2016-120

Response ID ANON-F7WP-299Y-1

Submitted to **Furniture and furnishings fire safety regulations: proposed changes (2016)**
Submitted on **2016-11-04 08:30:43**

Introduction

Redacted

1 What is your name?

Name:

2 What is your email address?

Email:

Yes

3 What is your organisation?

Organisation:
Walker Greenbank PLC

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?

No

Comment box:
The current regulations are well understood considered one of the best in the world, why do we need to change them
The industry understands them, the only change we agree with is the change of foam to be CHMR across the board

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:

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?

No

Comment box:
The risk is that people will bring outdoor furniture into the homes not understanding the risks of doing so.

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)?

No

Comment box:
These items are used by parents smoking, the same regulations should apply

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)?

No

Comment box:
We are surely at the stage now where the majority of products would comply. Charities re-cycler's are destroying perfectly good furniture for the sake of a label. The rule's for labelling should include going forward that the label should be fixed to the furniture so that it does not hang down is a permanent label in an in conspicuous place that the consumer does not see in normal use and removes as its unsightly.

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:
Confusing to all

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?

Yes

Comment box:
Agree more like final composite is likely to be.

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

No

Comment box:
Adds such differing levels of regulation that we as fabric manufacturers never know what the end use/make up is going to be, how can we advise our customers

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

No

Comment box:

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

No

Comment box:
This will surely increase the use of chemicals as they are introduced to the furnitures components to meet the requirements

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 have always considered the match test the first level of defence in fire prevention, the chance of a cigarette being dropped on furniture is much much greater than a match being dropped on it.
As fabric manufacturers we supply fabric that meets this regulation, what the furniture mfr does is beyond our control, they may or may not adhere to the regulations by using an interliner or chemical treatment, but we have the safety net that the fabric covering at least give some protection. in the event of unscrupulous or genuine errors meaning that the furniture is not compliant

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

Not sure

Comment box:
I would have thought that from our experience our customers would continue witn the chemical treatment of the fabric

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:
as above

Interliner use double the cost of upholstery

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?

No

Comment box:
The data suggests the life of the furniture is greater than the time to keep records

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:
These labels give customers re-assurance at point of sale

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 necessary

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:

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

Comment box:
The use of chemicals to pass the current regulations will not change for us as a supplier the majority of our products would fail the match test without this usage. The comments about deca use may be relevant, but non of our treatment houses use these chemicals they have sourced other chemical with none of the 'potential' harmful affects.
We agree that the regulation need amending to more cater for the changes over the years , but these changes will not achieve the desired affect of less use of chemicals without risking the dropping of standards in our opinion , The change of foam to the CHMR foams that are used is positive, and we agree with this, the new regulation is confusing the results about a hole or something else is at best vague.
The clarification about cushions is welcome, this should also include clarification about armcaps.
One area that has caused us problems as manufacturers could be resolved in this change and that is the frequency of testing fabrics, there is nothing that confirms the validity of a Cigarette Test Certificate, if the product is not changed in any way, why should there be a further test on a yearly/six monthly basis as we are seeing requests for? this seems to be a paper exercise that is costing manufacturers needlessly and adding no benefit , only cost to industry and subsequently increasing costs to the consumer. I am willing to discuss this further if needed.

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:
I believe that this changes will put unnecessary additional admin across the industry, our back catalogues will need all testing to new regs , this will run into many hundreds of skus, and the associated costs, and time this is grossly understated In the above, as the current regulations take more than this in man hours now.

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

Amount saved::

Nothing

Comment box:
We would se an increase in testing to achieve the new Match Test

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

Amount saved::

Nothing

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.

Yes

Comment box:
see previous comments

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: