2016-063

Response ID ANON-F7WP-299J-J

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-10 10:29:57**

Introduction

1 What is your name?

Name:
[redacted]

2 What is your email address?

Email:
[redacted]

Yes

3 What is your organisation?

Organisation:
IKEA Retail UK & IE

4 How would you classify your organisation?

Organisation type:
Retailer

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:
none

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:
Please define size of washing machine that would support this question. As its not defined in this and sizes vary with machines.

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:
60 x 60 would be ideal size

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:
the outdoor furniture could be used inside and the definition of unsuitable does not help retailers support this being implemented to customer. This needs to have clear points that related to what unsuitable means and how we can secure this to meet the regulation the best way possible with out misinterpretation.

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:
We believe more could be done but this is a start

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:
There are risks during the transition within this area with second hand and our policy of returning unwanted goods within a year can impact us.
Would this be defined as second hand returned unused goods or new? Also what are the impacts at the two years within this area? Will we need to secure the permanent label to all these items or do we need to have evidence they where being sold before end of old regulations? Or do we remove these. Also the impact to Ireland as they wont be fully on board if we go ahead? Will TS understand this as now there is a 12 month window to take action?
Need definition of what is classed as second hand and expectations of handling and label during and after regulations. Also guidelines with regards to Ireland as they wont of implemented and this could cause concerns.

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:
none

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:
It is hard to tell without having practical experience from testing with the suggested foam. This needs to be done to have a better understanding.

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

Yes

Comment box:
Requires clear definitions and descriptions on application of the requirement. For example how often should the material be tested for protectiveness? This is not stated or clear within the proposal and additional testing will add cost.

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

Yes

Comment box:
none

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

Yes

Comment box:
but want a clear and defined list of exclusions. But it needs to be clear how to apply the requirement. Frequency of testing?

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

Yes

Comment box:
There still needs to be more practical research on testing methods within proposal

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

Protective cover

Comment box:
Protective cover (3) Non-protective cover + complaint components to the cover (4)

as far possible this option is the most wished for & would be the aim for the future products as well as long as it can be passed with reduced amount of FR. Otherwise route 4 would be the most appropriate for all cover materials except those that can be used with an interliner Schedule 3

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:
How ever the 40mm rule may impact this

Traceability and enforcement

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

Yes

Comment box:
Tech files must have high level of details and same batch test so a full audit can be traced from Customer order straight through to maufacturere and testing certification etc which we agree with on a retail side Consistency when TS audit and review this could put retail at risk.
Need clear working way and expectations when securing Traceability and enforcement.

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:
none

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:
symbol:
A symbol would most likely be the most effective mean of conveying the use of flame retardants in the cover. The vast majority of the affordable covers could still have flame retardants, for the next couple of years, while better options are developed and only a few, pricier covers might be without.

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:
The suggested changes will require a lot of work to determine status of current range, initiate needed changes and phase out old stock in time.

Also Concerns on Ireland and when they will or will not comply will impact this. As we would potentially have same stock but different requirements. Causing challenges of compliance

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

Comment box:
1) Define further of sample sizes etc for component testing of materials close to the cover?

2) Define further of sample sizes etc for component testing of materials close to the cover?

3) Second hand goods definition and what are returned unused goods defined as? How do we manage these when 2 years completes? What is the expectation?

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?

No

Comment box:
We are a big company, much more work is needed to test and find appropriate routes to compliance that allows reductions of flame retardants.

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

Amount saved::

Not sure

Comment box:
With the adding of the test of components close to the non-protective cover, it is hard to tell.

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

Amount saved::
?

Not sure

Comment box:
none

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:
none

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:
there are a number of questions raised still that we need clarity to be truly in strong agreement. These need to be addressed as soon as possible.