

EFIC input to TRIS notification 2025/7003/XI on the The Furniture and Furnishings (Fire) (Safety) (Amendment) Regulations 2025

April 2025

EFIC, the European Furniture Industries Confederation, welcomes the opportunity to give input to the amendments on the UK Furniture and Furnishings Fire Safety Regulations (FFRs) via [TRIS notification 2025/7003/XI](#). We have been following closely the UK FFRs over the years and we have contributed to all related public consultations.

The European furniture industry needs a harmonised European regulatory framework to reduce the use of unwanted toxic flame retardants in furniture and support the industry to comply with EU Regulations - such as the Ecodesign for Sustainable Products Regulation and product aspects like presence of substances of concern, design for recyclability, among others. A harmonised framework will help reduce exposure to harmful chemicals and boost a more circular economy. In this context, we welcome a new approach to fire safety for furniture and mattresses in the UK and the government's intention to facilitate a reduction of chemical flame retardants.

Please find below our main remarks and recommendations on the UK Office for Product Safety and Standards' Policy Paper "[The fire safety of domestic upholstered furniture](#)", published on 22 January 2025.

EFIC support for the proposed immediate changes to existing legislation

- EFIC welcomes the proposal to **remove certain children's products from the scope**. This will reduce babies' and children's exposure to chemical flame retardants, where that exposure risk is greater than the fire risk. However, babies and toddlers live in the same home environment, and they will still be exposed to flame retardants if included in sofas, parents' mattresses and other products in the house. While the intention is applauded, we believe that the sole removal of baby and children's products from the scope will not ensure that they are not exposed to flame retardants. Instead, a regulatory framework supporting fire safety without the use of flame retardants is needed.
- EFIC welcomes the upcoming amendment to the regulations on labelling, particularly regarding **the removal of the display label requirement**. We also welcome the fact that current labelling requirements will be simplified in the longer term, consolidating labelling to a single new permanent label. However, we believe that a physical label can lead to inefficiencies. If chemical flame retardants are used, disclosing information on their presence is important for the consumers and end-users. The listing of chemical flame retardants could also be done online and not necessarily on a physical label. Moreover, we recommend informing the consumer about the intended use of chemical flame retardants, in the sense of



Recital 25 of the revised Construction Products Regulation¹. This information should be provided before the purchase.

In addition, we believe that the idea of traceability back to the manufacturer will not work in practice, as it would require a ‘disclosure’ of the supply chain. The pragmatic approach would be to know the time of placing on the market based on the product identification marking and thus also the regulated substances known at that time. Provided that the corresponding limit values are complied with, a decision can be made later (with new limit values or new critical substances, if necessary) as to whether the material is used or not.

- Finally, we agree with the **extension of the time frame for instituting legal proceedings from 6 to 12 months**, providing more time to companies for effective enforcement.

Other issues to be addressed via future amendments

- Scope

The European Furniture Industries welcome that the product scope will be set by an **overarching definition of domestic upholstered products** and supplemented by a **list of excluded products**. A clear scope will provide greater clarity to companies.

EFIC welcomes the fact that the UK government considers **keeping outdoor products in scope** of the regulations. EFIC believes that outdoor upholstered furniture should remain in scope of the regulations as this type of furniture can be used in semi-outdoor areas like a pool house or deck area. They can also be used inside the dwelling, even if primarily intended for outside use. Moreover, seasonal storing of this type of furniture can be made inside the dwelling. Regarding the warning label, the European furniture industries **discourage additional labelling** that could lead to confusion for the consumer. “Outdoor furniture” may be used by consumers indoor as well.

Further clarification should be given when it comes to “natural materials”, in particular what is considered a natural material. This should be clearly defined.

- Size cut-offs

With regards to **decorative cushions**, the previous regulation set the size limit to 60x60cm, however, the size is now proposed to be reduced to 45x45cm. We believe that it would likely help many manufacturers if the size limit was changed to **60cm**, as it was before. Indeed, the decorative/scatter cushion range is likely adapted to be ~40 55cm due to the previous requirement.

- Testing methods

Testing needs to be revised in order **to reflect changes in manufacturing processes, new materials, innovations in fire safety**, and not least of all, to allow **alignment with the chemical safety and circular economy** (reuse, remanufacturing, recycling) agendas.

When it comes to the standardisation work being carried out with the British Standards Institution, we recommend **harmonisation with the European standards** and that **EN 1021/1 (cigarette test)** should be the standard put in place under the Furniture Fire Regulations.

¹ Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 laying down harmonised rules for the marketing of construction products and repealing Regulation (EU) No 305/2011 ([link](#))



Alternatively, EFIC supports a new UK regulation that **tests the upholstery construction (a mock-up) of the furniture in its installed form**, without additional requirements for the foam. This would allow different product mixes that will pass the test standard. The foam material-only testing, on the other hand, could undermine the ambition to reduce the use of flame retardants. The essential safety requirements on foam imply that very few products will have a chance to benefit from the end-goal of this new approach: with an open flame test on foam as a material, manufacturers would surely need to use flame retardants. The purpose of the essential safety requirements is to demonstrate that a product is safe, using the actual combination of materials "in its final form". The point of performing a test of the construction (instead of materials) is to allow manufacturers the possibility of designing a product to be safe, using layers of materials which prevent the fire from reaching the more flammable filling materials below (i.e. the foam)².

We also believe that an approach in which the materials for each layer of an upholstery structure should fulfil certain requirements will not lead to a reduced use of chemical flame retardants. In this case, testing the overall structure of the upholstery would then allow the use of a so-called interliner, which in itself consists of a fire-resistant material, and would therefore not require flame retardants in the other upholstery materials (foam, cover fabric, fleece), provided that the test requirements were then reduced to the level of EN 1021-1.

Legislators should also consider that the number of smokers has decreased significantly in recent years and that the use of open flame test in connection with (upholstered) furniture has logically decreased as well. It therefore seems factually correct to set the cigarette test (EN1021-1) as the basic requirement.

This would then also correspond to the **US TB-113 approach**. The United States adopted in 2020 the COVID-19 Regulatory Relief and Work from Home Safety Act³, requiring that all upholstered seating for furniture imported or sold in the US comply with the flammability test specified by the California Technical Bulletin 117-2013 (TB 117 – 2013), a smoulder test. TB 117-2013 provides fire safety protection against smouldering sources, which prior to the TB 117-2013 adoption were the leading ignition sources of furniture fires and associated losses. In the US, several sources alerted of the negative effects of chemical flame retardants.⁴⁵

- Flame Retardant Technology Hierarchy

We welcome the potential inclusion of the **Flame Retardant Technology Hierarchy** as steering principle **to reduce the use of flame retardants** and facilitate innovative ways of **producing fire safe furniture**. The Flame Retardant Technology Hierarchy implies that the fire safety requirements can also be met by other means, such as the use of an interliner. However, if the requirements are too high that it is not possible to meet the requirements without the use of flame-retardant agents, this would lead to an additional testing and documentation effort without real possibility of choice for non- chemical flame retardant options for consumers. Therefore, we recommend that **necessary**

² Vytenis Babrauskas, John Krasny, 1985, Fire Behavior of upholstered furniture ([link](#))

³ COVID-19 Regulatory Relief and Work from Home Safety Act ([link](#))

⁴ Chicago Tribune - Chemical companies, Big Tobacco and the toxic products in your home ([link](#))

⁵ - Charbonnet, J., Weber, R., & Blum, A., (2020). Flammability standards for furniture, building insulation and electronics: Benefit and risk ([link](#))

- Rodgers, K.M., L.R. Swetschinski, R.E. Dodson, H.R. Alpert, J.M. Fleming, and R.A. Rudel (2019). Health toll from open flame and cigarette-started fires on flame retardant furniture in Massachusetts, 2003–2016. American Journal of Public Health ([link](#))

- US Consumer Product Safety Commission, Organohalogen Flame Retardants Petition ([link](#))



guidance is put in place in order to reach the goal of reducing the use of flame retardants, **without adding administrative burdens** for the producers.

- Re-upholstered and second-hand products

We welcome that the UK Government is committed to delivering reforms to the re-upholstery and second-hand sectors that ensure that **these products are safe, without creating additional burdens on small and medium-sized businesses or require the unnecessary use of chemical flame retardants** when employing traditional upholstery methods. We welcome the change that the Government is bringing forward now **to removing display labels**, as it will represent an immediate simplification of the requirements for second-hand products.

Many chemical flame retardants are not compatible with circular design principles as their use counteracts circularity and circular loops that are promoted by furniture manufacturers, such as **reuse, refurbishment, remanufacturing and recycling**. The use of these chemicals jeopardises the transition of the furniture industries to a more circular economy⁶ and is incompatible with several product aspects under the Ecodesign for Sustainable Products Regulation⁷ that has been recently adopted at EU level.

When it comes to applying a new re-upholstery permanent label, we believe that this might not work in practice. It will hardly be possible to get information about the original manufacturer once a product has been re-upholstered.

General considerations on chemical flame retardants

Many chemical flame retardants have been shown to have **negative implications in furniture products both from a health, environmental, labour and increased smoke toxicity perspective**⁸. The risks that the use of flame retardants bring to health do not outweigh the benefits⁹. From a fire prevention perspective, there is no clear evidence of the fire safety benefit provided by more stringent furniture flammability regulations¹⁰.

Apart from the above health and fire toxicity implications and the clear risks of being an **obstacle to a circular economy, the use of flame retardants in furniture reduces the quality of furniture foam and textiles and increases their prices**. Not only is the quality of furniture and mattresses reduced when using foam with chemical flame retardants, but the durability of the product is also expected to decrease. A high level of fire safety does not depend exclusively on the product, but also on other aspects¹¹, to be successful, like the installation of smoke detectors, automatic sprinklers in buildings, periodic testing of electrical and gas installations, self-extinguishing cigarettes and candles, better material combinations in furniture and buildings, reduced smoking rates, improved fire safety

⁶ Revision of the EU Green Public Procurement (GPP) criteria for Furniture (2017), page 118 ([link](#))

⁷ A new Circular Economy Action Plan For a cleaner and more competitive Europe - COM/2020/98 final ([link](#))

⁸ Anna A Stec (2017). Fire toxicity - the Elephant in the Room? ([link](#))

⁹ Sean McKenna, Robert Birtles, Kathryn Dickens, Richard Walker, Michael Spearpoint, Anna A Stec and T Richard Hull (2017). Flame retardants in UK furniture increase smoke toxicity more than they reduce fire growth rate ([link](#))

¹⁰ A compilation of studies can be found on the website of the Alliance for Flame Retardant Free Furniture ([link](#))

¹¹ French ANSES Report 2015 - To prevent the risk of domestic fires in France, alternative measures should be used rather than treating upholstered furniture with flame-retardants ([link](#))



education, and even by prevention campaigns regarding household fires, along with an evaluation of their results.

EFIC is the European Furniture Industries Confederation, representing over 70% of the total turnover of the European Furniture Industries, a sector employing 1 million people in about 130.000 enterprises across the EU and generating a turnover of over 100 billion Euros. The EFIC membership is composed of 18 national associations, one individual company member and several clusters. Further information can be found on our website: <https://www.efic.eu/>

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