

Date: 26 March 2021

Document: ESR for Labelling

Slide 9 and 10

Project: Revision of
Furniture & Furnishing
(Fire) (Safety)
Regulations

FW/6_21_0009

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 AUE /7					Problem 1: There is no information on how the Government will educate the consumer to enable them to make an informed choice with regard to chemical labelling. This cannot be expected to be the responsibility of industry.	Problem 1 solution: Start to prepare the Government education programme to coincide with the publication of the revised Regulation or implementation date.	
WS- B AMU SF					Problem 2: When reupholstering a piece, the original fabric and possibly some filling materials are taken off and may be replaced with new/difference materials. In the process the original labels may not be relevant to the reupholstery work carried out and, therefore, cannot be reused.	Problem 2 solution: 1 & 2: A generic label specific to re-upholstery work.	
WS- B AMU SF					Problem 3: If only partial replacement of the upholstery takes place i.e. fabric and filling materials, the upholsterer will not have the information relating the existing materials nor any chemicals used in/on those materials and, therefore, will not be able to show traceability of all materials used.	Problem 3 solution: 1 & 2: A generic label specific to re-upholstery work.	
TH NBF					Problem 4: Challenge – Clear and Simple Information Making clear to the consumer about whether the item contains FR chemicals and SVHGs so that they can make an informed choice when	Problem 4 solution: Suggest a simple label that is easy for the consumer (and enforcement officers) to understand. A traffic light system could be used Suggest it contains the following:-	

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

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					<p>purchasing.</p> <p>Identification of FR chemicals used would assist at end of life when trying to determine if it contains a chemicals that was restricted / banned after the product was placed on the market.</p>	<p>1. GREEN:- The materials used in this product do not contain FR chemicals</p> <p>2. AMBER:- The materials used in this product contain FR chemicals that are not listed as SVHCs at the time of supply. The FR chemicals used are:- Material X – FR chemical used:xxx</p> <p>3. RED:- The materials used in this product contains FR chemicals that are currently listed as SVHC. The FR chemicals used are xxxxxxxx Material X – FR chemical used:xxx</p> <p>It may be necessary to tick and complete information for both box 2 & 3 if different materials have different chemicals where one is not listed and one is listed as SVHC</p>	

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