

**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): National Bed Federation

Address: High Corn Mill, Chapel Hill, Skipton, North Yorkshire BD23 1NL

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
<input checked="" type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Large business (over 250 staff)
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Medium business (50 to 250 staff)
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)
<input type="checkbox"/>	Trade union or staff association
<input type="checkbox"/>	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: If FRs used can be reduced and in many cases this would appear to be possible we feel that these proposals will make furniture greener. At this stage we cannot ascertain if this will save money. The same applies to safety we cannot until the furniture is in production determine if this will be improved but we believe there will be no reduction in safety.

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

A ☐ Yes ☐ ☐

Comments: We do believe that the reduction in FRs will become a more important requirement from an environmental point of view and that consumers do have an increasing aversion to them especially in Nursery products.

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

A ☐ ☐ ☐ Not sure

Comments:

The changes will be viable if sufficient detail is included to clarify all aspects of the testing. For instance the type of PU Foam and Polyester fibre to be used needs to be specified carefully to avoid any possibility of different laboratories using different materials.

Also testing of small components may involve laboratories adapting the test method to accommodate different small components and this in itself could give rise to variability in results.

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

Comments: With regard to these materials there is still some confusion among manufacturers as to what is in scope and what is not. Therefore the guidance given must be clear and sufficient to enable manufacturers to understand what is intended.

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

A ☐ ☐ ☐ Not sure

Comments:

Para 31 Yes any reduction in FRs would be welcomed.

Para 32 Unable to determine at present time.

Para 33 No. We do not believe other European members are interested in increasing flammability requirements for furniture.

Para 34 No. There is no evidence to prove that inclusion of these materials would be more or less safe than current constructions.

Para 35 Yes. If the test corrects this problem it would obviously be a benefit.

Para 36 No. Rogue companies will continue whether we have a new test or not.

Para 37 Yes. If we can avoid expensive disposal charges however to do this we may need to remove the some FR,s completely.

Para 38 Yes. New technology is always welcome.

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

Comments: If at some later date the alignment of Headboards and Upholstered bedsteads with mattresses, divans and bedbases is included in changes to the regulations, we would prefer for all the changes to be carried out at the same time to avoid a second round of changes for manufacturers.

**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:

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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