2016 - 032

[redacted]

11 November 2016

To: [redacted]
Regulatory Delivery
Department for Business, Energy and Industrial Strategy
Fourth floor, 1 Victoria Street
London SW1H 0ET

Re: Furniture and furnishings fire safety regulations: proposed changes (2016)

[redacted]

I support the proposal of EFIC that the UK furniture flammability rules need to be reformulated so as to eliminate provisions and testing schemes which lead to the use of hazardous chemicals in upholstered furniture.

I oppose any form of match tests or open flame tests for upholstered furniture, as is proposed in the draft regulation. The basic reason is that open-flame resistance is commercially implemented by the use of FR chemicals which show known or suspected harm to health or harm to the environment. Furthermore, the fire problem with upholstered furniture is overwhelming cigarette ignitions. This is where regulatory attention should be focused, since such solutions can be both highly effective from a fire safety point of view, and devoid of negative impact on health and environment.

One healthy solution is to change the UK regulations so that they are identical to EN 1021-1. This will eliminate the need for harmful chemicals in upholstered furniture. An even better solution is to adopt the new California TB117-2013 standard. This new standard enhances testing provisions intended to assure smolder-resistance of upholstered furniture and similarly is met

without use of harmful chemicals. [redacted]

I finally note that the UK experience with upholstered furniture fires and regulations has been misrepresented by various fire safety experts, a number of which are, in fact, associated with the FR chemical-making industry.

In the 2013 paper "British Furniture Fire Safety Regulations: Do the Benefits Justify the Health and Environmental Risks?" paper of which I am an author, we examined the UK fire death statistics. While there is no doubt that the trend has been for decreasing fire deaths, the paper shows that the reduction is directly correlated to reduction in cigarette consumption. Furthermore, there is no acceleration of the decrease seen that would coincide with the effective implementation data of the UK furniture fire regulations (1988) that introduced open-flame requirements leading to utilization of FR chemicals with known or suspected health harm effects. The trends pre- and post-1988 appear to exhibit the same, continuous downward slope.

Sincerely yours,

[redacted]

attachments:

[redacted]