



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): IKEA

Address: Tulpanvägen 8, 343 81 Älmhult, SWEDEN

Please return completed forms to:

Terry Edge
4th Floor, Orchard 1
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London SW1 0ET

Telephone: 020 7215 5576

email: terry.edge@bis.gsi.gov.uk

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
X	Large business (over 250 staff)
	Legal representative
	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?

Comments:

Yes, compared to current requirements.

However, there is room for improvement as more can always be done to minimize the use of FR chemicals.

Questions 2: Do you think that paragraphs 19-22 accurately set out the need for a change to the current match test?

A

☒ Yes

☐ No

☐ Not sure

Comments:

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

A ☒ Yes ☐ No ☐ Not sure

Comments:

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

Comments: It is hard to see, without any statistics, how big impact the flammability of the currently unregulated materials has on domestic fires today.

To test each material separately does not show the behaviour within the finished product.

Inclusion of currently unregulated materials within 40 mm of the outer cover within the upholstery composite could increase initial complexity as analysis of all materials must be done and compared to the exemptions. It could be many misinterpretations.

It seems to be too complex and potentially extensive for this test to be mandatory for domestic market. A simpler way could be to do a voluntary full scale test.

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

A ☐ Yes ☐ No ☒ Not sure

Comments: It is hard to say without having seen the changes in practice.

If the test methods in practice will lead to less use of FR without decreasing fire safety it would be considered a great benefit.

Most of the changes will probably simplify the entire process.

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

Comments:

They are good. If UK can keep up the level of the current requirements, but without the need of FR chemicals, it is a promising step in the right direction towards common flammability requirements in all of Europe.

Question 7: General rating of the proposals.

On a scale of 1 to 5, 5 being the highest, grade your overall approval of the proposals

	5	4	3	2	1
Right problems identified		x			
Range of options wide enough		x			
Preferred options well chosen			x		

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

Comments:

It would make more sense to change numbers on the fillings;

Filling 1: Combustion modified foam, as in the current test foam required for Schedule 5 Part 3, plus 200 g/m² thermally bonded sheet polyester fibre compliant with Schedule 2 Part 1 but not treated with a flame retardant;

Filling 2: Combustion modified polyurethane foam, as in the current test foam required for Schedule 5 Part 3 of the FFRs.

i.e. "Covers that meet the requirements using Filling 1 can be taken as also meeting the requirements using Filling 2.

Cover that fail when tested over Filling 1 may be tested over Filling 2 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.

Cover that will be used over any other filling than foam, or used where no filling is present (assuming the product contains some form of upholstery), will require testing over Filling 1."

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

Q1: Is the assumption on the cost of testing above right in your view? Could you provide evidence supporting your arguments?

Yes

Q2: Do you have any evidence that could help to refine this cost estimates?

No

Q3: Are there any other costs not included here that should be included? Please provide evidence supporting your arguments.

No

Q4: Do you agree with the assumption that there will be minimal losses of stock given the transition period? What is your normal turnover of stock?

Yes, if implementation 18 months.

Q5: Do you agree with the assumption on annual cost savings to UK based companies testing of fabrics for the cigarette test? Could you provide information on the cost of the cigarette testing for your company?

Yes. Average cost of one cigarette test: 52 EUR. No info on amounts of testing annually.

Q6: Do you agree with the range of cost savings above? What are the cost savings most likely to be for your company?

Yes

Q7: Are there any other methodologies you think would be more appropriate?

No

Q8: Do you agree with the cost estimates above? Could you provide alternative estimates? Could you provide estimates of cost savings for upholstered garden furniture and/or caravan upholstered furniture?

Yes / No / No

Q9: Do you agree with the assumptions above towards calculating the total annual amount of treated fabric? Please provide evidence supporting your arguments.

Yes. Have no info.

Q10: Are there any other unquantified costs or benefits? If possible, please provide evidence supporting your arguments.

No

Q11: Is this a fair reflection of how smaller businesses will be affected? Please provide evidence supporting your arguments.

Seems fair.

Q12: Are the familiarisation cost savings, in time, between options 2 and 4 an accurate reflection of the difference? Please provide evidence supporting your arguments.

Yes.

Q13: Do the cost saving time profiles accurately reflect the timings of cost savings your business expect to see?

Do not know.

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

Question	Response
Name of Company	IKEA
Manufacturer, supplier, importer, retailer, other?	ALL
Estimate of money spent annually on testing products to the FFRs	--
Estimate of money spent annually on treating fabrics for the FFRs	--
Estimate of amount of fabric (in metres) treated annually	--
Number of furniture units sold that are required to meet a) the match test of the FFRs, b) other FFRs' tests	--
Average amount of treated fabric used for the furniture products in scope of the FFRs	1.0-1.2 million meters
Market share	~10%

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