

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:

Organisation (if applicable):

Address:

WESTBRIDGE FURNITURE

Please return completed forms to:

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BIS

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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 checked="" 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)

	Organisation type
	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: At this stage it is still difficult to confirm a money saving - on the application of FR Finish . As most of our fabrics are synthetic (there are initiatives being applied to push us into using only environmentally acceptable cotton which is more expensive) we do not feel that there will be much saving to be made in FR chemical consumption for us .

After discussion with interested parties – we don't believe that there will be great savings to be made on testing either .

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:

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

A ☐ Yes ☐ No ☒ Not sure

Comments:

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

For us this will be mostly unnecessary . We are advised , by Steve Owen , that (after itemising them) all our unregulated components will be exempt from testing .

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

A ☐ Yes ☐ No X ☒ Not sure

Comments:

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

No Comments .

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?

Keep it simple

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 . See answer to Q1 above .

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

Yes . We spend £10K per annum on Independent FR Testing . Our suppliers carry out their own testing and also spend in the region of £30-40K per annum on Independent testing .

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

No .

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?

No . With a large portfolio of Customers – large & small , we will have slow & fast selling fabrics . We feel we would need 18 months to reduce / exhaust our slow moving fabric stocks .

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?

We don't yet know what the laboratories will charge for the new test . Until we can get confirmation it will be unwise to say .

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

We are not entirely convinced that there will be savings – our Retail Customers tend to dictate due diligence testing frequencies . As you will have realised yesterday – NEXT have strong reservations .

Currently we are able to sell off customer returned furniture – via second hand outlets . If the new test method confirms that these items become non-compliant – we will lose this option & associated revenue and these items will go to landfill . Similarly – landlords may have to change all of there now non-compliant furniture and send this to landfill .

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

No

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

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?

X Yes

☐ No

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