2016-001 Aero Zip Highlighted for redaction.

Response ID ANON-F7WP-29KQ-B Redacted

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-11 08:33:44**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Aero Zip Ltd

4 How would you classify your organisation?

Organisation type:
Small business (10 to 49 staff)

Other - please describe here:
Component supplier to domestic upholstery manufacturers

Scope

5 The proposed regulations cover any item of domestic furniture which is ordinarily intended for private use in a dwelling and comprises a cover fabric and a filling.Do you agree with the revised definition of the Regulation's scope?

Yes

Comment box:

6 Do you agree with the proposals relating to sleeping bags and mattress protectors (i.e. those which can be put in a washing machine are explicitly removed from scope and do not have to meet the requirements of the regulations)?

Not sure

Comment box:
We were unaware that sleeping bags were in the scope of the regulations.

7 Do you agree with the proposals relating to cushions and seat pads (i.e. that they remain excluded from cover tests but the definition of these products to be specified more clearly)?

Not sure

Comment box:
We agree that a better definition of scatter cushions and seat pads is a good idea. We would suggest, that rather than have two different sizes, both scatter cushions and seat pads are classed as less than 60cm x 60 cm x nominal thickness.

8 Do you agree with the proposals relating to outdoor furniture (i.e. that outdoor furniture unsuitable for use inside the home, and clearly labelled as not complying with the Regulations) should be out of scope?

Not sure

Comment box:
We agree that the definition of outdoor furniture needs to be improved.

9 Do you agree with the proposals relating to baby products (i.e. that items covered by covered by BS EN1888 (wheeled child conveyances) and BS EN1466 (carry cots and stands) are removed from scope, with padded playpens treated in the same way as

mattresses)?

Yes

Comment box:

10 Do you agree with the proposed treatment of second-hand products (i.e. that they would be required to bear the relevant permanent label)?

Not sure

Comment box:
We have concern regarding the position of reupholstered furniture under the proposed new regulations. The consultation says that the product must carry the original permanent label, but for a re-upholstered product this would not be possible which could either force re-upholsterers out of business or cause them to become non-compliant.

Testing

11 Do you agree to removing the Filling 1 option? (i.e. to remove the option to test where covers are placed directly over the foam filling in the final product)

Yes

Comment box:
Yes this will simplify the proposal

12 Do you agree that the specifications set out in the draft Regulations for the test foam and fibre wrap are sufficient to achieve the objectives of the Regulations?

Not sure

Comment box:

13 Do you agree that the regulations should provide a protective cover option?

Yes

Comment box:
In principle that this would be the simplest route to compliance.

14 If yes, do you agree with our proposed definition of protectiveness?

No

Comment box:
We do not accept this definition. The 2 mm diameter hole will be difficult to measure, and there is no tolerance. Many cover fabrics (predominately that contain man-made fibre) currently satisfy the current protective test can split by more than 2 mm diameter, but will now be non-protective. Also when the flame is applied the split tends to be a line, not a hole. It is expected that this test will cause a lot of variation in use. Also it is noted that in the draft regulations the test has to be made 5 times (10 applications of the flame) and pass 4 times. This will be very expensive as it will require 5 times the test materials and 5 times the cost of test. This does not seem to have been accounted for in the impact assessment. It is noted from the Technical Panel documents none of the assembled experts supported this definition of protectiveness. This may lead to an increased use of fire retardants for compliance. A better test is the current test over a non-combustion modified foam, which for all its faults is very clear and simple to understand when a fabric is compliant.

15 Do you agree with the proposed requirements for components close to the cover?

No

Comment box:
In its current form in the draft regulations this would be a difficult route to follow as it adds significant layers of due diligence to ensure all components are compliant. It would be easier to introduce an exclusion list, as originally proposed for smaller components such as zip fasteners, Velcro , webbing etc. which pose a relatively low fire risk within the overall construction of the furniture .

Whilst fire safety is of prime importance, there would be a significant cost increase to treat such components to pass the proposed modified match test for components. It would also likely increase flame retardant usage.
We also have concerns that the proposed modified match test for components is not well defined and does not explain how small or shaped components should be tested.

16 Do you agree that there is no need for the cigarette test for covers that pass the revised match test?

Yes

Comment box:

17 For business respondents - Which of the routes to compliance do you expect to follow for most of your products?

Not sure

Comment box:
This is a very difficult. Any one manufacturer may use a selection of different fabrics, filling and support mechanisms on different styles of furniture and this may drive them down a different route for different models. The schedule 3 interliner route allows the use of any fabric, but significantly adds to the cost as effectively the covers have to be made twice (once with the interliner and once with the cover fabric). Also this would increase the use of fire retardants on the interliner itself. The protective cover route would be the closest to the current situation, but it is believed that the variability in the test and the additional test costs may make this a less favoured option. The non-protective cover and compliant components is still a relatively unknown quantity. We know that there may be issues with components such as zips and webbing not satisfying the test.

18 For business respondents - What do you expect the impact of the testing proposals to be on your use of flame retardants in covers?

Not sure

Comment box:
There are concerns that the protective cover route may actually drive up flame retardant usage.

19 For business respondents - What do you expect the impact of the testing proposals to be on your overall use of flame retardants?

Increase

Comment box:
Based on the current proposals we believe the use of flame retardants overall will probably increase, whether that is with protective covers, increased interliner usage or modifying the components close to the cover.
It should also be noted that as both current and alternative flame retardants , are likely to be classed as SVHC's in the next couple of years and thus banned under REACH (Consultation document September 2016 pages 8& 9), the proposed new regulations could, as a result become unworkable within a short period of time.

Traceability and enforcement

20 Do you agree with the product record/technical file requirements for manufacturers and importers?

Yes

Comment box:

21 Do you agree with the requirements for the single permanent label, and the proposal to remove the requirement for additional display labels?

Yes

Comment box:

22 What do you think is the most effective means of conveying the use of flame retardants in the cover of this product eg by text, symbol?

Comment box:
Text

Other questions

23 Do you agree that a 24 month transition period is sufficient, and that the changes should be reviewed in five years?

Yes

Comment box:

24 Do you have any other comments on the proposals or draft regulations?

Comment box:
There are a number of differences between the proposals and the draft regulations that need to be resolved.
e.g. It is not clear from the Regulations whether private rental properties (both residential and holiday) are covered by these Regulations – they are in the current Regulations.
It is disappointing that the test methods in the proposed regulations still reference old test standards e.g. BS 5852: Part 1:1979 and modify them which can be confusing. It would be clearer if the complete test method was included in the new regulations.

Impact Assessment

25 Do you agree with our estimate of traceability time in the Impact Assessment – ie one-off input of 16 hours per firm and ongoing per year time of 48 hours per firm? If not can you provide additional evidence to support your answer?

Not sure

Comment box:

26 How much do you estimate you would save per year from the removal of the cigarette test?

Amount saved::

Nothing

Comment box:

27 How much do you estimate you would save per year from reduced use of flame retardants?

Amount saved::

Nothing

Comment box:
As noted above it is not clear whether flame retardant use will be reduced or increased. With a protective cover or interliner route it is estimated that use of flame retardants may increase which would result in an increase in costs.

28 Are you aware of any further costs or benefits we have not identified in the impact assessment? Please support with any evidence you have.

Yes

Comment box:
The additional cost of the 5 times match test for protective covers does not seem to have been accounted for in the impact assessment.

29 To what extent do you agree that, overall, these proposals represent a reasonable compromise – bearing in mind the information in this consultation document, feedback on the previous (2014) consultation, and other stakeholder input during the review?

Not sure

Comment box: