2016-012

Redacted

Response ID ANON-F7WP-2997-Y

Submitted to Furniture and furnishings fire safety regulations: proposed changes (2016)
Submitted on 2016-11-03 15:23:20

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Bingley Textile Supplies Ltd

4 How would you classify your organisation?

Organisation type:
Manufacturer

Other - please describe here:
Textile Manufacturer

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:

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)?

Not sure

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)

Yes

Comment box:

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?

Not sure

Comment box:

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

Yes

Comment box:

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?

No

Comment box:
We are a piping cord manufacturer, and it makes up over 60% of our business. Piping Cord is an optional item (e.g. it does not stabilise or strengthen any part of any sofa / mattress / cushion etc), and can easily be taken out of a design.

The product will more than double in cost to us, as a result of the FR additive that we'd have to buy with our raw materials. In addition to this, around 40% of our Piping Cord is made from Paper. There is no possibility of making this Fire Retardant.

As a result, we expect to loose a lot of our Piping Cord business, which is the bulk of what we do. We cannot understand why Piping Cord would be in the scope, when its covered by another fabric. Including Piping Cord in the scope could very easily kill our business.

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

Yes

Comment box:

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

Not sure

Comment box:
I believe our raw materials would have to have an additive, rather than a cover.

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

No change

Comment box:

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

Increase

Comment box:

Traceability and enforcement

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

Not sure

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?

No

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:

Other questions

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

No

Comment box:
I do not agree that the changes should come into effect for Piping Cord. If these changes do happen, I would want a review within the first 24 months, not 5 years, as I feel that it'd give us enough data to catagorically say "this is working" or "this is relevant for piping cords".

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

Comment box:
I can't stress enough how much of an impact this will have on our business. We have over 35 machines producing a paper piping cord, that would become obsolete. We also have another 35 machines making a washable piping cord, and I would predict that we'd loose a lot of customers on the part of the business. Clearly that would have an impact on our ability to trade / hire staff etc.

I would request that Piping Cord becomes exempt from the regulations, as the piping cord itself is switched into a fire retardant cover. Piping Cord makes such a small percentage of any given sofa / bed etc, that it isn't going to be the product that causes the whole house to go up in flames.

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 Answered

Comment box:

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

Amount saved::
0

Nothing

Comment box:

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

Amount saved::
0

Nothing

Comment box:
We dont use Flame Retardants now, and we would have to ADD them to our product. Covers are not feasible, so FR goods would go from 0 to approx 10 tonne a month.

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.

Yes

Comment box:
Raw material cost for our business will double (we have 1 customer who has taken an FR-based piping cord, and so we had to look into the cost ourselves). Invoices available on request.

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?

Strongly disagree

Comment box:
As I mentioned earlier, I believe these changes would cripple our business - and so although these changes may help someone somewhere, it clearly isn't a comparison that helps us.

In addition, the report already states that fire safety is strong in the UK. This seems to be a non-issue..