



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:

Organisation (if applicable): *NATIONAL TRUST*

Address:

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)
	Small business (10 to 49 staff)
	Trade union or staff association
✓	Other (please describe): Heritage (National Trust)

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: Based upon how you have explained the process I believe that all your criteria will be met. The use of chemicals should be reduced and this will be a consideration for furniture disposal at end of life. The test brings in unregulated linings, so I believe the test will make furniture safer.

There is better control on 'smoking' in certain environments and this awareness has no doubt led to a reduction in fires starting in furniture.

If there is a 'room fire' caused by electrical apparatus and it happens to involve furniture and other products of combustion then no amount of FR chemicals will stop the spread?

**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: As mentioned above there is better all-round fire safety awareness and less smoking in the area of this furniture so fires starting in these products is less.

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

A            ☒ Yes            ☐ No            ☐ Not sure

Comments: Yes, providing the materials meet the requirements of the test and I understand that previously untested materials are bought into the scope.

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

Comments: I think this is beneficial to the overall scheme as undoubtedly these additional materials can be very flammable. However, this may be costly and onerous to business. It has been explained that this can be treated based on 'batches', which appears to be a good way forward.

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

A            ☒ Yes            ☐ No            ☐ Not sure

Comments: I think you have to take the holistic view and coupled with better fire safety and fire risk assessment then the overall benefit is advantageous.

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

Comments: Single consultation is good, the standards need to be reviewed and this will bring us into line with the EU and help to grow the economy. My overall view is that this is coupled with better safety standards from less smoking and better fire risk assessments and better fire safety awareness in general. Removal of a chemical in a product(s) and better testing criteria has got to be a better solution.

**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		√			
Range of options wide enough		√			
Preferred options well chosen		√			

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

Comments: Just confirming my previous e-mail conversation with Philip Earl and the need to be specific about the requirements for existing historic furniture (e.g. Pre 1950's) and its use in holiday cottages etc. Some old furniture can be restored and clarity regarding if the materials used have to conform to the present regs. Or untested older materials can still be used.

Further to my previous email, I can clarify that the requirements of the Regulations do not apply in relation to the supply of furniture manufactured before 1 January 1950, or in relation to the supply of materials for use in re-covering and re-upholstering furniture manufactured before that date. So, if you are restoring furniture manufactured before 1 January 1950, you can use materials (filling materials and fabrics) that do not pass the tests in the Regulations for use in restoring that furniture.

Below are the additional questions from the Impact Assessment. Please respond to them on this part of the form. I am responding as an end user, so most of these questions re not applicable.

**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?**

N/A

**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?**

N/A

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

N/A

**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?

N/A

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

Yes

**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.

N/A

**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.

N/A

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

N/A

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 x

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?

x Yes

☐ No

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