Response ID ANON-F7WP-29X9-Z

Redacted

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-10-03 14:00:38**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Northumberland Fire and Rescue Service

4 How would you classify your organisation?

Organisation type:
Local government

Other - please describe here:
Fire and Rescue

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 revised definition is clear and I prefer the identification of excluded items to the attempt at trying to cover all possibilities in the definition as per the current regulations

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)?

No

Comment box:
Given the nature of a sleeping bag and the greater exposure to naked flame at camping venues, and the potential for mattress protectors to be used with elderly and vulnerable persons, I feel that these items should remain under the scope of the regulations, warnings over the reduction in fire retardant properties and guidance on number of washes etc could be provided. Additional research into more (laundry) resistant forms of fire retardant protection would be welcomed

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:
If the cushion or seat pad is designed to match or be used with an item of furniture then I feel that the materials should be tested in accordance with the regulations, I believe that there is an expectation that if the cushion appears to be made of the same material then it will be expected to perform as the item of furniture.

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:
it should be evident by the labeling that the furniture does not comply with the regulations

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)?

Not sure

Comment box:
On the whole I agree with the proposal, however I feel that carrycots and stands should be included in the regulations as they are often used as sleeping facilities for new born children.

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)

Not sure

Comment box:
This seems to be directed at industry specialists, but if the more representative construction method involves Filling 2 then this would appear to be a sensible approach.

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:
as identified in the consultation document, the technical panel have identified a number of factors which could influence the outcome of the test. The identification of a range of fibre densities commonly used would be of benefit. I feel more work is required in this area before a definitive decision can be made.

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

Not sure

Comment box:
aimed at industry specialists

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

Yes

Comment box:

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?

No

Comment box:
quotes from the technical panel report

Smouldering, as in the cigarette test, is based on long exposure to a low heat source. These behave very differently, and therefore it doesn't always follow that covers which pass the match test will automatically pass the cigarette test.

However, it was agreed that the less than 1% failure rate figure for the cigarette test on visible covers was accurate. And it was suggested that the cigarette test for non-visible covers is entirely redundant as there were no known failures. It was pointed out that this assumes that the types of covers by manufacturers will not change with the new regulations. Different covers might become more popular

which could mean that the currently low failure rate for the cigarette test could increase.

Removal of the cigarette test would reduce testing costs to industry. Carrying out a match test costs about two-thirds of the cost of combined match and cigarette testing.

A new standard for a smoulder and ignition test could be developed using something other than a cigarette, for example, an electronic substitute such as cartridge heaters. Or something specific to industry could be developed but this would take time and money so might be something to be considered in the longer term.

I feel that the development of a new smoulder test should be paramount of the cigarette test is to be removed. The test offers a completely different scenario top that of the match test and should not be ignored due to cost cutting measures.

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

Not Answered

Comment box:
N/A

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:
N/A

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:
N/A

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:
as stated in the proposal these labels are removed as soon as the item is purchased, the retailer should have a responsibility for identifying and showing the customer the location of the permanent label.

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

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:
I can see the value of having a more realistic test which reflects the actual end product sold and also removes the situation where the end product may not live up to the expectations of the consumer. I would be cautious with regards to the removal of the cigarette test without an adequate alternative smoulder test being

applied. The greater reliance on electrical goods and chargers which are designed to generate heat or by their use generate heat should be accounted for in the tests, not just the application of a naked flame for a limited period of time.

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:
cannot comment

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

Amount saved::

Not sure

Comment box:
not applicable

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

Amount saved::

Not sure

Comment box:
not applicable

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?

Disagree

Comment box:
my greater concerns in the 2014 proposal were based upon the removal of the smoulder test and the main driver being the saving to industry rather than the provision of the best possible fire retardant products. The new proposals have provided a more realistic estimate on the financial gain to industry but still propose to dilute the current standards, something that in my thinking represents a backward step.