2016-119

Response ID ANON-F7WP-2915-N

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-09-21 10:53:47**

Introduction

Redacted

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Upholstery Supplies & Upholstery Training Centre

4 How would you classify your organisation?

Organisation type:
Small business (10 to 49 staff)

Other - please describe here:
Upholsterer & Tteacher

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:
Should this also include Caravans & Motor Homes? Also Wheel chairs for the disabled

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:
These items are cleaned and washed and so it would not work to include these items and also it would not be healthy to sleep in a product containing so many chemicals.

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:
This has long been an area that has been unclear. Such as when is a scatter cushion not a scatter cushion but part of a sofa or chair.
There is also an area that is missing with regard to labeling and that is when a gel is used as part of the filling, I have been asked to the provide the appropriate labels for such cushions but have been unable to be sure which labels would be appropriate and so have sent the customer back to their testing house to check.

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:
This has been a loop hole for conservatory furniture especially imported furniture.

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)?

Not sure

Comment box:
In the past years a lot of good furniture has gone to landfill due to the lack of labeling. There is already a shortage of good mid 20th century upholstered furniture frames that have gone to landfill due to the lack of a label.
I have got around the problem by completely re-upholstering any pieces that comes to me without a label,rather than re-covering, as originally requested by the customer.
Can there not be an exception to the rule? If the furniture can be dated or proved to be bought new in a certain period. Obviously a chair that is manufactured and sold in this country during the 2000 period it will comply but may not have its labels in tact.
Similarly if I recover a chair in a fabric of the right spec that had a permanent label, that label will be removed with the old fabric. However, I cannot add a new label as I do not have tractability of the original fillings. How does that work?

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:
I tend to agree with the BSI comments that the current testing over non FR foam should remain for the reasons that they have so clearly stated. However I do agree with replacing the cigarette test with an alternative to a cigarette and using an electronic substitute.

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

Yes

Comment box:
Rather than needing to make all webbing and hessians FR. I hope I have understood this.

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?

No

Comment box:
I cannot see how this can be done without massively increasing our use of chemicals. The cover and filling should be sufficient as it has been for many years.

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?

Not sure

Comment box:
As re-upholsterers the method would vary depending on the cover chosen by the customer and the old or new filling.
For any new pieces that we make we would go for schedule 3 interliner or protective cover again whichever will comply.

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:
Any increase is not acceptable.

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:
Not aceptable

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:
It would depend on what the new permanent label is and if there is any rules about where it is to be displayed.

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 is fine but few members of the public would understand the symbols so both would be needed.

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 months to 48 would be more sensible as a transition period but a review is fine.

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

Comment box:
I think that the changes made in 1988 have saved many lives and worked well. The ban on smoking has also had an impact. Therefore I think that changing too much of the original regs is unwise. However I do agree that there are areas that need to be made clearer.
However none of this will be helpful if the public are not made aware of the rules and what labels are indicating so that they understand what they should be looking for. IMPORTANT -Better education of the public is needed in the form of a full campaign.
It should also be made compulsory for furniture stores, second hand shops, re-upholsterers etc. to have signs in clear sight showing pictures of the labels and explaining their meaning.

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::

Nothing

Comment box:
It would not affect my business.

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

Amount saved::

Nothing

Comment box:
This cost is passed on to our customers.

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:
If all components within 40mm from the surface are to be made FR the cost of testing etc will be huge.

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: