2016-083 National Caravan Council

Response ID ANON-F7WP-29KZ-M

Redacted

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-11 14:15:16**

Introduction

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
NCC (The National Caravan Council)

4 How would you classify your organisation?

Organisation type:
Business representative organisation/trade body

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)?

Yes

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)?

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)?

Not sure

Comment box:
Not really relevant to the work of the NCC

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:
The previous version of the regulations included an easement for second hand caravans due to the seating / upholstered furniture being an integral part of, and bespoke to the caravan. It is therefore not easy for non-compliant furniture to be removed, retested or replaced when a caravan is resold into the second-hand market. The value of the upholstered furniture is small in comparison to the value of the overall caravan it would be onerous for individuals or businesses to be prohibited from selling an entire caravan on the basis that the upholstered furniture did not carry the correct labelling. The NCC would therefore suggest that there is an exclusion included within the regulations to cover this specific situation.

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?

Not sure

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?

Yes

Comment box:

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

Yes

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?

Schedule 3 interliner

Comment box:
Protective cover option also used in some products within the caravan industry

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:

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

No change

Comment box:

Traceability and enforcement

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

Yes

Comment box:
We welcome the reduction in the requirements for record keeping at the consumer end of the supply chain.

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:
The single design of label will increase traceability.

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:
Not sure

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:
Please see note regarding the special exclusion for second hand caravans above

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

Comment box:
None

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.

Not sure

Comment box:

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 agree

Comment box: