2016-066 J E Ekornes

Response ID ANON-F7WP-29XT-U

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-09-28 08:57:02**

Introduction

1 What is your name?

Name:
[redacted]

2 What is your email address?

Email:
[redacted]

Yes

3 What is your organisation?

Organisation:
J.E.Ekornes AS,Norway

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:
yes,regarding fire-safety,but not with regards to health and environment impacts.

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 sure

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)?

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?

No

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 sure

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:

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:

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

Not sure

Comment box:

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

Not sure

Comment box:

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

Not sure

Comment box:

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?

Non-protective cover + compliant components

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?

No change

Comment box:
We use only leathers today passing without FRs. We stopped using textiles because of trouble having reliable and same testresults from different labs for the textiles. If we start using textiles again the FR amount will be less than before because of testing the textile against crib5 foams instead of std.blockfoam not retarded.

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:
If adding textiles to our collection again it will be an increase of FR-use. The problem is that you cant import the FRs in textiles to Norway anymore because they are banned,or will be. If that's the result, we cant deliver furniture having textiles for the future to England/Ireland,except for the textiles passing the fire-test without FRs added.

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:

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:
I read the info with interest;
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544021/beis-16-14-technical-panel-to-the-review-of-the-furniture-and-furnishings-fire-safety-r

From this I understand that your intention as a whole is to have as high fire-safety using no flameretardants if possible?

Specificly I understand that you intend to reduce the flameretardants for the cover. The foams you dont mention at all though they contain a lot more flameretardants to pass crib 5 than the covers. That makes the cover the minimum-factor in the tested assembly and transforms it to a "secondary ignition source" if the source is bigger/longer than in the normal test. That might ignite the foam in practice in the furniture. Then its crisis even having a crib 5 foam due to a bigger ignition source! In my opinion you should do the opposite to increase the fire-safety,and additionally take away the flameretardants as a whole.

My alternative is;

1. Make it mandatory that all furniture shall have a fiber-wrap covering the filling/foams. The fiber shall be made from 100% polyester and have a weight of at least 150G/m2.

2. Ask for all textiles/leathers to pass a match-test(18 seconds exposure) over the real, principle combination that's in the sold furniture. That means the cover over 150g/m2 polyesterfiber, and the used foam underneath this again. Covers passing this without flameretardants is possible either by using leather or by choosing textile fibers in the fabric ,that inherently by nature, have the flameretardancy needed. (ex.polyester and wool) The textile might have a backing supporting the flameretardancy additonally.

3. The foam needs only to pass a cigarette test like TB117-2013 or alternatively a normal PUR-HR flexible foam passing a match-test without flameretardants added.

This combination will be just as good or better,regarding ignition of a complete furniture, as what is proposed for implementation. The big difference is that you don't need flameretardants in this proposal! The fire-safety is about the same out in the society and in normal use.

Everything depends on the ignition-source,the smoke-detector effectiveness and the automatic firefighting-equipment installed. Actually its mostly depending on when, or how early the fire is detected, to give escaping time,not so much on speed of development of the fire!

Best regards

[redacted]

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:
Almost nothing!

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:
For the society there are a lot of benefits. You just think about fire-safety and not about all other implications for people. That's not an impact assessment for all consequences in the proposal. How can you do that???
Flamretardants have much greater negative impact on health and environment than increase in fire-safety. How can you mention this an impact assessment?

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?

Strongly disagree

Comment box:
1.The proposal does not use available technical knowledge to optimize fire-safety.
2.It does not use health and environment aspects in the impact assessment.
3. It does not regard "Circular economy"
4. It does not respect international fear of environmental impacts.
5. It does not respect peoples wish for a healthy home and environment.
6.It does not respect the authorities mandate to build a better society. etc.