



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 7<sup>th</sup> 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): ipea UK Ltd.

Address: Unit 2, Goat Mill Road, Dowlais, Merthyr Tydfil C8 3TD

Please return completed forms to:

Terry Edge

4<sup>th</sup> Floor, Orchard 1

BIS

1 Victoria Street

London SW1 0ET

Telephone: 020 7215 5576

email: [terry.edge@bis.gsi.gov.uk](mailto: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
	Large business (over 250 staff)
	Legal representative
	Local Government
	Medium business (50 to 250 staff)
	Micro business (up to 9 staff)
<b>YES</b>	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?**

**Aim 1-To make UK furniture greener-NO**

Independent research has shown that an overall reduction in use of FR chemicals may not be achievable on many fibre compositions, and for certain blends will require an increase in the use of FR chemicals to pass the new match test requirements.

**Aim 2-Save money to industry-NO**

Due to reasons given above we do not believe there will be any significant cost savings to industry.

In addition there would be significant additional costs to make currently unregulated materials within 40mm of the outer cover compliant with the new test requirements.

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:

The testing of unregulated components could be an issue.

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

Comments:

- The current guidance is unclear and the industry is struggling to accurately assess the impact of the new requirements.
- The inclusion of currently unregulated components will undoubtedly result in a significant increase in their cost.
- The test method needs to be more clearly defined.

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

A ☐ Yes ☒ No ☐ Not sure

Comments:

#### **Para 32- Benefit-Cost saving**

For reasons already stated we do not believe there will be any cost saving.

#### **Para 34-Benefit-Inclusion of currently unregulated materials**

There is no evidence to suggest that the new test for unregulated materials will prove more/less fire safe than the current.

#### **Para 36-benefit-Preventing insufficiently treated products getting into UK home.**

The unscrupulous organisations currently responsible for doing this are unlikely to cease under the new test regime. What would help is better enforcement of the Regulations.

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

Comments: A review of the regulations is welcome, but a more detailed analysis of the potential costs/savings should be undertaken before making a final decision.

**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:

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?

We believe the additional cost of testing lining materials and unregulated components will off-set any savings on the current cigarette test for fabrics that pass the match test.

Confidential information discussed within our trade association also indicates the BIS's predicted test saving of £7.5million to be a massive over estimation.

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

Confidential information discussed within our trade association.

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

The primary additional costs associated with the new match test are:

- Increased due diligence costs throughout the supply chain
- Alternative product development costs
- Potential increase in cost of alternative products

**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?

We believe a more realistic transition period would be 24 months rather than the 18 months currently suggested by BIS.

**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 believe the additional cost of testing lining materials and unregulated components will off-set any savings on the current cigarette test for fabrics that pass the match test.

Confidential information discussed within our trade association also indicates the BIS's predicted test saving of £7.5million to be a massive over estimation.

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

There are unlikely to be any cost savings for our company due to the additional cost of making unregulated components compliant plus the additional compliance costs.

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

Unknown

**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?

Unknown

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

Unknown

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

Unknown

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

Unknown

**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.

We don't understand the table, nor the argument, so cannot comment

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

We don't understand the table, nor the argument, so cannot comment

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

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