FIRA

Furniture Industry Research Association

SOURCING FURNITURE PRODUCTS IN THE SUPPLY CHAIN



Members: Free
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Foreword

This guide has been prepared by FIRA International Ltd on behalf of the Furniture Industry Research Association.

This document is intended as a guide for product designers, developers, importers, distributors, retailers and manufacturers of furniture and furniture accessories. It is not intended to replace any legislative documents that are available and simply provides additional information to raise awareness of the relevant requirements, responsibilities and actions which may be taken to ensure compliant products are placed on the market. As such, supporting Regulations must also be understood.

The dates and titles of Standards and Regulations referenced within this document were current at the time of publication. It is recommended that advice is sought on the status of these and any other applicable documentation when assessing products.

All efforts have been made to ensure this document is correct at the time of going to press. The opinions and advice expressed are given in good faith. However, the authors cannot be held responsible for any action resulting from the content of this guide as the ultimate interpretation of the supporting Regulations rests with the courts. Where serious doubt occurs professional legal opinion should be sought.

For the purposes of this guide, and with specific reference to the placing of product on the market, making available any products and distribution of products etc. this is only considered to the extent that it relates to placing product for use on the market within the UK.

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Any amendments or revisions made to this document are recorded here:

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1. Sourcing Responsibly

1.1 General Product Safety - EU and UK Regulations

For furniture producers and distributors in the UK the requirements pertain to statutory Instrument SI 2005 No. 1803 The General Product Safety Regulations (GPSR). This regulation still covers the UK following the end of the transition period on 31 December 2020, but provisions are now applied differently in Great Britain (England, Scotland and Wales) and Northern Ireland. This will continue to be the case while the Northern Ireland Protocol is in force. So slightly different rules apply in Northern Ireland (NI), in particular of note that:

- Producers and distributors should ensure that products meet EU requirements
- If you are an importer, established in the EU or NI and you sell products from a country outside of the EU and NI (including from GB) into NI. Products sold in NI should be marked with details of any EU / NI based importer
- Authorised representatives can be based in NI or the EU

For furniture manufacturers exporting goods to the EU the requirements are Directive 2001/95/EC on General Product Safety (the 'GPSD'). It is your responsibility to comply with the GPSD. You must also comply with national laws and regulations in Member States which implement the GPSD. It must be noted that the GPSR UK Regulation and GPSD are broadly the same in terms of scope, definition of safe product and obligations for producers and distributors except for references to the different regulatory territories and markets.

In this guide we will focus on UK regulations in the supply chain including only GPSR.

1.2 GPSR - General Product Safety Regulations

When considering the GPSR it is often easier to think of it as a safety net in that it is effectively designed to cover the safety of all consumer products, regardless of how sold. This not only includes products that are intended for use by consumers, but also commercial, or non-domestic products that may reasonably find their way into the hands of a consumer. It includes products that are second hand or reconditioned as well as new products and contains requirements and obligations in relation to the manufacture, supply and distribution, marking, after-sales monitoring, market surveillance and recall of those products.

The range of products covered by the GPSR is almost every product. Products not within the scope of the Regulation cover 4 main sectors of consumer goods where the GPSR does not apply, these are pharmaceuticals, machinery, medical devices and food

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which all fall under separate and specific legislation. Therefore, consider carefully any furniture products deemed to be classed as machinery or medical devices under the 'Supply of machinery (safety) regulations' or the Medical Device Regulations.

So, almost every "product", as defined by the Regulation, falls within scope:

> ***(a) 'product'*** *shall mean any product - including in the context of providing a service - which is intended for consumers or likely, under reasonably foreseeable conditions, to be used by consumers even if not intended for them, and is supplied or made available, whether for consideration or not, in the course of a commercial activity, and whether new, used or reconditioned*
>
> *Outside of the scope of the Directive are second-hand products supplied as antiques, or products to be repaired or reconditioned prior to being used (provided that the supplier clearly informs the consumer whom he supplies the product to that effect)*

This means in effect any product regardless of whether it is:

- New, second-hand or re-furbished
- Made commercially available for a fee or free of charge including as a loan product
- Provided as part of a service
- Not originally intended for use by consumers, but reasonably foreseeable that it will be used by them.

Manufacturers have a legal responsibility to comply with the GPSR and the consequences of not doing so are very serious. The maximum penalty that may be applied when considering the supply of non-compliant products is:

- 12 months imprisonment and/or
- £20,000 fine

The GPSR makes provision for the mandatory recall of unsafe products where any voluntary action taken by producers and distributors is not deemed to be sufficient or satisfactory and no other measures effectively remove the risk to consumers.

These so called "last resort" powers enable enforcement authorities to:

- Force a manufacturer to replace or recall an unsafe or faulty product
- Enter premises with a view to seizing products or records
- Suspend or withdraw products from sale
- Destroy products

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When considering the potential costs involved in the withdrawal from and loss of sales, repair or re-work or even the recall of a product, not to mention the associated logistic challenges, this could by far exceed any punitive measures in place. Whilst the cost associated with the above may be measurable, the potential damage to the brand itself, including loss of consumer trust, is immeasurable and in some cases could be so significant that businesses may never recover.

This is why it is very important to ensure that the products that you specify / source are responsibly sourced and comply with all safety requirements and Regulations that are relevant to your furniture item. It is equally important to have a good record keeping system that can be used to demonstrate that you have carried out any relevant product evaluations and that you have evidence on file to show what you have done to ensure that the product complies with the requirements of the GPSR.

1.3 Primary Objective and Responsible Sourcing

The primary objective of the GPSR states:

The purpose of this Regulation is to ensure that products placed on the market are safe.

A safe product, as defined by the Regulation, is a product that under reasonably foreseeable conditions of use presents either no risk, or only minimal risk to the user during the life of the product when taking into consideration each of the following points:

- Characteristics of the product, including materials it is made from, any assembly that is required and any maintenance that is undertaken by the user
- Instructions for assembly, use or maintenance
- Informative markings or labels
- The effect of the product on any other items it may be able to be used in conjunction with or fitted to
- The type of consumer for example whether they are considered to be vulnerable such as children or the elderly

Conversely, a dangerous product may be deemed simply as any product other than a safe product. You have a duty under the GPSR to ensure that only safe products are placed on the market in line with the points above. Responsible product selection is critical, always carry out the necessary background checks and use this information to decide whether to purchase a product from a particular source.

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1.4 Responsibilities in the Supply Chain

The framework under which the GPSR was written specifically takes into consideration each of the businesses or *operators* in the supply chain such as manufacturers, authorised representatives, distributors and importers and their roles in relation to product compliance.

The GPSR gives the definition of a "Producer" and "Distributor".

