2016-027

Response ID ANON-F7WP-2994-V

Redacted

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-08 10:34:23**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Cleland McIver

4 How would you classify your organisation?

Organisation type:
Manufacturer

Other - please describe here:
and Supplier

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)?

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:
Not enough research to base this change on- reproductivity of fibre layers and assembly with foam is in question.

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:
Not enough testing and research to prove this will allow less use of FR chemicals.

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

Not sure

Comment box:
Measurement of 'hole' to be clearly defined. Offering this route to compliance may lead to use of more FR and not less.

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

Not sure

Comment box:
What about melting and dripping?

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

No

Comment box:
Match test for components should be more clearly defined as this was not required before. Not all components relevant to be tested - components at base not in contact with air?
This will increase costs.

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

No

Comment box:
Not all fabrics that pass match test necessarily will pass cigarette test- even though the percentage is very high. Cellulosics all need cigarette test in place. Any future developments in new (and hopefully sustainable/renewable fibres) may act differently between the two tests. We believe both tests are required to ensure complete safety of the product.

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:
As our main product of concern are beanbags - the protective cover option will not be viable for all as the fabric tends to be a polyester - not heavy enough in weight to pass the 'protective cover' test. However the testing of all components will be very costly, and would impact the design of the product in reducing this testing.
The use of an interliner would also impact manufacturing costs as an alternative.

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:
Currently FR used to ensure covers pass match test (don't currently use cellulosics so cig test is not such a concern). We are not sure the change in foam would affect the performance of the fabric and therefore would not immediately reduce any FR chemicals until much more research has been understood.

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

No change

Comment box:

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?

Not sure

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:
Both

Other questions

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

Not sure

Comment box:

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

Comment box:
We would be concerned at the lack of definitive evidence to prove the changes would be beneficial overall - in terms of reducing use of FR. Changes allow new routes to compliance that could lead to inconsistency in measurement of protectiveness.
The main effect for us would be increased testing costs for all components.
We would like to see more research and trials using test labs and producing consistent and conclusive results that all parties can agree on going forwards.

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:
More research and findings are needed.