2016 - 047. Francis. Dinsmore.

Response ID ANON-F7WP-299R-T

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-10 11:58:05**

Introduction

1 What is your name?

Name:
[redacted]

2 What is your email address?

Email:
[redacted]

Yes

3 What is your organisation?

Organisation:
Francis Dinsmore Textiles - Kells N. Ireland

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:
These changes would seem to be clearer than previous legislation

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:
These items would need to be labelled as WASHABLE

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)?

Not sure

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?

Not sure

Comment box:
Leaning more towards NO. Where does this lead to if someone goes to purchase outdoor furniture for use indoors based on price difference because Non FR treated items would be cheaper? Even if it is identified as for outdoor use only? There may be a risk there.

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)

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?

No

Comment box:
I have a few concerns:
. There are various types of FR foam which will lead to different test results from UKAS labs versus internal testing of the FR application processers. In my opinion there must be ONE clear spec on testing foam used by ALL.
. The test using Non FR foam is to reflect a worst case scenario.
. The aim of the new test is to reduce the use of FR chemicals. In my opinion this would surely lead to fire spreading more rapidly once ignited.
. There would also be the risk of FR Processors and furniture manufacturers to only use the best UKAS labs (the labs that give the most consistent pass rate) IF the test houses were to use different foams.

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

No

Comment box:
If a FR cover is tested over a NON FR FOAM then there should be no need for testing FR treated components at a distance from the surface.

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

No

Comment box:
I would have doubts over the accuracy of the test method.

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

No

Comment box:
I cannot see any evidence that items close to a cover contribute to the ignition stage of furniture if it has a match resistant cover. In fact any data since the 1988 regulations would seem to indicate this a waste of time.

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

No

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:

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:
Due to the lack of test data, this means that nobody can be sure if the use of the FR chemicals will increase/decrease as result of the proposals.

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:

Traceability and enforcement

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

Not sure

Comment box:
Any improvements on traceability of products in the supply chain would be a good thing in my opinion. But the exact details that are recorded don't seem to be specified.

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:
the most effective means would be to have ALL furniture needing labelled would state that it is containing FR CHEMICALS

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:

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

Comment box:
I am slightly concerned that there are flaws in the proposals.
- Creating a new category of protective covering with little evidence to support the testing or overall fire safety.
- Additional tests of components close to cover and little/no evidence of its contribution to ignition of furniture covers with FR fabrics.
- Is there any evidence to support that the new match test is as safe as the current test?

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.

Yes

Comment box:
Testing cost will surely increase (dramatically I think)

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: