2016 - 033

Response ID ANON-F7WP-29XW-X

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-09-26 15:59:02**

Introduction

1 What is your name?

Name:
[redacted]

2 What is your email address?

Email:
[redacted]

Yes

3 What is your organisation?

Organisation:
Consultant to Furniture Industry and test centres

4 How would you classify your organisation?

Organisation type:
Other (please describe)

Other - please describe here:
Consultant

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:
The role of the retailer as a supplier should still be included in the regulations together with importer and manufacturer.

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:
Some guidance on the inclusion or exemption of certain might be useful if this is not fully understood by manufacturers retailers and importers. These include such things as: Lumbar supports and wedges for seating
, seat pads filled with such items as gels or seeds (eg lavender, wheat, flowers, etc)

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?

Yes

Comment box:

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)?

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)

No

Comment box:
There will always be some applications in products where outer covers are positioned directly over foam fillings.

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?

Yes

Comment box:
However density of packing of the fibre wrap is significant and a range of densities should be specified so that tests are reproducible.

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

Yes

Comment box:
Providing the acceptable route to this includes the use of proven, materials which conform to the required performance level and that suppliers of such protective covers can demonstrate their product consistently conform. It is well known that Schedule 3 interliner materials are extremely variable in quality and performance and many batches do not meet the minimum safety requirements.

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

Yes

Comment box:
Provided the definition of a 2mm hole is absolutely clear and not open to interpretation. Do you mean 2mm diameter? What about splits that measure less than 2mm wide but longer than 2mm?

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

Yes

Comment box:

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

Yes

Comment box:
Clearly this is a compromise as there will be some covers that will pass the match test and fail the cigarette test due to their special smouldering behaviour. As long as this is risk is recognised, measured and accepted by BIS and industry this is acceptable.

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

Not sure

Comment box:
I am of the opinion that this selection of choices will confuse many people and they will probably opt for the simple option of the Schedule 3 interliner.

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

Decrease

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?

Increase

Comment box:
Increase in work load at the design and pre production stage, Increase in time and money spent testing until familiar with the options and how they relate to individual products and methods of construction. After a fairly steep learning curve costs and time should level off.

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:
I believe it will be advantageous to use both a symbol and some text to explain the meaning of both the symbol and what the purpose of flame retardants are in the product. Also I believe text should be provided to supply information on the implication of the effectiveness of FR agents when items are cleaned or washed.

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:
Probably more than sufficient.

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

Comment box:
I would like to see significant effort and resources put into the education of all of those in the supply chain. In particular the fabric treatment companies, Schedule 3 interliner suppliers and the fibre filling/wrap suppliers will need assistance. Test houses will need to assist with interpretation and TSOs will need support with enforcement.

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:
The time input will vary significantly depending on width of product range, complexity of design and knowledge of the manufacturer or importer. In some case importers will need a lot of time to extract this information from overseas manufacturers who do not speak English or who do not understand the regulations.

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

Amount saved::

Nothing

Comment box:
Usually the match and cigarette tests on covers are done in the laboratory at the same time so time saved is minimal although materials costs will be reduced.

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

Amount saved::
Not applicable

Not Answered

Comment box:

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.

No

Comment box:

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?

Agree

Comment box: