2016-106

Name:	[redacted]
Organisation (if applicable):	South Wales Fire & Rescue Service
Address:	Forest View Business Park, Llantrisant, South Wales CF72 8LX
Respondent type	Local government

Questions on scope

Q1 Do you agree with the revised definition of the Regulation's scope?

Yes.

Q2 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.

Q3 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)?

NO :These are likely to be involved in development of fires.

Q4 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.

Q5 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: These can be stored in common areas of HMO or other buildings and removal from scope may affect them in fire development.

Q6 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: more than one label could assist in this.

Questions on testing

Q7 Do you agree to removing the Filling 1 option?

Not sure.

Q8 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: composition of materials will need t be consistent.

Q9a Do you agree that the regulations should provide a protective cover option?

Yes.

Q9b If yes, do you agree with our proposed definition of protectiveness?

Yes.

Q10 Do you agree with the proposed requirements for components close to the cover?

Yes.

Q11 Do you agree that there is no need for the cigarette test for covers that pass the revised match test?

No: cigarette tests on all covers as well as match test.

Q12-13b Not included

Questions on traceability and enforcement

Q14 Do you agree with the product record/technical file requirements for manufacturers and importers?

Yes: will allow greater traceability or products that may have issues post fire.

Q15a Do you agree with the requirements for the single permanent label, and the proposal to remove the requirement for additional display labels?

No: Permanent label and other display labels to assist in identification post fire or other incident.

Q15b 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?

Symbol consider elderly, multi-cultural societies

Other questions on the proposals

Q16 Do you agree that a 24 month transition period is sufficient, and that the changes should be reviewed in five years?

Yes.

Q17 Do you have any other comments on the proposals or draft regulations?

No.

Q18 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?

Yes.

Q19 How much do you estimate you would save per year from the removal of the cigarette test?

Nothing.

Q20 How much do you estimate you would save per year from reduced use of flame retardants?

This is the balance between cost saving and the potential increase in development of fire and possible loss of life.

Q21 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.

Q22 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 ☐ Agree ☐ Not sure ☐ Disagree ☐ Strongly Disagree

Agree.