2016-069

Redacted

Response ID ANON-F7WP-29XP-Q

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-07 10:47:57**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Kent Fire and Rescue Service

4 How would you classify your organisation?

Organisation type:
Other (please describe)

Other - please describe here:
Fire and Rescue Service

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:

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:

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:
Whist we recognise and support the need for regulatory amendments, we consider further research is needed to prove beyond all reasonable doubt, that the proposed BIS changes will not affect public safety. The FW/6 technical committee have expressed their concerns on a range of issues that suggest there is insufficient evidence at this point in time that would achieve the objectives set out by BIS. These aims include the maintenance (or improvement) of the FFRs in preventing injury and loss of life in domestic dwelling fires; and to provide alternative options in reducing the use of flame retardant chemicals on health and safety grounds, particularly those on the surface cover. Therefore we are mindful of the FW/6 committee's response and are unable to support the BIS proposal

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

No

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

No

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

No

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

No

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

Not Answered

Comment box:

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:

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:

Traceability and enforcement

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

Not Answered

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?

Not Answered

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:

Other questions

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

Not Answered

Comment box:

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

Comment box:
Whist we recognise and support the need for regulatory amendments, we consider further research is needed to prove beyond all reasonable doubt, that the proposed BIS changes will not affect public safety. The FW/6 technical committee have expressed their concerns on a range of issues that suggest there is insufficient evidence at this point in time that would achieve the objectives set out by BIS. These aims include the maintenance (or improvement) of the FFRs in preventing injury and loss of life in domestic dwelling fires; and to provide alternative options in reducing the use of flame retardant chemicals on health and safety grounds, particularly those on the surface cover. Therefore we are mindful of the FW/6 committee's response and are unable to support the BIS proposal

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 Answered

Comment box:

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

Amount saved::

Not Answered

Comment box:

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

Amount saved::

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.

Not Answered

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?

Not Answered

Comment box: