2016-036

Response ID ANON-F7WP-29R6-Q

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-10-31 09:31:37**

Introduction

1 What is your name?

Name:
[redacted]

2 What is your email address?

Email:
[redacted]

Yes

3 What is your organisation?

Organisation:
East Coast Nursery

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:
It is better but perhaps still not definitive enough as you could initially think 'domestic furniture' does not include cushions, mattress covers and other items (furnishings) which are technically not furniture. The definition does clarify this within the draft regulations but could the scope be clearer.

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:
Agree, but if being applied then other items should also be considered. For example for baby goods such as padded fabric covers for reclined cradles or highchairs which can be machine washed.

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:
Consideration should also be given to include other baby goods such as reclined cradles, highchairs and other such articles. These product also have a low fuel load and a child should also not be left unattended so also a low risk.

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:

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?

Not sure

Comment box:
Concerned if a pass or fail is based on a view if a 2mm hole has appeared in the burnt material.

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

Not sure

Comment box:
The 40mm could be open to abuse and / or increase in testing cost. This could also increase the amount of chemicals added to components, which is something we should all be trying to avoid.

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?

Schedule 3 interliner

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?

Decrease

Comment box:

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:

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?

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:
Text, a single sentence to state 'flame retardants have been used in this product'.

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:
Further consideration should be given to other baby goods, not just pushchairs, car seats or carry cots. Other items have a low fuel load, should be attended at all times when in use and removing them from the regulations will help towards the increase concerns and restrictions of chemicals being applied on baby goods.

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?

Yes

Comment box:

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

Amount saved::
£1000

Not Answered

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:
The more baby and nursery products exempt from the regulations the easier it will be to export such products. Many countries do not accept products which meet the UK FFR regulations due to concerns with chemicals which may have been added.

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: