2016-077

Redacted

**Response ID ANON-F7WP-29R5-P**

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-03 12:28:08**

## Introduction

**1 What is your name?**

**Name:**

**2 What is your email address?**

**Email:**

Yes

**3 What is your organisation?**

**Organisation:**
Mamas and Papas Limited

**4 How would you classify your organisation?**

**Organisation type:**
Large business (over 250 staff)

**Other - please describe here:**

## 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:**
In principle but a tighter definition of parameters might be helpful

**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:**

**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:**
Some minor clarification may be required as to how other child care articles are treated

**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:**

**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:**

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

Yes

**Comment box:**

**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:**
This suits childcare articles but may be an issue for furniture manufacturers

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

Yes

**Comment box:**

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

Non-protective cover + compliant components

**Comment box:**
This is the route (by design) that will enable us to reduce flame retardant chemicals on our products.

**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:**
The proposals will mean a very significant decrease in our use of flame retardants

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

Decrease

**Comment box:**

## 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:**
Text

## 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:**
We see the principle of the proposals will facilitate the reduction in exposure to chemical treatments for babies and small children which is to be welcomed as well as delivering significant savings and with no reduction in safety

## 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::**

Not sure

**Comment box:**

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

**Amount saved::**
several million pounds

Not sure

**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:**
Strongly agree in respect of child care products but understand that the Furniture Industry may have residual issues