Producer shall mean**:**

I. The manufacturer of the product, when he is established in the UK, and any other person presenting himself as the manufacturer by affixing to the product his name, trade mark or other distinctive mark, or the person who reconditions the product

II. The manufacturer's representative, when the manufacturer is not established in the UK or, if there is no representative established in the UK, the importer of the product

III. Other professionals in the supply chain, insofar as their activities may affect the safety properties of a product

Distributor shall mean any professional in the supply chain whose activity does not affect the safety properties of a product.

When considering the duties or obligations that apply to producers and distributors these are made as clear as is reasonably possible within the Regulation, but when considering the vast range of products to which the Regulation applies, there is a degree of flexibility in how these obligations can be met.

1.4.1 Producer Obligations

The GPSR expands into the supply of safe goods on the market, which includes the supply, any offer or agreement to supply, as well as possession for supply, the latter of which includes the holding of goods in a warehouse or similar storage facility.

General Product Safety Regulations - Obligations of Producers and Distributors General safety requirement

1. No producer shall place a product on the market unless the product is a safe product
2. No producer shall offer or agree to place a product on the market or expose or possess a product for placing on the market unless the product is a safe product

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3. No producer shall offer or agree to supply a product or expose or possess a product for supply unless the product is a safe product
4. No producer shall supply a product unless the product is a safe product

1.4.2 Distributor Obligations

A distributor, for example a retailer of branded goods, has fewer responsibilities than a producer but is required to act with due care in order to meet specific obligations and to help ensure compliance with the regulations. The obligations placed on distributors in the GPSR is that distributors are required to act with due care in order help ensure compliance with the applicable safety requirements. The Regulations again offer further clarity on these obligations and again make specific reference to the exposure and possession of goods for supply and the agreement to supply goods, particularly where it is known or it can be presumed based on any information given and experience of the distributor themselves, that the product may not be a safe product.

Obligations of distributors. A distributor shall act with due care in order to help ensure compliance with the applicable safety requirements and in particular:

a) Shall not expose or possess for supply or offer or agree to supply, or supply, a product to any person which he knows or should have presumed, based on the information in his possession and as a professional, is a dangerous product; and

b) Shall, within the limits of his activities, participate in monitoring the safety of a product placed on the market, in particular by:

   I. Passing on information on the risks posed by the product

   II. Keeping the documentation necessary for tracing the origin of the product

   III. Producing the documentation necessary for tracing the origin of the product, and cooperating in action taken by a producer or an enforcement authority to avoid the risks

(2) Within the limits of his activities, a distributor shall take measures enabling him to cooperate efficiently in the action referred to in paragraph (b)(iii).

Where a retailer sells ‘own branded’ product they may have to fulfil the obligations for both a producer **and** a distributor.

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1.4.3 Obligations of both Producers and Distributors

The GPSR also makes provisions that apply to both producers and distributors in relation to the reporting of dangerous products and co-operation with the relevant enforcement and / or market surveillance authorities, including with respect to any actions given, in order to prevent risks posed by products. This is commonly described as the "duty to notify" and is reflected in the GPSR in that any producer or distributor must:

- Immediately inform the market surveillance / enforcement authorities of any non-compliant or dangerous products; and
- Co-operate with the market surveillance / enforcement authorities in respect of any actions aimed at preventing risk posed by products

Whether classed as a producer or a distributor if a company either knows or become aware, for example as a result of a consumer complaint or as a result of product testing, that a product they have placed on the market or supplied poses a risk to the consumer that is not compatible with the general safety requirement, the onus is placed on that company to immediately:

- Notify the relevant market surveillance / enforcement authority (i.e. Trading Standards) in writing of that information, and
- Inform them of the action taken to prevent risk to the consumer; and

In the event that a serious risk is identified the notification to the market surveillance and or enforcement authority should also include the following information:

- Information enabling the precise identification of those product(s) affected (batch/serial number or date of manufacture)
- A full description of the risks that the product presents, including any relevant risk assessments, test or inspection reports
- All available information relevant for tracing the product
- A description of the action undertaken to prevent risks to the consumer

The producer or distributor is also obliged to co-operate fully with a market surveillance/ enforcement authority (at the enforcement authority's request) in relation to actions taken to avoid the risks posed by a product which they have supplied.

In the UK, guidance on the approach to such procedures is covered by PAS 7100 *Code of practice on consumer product safety related recalls and other corrective actions* - see section 10.

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1.5 Defence of Due Diligence

The GPSR provides a defence of due diligence which, in certain circumstances, allows a company to show that it has taken all reasonable steps and exercised all due diligence to avoid committing the alleged offence.

Regulation 29 Defence of due diligence states;

(1) Subject to the following provisions of this regulation, in proceedings against a person for an offence under these Regulations it shall be a defence for that person to show that he took all reasonable steps and exercised all due diligence to avoid committing the offence.

(2) Where in any proceedings against any person for such an offence the defence provided by paragraph (1) involves an allegation that the commission of the offence was due:

a) To the act or default of another, or

b) To reliance on information given by another, that person shall not, without the leave of the court, be entitled to rely on the defence unless, not less than seven clear days before, in England, Wales and Northern Ireland, the hearing of the proceedings or, in Scotland, the trial date, he has served a notice under paragraph (3) on the person bringing the proceedings

(3) A notice under this paragraph shall give such information identifying or assisting in the identification of the person who:

a) Committed the act or default, **or**

b) Gave the information, as is in the possession of the person serving the notice at the time he serves it

(4) A person may not rely on the defence provided by paragraph (1) by reason of his reliance on information supplied by another, unless he shows that it was reasonable in all the circumstances to have relied on the information, having regard in particular:

a) To the steps which he took, and those which might reasonably have been taken, for the purpose of verifying the information; and
b) To whether he had any reason to disbelieve the information

The defence of due diligence effectively enables a producer and/or distributor to argue that they had taken all reasonable steps and precautions and exercised all due diligence to avoid committing the alleged offence, in this case that the product placed on the market is a safe product.

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Regular documented risk assessment and product testing can be crucial to any due diligence defence as are the processes a company has in place to ensure products are consistently manufactured in accordance with a documented specification and regular checks are in place to identify any non-conformities or breakdown in the process itself.

The key word is "reasonable" as this takes into account the level of resources available, as well as knowledge and expertise that exist within the business. That does not mean that if there is insufficient expertise or experience in-house it will be accepted that no action can be taken. On the contrary, it means that there would be an expectation that external advice should have been sought from a suitably qualified or experienced source.

The enforcement authorities can request evidence of this documentation if they investigate a product that they deem to be non-compliant or a risk to consumers. It is therefore important for you to create a technical file for your product that will contain all the relevant information required to be held for your product.

Creating a Technical File for your Product

To be able to demonstrate 'due diligence' you will need to have a record of everything that has been done to ensure that the product is safe and fit for purpose, it is highly recommended that a technical file is produced for each product and this can be referred to at any time.

It is important to gather the correct information and have the documentation readily available in case required by supplier, retailer or enforcement authority.

Please refer to section 9 for further detail on technical files.

