



Department
for Business
Innovation & Skills

**FURNITURE AND FURNISHINGS
(FIRE) (SAFETY) REGULATIONS
1988**

**Consultation on proposed
amendments to Schedule 5 - the
Match Test - Part 1 and Schedule 4
- the Cigarette Test**

AUGUST 2014

**Annex 8: Proposed amendments to schedule 5 - the match test -
part 1 and schedule 4 - the cigarette test - of the furniture and
furnishings (fire) (safety) regulations 1988 - response form**

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is 7th October 2014.

Please provide answers to any of the questions below, and provide any additional response you believe is appropriate, headed:

Your name:

Redacted

Organisation (if applicable): Toledo Knitting Ltd

Address: Dunsil Road, Brookhill Industrial Estate, Pinxton, Notts, NG16 6NT

Please return completed forms to:

Terry Edge

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BIS

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London SW1 0ET

Telephone: 020 7215 5576

email: terry.edge@bis.gsi.gov.uk

Please tick boxes below which best describe you or your organisation.

	Organisation type
	Business representative organisation/trade body
	Central government
	Charity or social enterprise
	Individual
	Large business (over 250 staff)
	Legal representative
	Local Government
	Medium business (50 to 250 staff)
X	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
	Other (please describe):

Please note: in addition to the consultation questions below, we would be very grateful if you could also answer the questions from the Impact Assessment which follow them.

Consultation questions:

Question 1: Do you think this proposal will achieve its aims of: helping to make UK furniture greener, save money to industry and making UK furniture more fire safe?

Comments: Yes, these changes could possibly do this; however the estimate of 30-50% reduction is only based on theory, which could lead to further boarder line products passing tests in lab conditions only. We are unsure as to how a fabric manufacturer confidence would be, and therefore maybe they would not reduce FR finishes as much as the study has estimated, leading to a reduction in the financial savings stated in this report. The financial implications to manufacturer to effectively redesign all their fabrics to reduce the FR content and retest must not be underestimated.

Ultimately as the report is purely based on the manufactures selling whole piece of furniture and nothing has been mention about reupholsters, this could lead to the demise of a whole section of the industry which is actually one of the "greenest" areas i.e. Recover/reuse.

Questions 2: Do you think that paragraphs 19-22 accurately set out the need for a change to the current match test?

A ☐ Yes ☐ No x ☐ Not sure

Comments:

Question 3: Do you think the proposed changes are viable (paragraphs 23-29)?

A ☐ Yes x ☐ No ☐ Not sure

Comments: We do not think that the changes are viable as none of the study takes into account the construction of the fabric, which could give very different results especially in light of the later added stipulation of $>2\text{mm}^2$ hole formation. At no point does the proposal take into account the reupholsters sector which uses this testing criterion and cannot guarantee what materials are within 40mm in the customer's product.

Question 4: What are your views on the inclusion of currently unregulated materials (paragraphs 27-29)?

Comments: Impractical for the whole of the reupholsters market.

Question 5: Do you agree with the benefits BIS believes the changes will bring?

A ☐ Yes ☒ No ☐ Not sure

Comments: Unsure about the actual reduction in FR usage. We think the testing and realigning costs have been underestimated, as there is no data about the construction and weights of fabrics used in the trial testing procedures. Also the statement in Annex 2 that "Fabrics which pass the current Schedule 5 Part 1 match test always pass the new test", is not true with the hole formation inclusion. The testing suggests that you would be required to use an FR liner in all fabrics that produce a hole $>2\text{mm}^2$, surely this would increase the usage of FR chemicals within the final product?

Question 6: What is your view on BIS's reasons for bringing forward the changes (paragraphs 41-42)?

Comments: Until we know what the full changes are to be to the FFR we could not comment on this, therefore it would have been better to wait and change as one, to avoid confusion.

Question 7: General rating of the proposals.

On a scale of 1 to 5, 5 being the highest, grade your overall approval of the proposals

	5	4	3	2	1
Right problems identified					x
Range of options wide enough					x

	5	4	3	2	1
Preferred options well chosen					x

Question 8: Do you have any other comments that might aid the consultation process as a whole?

Comments: Please consider from the aspect of the manufacturers and sellers that are not selling a complete item. At present this proposal could potentially lead to the demise of a whole market sector and lead to independents producing illegally outside of the regulations.

Below are the additional questions from the Impact Assessment. Please respond to them on this part of the form.

Q1: Is the assumption on the cost of testing above right in your view? Could you provide evidence supporting your arguments?

No, too little, the report has underestimated the number of changeable elements within a fabric construction and final product.

Q2: Do you have any evidence that could help to refine this cost estimates?

No

Q3: Are there any other costs not included here that should be included? Please provide evidence supporting your arguments.

Unsure.

Q4: Do you agree with the assumption that there will be minimal losses of stock given the transition period? What is your normal turnover of stock?

Agree, as long as a full 18months

Q5: Do you agree with the assumption on annual cost savings to UK based companies testing of fabrics for the cigarette test? Could you provide information on the cost of the cigarette testing for your company?

No, do not think any cost saving.

Q6: Do you agree with the range of cost savings above? What are the cost savings most likely to be for your company?

None

Q7: Are there any other methodologies you think would be more appropriate?

Unsure

Q8: Do you agree with the cost estimates above? Could you provide alternative estimates?
Could you provide estimates of cost savings for upholstered garden furniture and/or caravan upholstered furniture?

No, but only a supplier of fabric so cannot give figures

Q9: Do you agree with the assumptions above towards calculating the total annual amount of treated fabric? Please provide evidence supporting your arguments.

No, due to the assumption of percentage reduction.

Q10: Are there any other unquantified costs or benefits? If possible, please provide evidence supporting your arguments.

Q11: Is this a fair reflection of how smaller businesses will be affected? Please provide evidence supporting your arguments.

No, there has been no inclusion of how small business will cope with this change if they need to redevelop entire ranges.

Q12: Are the familiarisation cost savings, in time, between options 2 and 4 an accurate reflection of the difference? Please provide evidence supporting your arguments.

Q13: Do the cost saving time profiles accurately reflect the timings of cost savings your business expect to see?

Thank you for your views on this consultation. Thank you for taking the time to let us have your views. We do not intend to acknowledge receipt of individual responses unless you tick the box below.

Please acknowledge this reply ☐

At BIS we carry out our research on many different topics and consultations. As your views are valuable to us, would it be okay if we were to contact you again from time to time either for research or to send through consultation documents?

x ☐ Yes

☐ No

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