

**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**

**BIS consultation 2014**

**Response of  
The Trading Standards Institute**

**October 2014**

### About The Trading Standards Institute

The Trading Standards Institute is the UK national professional body for the trading standards community working in both the private and public sectors.

Founded in 1881, TSI has a long and proud history of ensuring that the views of our broad church of Members are represented at the highest level of government, both nationally and internationally. TSI campaigns on behalf of the profession to obtain a better deal for both consumers and businesses.

We are taking on greater responsibilities as the result of the government's announcement in October 2010 that trading standards is one of the two central pillars of the new consumer landscape (the other being Citizens Advice).

We have taken over responsibility for business advice and education, and the role of local authority trading standards services in the promotion of public health gained in importance when, as part of its health reforms, the government repositioned public health back into English local government.

The TSI Consumer Codes Approval Scheme, established at the request of the government to take over from the OFT scheme, went live in April 2013 and was formally launched in June 2013.

TSI is a member of the Consumer Protection Partnership which was set up by the government to bring about better coordination, intelligence sharing and identification of future consumer issues within the consumer protection arena.

TSI is also a forward-looking social enterprise delivering services and solutions to public, private and third sector organisations in the UK and in wider Europe.

We run events for both the trading standards profession and a growing number of external organisations. We also provide accredited courses on regulations and enforcement which deliver consistent curriculum, content, knowledge outcomes and evaluation procedures, with the flexibility to meet local authority, business and operational needs.

In compiling this response, TSI has canvassed the views of its Members and Advisers. The response has been composed by the team of TSI Lead Officers for Consumer and Product Safety. If you require clarification on any of the points raised in the response, please do not hesitate to contact the team at email [loproductsafety@tsi.org.uk](mailto:loproductsafety@tsi.org.uk).

TSI does not regard this response to be confidential and is happy for it to be published.

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**Trading Standards Institute response – October 2014**

***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?***

TSI agrees that the proposal should make UK furniture greener because of the research that links health and environmental harm with brominated flame retardants. Disposal of such furniture requires special measures if it is not to harm the environment. Since flame retardants migrate out of furniture and thereby settle in dust and pose a hazard in the home environment, reducing the use of such flame retardants will also make furniture safer from the health point of view.

TSI also agrees that the new match test may in fact make products more fire-safe: by including currently unregulated materials that appear in products and which can be highly flammable.

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

Yes

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

TSI believes it makes sense for the match test requirement for test filling materials to change from non-combustion modified foam to combustion modified foam, as this would be the reality in use.

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

TSI welcomes the proposed requirement to test currently unregulated materials within 40mm of the surface of the product via a modified version of the match test.

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

Yes

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

TSI agrees as long as the further necessary amendments are not unduly delayed by focusing first just on this issue.

***Question 7: General rating of the proposals.***

TSI would like to see less emphasis on cost saving which, although welcome, should not be the main driver – improved consumer and environmental safety through the reduction in use of flame retardants is the main benefit.

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

TSI would like to see the regulations extended to duvets, sleeping bags, bed clothes, loose covers for mattresses, pillowcases, curtains and carpets.

In the case of bedding there is a greater hazard from bedding catching fire and quickly igniting from a source such as a candle or other heat source than from the mattress which is buried under the bedding.

Many consumers use electrical devices such as laptops or hair straighteners in or on the bed which can quickly overheat

The risk with sleeping bags is that the user is within the bag and should it ignite may have difficulty escaping from it.

Curtains and carpets if readily ignitable would increase the effect of a house fire – flames would spread far more quickly.