1.6 Getting the Product Right First Time

Bringing a new product onto the market can be difficult, even with lots of research and effort there is always the risk of it not being a success for various reasons. By focusing attention on making the release of the product successful from the first production run the Right First Time principle comes into play. The objective behind the "Right the First Time" principle is to reduce the number of product issues that get past design release that cause rework, scrap, and order changes, leading to unhappy customers. The "Right First Time" principle encompasses practices that allow manufacturers to perform more due diligence and validate design decisions. Pursuing the 'Right First Time' principle means developing procedures as part of the New Product Development Process to develop and verify the decisions made.

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For suppliers, giving them the correct design brief, correct product requirements and evaluating the risk at the start of the process all helps to achieve production of a product that is the correct specification, at the correct costing right from the start. This will result in fewer delays. Getting the product right at the start of the process will mean that you and your supplier are working towards the same goals and have a good understanding of each other's capabilities and requirements.

1.7 Retail Critical Path and Points of Failure

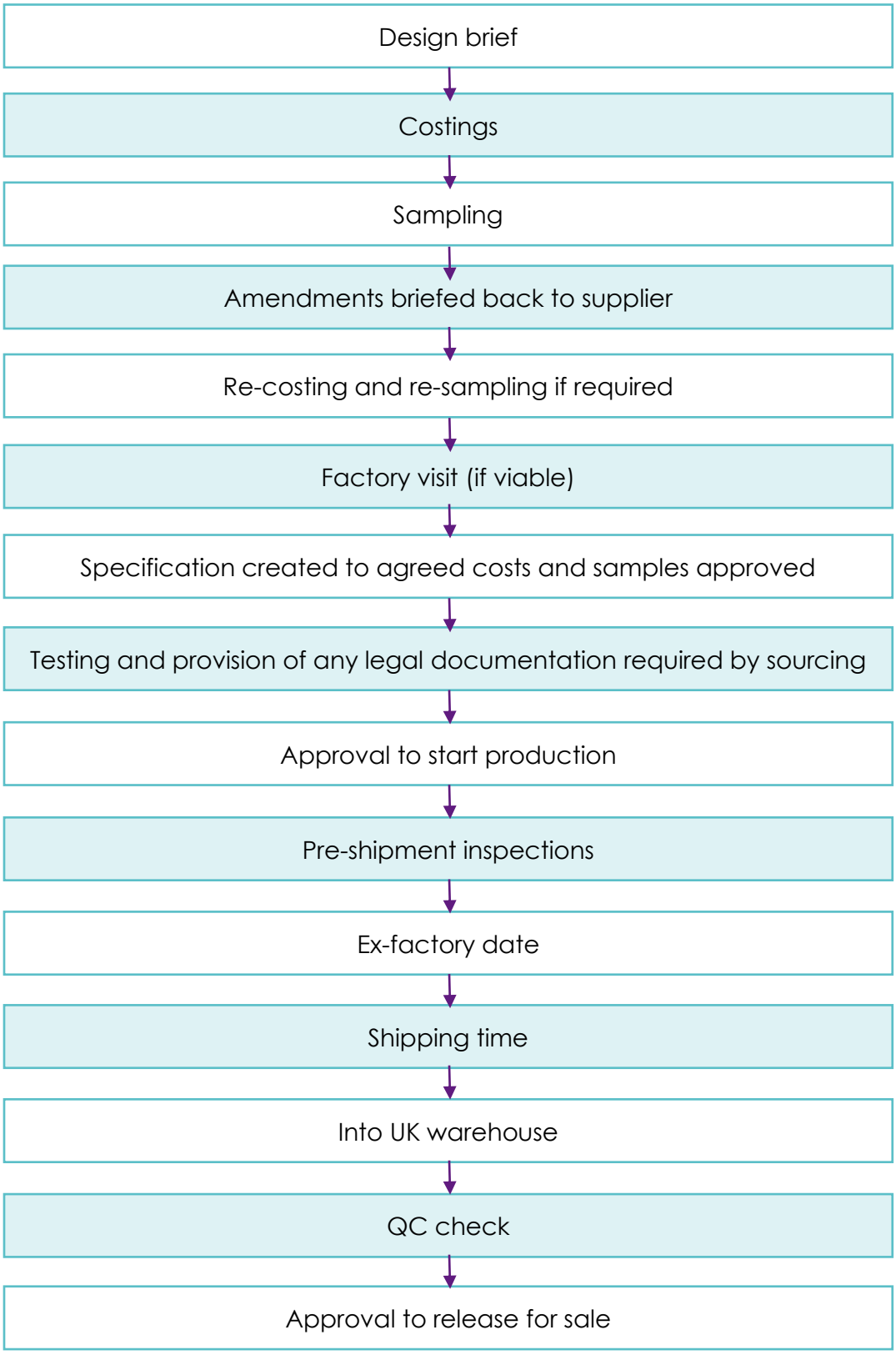
In the furniture industry, the **critical path** is a plan that contains a list of all of the necessary activities that are required to be done within a particular time frame. A simple explanation of a retail critical path is the timeline from the introduction of a design brief to delivery ensuring that production orders are shipped successfully to the warehouse within the estimated time of delivery (ETD). The final delivery date into the warehouse is critical and this deadline needs to be met otherwise the retailer is at serious risk of loss of sales at season/catalogue launch.

The critical path for many retailers is very time restrictive and a failure at any stage, either in approval of the design, approval of construction or approval of costings can be very costly in terms of time lost. Identifying and analysing the points of failure will allow you to pinpoint the exact issues and stages that led to the failure. Once those areas have been figured out, the next step is to ensure that it is not repeated. This depends on the nature of the specific problem, and you will need a good degree of experience in that particular part of the pathway in order to make decisions on the way forward to improve.

Many factories will work backwards from the into warehouse date in determining the key milestones to be achieved in the critical path. In the critical path there are always key milestones that need to be reached by set deadlines. If one of these deadlines is not met, then this will have an impact on the rest of the critical path. The milestones set may vary from retailer to retailer and the illustration shown overleaf is for example.

The factory must be able to plan when to commit to purchasing raw materials and must also allow for any testing time and product approval time when planning production start dates. Any failure to meet the key milestones must be reported to the retailer as soon as possible in case key decisions need to be taken i.e. to air freight product instead of sea freighting, as the final into warehouse deadline can rarely be moved and therefore needs to be met.

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1.8 Supply Chain Management

Working to set procedures and agreeing specifications with the supplier and ensuring that there is a process in place for product approvals will help to ensure that the product is made to the right quality and standard. This is sometimes known as SCM (Supply Chain Management) and consists of three` main elements:

- Management of suppliers - this discipline incorporates supplier evaluation to identify process capabilities, strengths and weaknesses. Suppliers can be developed if there is a need and current supplier capabilities are lacking. Supplier education is important to ensure that they understand the core goals and values of the buying organisation and how they are evaluated
- Transition management - Supplier integration to facilitate suppliers and their systems into the buyer organisation systems

Scouting - The scouting function carries out competitive intelligence analysis on the supply chains of major competitors to identify trends and assess the implications.

