2016 026

Response ID ANON-F7WP-29XA-8

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Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-10-04 12:08:46**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Clarkson Textiles Ltd

4 How would you classify your organisation?

Organisation type:
Medium business (50 to 250 staff)

Other - please describe here:
FR Coater

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)?

Yes

Comment box:

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)?

Yes

Comment box:
Whilst it is not ideal, in reality, these items are often washable and should therefore be exempt.

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?

No

Comment box:
What deems an item 'unsuitable' for use inside the home? The design of outdoor furniture is commonly becoming similar to furniture designed for use in garden rooms or conservatories. Whilst they do not have the same internal components, they do often have bulky cushioning and large areas of fabric covers. The definition needs to be clearer in relation to the 'design' of the item and not just the intended 'use'.

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:
They should be covered by more appropriate regulation.

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)?

Yes

Comment box:

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:
It would be impossible to run a two option system, both from a production and policing perspective.

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?

No

Comment box:
Ensure no reduction on safety: NO. Removal of 'worst case' test scenario and closer representation of 'real life' means there is no longer any allowance for variation from burn to burn (every test piece burns differently, even on same fabric, same coating).
Reduce flame retardant: NO. Each fabric will burn differently. Natural fibres and surface treated product will not be affected by the filling content or may even require increased levels of FR.
Allow innovation: NO. Ultimately, the fabric would still have to pass the specified composite test, irrespective of the flammability of internal components.
Industry choices: NO. Alternatives have limited use and are costly, therefore current procedures to meet regulation will continue for most bulk production.
Ability to enforce: NO. if it was just a pass/ fail over the composite then yes, but the option to have a protective / non-protective cover makes it difficult to police.

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

No

Comment box:
There should be no OPTIONS. It needs to be a pass / fail scenario in order for the supply chain to offer the best possible chance of compliance.
The 'protective' cover option will mean that either 'all' internal components must be FR certified, which will be an ongoing cost in order to ensure certs cover up-to-date items and suppliers or, FR levels will have to be increased in order to ensure a hole does not form and covers can be classified as 'protective'.
On most fabrics, it will be impossible to offer assurance that subsequent tests will also be 'protective' due to variations in burning characteristics from one burn to another.

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

Not Answered

Comment box:
N/A

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

No

Comment box:
Costly and almost impossible to keep up-to date and therefore impossible to police. There is also potential to increase FR chemicals on 'internal component' items.

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

No

Comment box:
It is not true that all all covers that pass the match test, will then pass the cigarette and we have many independent certificates to show otherwise. Particularly on natural fibres or fabrics treated with stain guards, there is a tendency for burning to be more likely on contact with a smouldering ignition source.
Also, this assumption has been made based on current level of FR treatments. If, as intended, the levels of FR could be reduced on some fabrics, what level of research has been done to suggest that this would still be the case?

Whilst the cigarette may not be the most ideal 'smouldering' ignition source, it is important that modern day hazards such as over-heating phones / chargers are represented in some form of smouldering test method.

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

Not Answered

Comment box:

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 Answered

Comment box:

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

Not Answered

Comment box:

Traceability and enforcement

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

Yes

Comment box:
Traceability is important.

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:
symbol. Universally recognisable.

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:
Generally if notice is given then people can comply. Most fabric stock would comply with new test and would therefore simply need re-testing.

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

Comment box:
These recommendations are very similar to the initial proposals which were generally found to be flawed by the furniture industry. It does not meet the objectives and will be costly to industry.

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::
£3k approx

Not Answered

Comment box:
The cigarette test is not charges seperately so we have no knowledge of how much match only test would be.

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

Amount saved::
£0

Nothing

Comment box:
Possibly an increase where protective covers are required or internal components require treatment.

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:
Internal component testing will be an ongoing cost to businesses and will limit choices. There will be a need to ensure that all suppliers and any product changes are covered by relevant certification.

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?

Strongly disagree

Comment box:
Very much based on the original proposals and carries many of the original flaws.
It will reduce safety, increase costs and probably increase levels of flame retardancy. It needs a ground up re-write.