



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): West Sussex Fire & rescue Service

Address: West Sussex Fire and rescue Service, Northgate, Chichester

Please return completed forms to:

Terry Edge

4th Floor, Orchard 1

BIS

1 Victoria Street

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

On the information provided it appears that the treatment techniques are greener. Testing the products as a finished product is a better testing method, most fires occur in domestic settings on finished products. However developed fires involve the complete product and therefore retardancy should be throughout the product.

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

☐ Not sure

Comments: When the regulations were written there were different drivers, the need for change is apparent to meet the new agenda's such as trade, green and costs. As well as the tests are suitable for new products and materials that has been developed.

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

A ☐ Yes ☐ No ☒ Not sure

Comments: Testing the finished product is a positive process, however as a fire investigator I am concerned that all products that are used in a mattress for example, meet the flame retardant tests as the mattresses often get involved in fires not directly involved with the ignition and will burn through the finished product outer layers. IE Bedroom fire.

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

Comments: The wider the remit to prevent sustained fires from ignition will be a positive act.

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

A ☒ Yes ☐ No ☐ Not sure

Comments: It all appears to be a positive step to bring the regulations into current priorities and maintaining current controls.

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

Comments: They all seem to have good reason although use of chemicals and the effect on the environment are very technical issues that I presume are fully supported by experts in that field of work.

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		√			
Range of options wide enough		√			
Preferred options well chosen			√		

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

Comments: Having seen the results of many fires that involve products that come under the current regulations, they still have a substantial contribution to fire growth when involved in fire. I am not convinced that any reduction in fire retardency will be a positive move. It appears that this new proposal is to make the lower level of ignitability in a more modern way. I understand that this is an important issue and must be addressed but not at the expense of increased contribution to fire growth, particularly in domestic settings. Less ignitability and fire growth is the key point and must be continually improved. I am concerned that European standards are acknowledged as lower than ours, so if the new standards allow better trading, that must mean that we are lowering our standards to meet trade requirements. This I cannot agree with as the current standards in the UK are one of the main contributors to the reduction of fire deaths in the home, to lower this standard in any way would be counterproductive to life safety.

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?

Unable to comment

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

Unable to comment

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

Unable to comment

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?

Unable to comment

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?

Unable to comment

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

Unable to comment

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

Unable to comment

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?

Unable to comment

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

Unable to comment

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

Unable to comment

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

Unable to comment

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.

Unable to comment

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

Unable to comment

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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