It is important to be clear and agree what is expected from the factory and the product at the start to ensure that first and foremost, you are working with the right factory, a factory that is capable of meeting your standards and requirements, and secondly, that they know what is expected in terms of product quality and materials and that they are not using inferior materials in the production of goods. This will help to limit the amount of product that is rejected during pre-shipment quality control (QC) checks and also ensure that the goods that are delivered into the retailer's warehouse are to the correct standard and ready to be released for sale. It is not beneficial to either the retailer or the manufacturer to have rejected goods that are not able to be sold.

1.9 Customer Satisfaction

Retailers, indeed any organisation, depends on their customers and therefore should understand current and future customer needs, meet customer requirements and strive to exceed customer expectations. The purpose of an organisation is to create and retain customers, all organisations depend on them. The retailer wants to sell a good quality product, at the right price, to be delivered on time and for the customer to be pleased with their purchase and to keep it and not return it due to not meeting expectations or receiving a faulty item.

Most businesses have to deal with problems in which things go wrong from a customer's point of view. How you receive and reply to complaints if they occur is important. Don't dismiss a customer's issue - even if you're not at fault. A customer with a complaint may actually represent an opportunity for improvement:

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- Handling a complaint successfully means the customer is likely to be more loyal than if no problem had occurred.
- Customers making the time to complain are rare - your complaining customer may be alerting you to a situation experienced by others who silently took their custom elsewhere.

Complaints should be handled swiftly and with courtesy. Your company should have an established procedure for dealing with customer complaints that are known to all employees. In order to offer products and services that meet or exceed their expectations, the organisation will have performed research to identify future needs and impacts of current or pending legislation on their product or service.

Customer Satisfaction in practice means everyone in the organisation views the customer as their paymaster, meeting customer requirements takes priority over other demands. These following four steps should be a continuous cycle:

- **Customer Feedback (Reports) -** decisions on the frequency and consistency with which the reports are needed for the customer service department. Helping the CS Department team learn to ask and answer the question "How are we doing?" By providing support on the 'critical service kpi's' the report needs to address
- **Involve (Display) -** decisions on how, where, and quantity of feedback/reports to be displayed or bulletined to Customer service team members. Support for creating feedback of interest to the most team members possible, especially those who provide services to the customer
- **Focus (Decision-making) -** decisions, based on the measurement of feedback, as to how it is integrated into and supports existing operations. This fosters soft skill development, such as leadership, for all team members in all operational areas. Management can provide support to customer service team leaders to insure the feedback facilitates coaching and follow through of operational strategies
- **Thanking Customers (Process) -** decisions on recognising customers and "thanking" them for their support (whether they elect to participate or not) and participation (for those providing feedback). This is the focal point at which the cycle culminates and re-launches continually. Here management can support customer service teams in thanking customers for their help and starting the practice over by asking "How are we doing?"

In summary, customer feedback is essential for continual improvement of product and this information should be used effectively and given serious consideration when looking at new product design and specifications. Considering the reasons why products are returned as faulty is essential and needs to be acted upon both during the life cycle of

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the current product and to learn from the errors and improve on new items being developed for future sales. Using information from product returns for non-faulty items can also be beneficial in understanding why the customer does not want to keep an item, such as quality, item not as described or pictured etc. It is important to gain an understanding of what your customer expects and examine any reasons why products are returned to incorporate improvements into future designs.

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2. Building Quality into Design

2.1 Design Briefs

In order to get the design brief right first time, it is important for the designer / specifiers to have an understanding of any product specific regulations / requirements that they may need to incorporate into the design specification.

For example if designing a bunk bed, it is important to consider the legal requirements for entrapment hazards and the need to design the right size of gaps into the product at the start, and if converting from a bunk bed into 2 x single beds – the use of self-tapping screws may not be allowed to secure the slats to the side rails. All these small details are extremely important and if they are not covered right at the start of the development process, it could lead to a re-design of the product in the later stages of production which would significantly impact costs, lead times and put a strain on the relationship with the supplier.

In summary, poorly briefed designs will not be specified correctly and as most costings are carried out from the design brief to start, this could lead to incorrect costings, incorrect choice of materials/substrates and loss of time as there may be a need to re-develop the product once these issues have finally been identified.

2.2 Build in Requirements for Product and Materials

The key product requirements must be built into the design brief at the start of the process.

Key considerations are:

- Any legal requirements specific to the product
- Any risks identified in the design / foreseeable use of the product
- Any materials to be specified at this stage that would affect costs i.e. use of flame retardant fabrics or fillings
- Any restriction on materials to be used – consideration of UK timber regulations, Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), persistent organic pollutants (POPs) etc.
- Use of materials within the product construction – type and thickness of panels etc.
- Labelling requirements – the factory needs to ensure this is included and costed accordingly

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- Any testing that is required to be carried out by or paid for by the factory
- Packaging of the product and any drop tests that are required to be carried out

By being specific and including all of your requirements at the design brief stage each supplier will then be working to the same minimum standards when producing their costings and prototype samples and there should be no hidden surprises in terms of extra costs that are added once the business has been awarded due to misunderstanding of what is required.

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3. Sourcing of Raw Materials

3.1 Agree a specification

When developing a product with any new factory/supplier, it is extremely important that you agree the specification of the materials that you are expecting to be used in the finished product.

The raw material specification should include details on the following:

- The reference details/name of the raw material
- The supplier of the raw material
- The details of the specification i.e.: weight, density, construction
- Details of any coatings or treatments applied (if applicable) for example; if timber is used, has it been kiln-dried or treated to eliminate any possible insect infestations. Fabrics may require back coating with an FR chemical to ensure it passes any flammability tests that are required
- A declaration that the item does not contain any restricted substances specific to that product
- A list of any standards or regulations that the raw material needs to comply with – for example; If the item is required to meet any flammability test requirements then this should be documented and agreed in the specification so that it is clear and agreed right at the start of the process
- The specification should always be signed and dated by both the supplier of the goods and the buyer of the goods so that there is a clear agreement on what will be used in the product

If you have a specification that details all of the above, this will then help to assist in any negotiations should the supplier change the raw material at any stage without your consent.

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Design Brief / Specification Example

Supplier	A Supplier
Model	Standard Chair
Lead Time	6 weeks
Brand	High End
Legal Requirements	Furniture and Furnishings (Fire) (Safety) Regulations 1988 as amended GPSR – General Product Safety Regulations REACH & POPs Chemical Regulations UK Timber Regulations (UKTR)
Image	Picture of product

General Specifications

Product	Height (mm)	Length (mm)	Depth (mm)	Internal (mm)	Seat Height (mm)	Seat Depth (mm)	Arm Height (mm)	Net Weight (kg)	Weight of Plastic Package (g)	Weight of Card Package (g)	Weight of Other Package (g)
Standard Chair	890	870	890	490	520	570	680	31	800	0	200

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Frame Composition	Solid hardwood rails with high density particle board panels. Screwed, glued and stapled.			
Piping	Plastic piping in 4mm / 5mm widths			
Lining Cloth Colour	Black to all seat linings			
Zips	Black Only			
Suspension	Seat		Back	
Springs	2" arc zigzag		N/A	
Spring Clip	Individual clips		N/A	
Webbing	N/A		Stretch webbing	
Feet	4 x wooden feet		Picture of foot	
Fabrics	Plush Red		Colour swatch picture	
	Linoso Stone		Colour swatch picture	
	Black Chenille		Colour swatch picture	
	Plush Slate		Colour swatch picture	
Seat Cushions	Fixed or Loose?	Interiors	Size (inches)	Weight (g)
SEAT CUSHIONS	Loose	Foam	20w x 25d	3000 per cushion
BACK CUSHIONS	Loose	Fibre	22w x 25d	2000 per cushion

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Packaging

Product Outer Packaging Include picture of packaged product	All pieces are delivered in a plastic tunnel bag sealed to one end with a cable tie. Feet wrapped in bubble wrap with cling film over.

Testing and Compliance Requirements – Supplier Responsibility

Legislation	Product or Raw material test.	Test Standard	Test Report / Declaration Required for Compliance
GPSR – General Product Safety	Product	BS EN 12520	UKAS Test Report
REACH & POPs Chemical Regulations	Product	N/A	Declaration from Supplier
UKTR	Wood based raw materials	N/A	Declaration from Supplier (UK based) OR Risk mitigation documentation (outside the UK)
Furniture and Furnishings (Fire) (Safety) Regulations 1988 as amended	Raw Materials - Slab Foam	Schedule 1 part 1	UKAS Test Report
	Raw materials – Visible Cover Fabrics	Schedule 4 part 1 and schedule 5 part 1	UKAS Test Report
	Raw Materials - Fibre Fill	Schedule 2 part 1	UKAS Test Report
	Raw Materials – Non Visible Cover Fabrics	Schedule 4 part 2 and Schedule 5 part 3	UKAS Test Report

DOCUMENTATION and TEST REPORTS TO BE SUPPLIED PRIOR TO SHIPPING

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Labelling

Permanent Fire Label  	Location - Stitched to seat lining, under seat cushions.
Swing Label   	Location – Stapled onto the back of Furniture
Traceability / Packaging Label Model – Standard Chair Model Code - XXX Date of manufacture XX/XX/XX Loading Date XX/XX/XX Customer Order No. XXXXXX Bar code	Location – Sticky Label placed on the front of packaging

Special Instructions

Not suitable for dry cleaning – may remove FR coating. Vacuum all over weekly. Avoid positioning in direct sunlight.

Sign Off

Supplier Sign off - Print name	Signed – XXXXXXXXXX
Buyer Sign off – Print name	Signed – XXXXXXXXXX

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3.2 Understand sourcing route of raw material

In certain circumstances it may be necessary to have full traceability of materials back to the raw material provider. One example of this is where timber is used.

It may be necessary for you to have full traceability of the timber back to the original source (forest) for legal reasons e.g. the UK timber regulations came into force 1 January 2020 and impose an obligation on the supply chain to prove that the timber used in the construction of furniture products has been sourced from a legal and sustainable route. See section 7 of this document for further information on this regulation.

Another reason you may need to understand the supply chain is also to ensure that you are confident that the route you are using is managing the raw material well and carrying out any pre-treatments that may be necessary – e.g. kiln drying of timbers to kill any potential insect infestations.

So you can see that managing your raw material and understanding your source and origin of materials along with any pre-treatments is extremely important and not a detail to be overlooked.

3.3 Quality of raw materials

In addition to understanding the source of the materials, it is equally important to ensure that the specification you have agreed is adhered to and that the quality of the raw material remains consistent and as per agreed specification throughout the production process and throughout the life cycle of the product. Therefore it is necessary to check the quality of the raw materials before production starts and carry out any relevant testing of the goods to ensure that they are suitable for use in mass manufacture. Raw materials should not be used in manufacture unless they have been subjected to, and passed the following:

- Quality checks
- Testing
- Approval for Production following pass results on QC check and testing

Quality Checks

Depending on the type of raw material, most QC checks can be carried out in-house at the factory to an agreed checklist criteria. E.g. for fabric materials, the checklist could be to check the following:

- **Colour** – check against the approved swatch to ensure that the correct colour level has been achieved. This is especially important on piece-dyed materials where colour may vary slightly from batch to batch. If tolerances are not agreed

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in the specification stage, then the supplier may not accept any complaints that you have once the furniture is produced, as they may feel that the variation is acceptable due to the nature of the processing of the material.

- **Weight** (g/m²) * to ensure that the correct construction and coatings have been applied. Weight can be a good guide to whether or not the correct level of coating has been applied.
- **Feel/handle** – this sounds like a very basic thing to check, but this can be one of the most important and yet one of the easiest checks to carry out. If the fabric is sticky, it could be a sign that the fabric has not been cured properly following any back coating procedure and it may need re-processing to achieve the correct finish. This can also have an impact on the ease of manufacturing. If the fabric is too stiff, it can have an adverse effect for the upholsterer as they may find it difficult to create a neat finish on the product, especially on awkward or intricate designs where finesse is required to achieve the correct look and style. Often the most basic checks are the fastest way of establishing problems at an early stage before any other more costly checks or testing has been carried out. If you can pick up a problem at this stage, before the factory has removed a sample and sent it for testing, you could save time and money.
- **Faults in the weave** – it is essential to agree in advance what flaws are and are not accepted. One way to ensure that you are both in agreement with acceptable quality levels is to create a Defect Classification List (DCL).

A Defect Classification List will show in detail, the types of fault that you will accept or reject per material to be used in the product construction. A defect classification list can also to be used for the actual finished product, but it is important to create the standard you desire for the raw material so that only the correct materials are used in the first instance, thus reducing the risk of rejected goods at the end of manufacture / on receipt. The defect should ideally be shown in an image and then classified as a major or minor fault depending on where the material is used. It is important to distinguish between different areas of the product and agree on what is acceptable in each area. For example:

Establishing A, B and C surfaces

'A' face: could be the front surface that is in full view of the customer

'B' face: could be the sides or back of a product that is not in full view of the customer

'C' face: could be an area that is covered by a seat cushion or back cushion in use and therefore not an essential area in terms of aesthetics, or for a piece of cabinet furniture, this could be an internal surface or a backboard

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Description of fault	Image of fault	Classification of fault	A Surface	B Surface	C Surface
Fault in weave > 0.5cm	Insert image here to help QC identify	Minor			x
		Major		x	
		Critical	x		

Example of a defect classification table for one fault in one material

So, if you look at the example above, you could create a table for fabrics that details all the defects that you are likely to find on that type of material and then you can classify whether or not you could accept the fault, and on which surface you class this as critical. The use of Defect Classification Lists can be very beneficial and can be used by the factory to assess the incoming raw materials as part of their quality checks, and also can be used by the recipient/purchaser once the goods are received. If both the supplier and the purchaser agree to the Defect Classifications at the start and this is incorporated into the specification, then the risk of defective goods entering production is minimised and also there is a clear record of what was agreed in the event of any disagreements.

