

VOICE Response to the public consultation on the Irish Furniture Fire Regulations

Dublin, 11/07/2025

VOICE are an environmental NGO active in Ireland for over 26 years. VOICE work on waste reduction and circular economy. VOICE are members of the Irish Environmental Network as well as Zero Waste Europe and the European Environmental Bureau. VOICE have long been actively involved in circular economy in Ireland, supporting community, business and policy initiatives that promote wiser use of resources and support the three principles of a circular economy: Design out Waste, Keeping material in use, and regenerate nature. VOICE are grateful for the opportunity to respond to the Department of Enterprise Tourism and Employments public consultation on the Irish Furniture Fire regulations. Post Brexit, it is timely to examine this area of regulation.

VOICE call for the department to follow option 2 as outlined in the call; Repeal the Irish Furniture Fire Regulations and Rely on the General Product Safety Regulation.

We do so for three reasons:

- (A) such a change will bring furniture design more into a more sustainable and circular economic model
- (B) reduces the likelihood of conflicting regulatory regimes and interactions with future sustainability and circularity requirements,
- (C) due to the adverse effects, and questionable effectiveness of many of the existing flame retardants and testing regime used in the UK.

Aligning with the EU methodology may in fact improve health and safety for consumers, industry and the environment through decreased environmental exposure to harmful chemicals, and increased ability to reuse, repair and recycle.

Chemical Flame Retardants and a circular economy.

The current regulatory regime, reliant almost exclusively on the Flame test, has resulted in an extremely high level of Chemical Flame Retardants (CFR)s being used in furniture in Ireland and the UK. The impacts of this are increased chemical exposure to the consumer throughout the lifecycle of the product as CFRs continually leak out into the environment¹. People are continually exposed to the chemicals via air, dust, food and water. Infants specifically are linked to a higher rate of exposure due to chewing behaviours².

CFRs have been shown to be problematic at all stages of the lifecycle, and reduce the ability to repair or recycle materials at the end of life, thus effectively eliminating many furniture items from a circular economy from their design.

Limited effectiveness

The current regulatory regime, relies heavily on testing using the flame test. The test has been heavily criticised by numerous authors in the UK and has resulted in the UK being one of the highest users of CFRs in the world³. The current system results in a high concentration of CFR, but fails to take into the account the impact of those chemicals in the larger use case, resulting in unintended consequences such as smoke⁴ and

¹ Page, Jamie, et al. "A new consensus on reconciling fire safety with environmental & health impacts of chemical flame retardants." *Environment international* 173 (2023): 107782.

² Sugeng, Eva J., et al. "Toddler behavior, the home environment, and flame retardant exposure." *Chemosphere* 252 (2020): 126588.

³ Page, Jamie, Paul Whaley, and Aleksandra Čavoški. "Reforming the UK Furniture and Furnishings (Fire)(Safety) Regulations 1988." *Environmental Law Review* 25.1 (2023): 43-50.

⁴ In this context it is important to note that smoke inhalation is among the most common forms of death in fire victims.

fire toxicity⁵. To this end Page et al.⁶ have called for a review of the existing UK legislation and cite the Californian revised domestic standard (TB117), and point toward the ban on halogenated flame retardants in the EU under the Ecodesign directive as precedent for the UK to examine.

Future developments

As a result the current regime does not design for circularity, as the products are not designed with end of use or keeping material in use at its highest value in mind, while they continually degrade the environment throughout their lifecycle. At the same time the system does not appear to achieve the aim of increased fire safety⁷. The problems of the system have been recognised by the UK and are under examination which may mean changing regulation in the future.

There is some discussion on the classification of CFRs as ‘substances of concern’ under the Ecodesign for Sustainable Products Regulation (ESPR) due to their inhibiting of recycling and repair. While furniture is likely to be considered under product specific regulation as part of the ESPR in 2028. Under the Chemicals Strategy for sustainability many of the chemicals used in these textiles are likely to be considered as part of a move to ensure better protection of human health and a zero pollution ambition for a toxic free environment. While under the Textiles strategy the commission intends to set design requirements for textiles to *inter alia* improve repairability and recyclability.

As such continuing to follow the existing UK regulations is likely to lead to increasing levels of regulatory divergence between Ireland and the EU, and creates an ever growing barrier to the single market with the EU.

Conclusion

While the issue of fire safety is an understandably emotive one, the flame test does not lead to increased safety from products but does result in increased exposure to harmful carcinogens and other chemicals, and the increased use of CFRs promoted by the test results in significant impacts on a circular and sustainable future for furniture design. VOICE believe that Ireland by adopting option 2 would be taking steps towards a more sustainable and circular approach to furniture design.

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⁵ Page, Jamie, et al. "A new consensus on reconciling fire safety with environmental & health impacts of chemical flame retardants." *Environment international* 173 (2023): 107782. – see point xiii

⁶ Ibid

⁷ [UK Impact assessment](#) "We do not have comparative data which allows us to assess whether the UK regulations actually lead to safer furniture than in the rest of the EU". (page 19) [accessed 11/07/2025]