2016 - 056

Response ID ANON-F7WP-299N-P

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-10 09:48:04**

Introduction

1 What is your name?

Name:
[redacted]

2 What is your email address?

Email:
[redacted]

No

3 What is your organisation?

Organisation:
H & C Whitehead Ltd

4 How would you classify your organisation?

Organisation type:
Small business (10 to 49 staff)

Other - please describe here:
Textile Finisher and Backcoater

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:
These items are not domestic furniture and should not be covered by regulations regarding same.

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:
Agree due to small physical size of the finished item

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:
There is always the chance that some (small/medium sized) items would be brought inside to provide additional seating for parties etc or that they are stored inside during winter months (but not necessarily used).

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:
These items are not domestic furniture and as such are not relevant in this instance.

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:
The label would need to be very securely attached.
Label possibly stating that the label must not be removed.

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:
This is a very bad idea.
The cover directly over the foam is a more consistent method, as per the current test methods.

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:
A very bad idea.
Fibre wrap is variable in it's manufacture, density and consistency.
The fibre wrap is easily compressed and thus different cover fabrics and different test labs will give variable and thus inconsistent results.
The cover directly over the foam would be a more consistent method, as per the current test methods.
MAKING A TEST EASIER TO PASS WILL NOT MAKE FURNITURE SAFER.

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

No

Comment box:
Synthetic fabrics in particular will be prone to failure and there will be arguments regarding the measuring of burn hole sizes.
This is a particularly bad idea and is likely to be unworkable in practice.

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

No

Comment box:
More chemical would need to be applied and this is counter-productive in terms of cost and efficiency.
Another bad idea.

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

No

Comment box:
It is not clear which components would need to be included and which are exempt.
If the components need to FR treated, this would be an additional cost and would require the use of more FR chemicals.
Manufacturers would be likely to use all FR treated components as the designs of furniture vary so much and would not seek to hold FR and non-FR component.
Has any in-depth testing been performed to validate this wacky and un-workable idea?

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

No.

Comment box:
The cigarette test is a valid way of determining suitability of furniture in the domestic environment.
As a heat source, it is very different to the match flame equivalent test which is shorter in duration.

People do fall asleep on furniture with lit cigarettes (I could name 2 people) and they have survived due to the success of the current legislation.
The survival rates from house fires show this since the introduction of the original regulations in 1979.

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

Not sure

Comment box:
We are a commission processor and not a furniture manufacturer.
From a technical perspective, the Schedule 3 interliner, is only valid for certain natural fibre products.
It is a "loaded" question as none of the alternatives are as reliable as the standards required in the current regulations.

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

Increase

Comment box:
The new proposals will simply lead to more testing with associated costs and ultimately more chemical being applied and thus higher costs to industry.
You should stick with the current test methods and legislation .

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:
Ultimately more chemical will need to be applied and will lead to higher costs to industry.
You should stick with the current test methods and legislation

Traceability and enforcement

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

No

Comment box:
It may be practical for the largest manufacturers but not for the smaller producers and small supply chain companies.
More paperwork = higher costs.

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

Not sure

Comment box:
It is not easy to say "permanent" as a label could be removed, damaged, defaced or lost.

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:
The focus should be on the fact that the furniture complies with the correct regulation and is SAFE for use in a domestic environment.

How the furniture complies with the regulation is not actually relevant.
This is a most unusual question to ask - is there a hidden agenda??

Other questions

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

No

Comment box:
The transition period needs to be longer.
A review in 5 years is workable.

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

Comment box:
The proposals and draft regulations appear to be poorly thought out and highly impractical. The 2014 version was terrible and it is sadly clear that nothing has been learnt from that sad debacle.
Many of the proposals appear to be based on guess-work as they are not backed by test nor analytical data.

As it stands, implementation will lead to higher costs in terms of testing and chemicals for the UK furnishing industry and the related supply chain.
In addition to this sham, there is the distinct possibility of higher death rates due to fire.
One death due to a house fire is too many!
This is simply not progress and not an improvement of the current standards.
Those behind this scheme would be well advised to stop it whilst there is still time to do so.

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?

No

Comment box:

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

Amount saved::
0

Nothing

Comment box:
There will be actually more time spent on match flame equivalent testing and the subsequent analysis/interpretation of the test results.

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

Amount saved::
0

Nothing

Comment box:
More chemical will need to be applied to give more consistent results.

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:
There are no benefits nor savings to be had.

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:
The 2014 plan was frankly terrible as it was ill-conceived and was not a practical proposition.
The 2016 attempt is on balance worse as nothing has been learnt from the previous attempt.
You are dumbing down and weakening a SAFETY standard, under the guise of cutting red tape, which has been proven over the last 37 years to save countless lives and save £ millions in insurance claims and £millions in costs to the NHS.
To say that safety has not been compromised when the tests are amended to make them easier to pass, is simply being dishonest, no more and no less.
BEIS should hang their heads in shame if these proposals are passed.