Testing of raw materials

Once the quality checks have been carried out, then any relevant testing must be carried out to ensure that the raw materials are compliant with any agreed requirements or legal regulations.

Two different types of testing may need to be carried out at this stage:

1. Legal compliance to specific Regulations – e.g. flammability testing to ensure compliance with the Furniture & Furnishings (Fire) (Safety) Regulations 1988 (as amended).
2. Legal compliance with REACH requirements – e.g. testing to ensure that there are no banned Azo dyes used within the fabric
3. Performance testing to ensure no customer complaints or returns during use – e.g. abrasion testing to ensure that the fabric will resist a minimum level of wear and tear, colour fastness to rubbing to ensure that dyes have been set correctly and there is no risk of transfer, especially on bright vibrant colours like reds, onto the customers clothing.

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3.4 Approval for Production

Only if the item passes both the QC checks and the testing, should approval for use in production be given. If the material does not pass the specified criteria, or any legal requirements, then it should be rejected and returned to the supplier for re-processing and the process should be followed again before the material is released for use in production. Sometimes, however, it is not quite as straightforward as a simple pass / fail situation and you may need to reach a commercial decision in order not to cease production or delay any production start dates.

In this case, you must still ensure that any legal requirements are met in terms of testing, but you may be able to take a view on performance testing that may be more relative to customer complaints. You will need to assess the impact on your business based on the results of the checks or testing and decide if this is a risk you can take. For example, if a fabric passes the legal flammability tests, but is just very slightly under specification, then you could decide to accept for this one batch, and you may even be able to reach an agreement with the supplier, that in the event of returns or complaints due to wear and tear issues on this batch, then they may underwrite the cost of the returns for you. Then you can still insist that they improve the material to the correct level for the next production run.

However, if the results are not borderline, and are a very clear fail and would certainly result in complaints, then you may still have to concede that this would clearly result in returns and may have an impact on the good name of your business and therefore the risk is not mitigated and cannot be taken and the only option, therefore, would be to reject the goods.

3.5 Impact on the critical path

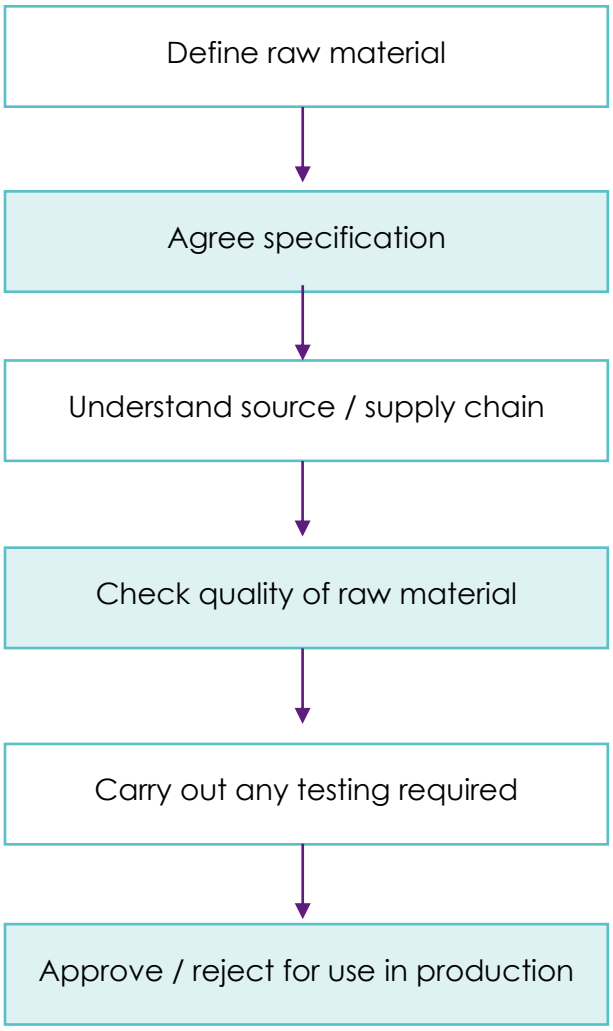
It is important to arrange the checks and testing on raw materials as soon as possible to reduce the risk of any delays to production start times due to failures or rejections. You should build the time it takes to carry out these checks into the critical path, along with a buffer to allow for any re-processing or re-testing should this be required. This can be the biggest stumbling block in terms of adding delays to lead times as many people do not account for it and mistakenly assume that everything will be received without fault and ready for production.

Plan for failure! - If this stage passes trouble-free, then you have the benefit of some extra time that can be used elsewhere in the production process in terms of any other delays that cannot be accounted for.

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To summarise:

The following steps should be taken to assure raw materials are suitable for use;



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4. Basic Factory Assessments

Quite often, the buying team may be the first people to start the process of selecting new materials and products and may do this based on costs and quality of goods. In an ideal world, the factory should be visited and assessed for suitability for your product before the business is placed and the product is selected, however, this is not always possible. If it is not possible to visit the factory, then it is extremely important to relay your requirements to the factory in advance of any costs being produced, so that the factory can allow for any improvements that may be required before production starts.

It is always preferential to visit the factory before any orders are placed. However, how do you know what to look for, how can you assess if they are suitable for production of your product? Different companies have different requirements, but to help you gain an understanding of some of the areas you should try to address, try to follow the basic checklists in this section as a starting point, as the minimum that you should check for and then add your own product specific requirements to these checklists to develop your own versions.

4.1 The Factory

You will need to visit the production site and not just the showroom. If the factory is sub-contracting any of the production or assembly, then it is always advisable to visit the sub-contractor too. You need to know where your goods are being manufactured and who is manufacturing them. It is difficult to determine what is right and what is wrong and give a detailed list of what to look for exactly, but as a general rule, you will gain a good understanding of the management of the factory by taking a walk around the factory and looking at the general condition of the building and the environment for the workers. The checklist below may give you some ideas to consider as you walk around a factory and questions to consider.

Questions to be considered
General condition of the building – are there any obvious hazards you can see? Dangerous infrastructure / electrics
What is the general impression of the factory/offices/warehouses – would you like to work here?
Are there good staff facilities? Canteens and toilets clean and tidy?
Adequate lighting – can the workers see what they are doing?

