2016 - 030

Redacted

Response ID ANON-F7WP-291A-1

Submitted to Furniture and furnishings fire safety regulations: proposed changes (2016)
Submitted on 2016-09-21 09:03:04

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

No

3 What is your organisation?

Organisation:
Community Playthings

4 How would you classify your organisation?

Organisation type:
Medium business (50 to 250 staff)

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:
Sleeping bags and mattress protectors should be removed from scope of the regulations.

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:
Cushions should remain excluded from the scope.

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)?

No

Comment box:
I agree that baby products should be removed from scope. However, this should include items covered by BS EN 716 (cots) and BS EN 1130 (cribs and cradles), and BS 8509 (Children's beds).

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:

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?

Yes

Comment box:

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

No

Comment box:
It is almost universally recognised that this will open the way for all kinds of unforeseen issues. There could be flammable, paper, cardboard or wood components that are "close to the cover" that could lead to failures. It has to be thought about very carefully before introducing new requirements.

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

Yes

Comment box:
That seems to make sense as I have never heard of a material passing the match test and then failing the cigarette test.

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

Schedule 3 interliner

Comment box:
As a business we are trying to move entirely away from the use of chemical flame retardants. A wool wrap is one idea but this will take a lot of research and development and will depend partly on the outcome of the revision of these regulations.

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

Decrease

Comment box:
Irrespective of what the proposed regulations specify, we as a business are trying to move entirely away from the use of chemical flame retardants. It will take a lot of research and development to achieve this but we are committed to getting rid of the nasties.

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

Decrease

Comment box:
Irrespective of what the proposed regulations specify, we as a business are trying to move entirely away from the use of chemical flame retardants. It will take a lot of research and development to achieve this but we are committed to getting rid of the nasties.

Traceability and enforcement

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

Yes

Comment box:
This is manufacturing best practice.

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:
Any sort of label is burdensome and does not add value or make the product any safer.

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:
This information should be in the technical file, not in a label of any kind.

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:
24 months is very short. 36 months would be better. The five year review period is OK.

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

Comment box:
Why are we still specifying a standard from 1982 for the cigarette and match tests? BSI refuses to update this standard because it is listed in the FFFSR so it is a "catch 22" and can never can get updated. This cycle needs to be broken. What is wrong with using BS EN 597 and BS EN 1021? It is time to embrace the 21st century and leave the 1980's behind.

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::
£100

Not Answered

Comment box:

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

Amount saved::

Nothing

Comment box:
Our suppliers would have to pass the cost saving on which is not very likely.

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.

Not sure

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?

Agree

Comment box: