

FFR Consultation response

National Caravan Council

Dear Mr Edge,

Thank you for the opportunity to respond to the above consultation, and I am grateful for the very short extension to the deadline to enable me to file a response on behalf of the National Caravan Council (The NCC).

Rather than comment on the individual numbered questions set out in the consultation, as agreed, we would prefer to make a more general response to the proposals, and to highlight a specific issue which we believe has the potential to have a significant impact on the caravan industry in the UK.

Our response is as follows:-

Introduction

The NCC (National Caravan Council) is the UK trade association representing the collective interests of touring, motorhome, caravan holiday home and residential park home (mobile home) industries. The industry has a turnover approaching £6 billion, employs in excess of 90,000 people and serves over 1 million caravanners, over 300,000 holiday home owners and in excess of 85,000 residential park home households. Our members include over 90% of the UK manufacturers of tourers, motor homes, caravan holiday homes and residential park homes (mobile homes) along with park owners, dealers, and suppliers and service providers.

The NCC welcomes the opportunity to respond to this consultation. The NCC has been fully supportive of, and worked closely with BIS and its predecessors for over 25 years in the interpretation and application of the Furniture and Furnishings (Fire Safety) Regulations 1988 (as amended in 1989 and 1993) - the 'FFRs' - as they extend to our industry. It is in this context that we make the following general response to the consultation based on our knowledge and expertise of the sectors of our industry that will be affected.

Observations

1. The NCC supports the overall policy objectives of the proposals; *to maintain and improve the current high levels of fire safety of UK domestic upholstered furniture which prevents injury and the loss of life; to reduce the cost to business of meeting the flammability requirements of the FFRs; and to reduce the use of flame retardant chemicals on health and environmental grounds.*
2. The FFRs apply to furniture and furnishings in new and second-hand domestic upholstered furniture, and also apply to those who hire out furniture in the course of a business, including accommodation such as holiday homes and residential furnished lettings. When the Regulations were first introduced in the late 1980s the NCC entered into protracted dialogue with the then DTI about the impact of the Regulations on second-hand caravans which includes touring caravan, caravan holiday homes and residential park homes. In particular the NCC was extremely concerned that with the volumes of units in the market the consequential impact would be disastrous. This was duly recognised by the DTI at the time and second hand caravans were excluded from the scope of the Regulations.
3. In 1993 the 1988 regulations were amended in respect of those hiring furniture or those who let furnished accommodation either as a principal, on their own behalf, or as an agent on behalf of another. The amendment allowed furniture not meeting the fire resistance requirements of the 1988 Regulations to continue to be supplied in accommodation until 31 December 1996, provided that it was included in the letting of the same accommodation prior to 1 March 1993. The DTI also confirmed that the 1993 amendment does not affect second-hand caravans as they continue to be excluded from the fire resistance requirements by virtue of Regulation 15 (2) of the 1988 Regulations. Further, at the time the DTI advised that caravan hire fleets could also take advantage of the derogation after the delay granted to the hire of furniture in let accommodation, previously let, up to 1 January 1997.
4. We understand and recognise that BIS has been reviewing the FFRs overall and that whilst further amendments are planned, the current proposals to amend the match and cigarette tests represent the biggest changes to the amendments.
5. In respect of lead-in times we note that the consultation mentions these to be in the region of between 12 – 18 months from the implementation date which is stated as April 2015. We understand this lead-in time will allow industry to develop new compliant products and to sell existing stock (compliant with the current tests). In respect of the impact of the proposals on furniture and furnishings contained in accommodation available to hire or let such as caravan holiday homes, touring caravans and where appropriate residential park homes, the NCC is concerned that such a lead-in time is grossly insufficient to ensure that the number of existing units available for hire or let can become compliant with the new tests.

We would respectfully suggest, therefore, that an amendment similar to that granted to the caravan industry in 1993 (see paragraph 3 above) be applied to all appropriate furniture and furnishings in scope in such accommodation available for hire or let for a minimum period of 8 years (until 31 December 2023), provided that the furniture in the accommodation available for hire meets the current regulations prior to April 2015.

Conclusion

We would welcome the opportunity to discuss our response with you and your team in more detail as appropriate, and would ask for an early consideration and acknowledgement of our observations as they relate to the caravan industry.

Kind regards,

Redacted

www.thencc.org.uk

www.motorhomeandcaravanshow.co.uk

www.cris.co.uk



The UK trade body for the touring, motorhome, caravan holiday home and park home industries.



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