

Risk Statement – Hotpoint Fridge-Freezer model FF175B

Product Safety Investigation:

Following the Metropolitan Police Service's statement that a Hotpoint FF175B fridge freezer had been identified as potentially involved in the Grenfell Tower fire the government ordered an immediate investigation by technical experts.

The product, which was manufactured between 2006 and 2009, has not been subject to product recalls and the investigation was to establish whether any action was required.

The Department for Business, Energy and Industrial Strategy (BEIS) led this investigation. Following its creation in January 2018, the Office for Product Safety and Standards assumed direct responsibility.

Hotpoint is a wholly owned brand of Whirlpool Corporation/Whirlpool UK appliances Ltd.

FF175B Risk Assessment:

As part of the product safety investigation into the Hotpoint fridge-freezer, a risk assessment was carried out by BEIS. The finding formed one part of the decision on appropriate regulatory action.

Risk assessment is an ongoing activity with responses based on the best assessment of the risk at the time. Throughout the investigation BEIS has continued to review any additional information and update its assessment.

FF175B risk to people and property:

The assessment found that the risk to people and property from a fire caused by this product is low.

The risk is calculated by evaluating the Hotpoint fridge-freezer as a potential source of harm (a hazard) to people and property within a number of scenarios, using available information.

Scenarios included considering the likelihood of a Hotpoint fridge-freezer catching fire, the fire spreading beyond the appliance and causing one or more fatalities and/or extensive property damage. The risk to people was considered in scenarios involving (1) all dwelling types (houses, flats, nursing homes etc) and (2) only purpose-built flats with four or more storeys.

Available Information:

- Publicly available information on www.gov.uk relating to fires and the causes of fires <https://www.gov.uk/government/collections/fire-statistics>
- Publicly available reports on www.gov.uk relating to the market and populations of domestic appliances <https://www.gov.uk/government/collections/fire-statistics>

- An analysis of information on the rate of incidents of fire in FF175B, other fridge freezers and other white goods, available to BEIS
- A range of commercially sensitive information supplied as part of the investigation, including;
 - Information on the construction of the FF175B
 - Information about individual components types used in FF175B and similar models
 - Details of incidents that have been reported by consumers relating to the FF175B
 - Technical documentation and drawings relating to specific components

We also gathered available information from:

- Citizens Advice
- Peterborough City Council
- European alerts system, RAPEX
https://ec.europa.eu/consumers/consumers_safety/safety_products/rapex/alerts/repository/content/pages/rapex/index_en.htm
- Health and Safety Executive

Independent Review:

The risk assessment was carried out by technical and scientific experts within BEIS and included input from an independent electrical product safety expert.

This assessment was taken into account internally by a panel chaired by the Government Chief Scientific Advisor and including the BEIS Chief Scientific Advisor; and externally by the Health and Safety Executive and independent experts selected by the BEIS Chief Scientific Advisor. The risk assessment was revised based on their input.

Risk Assessment Methodology:

Regulatory framework:

The Government's top priority is to keep people safe. Product safety legislation, specifically the Electrical Equipment (Safety) Regulations 1994 and the General Product Safety Regulations 2005 provide a legal framework to assess the level of risk and take proportionate actions, where necessary.

The European Directive on General Product Safety 2001/95/EC set up the RAPEX system to provide a rapid exchange of product safety information between European Member States and the European Commission.

Risk, as described in this context, is the chance, high or low, that any hazard will actually cause harm to people or property.

Process:

The RAPEX Risk Assessment Method is the prescribed process for undertaking regulatory risk assessments.

It is based on a matrix that considers the severity of harm that can be caused by the hazard (product) against the likelihood of that harm (injury/damage), in order to identify the level of risk.

Likelihood of harm (during the foreseeable product lifespan)		Severity of harm 			
		Low		High	
High  Low	>50%	H	S	S	S
	>1/10	M	S	S	S
	>1/100	M	S	S	S
	>1/1,000	L	H	S	S
	>1/10,000	L	M	H	S
	>1/100,000	L	L	M	H
	>1/1,000,000	L	L	L	M
	<1/1,000,000	L	L	L	L

A number of factors are considered, including:

- The nature of the hazard
- Whether it is an obvious hazard
- The severity of injury/harm
- Whether the risk concerns vulnerable or non-vulnerable persons
- The exposure to the hazard
- Frequency and duration of use
- The lifetime of the product
- Whether the hazard is always present and likely to occur in foreseeable use
- Whether there are adequate warnings or safeguards
- Whether the risk varies with time
- The ability of persons to take evasive action
- The level of risk that society accepts

One of four levels of risk can be identified:

- Serious (S) risk - notification to regulatory authorities required
- High (H) risk - notification to regulatory authorities required
- Medium (M) risk - notification to regulatory authorities likely
- Low (L) risk - notification to regulatory authorities unlikely

Proportionate Action:

There are a range of actions that can be taken from changing the design of a product to full recalls.

The decision about the type of action to be taken is dependent on the overall level of risk.

There are no required actions for a regulator when the risk is assessed as low or medium.

Regulators will take into account:

- The total number of unsafe products on the market
- The total number of the products sold which are likely to be still in use

- The range of products (models) affected
- The total number of products/consumers affected
- The cause of the hazard (occasional product defect, product deterioration, unusual operating conditions, misuse of the product, random failure etc)
- The practicalities of taking action (e.g. the traceability of the products)
- The expected effectiveness of the action
- The advice of the market surveillance authorities
- Media sensitivity to the hazard.

FF175B Conclusions:

Using this risk assessment methodology, based on current data and subject to review, the risk applying to FF175B is low and there is no required action for the regulator.

As this product is no longer being manufactured, supply and design issues do not apply.

Whirlpool has ongoing responsibilities including monitoring the safety of all their products. The Government will be writing to them setting out what it wants to see done by the company, such as following the new code of practice for product recalls which sets out how businesses can best prepare for any future product safety incidents.

This risk assessment has confirmed there is no need for a product recall or any other corrective action and consumers can continue using the product as normal.