

Date: 26 March 2021

Document:

**Essential Safety
Requirements for ignition
prevention**

Slide 7

Observations of the
secretariat

Template for comments and secretariat observations

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3:1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
JM					Problem 1 Under 'Principle objectives' removing barriers to innovation is cited but there is no mention of removing barriers to trade.	Problem 1 Solution Add that this new approach should remove barriers to trade under 'Principle objectives'.	
JM					Problem 2 The parameters for resistance to ignition and readily igniting require better specification.	Problem 2 Solution Specify parameters for ignition resistance and ignition readiness.	
WS-B AMUSF					Problem 3 Furniture is specified, but the reupholstery sector will not have knowledge of all underlying filling materials when only asked to either re-cover or refurbish a piece of upholstered furniture.	Problem 3 Solution Change "Furniture" to "Upholstery"	
TH NBF					Problem 4 <u>Challenge – How to demonstrate compliance</u> The aim is to ensure that the finished product meets a level of ignition resistance and a low spread of fire. We recognise that other furniture items such as sofas present a challenge as they have several different material configurations within the same	Problem 4 solution Mattresses & Bed Bases currently are tested in a way to ensure the final item offers a level of ignition resistance and spread of fire is also measured. BS 7177 tests are conducted on either the finished product or a small-scale sample that is representative of the finished product. This demonstrates the combination of materials put	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	--	--

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
					<p>product, and it is not possible to always conduct final item testing / represent the full item on a single test rig (BS 7176).</p> <p>However, mattresses, bed bases and headboards are less complicated in this respect and it is possible to conduct testing on items / samples that a representative of the finished product.</p>	<p>together meets as a final item.</p> <p>Headboards could be tested using the method in BS 7176 which allows for the actual materials to be used for the test.</p> <p>Sofas etc... probably still needs to be some form of component testing to demonstrate the cover materials are ignition resistant and low spread of fire to ensure the manufacturer can assemble? Perhaps BS 7176 method of test for domestic level which uses a standard test material – but not the non-FR foam in the current regs – perhaps fibre and foam which was previously identified as a current worst case scenario.</p>	
TH NBF					<p>Problem 5</p> <p>Challenge – Headboards</p> <p>Headboards are currently tested to the same requirements as sofas rather than the same as beds.</p> <p>This means that the headboard would generally need to be treated with a higher level of FR chemicals to pass the schedule 5-part 1 match test than a mattress or bed base that is tested to BS 7177.</p>	<p>Problem 5 solution</p> <p>Move headboards to the same standard as mattresses / beds so that the test is representative of the final item.</p> <p>This would allow for a reduction in the level of FR chemicals used whilst still demonstrating a level of resistance to ignition and spread of fire.</p> <p>This would also provide a route for an interliner to be used with a synthetic cover (provided it met the test requirements) and this could even remove FR chemicals if a wool interliner was able to be used. It would allow for design and construction using</p>	

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)
- 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	---	---

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
TH NBF					<p>Problem 6</p> <p><u>Challenge – Divan bases</u></p> <p>For domestic level, the divan base is tested on the top surface for cigarette and match resistance.</p> <p>In reality, a mattress is positioned on top of the divan / bed base and therefore we are applying FR chemicals to pass a test that does not represent real life situation as an ignition source is unlikely to settle on the top of such a product</p>	<p>materials to ensure compliance in addition to the alternative route of using chemicals (which would be reduced from the current regime).</p> <p>Problem 6 solution</p> <p>Consider removing the test on the top surface of a divan / bed base so that the bed base is out of scope for domestic level.</p> <p>2019 statistics indicate that 2.5 million divan bases were sold in UK which could be a good reduction in use of FR chemicals for a product where the test area is covered by the mattress placed on it.</p> <p>However, this would still apply if the bed was a type where the mattress and base were combined and could not be separated?</p>	
TH NBF					<p>Problem 7</p> <p><u>Challenge - Mattresses</u></p> <p>Single sided mattresses that are specifically designed with little or no filling materials on the underside are currently subject to the same test requirements as the sleeping surface.</p> <p>This means potential use of FR chemicals to pass the test – when the product will not usually be slept on / used on this surface.</p>	<p>Problem 7 solution</p> <p>Remove the requirement to test the non-sleeping surface side of the mattress where it is clearly designed and labelled that it cannot be used as the sleeping surface?</p> <p>This could allow for a reduction of use of FR chemicals on this non-sleeping side of the product?</p>	

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)
- 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	---	---