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When was the last fire inspection? Check fire safety emergency evacuation procedures. Are the fire escape routes blocked or signs clear and uncovered?
Evidence of the last Fire Drill being conducted?
Fire extinguishers/equipment regularly serviced (within 12 months)
First Aid – are there any trained first aiders on site. Is there access to medical treatment / first aid supplies - accident record book avaialble?
Clearly marked and unobstructed aisles and walkways
Is the factory well organized and clean? Are there raw materials and finished products everywhere, or does it seem organised and controlled?
Does the company have a waste management or recycling process? Is there evidence of waste recycling/waste management – do the factory have an area to keep rubbish/waste or is this lying around in/around the factory premises?

4.2 Basic Health & Safety

The below checklist covers some basic information on what you must do to make sure a business complies with health and safety laws. In general, health and safety laws apply to all businesses. Health and safety laws are there to protect employees and the public from workplace dangers.

Questions to be considered
Who is responsible for Health and Safety
Is there a Health and Safety Policy?
Has there been any H&S prosecutions?
Has there been any planning or noise abatement notices or prosecutions?
Check that there are Risk Assessments in place?
Are there safe workstations (machinery and desks)? Check maintenance and machinery testing records?
Is there adequate ventilation if required in the working environment? Check latest LEV report?

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Have all employees using machinery/ fork lifts received training where available and/or relevant and when did they receive their training?
Do workers have access to the correct PPE – e.g. eye wash, gloves, eye protection, ear protection in noisy environments etc.?
Are any hazardous substances used? If yes inspect storage, safe handling and disposal practices and other procedures such as proper venting of spray booths and use of individual breathing masks

4.3 Control and Storage of Raw Materials

Raw material must be protected from bad weather: cold, wind, humidity. The proper storage of raw materials and of finished goods is not only essential to prevent physical losses, but is also an important aspect of quality control. A company must also be able to demonstrate that they are in full control of the materials used to construct the finished product to ensure that no raw materials are used that do not meet the specification/design brief requirements. If supplying to both UK and non-UK markets, the company must be able to show control of the raw materials to ensure that non-UK compliant materials cannot enter the production for UK products. The below checklist covers some basic questions that could be asked around raw material storage and control.

Questions to be considered
Are the goods kept in a clean dry environment? In the case of timber, it may be necessary to ensure that the goods are kept indoors for a certain period of time prior to production to maintain moisture content levels.
Are the goods in a flood risk area – do they need to be raised from the floor?
Goods inwards – are quality checks carried out on the incoming raw materials?
Goods inwards – are the raw materials verified as correct before being stored?
Goods inwards – are the goods checked to see if they have a batch number on the goods for traceability purposes?
Goods inwards – how are the batch details recorded?
Goods inwards – are goods segregated according to UK / Non-UK regulatory requirements.

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Goods inwards – how are faulty /non-compliant goods quarantined to ensure they do not enter the manufacturing process?
How are the raw materials allocated to production? Does the worker just take the goods or are they released into production by a supervisor who manages the area?
Does the batch number remain with the material when the raw material is sent to the next production stage to maintain traceability?

4.4 Factory Production / Process Control

Manufacturers must ensure that each piece of furniture remains in conformity with the provisions of the agreed specifications and regulations. The internal checks on the manufacture of the product in any control system refers to the manufacturing process being robust enough to ensure consistency of production so that all product complies with the Specification, Regulations and technical file. Quality Control is very important to ensure the 'nth' product conforms and is safe as well as the first product manufactured. An Internal production control system should include any in-process or final quality control and commissioning procedures. A formal quality management system (QMS) such as ISO 9001 would satisfy such a requirement. For those manufacturers that do not have a formal ISO 9001 system in place, the following checklist may be helpful to determine the level of production/process control in place.

Questions to be considered
Does the producer apply a quality management system related to the technical specification?
If YES, is that proved by a valid certificate and by whom?
Are there procedures for carrying out the whole process from purchasing of raw materials to the production and testing of the finished product that will enable a consistent product?
How does the factory production flow? Would you describe the production process as lean and efficient?
Are target and control limits defined for each relevant production step?
Are goods manufactured to order? How well do the production planning and control system adjust to demand and is it flexible in adjusting to constraints (e.g. labour shortages in key areas)?
Are there adequate procedures for controlling the quality documentation, so that all relevant personnel have up-to-date procedures and recording documentation?

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Are the responsibilities of the persons who may affect quality defined? Is there a supervisor present in each area as a point of contact if they find any issues or problems within production?
Is there a representative of the company who is responsible for the quality system?
Are there sufficient personnel and equipment available to produce to the technical specification?
Are there work instructions or relevant standards available at relevant places throughout the production process to produce the product in accordance with the technical specification?
Are key elements of the production concerning the specification subcontracted to others on or off the site? If YES which part of the production
How are sub-contractors effectively monitored and controlled to meet the quality standards required
Does the manufacturer apply an adequate documented system that allows the detection of defects and deviations quickly enough to identify unambiguously those products that are not in accordance with the product specification so that they are removed before delivery?
If a non-conforming product is detected is there a process for correcting/preventing a re-occurrence?

4.5 Control of Upholstered Materials

If the furniture contains upholstered elements, then it is important to ensure that good control can be demonstrated in terms of batch traceability. You will need to check the controls that are in place to ensure that only the correct materials are used in production to ensure that no non-FR fabrics are used and that only FR fillings are used. Manufacturers must be able to trace these back from the final batch number applied to the finished product.

It is therefore important for any factory that makes upholstered furniture to be able to demonstrate how the materials are transferred from raw material storage to the sewing department for the fabrics, and then how they control any final batch numbers – considering the different batches of fillings that may also then be added to the product in assembly. Further information about the requirements for traceability can be found in section 6.

There are also other considerations to be taken into account when dealing with upholstered furniture, and this includes the control of needles and especially broken needles that are often encountered during the sewing process. You need to ensure that

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the factory controls broken needles and has suitable means of finding all the appropriate parts of the needle. If all broken parts cannot be found, then the only safe way of dealing with the article is to reject that particular sewn piece, as you cannot risk any broken needles being found by the customer when using the product. Further information about relevant procedures, including the broken needle procedure, can be found in section 5.

The below checklist covers some basic questions that could be asked on control of material batches related to traceability.

Questions to be considered
How is the batch number of raw materials followed through the production process? Foam filling, non-foam filling, visible cover material, non-visible cover material etc.
How are batches of fabric kept together during the pattern cutting process?
What records are kept showing which batches of raw materials were used on which products?
How does this relate to the final batch number applied to the article?
Using the company's system for traceability, can all batches be traced back from permanent label batch number to raw materials?
Is the company able to identify where these products were dispatched to?

