



Department
for Business
Innovation & Skills

**FURNITURE AND FURNISHINGS
(FIRE) (SAFETY) REGULATIONS
1988**

**Consultation on proposed
amendments to Schedule 5 - the
Match Test - Part 1 and Schedule 4
- the Cigarette Test**

AUGUST 2014

**Annex 8: Proposed amendments to schedule 5 - the match test -
part 1 and schedule 4 - the cigarette test - of the furniture and
furnishings (fire) (safety) regulations 1988 - response form**

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 7th October 2014.

Please provide answers to any of the questions below, and provide any additional response you believe is appropriate, headed:

Your name:

Redacted

Organisation (if applicable): Lincolnshire Fire and Rescue

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Lincolnshire

LN5 8EL

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Please tick boxes below which best describe you or your organisation.

	Organisation type
	Business representative organisation/trade body
	Central government
	Charity or social enterprise
	Individual
	Large business (over 250 staff)
	Legal representative
x	Local Government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
	Other (please describe):

Please note: in addition to the consultation questions below, we would be very grateful if you could also answer the questions from the Impact Assessment which follow them.

Consultation questions:

Question 1: Do you think this proposal will achieve its aims of: helping to make UK furniture greener, save money to industry and making UK furniture more fire safe?

It is welcomed that, in some instances, the changes may result in the use of less fire retardants, and therefore reduces cost. However, it is anticipated that not all fabrics will need less fire retardants. In addition, with other materials being proposed to come into scope of the Regulations, there may be an increase in fire retardants elsewhere (especially components made from materials such as plastic). Have these issues been included in the cost calculations/impact assessment?

It would not be unreasonable to expect that such a requirement will add considerable cost to furniture products as now all materials will have to be tested and additional due diligence systems will need to be introduced and implemented.

Accidental fires in dwellings are responsible for many injuries including deaths every year. Many of these fires involve upholstered furniture. It is without doubt, the introduction of the FFFS Regs implies usage of flame-retardants in the fabric or foam of the furniture. The incorporation of flame retardants has the benefit of improving reaction to fire properties and reducing the fire hazard due to fire spread and heat release and contributed to the reduction of the injuries and deaths. With increased use of non-self-extinguishing cigarettes that can be purchased at a fraction of legal cigarette prices, it would be unwise to move away from the current test method, which has proven to be successful.

Questions 2: Do you think that paragraphs 19-2 accurately set out the need for a change to the current match test?

Reducing levels of FRs may make fabrics more ignitable. However, it's important to bear in mind that the match test is intended to achieve a relative rather than an absolute level of safety. Also, the range of products covered is broad. The inclusion of previously unregulated components, such as the arms, the new test will provide more fire safety. The current existing test has proven effective and therefore we welcome its continuation with the introduction of the present unregulated components.

Question 3: Do you think the proposed changes are viable (paragraphs 23-29)?

The test proposed only includes the manufacturing elements and does not include any chemicals that are used in the storage and delivery stage. Will the use of these additional products affect the results of the final used product by the consumer?

Question 4: What are your views on the inclusion of currently unregulated materials (paragraphs 27-29)?

This inclusion is welcomed and supported

Question 5: Do you agree with the benefits BIS believes the changes will bring?

It is welcomed that consideration and recommendations are suggested to the reduction of chemicals used in any testing process. However, this must not be to the detriment of safety.

Question 6: What is your view on BIS's reasons for bringing forward the changes (paragraphs 41-42)?

LFR have no comment to make on this matter

Question 7: General rating of the proposals.

How will such a system be enforced? Currently it is difficult to enforce the Regulations as the requirements are very much written around new materials.

Question 8: Do you have any other comments that might aid the consultation process as a whole?

It is understood that reduction in the fire resistance of a cover fabric affected by the proposed amendment may reduce the safety of a product, and therefore explain why the requirement for having additional compliance of materials within 40 mm of the cover fabric has been added. However, this gives some cause for concern. Specifically:

- What is the test?
- What will be the effect on current materials used in furniture products?
- Has any research been undertaken on whether materials currently used in furniture will comply?
- If materials need to change to meet the amended requirements this will incur additional cost and arguably affect the competitiveness of the UK industry.

Below are the additional questions from the Impact Assessment. Please respond to them on this part of the form.

Thank you for your views on this consultation. Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☒

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

☒ Yes

☐ No

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