2616 - 109

Response ID ANON-F7WP-29KC-W

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-11 10:39:29**

Introduction

Redacted

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
TEGEWA

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)?

Not sure

Comment box:
There should be a clear definition of the articles in scope to avoid that producers might think their respective articles are not covered.

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:
There should be a clear definition of the articles in scope to avoid that producers might think their respective articles are not covered.

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?

Not sure

Comment box:
There should be a clear definition of the articles in scope to avoid that producers might think their respective articles are not covered.

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:
If there is contact to skin baby products should have their own set of regulations.

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:

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?

No

Comment box:
It is not clear for us if results of test foams experiments acc. to the proposed specifications really reflect fire safety or not. Bad experiences with such test results would reduce generally the reputation of results of fire safety test procedures.

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?

No

Comment box:
We do not understand the justification that test results of covers with a higher level of treatment are taken as evidence that covers with lower levels of treatment will pass the test criteria.

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

Not sure

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?

Not sure

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?

Not sure

Comment box:

Traceability and enforcement

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

Not sure

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?

No

Comment box:
The function of the permanent label should be information of consumers whether flame retardants are used or not. Such an information implies that flame retardants are a unique class of chemicals with comparable performance and comparable properties in view of hazard and risks which is certainly not the case. There are many groups of chemical substances that have flame retardant properties and often specific substances from the same group hold different properties in view of human health and the environment.
Therefore, the information whether flame retardants are used or not has no significant value for the consumer: The consumer cannot be sure about risks for health and the environment nor does the consumer get an Information about fire safety.

We would prefer that the consumer gets an information that the product complies with existing fire safety regulations.

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:
We do not think that an information about use of flame retardants is helpful for the consumer.

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:

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?

Disagree

Comment box: