2016-123

Response ID ANON-F7WP-29RJ-B

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-02 16:09:51**

Introduction

Redacted

1 What is your name?

Name:

2 What is your email address?

Email:

No

3 What is your organisation?

Organisation:
Westbridge Furniture Designs 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:
Where do beanbags fall - within the scope of the newly proposed regulations ?

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)?

Yes

Comment box:
Seat Pad sizes need to reflect the products on the market - most being significantly thicker than 1 cm .

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)?

Yes

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:
We propose a comment on the Permanent Label -

" Do not remove this label , as it will mean that you will not be able to re-sell your furniture"

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)

No

Comment box:
We propose the use of combustion modified foam only - as fibre wrap will add an unknown variable - due to the lack of detailed specification and due to an extra variable , in testing , due to variation in tension on the test rig .

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:
A more detailed specification for the fibre wrap is required - weight / thickness / fibre type & denier etc .

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

No

Comment box:
The trade concensus is that this will not work - as we expect variability in assessment of results . There are increased costs in testing due to 5 X the number of flame presentations and larger sample consumed (X4) . Most fabrics (consumed in the greatest volume) - such as 100% Polyesters from China will fail the test leading to scope for the use of more flame retardent . The technical panel proposed to reject this and stick to the existing test method . There are also some difficulties in the finite assessment / measurement of a hole measuring 2 mm in size .

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?

No

Comment box:
We are not clear what components are covered by the scope or exempt . Treatment of components that fail the test will result in the use of more flame retardents at significant costs to the industry . We do not know if there are treatments available that will work on these components . This defeats one of the main objectives - to reduce the use .

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:
This option has the least add-on cost .

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

Increase

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?

Increase

Comment box:

Traceability and enforcement

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

Yes

Comment box:
But we expect our customers to retain their brand name on the product . This means that they will have to own & keep the technical file - but that we will have to maintain it for them .

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:
Text - i.e. " This product contains flame retardant " or " This product does not contain flame retardant " .

It is not possible to declare the chemical composition of the flame retardant - as this would expose " the intellectual property " of the chemical manufacturer .

Other questions

23 Do you agree that a 24 month transition period is sufficient, and that the changes should be reviewed in five years?

No

Comment box:
36 month transition and 5 year review .

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

Comment box:
The proposals fail to achieve the intended objectives of the revised regulation :

* reduce the consumption of flame retardants (Also , would there not be an increased environmental impact of having to make a new range of components fire retardant
(spring clips , card etc.) ? There will be a resultant " End of Life " issues associated with this .

* reduce costs to industry (the new match test will be significantly more expensive with 5 times the number of tests - consuming 5 metres of fabric) . FIRA indicate that the cigarette test , if dropped , will result in a 5% saving only .

As 90% of our fabrics will be classified as " non-protective " - we are likely to be forced down the route of testing components within 40 mm of the cover fabric .

There will be significantly more work involved in maintaining the technical file .

There is evidence that smoking materials now cause only 6% of accidental domestic fires and there are 26% fewer fires of this type than there were 10 years ago

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:
There will be a need for increased resource to maintain the technical file . We estimate this to be 2 full time administrators for a company of our size .

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

Amount saved::

Nothing

Comment box:

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

Amount saved::

Nothing

Comment box:
We estimate increased costs

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:
Additional fabric will be consumed in testing and testing costs will increase 4 or 5 fold . We will experience additional administrative costs .

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: