

FFR Consultation

TEGEWA response

Dear Mr Edge,

We are answering to your consultation on behalf of Verband TEGEWA, Germany.

We, being an association of the chemical industry in Germany and as such strongly involved in the European Chemicals Legislation REACH, are astonished and disappointed that within your proposals the role of REACH in the process of controlling the use of chemicals in articles is hardly mentioned. We believe that in REACH a lot of your items are already tackled and we feel this should be more emphasised and included in your proposals.

We would prefer to consider existing European flammability provisions, such as the EN 1021 norm, rather than adding in presently unregulated materials. Besides, we strongly believe that EU Member States will not accept these proposals to extend UK furniture's regulation.

The existing test methods have been proven to work in practice. When establishing new test methods it is a usual procedure within standardization work to verify them in round robin tests. We would urge you to follow this procedure in order to really ensure fire safety.

Plus, we would like to draw your attention to the EU-Ecolabelling approach where both scientific facts and hazard based strategies are considered which appears to make sense also for the FFR topic.

With kind regards

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