



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): Scottish Fire and Rescue Service

Address: Scottish Fire and Rescue Service, West Service Delivery Area HQ, Bothwell Rd,
Hamilton, ML3 0EA

Please return completed forms to:

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4th Floor, Orchard 1
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1 Victoria Street
London SW1 0ET

Telephone: 020 7215 5576
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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)
	Micro business (up to 9 staff)
	Small business (10 to 49 staff)
	Trade union or staff association
x	Other (please describe): Fire and Rescue Service

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:

The reduction in the use of fire retarding chemicals (FRs) for example Brominated flame retardants (BFRs) and Chlorinated flame retardants (CFRs) which some studies have linked to adverse effects on human health and the environment will, in the longer term, make UK furniture greener.

The money saved by reducing the use of FRs appears to be significant but the amount of saving is debated by the textile industry. The overall saving potential indicated in the Impact assessment (annex 7 of the consultation document) considers the transition costs to industry in its assessment and gives a detailed explanation of cost saving benefits and where they are made. Claims made recently by FRETWORK (flame retardant textiles network) are that the cost benefits may be significantly less than expected and may in fact increase due to more materials having to be tested (any material within 40mm of the outer surface will have to be tested).

composite) but they do not provide detailed evidence to support these claims. There is more supporting evidence provided at this time to indicate the savings to Industry may be significant.

Supporting evidence would indicate that the proposed changes to the regulations will have a positive impact in making UK furniture more fire safe. It is also reasonable to exempt materials from the cigarette test if they have passed the match test as evidence has been provided that no product which passes the match test has failed the cigarette test.

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

A X Yes ☐ No ☐ Not sure

Comments:

Mostly.

Paragraph 21 indicates that "it is likely" changes in EU legislation will require that furniture containing potentially harmful substances to be disposed of safely and that this could be an "expensive process". How does this fit the proposed changes to the match test when the proposed changes to the disposal of goods containing harmful substances would include all furniture which complies with the current regulations?

The proposed changes also only apply to coverings and materials within 400mm of the outer coverings so even though furniture is made to comply with the proposed regulations would the other materials contained within not mean it would still require to be disposed of safely?

Where is the evidence to support the statements made in this paragraph?

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

A X Yes ☐ No ☐ Not sure

Comments:

Supporting evidence would indicate that the proposed changes are viable.

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

Comments:

The type of materials used within 40mm of the outer cover of furniture is currently unregulated and often these materials would be classed as highly flammable. The proposed changes would address this issue and go some way to ensuring only fire safe furniture is available for purchase in the UK.

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

A ☒ Yes ☐ No ☐ Not sure

Comments:

In general yes however in response to paragraph 37 please see the answer to question 2 above. More supporting evidence is required.

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

Comments:

The reasons for bringing forward this change are logical and will ensure the UK maintains a higher standard of fire resistance in furniture than other EU countries. It will also ensure cost savings are made at the earliest opportunity.

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			
Preferred options well chosen		X			

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

Comments:

None.

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?

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

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

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?

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?

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

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

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?

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

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.

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?

☐ Yes

☐ No

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BIS/14/980RF