



Department  
for Business  
Innovation & Skills

**FURNITURE AND FURNISHINGS  
(FIRE) (SAFETY) REGULATIONS  
1988**

**Consultation on proposed  
amendments to Schedule 5 - the  
Match Test - Part 1 and Schedule 4  
- the Cigarette Test**

**AUGUST 2014**

**Annex 8: Proposed amendments to schedule 5 - the match test - part 1 and  
schedule 4 - the cigarette test - of the furniture and furnishings (fire) (safety)  
regulations 1988 - response form**

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 7<sup>th</sup> October 2014.

Please provide answers to any of the questions below, and provide any additional response you believe is appropriate, headed:

Your name:

Organisation: Welsh Government

Address: Welsh Assembly Building, Merthyr Tydfil

*Redacted*

Please return completed forms to:

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Please tick boxes below which best describe you or your organisation.

	Organisation type
<input type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	* Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)
<input type="checkbox"/>	Trade union or staff association
<input type="checkbox"/>	Other (please describe):

Please note: in addition to the consultation questions below, we would be very grateful if you could also answer the questions from the Impact Assessment which follow them.

Consultation questions:

**Question 1: Do you think this proposal will achieve its aims of: helping to make UK furniture greener, save money to industry and making UK furniture more fire safe?**

Comments: We agree with the assumptions made within the consultation document. The benefits of implementing the proposals will go much further if the EU regulations on disposal of FSC could add additional costs and if implementing changes as outlined within the document can avoid these additional costs, then this can only be seen as a positive outcome for all concerned.

Any advances in technology/materials which can reduce the impact on the environment are welcome and should be encouraged.

It is difficult to fully understand or comment on the technical aspects of the proposed changes however, any proposals to make furniture more fire safe would of course be supported by the Welsh Government.

**Questions 2: Do you think that paragraphs 19-22 accurately set out the need for a change to the current match test?**

A ☒ Yes ☐ No ☐ Not sure

Comments: The need for a change to the current match test is described well within the document. It is pleasing to note that BIS, in completing this work, have identified a broad range of factors which underpin the need for change. The technical differences between match tests and cigarette tests are difficult to understand, none the less the proposal to change the match test seems eminently sensible when the material facts are presented.

One of the factors – potential EU regulations around disposal could lead to an increase in fly tipping given that there are, as you state, only two incinerators capable of dealing with this type of waste. Any increase in fly tipping could lead to increased pressures on Local Authorities for removal as well as a potential increase in the incidences of arson. This is something that Government would wish to avoid.

**Question 3: Do you think the proposed changes are viable (paragraphs 23-29)?**

A ☒ Yes ☐ No ☐ Not sure

Comments: We can see no reason why the manufacturing industry would not wish to support the proposed changes. There may be some transitional issues around existing stock, although we note the transition period identified within the document. This will no doubt be reflected in consultation feedback from the manufacturing sector.

**Question 4: What are your views on the inclusion of currently unregulated materials (paragraphs 27-29)?**

Comments: Including currently unregulated materials is the right thing to do. Ensuring as many aspects of upholstered furniture are included within the scope of the changes is appropriate.

**Question 5: Do you agree with the benefits BIS believes the changes will bring?**

A ☒ Yes ☐ No ☐ Not sure

Comments: We acknowledge the benefits outlined within the consultation document. Welsh Government would be supportive of any changes that reduce costs for business, the consumer and prevent unnecessary damage to the environment.

**Question 6: What is your view on BIS's reasons for bringing forward the changes (paragraphs 41-42)?**

Comments: it is difficult to comment on the technical aspects of the proposals. The assumption that pending EU regulations may bring about additional costs associated with the disposal of furniture which has fire resistant chemicals within it are rightly founded and any proposals to counter these regulations should rightly be explored.

Any proposals to ease the burden on manufacturers and indeed suppliers and retailers is very much welcomed, especially at a time where the country is working its way out of a recession.

**Question 7: General rating of the proposals.**

On a scale of 1 to 5, 5 being the highest, grade your overall approval of the proposals

	5	4	3	2	1
Right problems identified	yes				
Range of options wide enough	yes				
Preferred options well chosen	yes				

**Question 8: Do you have any other comments that might aid the consultation process as a whole?**

Comments: As is stated within the body of the document, FFRS provides the highest levels of fire resistance for domestic upholstered furniture in the world. This is a bold statement and reflects the high standards we would expect in domestic upholstered furniture.

It would be disappointing if this standard was to be compromised and members of society put at increased risk from fire involving furniture in their homes. We do not believe this will be the case and acknowledge the work completed to ensure that the standards will remain high, whilst the environmental issues associated with Brominated flame retardants are hopefully eradicated.

Thank you for your views on this consultation. Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☐

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

☒ Yes

☐ No

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**BIS/14/980RF**