From: [redacted]
Sent: 10 November 2016 12:18
To: [redacted]
Subject: CPES reply to the BEIS consultation on the UK fire regulations

Dear [redacted] and Christine,

I am writing to you to give our response to the BEIS consultation on the proposed changes to the UK fire regulations.

We are a health charity who work to reduce human exposure to harmful chemicals. UK dust has the highest levels of some flame retardants in the world https://www.ncbi.nlm.nih.gov/pubmed/26232632 Thus we welcome any regulations that lead to a reduction in the use of harmful flame retardants. However, we cannot tell whether the proposed changes to the 1988 fire regulations will achieve this and this is our primary concern.

Flame retardants are problematic at all stages of the lifecycle: in normal use, during fires and at end of life (disposal). We believe that fire safety should be achieved through design, alarms, and the use of not easily flammable materials rather than using easily flammable materials and then adding flame retardants thereby exposing the entire population and the environment to them for years and decades.

We are concerned that when old flame retardants are phased out new ones replacing them are also problematic and/or have large data gaps. This is demonstrated in the recent report on organophosphorus flame retardants produced by the Danish EPA http://www2.mst.dk/Udgiv/publications/2016/01/978-87-93435-23-0.pdf

We very much endorse the submission to this present consultation made by the Sustainability Network for Standardisation. In addition, we support the policy paper "The Case for Flame Retardant Free Furniture" of the European Furniture Industries Confederation (EFIC) http://www.efic.eu/Documents.aspx , the San Antonio Statement http://ehp.niehs.nih.gov/1003089/ , and the Canadian Toxic by Design report: http://bit.ly/2e5mrzE

We also support the mandatory requirement for clear transparent labelling stating if a product contains flame retardants and, if so, exactly which ones. This will have two benefits: it will allow discerning customers to avoid questionable chemicals; and it will allow for the elimination of furniture containing banned or phased out flame retardants – this is not currently the case and many homes will certainly contain banned or phased out flame retardants.

We also recommend, if this is not currently the case, that BEIS consults with the flame retardant and fire toxicity experts Arlene Blum, Stuart Harrad, David Mortimer and Richard Hull. It is vital that BEIS does not depend on input from organisations with a commercial interest in the use of flame retardant because this would constitute a major conflict of interest, nor should it delay implementation of measures that would reduce the use of flame retardants because of pressure from these groups – with each passing month the entire UK population is being exposed to these chemicals.

Please can you acknowledge safe receipt of this email – thank you.

Yours sincerely,

[redacted]

The Cancer Prevention and Education Society
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