate pumps and RFI filters.

AMDEA, as an industry representative, along with many of its members, actively participates in the CPL/61 working group. This group is dedicated to reviewing and establishing robust standards for products and their associated componentry, addressing specific areas when trends or issues are identified.

AMDEA and its membership have not been involved in discussions specifically on condensate pumps and it would be helpful to receive more background information and insights into the findings that led to the inclusion of these points in the report.

Despite condensate pumps and RFI filters being called out specifically here, their consideration may fall within the scope of risk assessments rather than directly within standards. The standards developed through CPL/61 set a method to support meeting the requirements within the appropriate legislation.

The working group's initiative sets the required safety standards, helping to reduce the risk of safety incidents and promoting continuous improvement within industry specific standards. AMDEA remains committed to supporting this working group and its vital functions.

(5) Manufacturers to share data on decisions and rationale behind recall / replacement of condensate pumps and RFI filters with the Office of Product Safety Standards (OPSS) as the regulator, and London Fire Brigade, to support fire prevention work.

Transparency is a core principle within AMDEA's membership, ensuring that safety practices are upheld across the industry. Through AMDEA's Panels, we promote best practices in recalls, servicing and parts replacement facilitating shared learning and collaboration amongst manufacturers. AMDEA and its members not only support but also took part in the development of the OPSS and BSI document [PAS7100:2022](#), which is a code of practice for Product Recalls and other corrective actions for businesses and regulators.

The "[Register my Appliance](#)" initiative, also promoted by London Fire Brigade and other fire services around the UK, ensures that homeowners are aware of any recalls available for their appliance and as a record of identification of appliances within homes. This data is held by the manufacturers so that in the event of a safety recall or enhancement the appliance owners can be contacted should there be product safety changes to be conducted.

Our members are committed to working closely with regulators, including the OPSS and will provide data on decisions and the rationale behind product recalls or replacements when required. It is also important to know that OPSS holds the relevant information regarding decisions and the rationale for recalls or replacements of condensate pumps and RFI filters. AMDEA will continue to support this function as needed and facilitate any additional data sharing to enhance fire prevention.

Manufacturers have a legal obligation to report safety incidents to OPSS, Trading Standards, and their Primary Authorities, in accordance with the '[General Product Safety Regulation](#)' and associated OPSS guidance. This includes documents such as '[Product-Related Fire Incident Notifications](#)' and '[Product Safety and Noncompliance Notification Guidance](#)'. These regulations and guidelines highlight the critical need to identify and report fire incidents linked to consumer products to the appropriate businesses and regulatory bodies.

Should significant trends emerge, we recognise the importance of collaboration between the manufacturer and OPSS. Such partnerships aid in the identification of potentially hazardous products, support fire prevention efforts and contribute to safer environments for the consumer.

(6) Companies investigating fires to notify Trading Standards and the Office of Product Safety Standards (OPSS) of the outcome of those investigations.

Manufacturers are required to proactively report safety incidents to OPSS, Trading Standards, and their Primary Authorities, as outlined in the '[General Product Safety Regulations](#)' and the relevant OPSS guidance including '[Product-Related Fire Incident Notifications](#)', and also market surveillance and enforcement authorities '[Product Safety and Noncompliance Notification Guidance](#)'. These guidelines emphasise the importance of identifying and reporting fire incidents originating from consumer products to relevant businesses and regulators.

AMDEA supports this process through its product identification service, as part of the Safety Liaison Panel remit. This includes providing a 'code of practice' and guidelines for obtaining appliance photos to aid in identification. When remote identification cannot be confirmed, AMDEA members may attend the site, providing the appliance is preserved. However, this is not always possible due to the site clearance practices, limiting the ability to confirm appliance identity.

To improve the effectiveness of fire investigations, cross-sector data sharing is essential. Despite ongoing relationships, certain sectors, such as insurers, have historically not shared data with AMDEA or its members, which hinders the effectiveness of data collation. An enhanced collaboration across sectors would improve data collation statistics.

Current UK governmental guidance suggests logging the following at the scene of a fire concerning a consumer product:

- The product involved, including model and serial numbers.
- The age and place of purchase.
- The degree of severity of the fire.

If changes are proposed to the guidance, it will be crucial to establish clear reporting standards to ensure nationwide consistency and understanding. While this would increase administrative burden across the chain and at times there would be no guarantees that data was conclusive it would strengthen the overall amount of data collected and therefore, the response to fire incidents.

AMDEA members remain committed to notifying Trading Standards and OPSS of the outcomes of fire investigations. This practice ensures all relevant authorities are informed of potential hazards and enables them to take appropriate action to mitigate risks effectively.

(7) Manufacturers to be required to use the OPSS risk assessment methodology, PRISM, when conducting risk assessments to account for persons in a property and their actions, i.e., sleeping whilst a product is taking advantage of lower electricity rates.

As a manufacturing trade body, we fully support the importance of robust risk assessments within the industry, and we acknowledge that this practice is already mandated under the '[Electrical Equipment \(Safety\) Regulations 2016](#)'. While the use of the PRISM methodology remains optional, AMDEA is supportive of the framework, value, and relevance, particularly as it is employed by regulators.

To promote PRISM's adoption and understanding, AMDEA regularly discusses PRISM within our panels and host training events in collaboration with OPSS. These events ensure our membership is fully informed and equipped to apply its key principles effectively.

Risk assessment methodologies must integrate with mechanisms for product safety monitoring and notification. Manufacturers within the EU use the Safety Gate (formerly RAPEX) system for rapid alerts about hazardous products. Post-Brexit, OPSS has introduced the 'Product Safety Database' (PSD). The PSD facilitates notifications from local authorities, market surveillance authorities and manufacturers about potentially hazardous products and allows the UK to act independently to safeguard consumers. However, the PSD lacks the integrated EU-wide coordination offered by safety gate, therefore there are potential for gaps in identifying and addressing risks across UK/NI/EU borders.

Risk assessment processes must continuously evolve to reflect shifts in market dynamics, technological advancements, and consumer behaviours. Adaptable frameworks, such as PRISM are well-suited to address these challenges including scenarios such as accounting for individuals sleeping while appliances operate during discounted (or even free) off-peak energy operation periods. In addition, PRISM expands on the traditional scope of risk assessments by addressing a broader range of safety factors, including mental health considerations.

While AMDEA remains committed to supporting the implementation of adaptable and comprehensive risk assessments aligned with evolving safety and consumer needs, we note that our members already employ their own robust systems that effectively cover these points without being part of the PRISM framework. We will continue to recommend PRISM as a complementary tool to help adapt and enhance their existing risk assessment processes, rather than as a replacement.

Mandating the use of PRISM as a standalone requirement risks creating a UK-specific divergence, potentially leading to inconsistencies and additional documentation to manage within the broader market. Encouraging manufacturers to adopt flexible systems allows for optimum alignment and interoperability between EU safety gate (RAPEX) and the Product Safety Database (PSD). This approach ensures consistency, the highest safety standards across markets and alignment with international best practices while minimising additional administrative complexity.

(8) Identification plates on appliances that will not be destroyed by fire akin to those on vehicles.

It is important here to note that the specific case in question was not brought to AMDEA's attention, and as such, we are unaware of the relevance or connection of the identification plate to our current practices. In this instance, the appliance was clearly identified, and the manufacturer was notified well before AMDEA received any details. Identification is increasingly achieved through digital means, such as online appliance registration or digital receipts. Over the past 18 months, AMDEA has collated and analysed data for fire incidents involving unidentifiable appliances. The data continues to show that the number of such cases remain low, which does not justify the widespread implementation of fire-resistant identification plates. However, AMDEA remains committed to enhancing the existing processes, which effectively support manufacturers in conducting post-fire incident investigations and where necessary initiating product recalls.

The proposal for identification plates on appliances which are resilient to fire has been thoroughly investigated and researched as part of the Safety Liaison Panel's remit. By bringing together fire brigades and manufacturers, a process and 'code of practice' for addressing unidentifiable appliances was established. It is worth noting that within the automotive industry, metal identification plates, such as VIN (Vehicle Identification Number) plates, are designed to withstand various environmental conditions, including heat. However, in severe fire incidents, these plates can also become damaged or destroyed, complicating the identification process.

AMDEA's current system developed as part of the 'code of practice' includes a process where unidentifiable cases are reported to AMDEA via specific email channels and then disseminated within our membership. AMDEA's members are then given an opportunity to rule themselves out or indicate whether they believe it's theirs and wish to attend the scene for further investigation. While this process has successfully facilitated feedback, in a limited number of cases the appliance is too severely damaged or not been held as part of the scene, making onsite confirmation of the appliance impossible.

Fire incident data for key appliances is collated annually in line with international IEC focuses, helping to identify trends and inform on safety improvements. AMDEA will continue to monitor the situation and collaborate with Fire Services and manufacturers to explore practical, data-driven measures that enhance appliance safety.