2016 - 010

Response ID ANON-F7WP-299A-9

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-08 16:52:20**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Bedfordshire Fire and Rescue Service

4 How would you classify your organisation?

Organisation type:
Local government

Other - please describe here:

Scope

5 The proposed regulations cover any item of domestic furniture which is ordinarily intended for private use in a dwelling and comprises a cover fabric and a filling.Do you agree with the revised definition of the Regulation's scope?

Yes

Comment box:

6 Do you agree with the proposals relating to sleeping bags and mattress protectors (i.e. those which can be put in a washing machine are explicitly removed from scope and do not have to meet the requirements of the regulations)?

Yes

Comment box:

7 Do you agree with the proposals relating to cushions and seat pads (i.e. that they remain excluded from cover tests but the definition of these products to be specified more clearly)?

Yes

Comment box:

8 Do you agree with the proposals relating to outdoor furniture (i.e. that outdoor furniture unsuitable for use inside the home, and clearly labelled as not complying with the Regulations) should be out of scope?

Yes

Comment box:

9 Do you agree with the proposals relating to baby products (i.e. that items covered by covered by BS EN1888 (wheeled child conveyances) and BS EN1466 (carry cots and stands) are removed from scope, with padded playpens treated in the same way as mattresses)?

Yes

Comment box:
Baby furniture/items I believe is covered under separate legislation

10 Do you agree with the proposed treatment of second-hand products (i.e. that they would be required to bear the relevant permanent label)?

Yes

Comment box:

Testing

11 Do you agree to removing the Filling 1 option? (i.e. to remove the option to test where covers are placed directly over the foam filling in the final product)

Not sure

Comment box:
the tests ought to replicate all of the possible combinations of fabrics and materials or the regulations provide for use of only those which have been seen as successful under test

12 Do you agree that the specifications set out in the draft Regulations for the test foam and fibre wrap are sufficient to achieve the objectives of the Regulations?

No

Comment box:
as above I am unsure the specification does deal with every possible construction scenario particularly related to where the test specifies the use of modified or unmodified filling

13 Do you agree that the regulations should provide a protective cover option?

Not sure

Comment box:
depends on the nature and definition of protective cover

14 If yes, do you agree with our proposed definition of protectiveness?

Not sure

Comment box:

15 Do you agree with the proposed requirements for components close to the cover?

Yes

Comment box:

16 Do you agree that there is no need for the cigarette test for covers that pass the revised match test?

No

Comment box:
cigarette test relates to different circumstances and a different type of fire or combustibility

17 For business respondents - Which of the routes to compliance do you expect to follow for most of your products?

Not Answered

Comment box:
n/a

18 For business respondents - What do you expect the impact of the testing proposals to be on your use of flame retardants in covers?

Not Answered

Comment box:
n/a

19 For business respondents - What do you expect the impact of the testing proposals to be on your overall use of flame retardants?

Not Answered

Comment box:
n/a

Traceability and enforcement

20 Do you agree with the product record/technical file requirements for manufacturers and importers?

Yes

Comment box:

21 Do you agree with the requirements for the single permanent label, and the proposal to remove the requirement for additional display labels?

Yes

Comment box:

22 What do you think is the most effective means of conveying the use of flame retardants in the cover of this product eg by text, symbol?

Comment box:
Is this necessary? if there is already a label detailing compliance does that not imply the use of retardants

Other questions

23 Do you agree that a 24 month transition period is sufficient, and that the changes should be reviewed in five years?

Yes

Comment box:

24 Do you have any other comments on the proposals or draft regulations?

Comment box:
I am very concerned that what has been a technical discussion for some months is being consulted on by seeking opinion rather than presenting science. some of these matters are absolute it either does or it doesn't. I do not have sufficient scientific understanding to properly judge some of the questions posed.
I do know that these regulations have been largely successful and whilst I am willing to explore ways to make them more efficient or friendly I would not wish to see their efficacy diminished and would like to see the evidence which demonstrates this not to be the case.

Impact Assessment

25 Do you agree with our estimate of traceability time in the Impact Assessment – ie one-off input of 16 hours per firm and ongoing per year time of 48 hours per firm? If not can you provide additional evidence to support your answer?

Not sure

Comment box:

26 How much do you estimate you would save per year from the removal of the cigarette test?

Amount saved::

Not sure

Comment box:

27 How much do you estimate you would save per year from reduced use of flame retardants?

Amount saved::

Not sure

Comment box:

28 Are you aware of any further costs or benefits we have not identified in the impact assessment? Please support with any evidence you have.

No

Comment box:

29 To what extent do you agree that, overall, these proposals represent a reasonable compromise – bearing in mind the information in this consultation document, feedback on the previous (2014) consultation, and other stakeholder input during the review?

Disagree

Comment box: