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Response ID ANON-F7WP-291V-P

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-09-21 10:06:37**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Not Answered

3 What is your organisation?

Organisation:
Mobus Fabrics Ltd

4 How would you classify your organisation?

Organisation type:
Manufacturer

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:

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)?

Not Answered

Comment box:
not relevant to our organisation

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:
Clearer clarification to the industry, most people are confused regarding this area and still insist on supplying Fr coated fabric when it is not required

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)?

Not Answered

Comment box:
not relevant to our organisation

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)?

Not sure

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:
My concern is the variability in the fibre wrap

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:
It depends on the variables with the foam and fibre wrap to ensure we have limited variance between test houses

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

Not sure

Comment box:
I would be happy to provide fabric that meets compliance without fr processing

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

Not Answered

Comment box:

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

Not sure

Comment box:
Not familiar with this are

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

Yes

Comment box:
I am happy to agree but form experience you have potential issues with cellulosic fibres

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:
We currently supply mainly polyester based fibres and as a wholesaler , unless the customer is very large, we will limit the variations we offer

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:
From previous tests we have found that cellulosic blends required more compound when tested over the proposed test.

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

Not Answered

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:
symbol

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:
Happy with the 24 month transition but concerned that the review of five years is to long. Should be sufficient data from the level of testing to asses the effectiveness of the new test.

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

Comment box:
Would like a review of the test for Shedule interliner-the failure rate is so high that either the test is too severe or the product should not be offered?

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:
Trace-ability should be part of your everyday practice therefore the time required is much higher

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

Amount saved::
£11,000

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:
the fr compound cost is not the largest part of the costs involved in fr processing , depending on the quality perhaps £250,000/year
Any saving would be passed on to our customer so the company would not benifit

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 Answered

Comment box:
Costs for failures either retesting or reprocessing can be high.

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: