



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): Steinhoff UK Upholstery

Address:

Kingsway

Bridgend Ind Est

Bridgend

Mid Glamorgan

CF31 3RY

Please return completed forms to:

Terry Edge

4th Floor, Orchard 1

BIS

1 Victoria Street

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:

A – Help to make UK furniture greener - No

On information seen to date, I would think companies will increase FR chemicals rather than reduce them to meet the new standard.

B – Save Money – No

More FR chemicals and testing components within 40 mm will result in more cost.

C - Unknown

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:

The new proposed change will not eliminate the use of FR compounds in upholstered furniture and in some cases more FR compound will be needed.

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

A ☐ Yes ☐ No ☐ Not sure

Comments:

There is already a difference in results and method between test houses I can only see this complicating things more.

Guidelines would need to be clear and testing methods policed within a strict tolerance.

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

Comments:

At the moment it's unproven and more investigation is needed on unregulated materials. I don't think enough information has been gathered in this area, there is still confusion of what is in scope and what is not.

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

A

☐ Yes

☐ No

☐ Not sure

Comments:

I don't think a greener / cheaper product is achievable by the inclusion of the 40mm proposal.

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

Comments:

I agree on BIS's reasons but disagree on bringing forward the changes due to the lack of a proper trial period and assessment of the new proposal. It is still unclear whether there is a cost saving and the ability to reduce the amount of FR's within the product.

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:

- There has not been a reasonable amount of time given to evaluate the new proposal,
- There is no set method established
- No mention of how this new proposal is going to be policed across all test houses.
- The potential cost saving has not been proven.
- No product trials have been conducted to my knowledge.

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?

No

There has not been enough time to fully evaluate any savings at this moment, our view is that testing to 40mm would increase the cost of materials within this area.

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

We have offered to manufacture a number of products within our development department to the new proposal.

This offer has not been taken up.

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

Increase in component cost to additional FR. Extra testing cost for materials within 40mm

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?

As long as there is 12 – 18 months lead in period losses will be kept to a minimum.

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?

We agree that there will be a cost saving to our company on cigarette testing. Any savings will be lost with the additional testing and increased component costs.

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

As above.

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?

No

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

No comment

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.

No comment

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.

The question is unclear.

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

As above.

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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Any enquiries regarding this publication should be sent to:

Department for Business, Innovation and Skills
1 Victoria Street
London SW1H 0ET
Tel: 020 7215 5000

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