

From:

Redacted

Company: Siren Furniture Limited

Representing: Siren Furniture Limited

Dear Mr Edge

In response to the public consultation regarding the amendments to The Furniture and Furnishing (Fire) (Safety) Regulations (1988) please see my comments and responses below:

Having attended the conference with fellow manufacturers and retailers at FIRA, it became clear to me that whilst nobody is against updating the regulations to meet the Governments targets of reducing FR chemicals in products; there is a great deal of concern and scepticism as to the benefits of these proposed amendments and whether they will in fact offer the improved safety, reduced costs and environmental benefits being suggested by BIS and Intertek.

Section 23 Main Points:

Match test requirement for filling materials to change from non-combustion modified foam to combustion modified foam, in one of two forms. Whilst testing over combustion modified foam should be representative of the way in which furniture is produced, it does not provide a 'worst case scenario'. Fabrics that may fail the existing test as a result of the fabric splitting / flame spreading too far may not occur, therefore borderline fabrics, or fabrics where there may be some inconsistency in the back coat may pass where they would otherwise fail.

Exemption from the cigarette test for any fabric which passes the match test: At present the majority of test houses (Of the ones that I deal with) do not proceed with match test if there is a failure on the cigarette test; they deem it to be a waste of the manufacturers time and money. I have yet to see any data showing significant and conclusive evidence that a pass on the Match test would also mean a pass on the cigarette test. Furthermore this analysis would need to be conducted against the 'new / proposed' test method to demonstrate that this is still the case.

Removal of the cigarette test for invisible linings: are seat platforms (beneath seat cushions / back cushions) still being classed as invisible / non-visible linings fabrics? If so, I cannot understand the logic in performing the match test but not cigarette test. Do you have documented data that shows if a cigarette / match is dropped down the side of the sofa that one will remain alight and not the other? My personal thought would have been that the match may extinguish as it works down to the platform rubbing on the other components, whereas a lit cigarette can smoulder for a considerable time even if lightly crushed. What is the background for making this change?

Regulation of lining fabrics which are directly behind the visible cover by incorporation into the new visible covers test (with the exemption of non-woven polypropylenes with weights of less than 90g/m² e.g. Corovin): At present I currently test corovin / non-visible non wovens under schedule 4 part 2 schedule 5 part 3, you seem to be saying these will be excluded? These were always regulated. Why when another part of the regulation is looking at testing components such as silent wires up to 40mm below the cover.

Section 25:

Covers that fail when tested over Filling 2 may be tested over Filling 1 provided that in the final product the cover material will be directly over foam (however, this does not include laminated or quilted fabrics over a very thin layer of foam): what is a very thin layer of foam? Description are very loose and open to wide interpretation.

Section 27:

Testing will increase significantly by testing materials within 40mm of the top cover. For example 1 single product in my production may contain: Beech, Plywood, Chipboard, Fibreboard, Hardboard, Webbing,, plastic or plastic coated metal spring clips, silent wires. This is without ties, button pulls, or the usual foams and fibres etc.

How will you monitor these items by type?..... one chipboard supplier will use different amounts or type of adhesive than another which may affect performance.

By saying that these materials are exempt if a fabric forms a barrier and no hole is formed, can the top cover be the barrier. If not manufacturers will need to interline all products, significantly increasing the production cost (material and labour to make the product) When questioned at FIRA, Steve Owen did suggest that manufacturers could either purchase FR webbing or laminate cardboard over the webbing. By adding card to webs you prevent them from doing their job of offering a soft support for back cushions etc. This could potentially increase the number of complaints as the card delaminated from the webbing creating a rubbing noise; this in itself would cost the industry thousands of pounds in replacements not to mention the additional landfill of old product, and increased carbon footprint of making and shipping replacement goods. This therefore goes against the '£50million' saving for industry.

Surely adding FR compounds more constituent parts of a upholstered furniture defeats the object of reducing the chemicals and costs. To add even more confusion to this matter, Intertek and BIS are proposing leaving piping as no requirement to test, despite the fact that the piping cord is next to top cover fabric and yet webbing maybe 40mm away.

How many times will a cover fabric need testing to demonstrate that a hole is not formed?

In recent months it has been highlighted by trading standards and test houses that the biggest issue affecting UK manufacturers and Importers to the UK is achieving a consistent back coat; i.e achieving a back coat that will pass at every test house on every occasion. This has become an issue as suppliers try to keep costs down in the current climate of increased costs and decreased margins. This therefore begs the question of how reducing the amount of FR chemical will achieve consistent results. If we give mill's and back coating companies license to make coating more 'borderline' in terms of passes (see earlier comment on changing to combustion modified foams), and we don't address the key issue of consistency of back coating then we are in danger of having more fabrics pass at one test house and then fail again once trading standards or retailer perform follow up testing.

Section 30: Testing by Intertek and FIRA

What is of great concern to me is the lack of 'testing' on this new method, one back coat compound / technique has been trialled from one coating company, limited fabrics have been tested, and no comparative tests have been completed amongst the many UK, UKAS accredited laboratories to ensure true correlation of results.

In fact under the proposed tests FIRA have demonstrated that a Polyester that fails the current regulations would have passed the new test; one therefore has to ask the question how are the proposed methods safer in every instance. In a similar vein, how can the current test be blamed for failing to continue the decrease in deaths from household fires? One could ask why these new regulations are not taking into account the growing issue of electrical fires and there effect on upholstery. I am surprised that the new regulations do not take into account the growing trend in the UK of people having electrical cigarettes, mobile phone s / phone charges on product, often phone charges are left plugged in. Are these the true causes as to why the fall in deaths / fires has plateaued?

There is no mention how the new regulations will affect the thousands of local upholsterers that recover peoples old sofas up and down the country. If they remove the top cover of somebody's product, how will they know if the other interior components comply? Therefore they would also need to add a barrier cost significantly increasing both FR compound used, time for the upholsterers to produce the furniture whilst also increasing their costs, which will either affect their margins or the final price to the customers making them uncompetitive against larger retailer.

Section 32 Cost Saving:

Whilst I whole heartedly support the idea of change / reform to the regulations; it need to be done over a sensible timescale with the correct information being collated and careful thought as to how they are going be implemented as well as the consequences surrounding the changes. Existing proposals will cost the industry hundreds of thousands of pounds in order to replace shop floor displays and clear old stock down before implementation. What deeply concerns me more than anything however is that we will go into this process without actually knowing whether the new regulations are even safe or workable

Kind Regards

Redacted