

**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 7<sup>th</sup> October 2014.

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

Your name:

Organisation (if applicable):

Address:

NORTHAMPTON SHIRE FIRE & RESCUE

Please return completed forms to:

Terry Edge

4<sup>th</sup> Floor, Orchard 1

BIS

1 Victoria Street

London SW1 0ET

Telephone: 020 7215 5576

email: [terry.edge@bis.gsi.gov.uk](mailto: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
X	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

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 proposals as detailed in the document are very technically worded. That said, I support the changes as the indication is that the changes will improve the safety of foam filled furniture and save money for industry

**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:

See answer to question 1

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

A      X ☐ Yes                      ☐ No                      ☐ Not sure

Comments:

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

Comments:

I have limited technically knowledge to challenge this assumption, however, from a laypersons perspective, if all substances are exempt what confidence is there about the thermal capacity or latent heat or put another way the "fire point" of the fabric will not add to the fire development of the finished product. So is there a potential of direct heat passing through the outer layer and subsequently igniting the material underneath through conduction heating. Therefore, this doesn't require a hole in the outer cover.

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

A            X ☐ Yes            ☐ No            ☐ Not sure

Comments: They sound plausible

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

Comments:

I see the balance is about pushing innovation for thermal barrier protection on furniture and the reduction in FR chemicals. This then needs to be balanced with the carbon given off during a fire and the carbon used in replacing, rebuilding property post fire, due to Foam Filled Furniture.

**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
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	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:

How wide or how the lining will be regulated? Is there any risk that recycled waste could be used as a filling? What tests have been undertaken to check the longevity of the lining? And it's exposure to household products, impregnation, mechanical damage which may all inhibit the materials ability to operate as a barrier to flame?

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?

Not able to comment

**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.

Cost of Carbon?, cost of a life? Costs of redecoration of a room?

**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?

If heavily discounted the like hood is that the older furniture will be in use in low social economic classified groups, who are statistical more at risk of fire, can the new furniture be available in an incentivised way to these groups?

**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?

N/A

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

N/A

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

N/A

**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?

N/A

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

N/A

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

N/A

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

N/A

**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.

N/A

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

N/A

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 X

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

X No