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
TH NBF					<p>Problem 8</p> <p>Challenge – Mattresses</p> <p>Mattresses are tested for ignition resistance and spread of flame as a finished product, but then the product is covered in bedding materials (bed linen, duvet covers) that are not tested to any requirements.</p> <p>It seems we are engineering a product (with or without FR chemicals) to meet requirements that in real life is not the way in which the product would be used, and it is a shame to be engineering in this way when the main risk is probably the bedding and not the mattress?</p>	<p>Problem 8 solution</p> <p>Can BEIS OPSS share any information on fire data so consideration can be made as to whether we should include mattresses – or just regulate the foam filling?</p>	
SM BFM					<p>Problem 9:</p> <p>‘Furniture must resist ignition and not readily ignite across any part of the surface area if directly exposed to a flaming or non-flaming ignition source, flame or spark or other potential source of fire’</p> <p>What does resist ignition and not readily ignite mean (prevent, undamaged, unaffected, yielding, reluctance) and how is it determined in the context of exposure to an ignition source?</p>	<p>Problem 9 solution:</p> <p>Features and attributes need to be more closely defined as an outcome for this characteristic to provide testing regimes in determining compliance and aiding enforcement</p>	
TN SATRA					<p>Problem 10:</p> <p>More clarification required in the “principal objectives”</p>	<p>Problem 10 solution:</p> <p>Specify parameters and ignition sources.</p>	

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)
- 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	--	--

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
PW FRET WORK					<p>Problem 11: Furniture. The use of “furniture” was probably an easily made mistake but the principles behind the reason for the FFR must be respected and consistently. It is important there is a clear definition of upholstered furniture (UPH). See Slide 11 “Proposed definition of an upholstered furniture product in scope of regulations: any item of domestic furniture which is ordinarily intended for private use in dwelling and comprises a cover fabric or cover material and a filling.” This must always be referred to and applied consistently.</p>	<p>Problem 11 solution: The Review of the FFR should thus be only considering UPH.</p>	
PW FRET WORK					<p>Problem 12: “...flaming or non-flaming ignition source, flame or spark or other potential source of fire ...” It is important to have clear understanding when</p>	<p>Problem 12 solution: Define the 2 relevant types of ignition. (see existing standards)</p>	

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by ***)
 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	--	--

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
PW/ FRET WORK					<p>technical definitions are used. Open flame and smoulder ignition are the 2 types of ignition relevant to consideration of UPH. These can be defined scientifically. A list of possible "scenarios" is not helpful in this context.</p> <p>Problem 13: "...any part of the surface area ..."</p> <p>This phrase suggests that it is intended to require whole item/ final article testing as the mainstay of the testing regime defining compliance.</p> <p>This presents 2 problems:</p> <p>1 A "General" approach (as in GPSR) rather than a specific approach as in the original FFR here very specific articles and the combination of materials to manufacture those articles.</p> <p>2 The very specific problems identified when the original FFR was written i.e. Very serious risk to life due to the behaviour of specific types of materials when used in combination.</p> <p>Textiles have always had ignition risks due to what describes them as textiles. Polyurethane foam and other filling materials are used otherwise and elsewhere without clear and</p>	<p>Problem 13 solution:</p> <p>There must be clarity in defining:</p> <p>The specific fire risks in UPH that were the origin of the FFR</p> <p>The problems caused by the combining of materials.</p> <p>The 2 types of ignition.</p>	

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by ***)
 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	---	---

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
					<p>statistically significant problems.</p> <p>It is the combinations of materials that not only defines what is UPH but also defines the risk that must be addressed. It remains essential that all new and novel ways to providing safety can be assessed against the very specific risks.</p> <p>We are considering extremely strong requirements for reducing ignition potential and a clear explanations as to why are necessary.</p> <p>Making a more general approach and losing the defined risk brings the risk of diminishing the problem – and not maintaining safety standards. The very specific risks apparent in the 1980's (see https://fetwork.org.uk/brma-document-fetwork/) remain and are as critical today as they were in the 1980's.</p>		
KK CIA					<p>Problem 14:</p> <p>"Furniture must resist ignition and not readily ignite when exposed to a flaming or non-flaming ignition source, flame or spark or other potential source of fire"</p>		

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)
- 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Template for comments and secretariat observations

Date: 26 March 2021	Document: Essential Safety Requirements for ignition prevention Slide 7	Project: Revision of Furniture & Furnishing (Fire) (Safety) Regulations FW/6_21_0005
---------------------	---	---

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments Problem	Proposed change Solution	Observations of the secretariat
					The relevant standard in this instance is BS 5852:2006 which falls under the jurisdiction of FW6 Committee. This standard is up for review in 2021 which presents an opportunity to fine tune the metrics for ignition resistance in order to underpin the ESR. The tests BS 5852 Part 1 and 2 mentioned in the Furniture Regulations could be removed and replaced by BS 5852 as a basis for the ESR for foams.		
KK CIA					Problem 15: BS 5852:2006 contains all relevant reference ignition sources that have become normative for the UK furniture industry. The ignition sources described there are the cigarette and butane flame test simulating a match. They take account of the most common modes of ignition and are defined appropriately in the BS 5852 standard. These standard ignition sources can also be assessed during the review process, and appropriate modifications implemented in order to support this ESR.		

- 1 **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)
- 2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial