

(I Want to Be in)
The Room where It Happens:
Private Code Making

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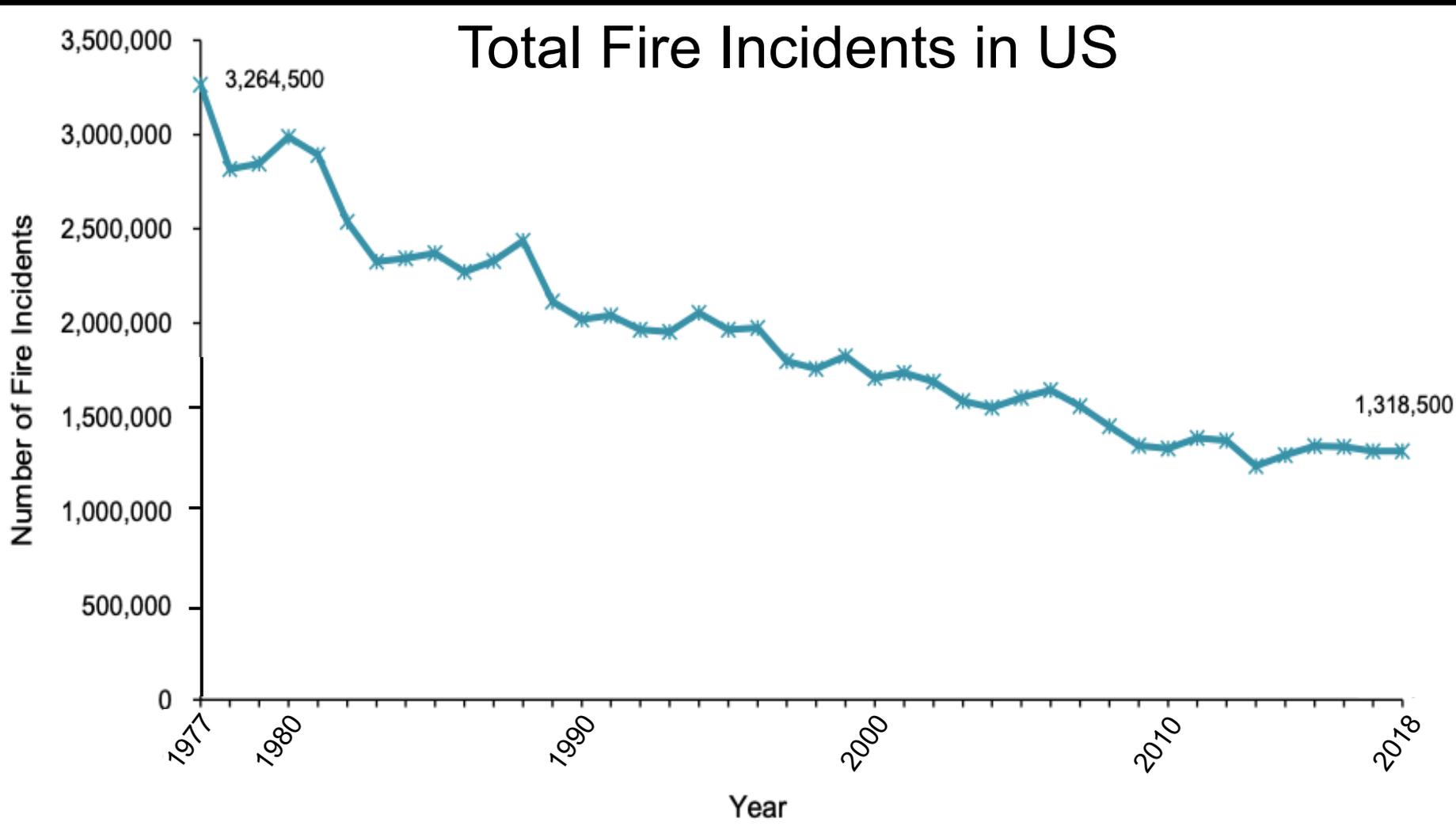
Why are there toxic flame retardants in so many of our products?

