2016 - 008

Redacted

Response ID ANON-F7WP-299W-Y

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-06 15:57:47**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Baby Products Association

4 How would you classify your organisation?

Organisation type:
Business representative organisation/trade body

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:
We are in full support of the new scope.

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:
Giving one definition specifying the dimension of a cushion and/or seat pad would be preferable to a description for each but we support the improved definition.

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:
How this furniture is identified as 'unsuitable for use inside the home' may need further clarification. Foreseeable use for some products is outside the home in summer months but inside the home during winter months (such as in a conservatory).

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:
We fully support these exclusions. Clarifying that products such as baby bouncers, reclined cradles, swings, travel cots and similar articles are excluded from Regulation 12, 14, 15, 17, 18 and 19 (in the same way as cots and playpens) would be beneficial and would prevent open interpretation.

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)

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?

Yes

Comment box:
In relation to nursery products.

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

Yes

Comment box:
But as one of at least two options.

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

Yes

Comment box:

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

Not sure

Comment box:
The requirement to keep and update a detailed Technical File places an additional burden on manufacturers although these are becoming more commonplace anyway.

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?

Non-protective cover + compliant components

Comment box:
It is likely that the nursery industry will use the 'non-protective' cover option for those products that remain fully in scope. The most likely is the use of a non-protective cover and compliant components given the limited amount of components within the upholstered part of the product. Should the scope change to include products excluded in this draft, the response would be different.

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 sure

Comment box:
Each company will have to conduct its own cost analysis.

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

Not sure

Comment box:
Each company will have to provide its own estimate based on the option it chooses for compliance.

Traceability and enforcement

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

Yes

Comment box:
As mentioned previously, Technical Files are becoming more commonplace now and whilst there will be some initial burden on manufacturers that currently do not keep them, this is likely to be acceptable.

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:
Preference would be for text rather than a symbol to ensure it is properly understood by the consumer and does not deter them from purchasing a product. A simple message such as 'fire retardants have been used in the manufacture of this product' is preferred to listing the chemicals. This requirement should only be met if fire retardants are present in the cover fabric and not if an interliner has been used (in the same way that it does not apply to the filling).

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:
If this is from the time the product is placed on the market and not to have cleared retail sales.

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

Comment box:
As work has been continuing on this revision for several years, implementation as early as possible would be appreciated.

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:
This would depend on the way in which the requirements are met. It is likely to take manufacturers longer than the initial 16 hours to test components within 40mm of the cover and list these in the Technical File.

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

Amount saved::

Not sure

Comment box:
This has not been calculated by the Association.

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

Amount saved::
£50m+

Not Answered

Comment box:
The removal of wheeled child conveyances, carry cots and car seats from scope of the Regulations was estimated amongst members and calculated across the industry in the UK.
The intention to treat cots, playpens, baby bouncers, reclined cradles, travel cots, swings and other similar products in the same way as mattresses will show additional savings but these have not been estimated as the full list of products is not yet confirmed.

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:
There will be additional savings in the nursery industry as dual manufacturing processes and separate SKUs will no longer be necessary for products removed from scope.

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 agree

Comment box:
Some clarification is still required but overall we agree with this statement.