No explicit requirements to use flame retardant chemicals



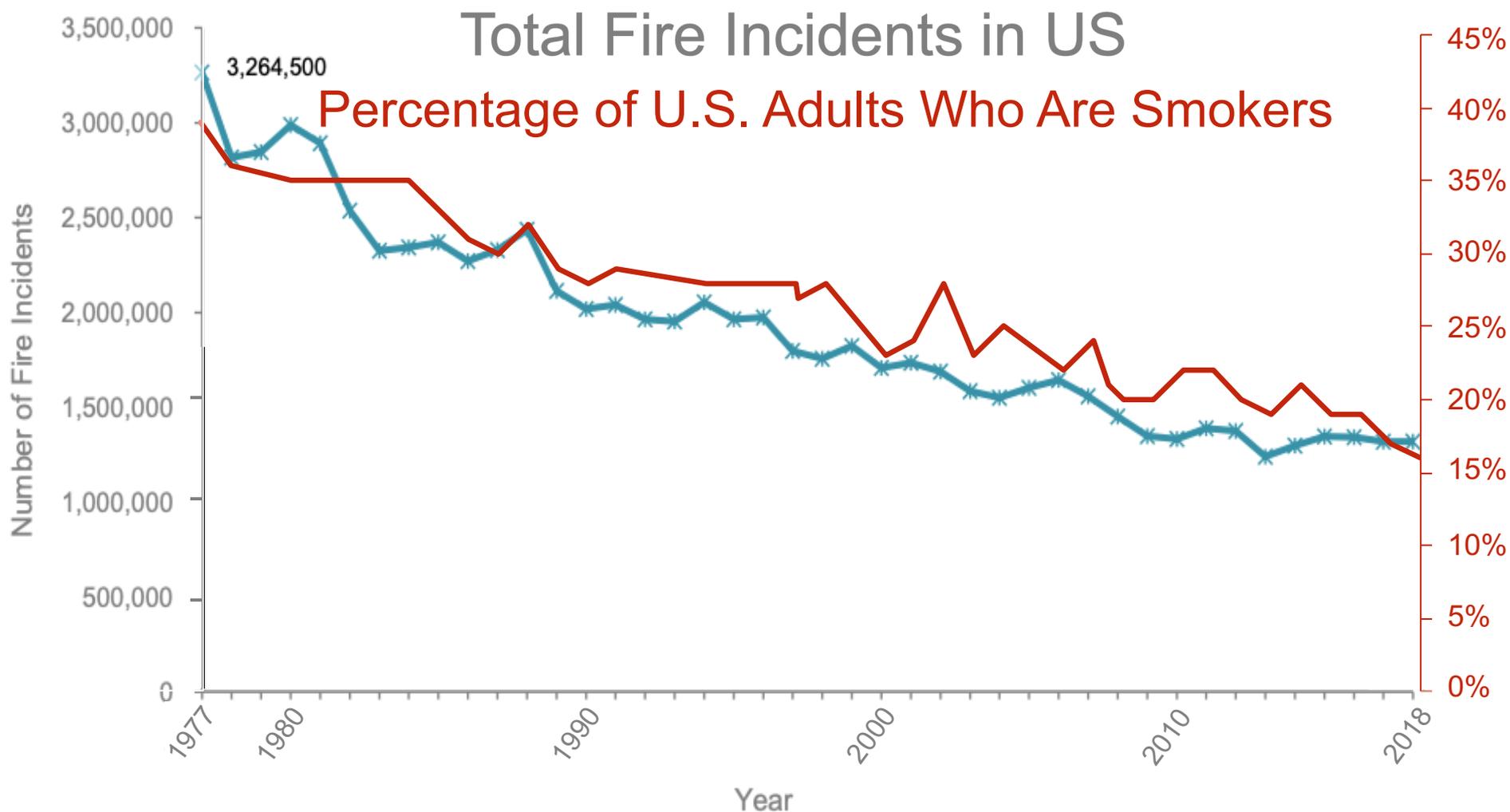
Instead: open flame standards that can only be met with added flame retardant chemicals

Do Open Flame Standards Make Us Safer?



Sources: NFPA, 2018; Gallup, 2018

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Do Open Flame Standards Make Us Safer?

- All* insulation must pass Steiner tunnel test
 - Not appropriate for “materials that melt, drip, or delaminate”
...like foam plastic



*Even underneath a building's foundation

Do Open Flame Standards Make Us Safer?

If open flame standards don't represent real-world risk, and expose us to toxic chemicals, why don't they change?

Who Writes Our Building Codes?

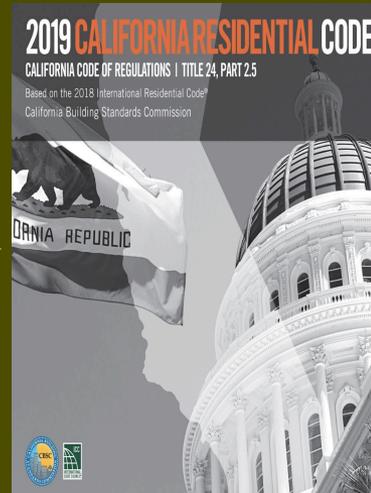


Adoption
Process

Local Code
Modifications
Local Code
Councils

Local Code
Modifications
Local Code
Councils

Force of law



International "Model" Code
International Code Council

Who Writes Our Building Codes?

International Residential Code Committee:

- Moderator and members appointed by private entity with no public oversight
- Fire Service representative: works for fire testing lab
- No representatives of public, material health

2 minutes of testimony per speaker, in person

May 2019: ICC rejects proposal to exempt insulation below a slab from flammability standards



Who Writes Our Building Codes?

California Building Standards Commission:

- Chaired by Secretary of Government Operations
- Representation quota: public members, labor, and differently-abled

No limit to length of testimony, call-ins allowed



Jan 2019: CA Building Standards Commission unanimously accepts proposal to exempt insulation below a slab from flammability standard.

Electronics Standards

Standards and certifications for safety and conformity

- Facilitate trade
- Promote harmonization
- Protect liability & safety
- Model national standards



Who Writes Electronics Standards?

One important standards and conformity organization:

The International Electrotechnical Commission (IEC)



Closed committees. Primarily of representatives from:

- Electronics
- Supply chain
- Plastics and flame retardant industries

IEC: Flammability Clause Committee

Committee chair:

- Calls meeting during a larger conference with one hour's notice, in *Shanghai*.
- Proposes to treat all circuits as though they could ignite, without considering of their power.

Committee chair:

- Proposal during teleconference
- Triple minimum distance between a circuit and a non-FR electronics case

Private Code Making

1. Flame retardants required *indirectly* through flammability standards
2. Open flame standards are poor representatives of true fire risk
3. Standards often *de jure* voluntary but *de facto* mandatory
4. Standards often written by closed industry groups
 1. Independent interests?
 2. Consider public health?



*I was long aware of the problem
before the inherent difficulties had
finally been surmounted.*

-Max von Laue



GreenSciencePolicy.org
SixClasses.org
PFASCentral.org