4.6 Quality Control - Final Inspection

As discussed in the previous sections, early identification of defects in products with inline inspection before they arrive at the final inspection stage increases the efficiency of the entire manufacturing process. The final inspection will help catch any problems before a shipment leaves the factory but may be too late at this point to rework the product or satisfy delivery on time to the customer. In the Final Inspection, the whole of the product including any requests from customers is inspected. It is important at this stage that there is evidence of a specification and a Defect Classification List for the quality control person to check against. It is also advisable where possible for you to approve a finished product at the factory as the production standard, sign and date the sample in an area so that it is verified as the correct reference sample. This visual sample can be very beneficial to have at the end of the line so that the workers can check that the current production is still representative of the agreed buying approval sample.

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Where flat pack furniture is produced, there may be a requirement for the factory to build an item of furniture as a quality check to ensure that the fittings pack contains the correct materials and that the item can be built in accordance with the instructions provided. This is a great way of being able to establish that production panels have been produced correctly with the drill holes in the correct places and everything is aligned correctly so that the customer will not have any issues when they receive the product and carry out the building process in their home.

The below checklist covers some basic questions that could be asked at final inspection

Questions to be considered
Are the goods subjected to a final inspection before being packaged?
How are they checking that the goods are to the correct quality levels as agreed?
Is a master reference sample / approved sample available to check actual production against?
Is there a visual management quality fault board that shows acceptable and unacceptable faults for the product?
Is there a supervisor that oversees the final inspections?
Is there a build area? Procedure to perform first off build of any flat-pack furniture, records of the build?
Is there a quarantine area if goods are rejected at this stage – or a process that would prevent rejected goods from being sent into the packaging area and being mixed with good quality products?

4.7 Independent Third Party Inspections

Independent inspections are also sometimes requested in addition to the factory inspections, to ensure that the goods are absolutely correct before being released for shipment, as the goods are rarely able to be returned once shipped from overseas due to transportation costs and practicality. It is also difficult to obtain agreements on the liability of faulty goods once the goods have left the factory and shipped to the destination warehouse.

Therefore, many retailers will appoint a third party inspection company to check the goods on their behalf to ensure that the goods are of satisfactory quality and are in line with the approved buying sample. If you take this route, then you will need to provide the inspection company with as much information as you can to enable them to carry

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out the checks in the way that you desire. The following would be advisable as a minimum in order for them to check your goods:

- A copy of the agreed specification
- A copy of the agreed Defect Classification List
- Detail of your product labelling requirements
- A copy of the agreed assembly instructions or care guide
- Details of your carton labelling requirements
- A copy of your product approval form including images of the products and comments where you have asked for any improvements for production
- An agreement of the inspection level to be carried out – this will specify the sampling levels and any acceptable levels of minor faults that may be allowed

Approval to ship is usually only given following a satisfactory pass result from this inspection.

If the inspection fails for any reason, then the third-party company will usually send a full copy of the report along with supporting images so that you can take a commercial decision on whether to accept or reject the goods. If faults are found with the product, and rejection is the ultimate decision, then re-work may be able to be considered as an option and the goods re-inspected again following completion of the rework. These third-party inspections are normally carried out on finished, packaged goods. Therefore, when you visit the packaging areas, it would be advisable to ask if there is an area designated for the opening and inspection of packaged goods.

4.8 Packaging Types and Areas

A whole range of inputs, including, material costs, packing/production line labour time, customer requirements and performance drive packaging selection and design. In the furniture industry the primary drivers for pack selection are performance (product protection) and cost. If damage return rates are high, improving packaging and packaging practice (without upward spiralling costs) is key to maintaining profitability and protecting customer confidence.

The best pack is one that is compatible with product manufacturing, addresses handling constraints, matches the hazards and hazard levels of distribution, meets the customer needs, considers waste disposal, and considers the total cost. As such, the best pack solution will depend on the particulars of each manufacturer's methods, their distribution network and their markets. The packaging used can be a good indicator as to what they use and what they may have costed for your products. You may need to

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specify additional packaging requirements if the packaging they use does not meet your usual standards. Different factories will use different methods and materials for packaging – and their customers will probably have differing requirements in terms of drop tests and thickness of cardboard, so it is very important to clarify the packaging right at the start of your development process with the factory to ensure that you have the right costings and the right packaging for your product.

The below checklist covers some basic questions that could be asked on packaging.

Questions to be considered
What type of packaging is the factory using? Is it to the agreed specification?
Are the items moved straight from production into packaging – or are they stored for any length of time before packaging?
Are there any assembly instructions / care guides supplied with the products? If so, are they correct and at what point are these instructions added to the carton
Are correct fittings provided and added to the carton?
How are the boxes sealed? Check that the cartons are fully sealed.
How are the packaged goods stored prior to dispatch? How long are the goods stored prior to dispatch?
How are the goods handled? Using forklift trucks, palletised or handled manually. Check loading on the vehicle/container, risk of damage during the process.

4.9 Labelling of Cartons

Each retailer will usually have its own specific requirements on the type of carton label to be used and where to position the label. You need to be very clear about what your requirements are and establish whether the factory is capable of meeting your requirements. Label costs will have to be taken into consideration when at the initial costing stage, so you will need to be clear at the start of the process in order to avoid any further costs being added. Labelling can be critical. If not carried out correctly, or the incorrect label is applied to the outer carton, then this can cause real difficulties when the product finally arrives at its destination warehouse.

Carton labels and barcodes are often thought of as easy and no real effort is afforded in the detail of these requirements, but, if the wrong barcode is placed onto the outer carton, then this can have a drastic effect to the retailer when the shipment is received. If the barcode is incorrect, then the warehouse will not be able to scan the item into stock, or, worse still, may scan as the wrong item and show incorrect stock levels. This

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would mean that your customer may order something that you have stated is in stock, but actually, they receive the incorrect product. This would result in dissatisfaction from the customer as they would have to return the item and await a new delivery.

The return of product should always be avoided at all costs. Once the customer has opened the packaging, it can be very difficult for the customer to re-pack in the same way that the original packaging was completed. It may therefore suffer damage in transit on the return journey to your premises/warehouse and then may not be fit to be returned to stock upon receipt. This is a real challenge for furniture retailers and the costs associated with this type of damage can be extremely significant.

The below checklist covers some basic questions that could be asked on labelling.

Questions to be considered
Is the carton label permanently attached to the carton, written directly on the carton or a non-removable label?
Does the carton markings contain all the information agreed in the specification?
Is the label readable, legible incorrect language?
Does the information on the label match the product contained within?

4.10 Social & Ethical Auditing

Auditing against social and ethical standards, e.g. ensuring satisfactory working conditions, health & safety and correct payment for hours worked really needs to be checked and verified by a qualified person and therefore it is recommended that you seek an accredited company to carry out these checks on your behalf. These audits are extremely important and can affect whether the business is placed at a factory or not. Social compliance violations could cause a company to lose critical customers and for your products.

Social & ethical auditing is a method to evaluate a supplier and quickly identify potential compliance issues. There are many different social compliance standards (Sedex Members Ethical Trade Audit (SMETA), SA8000) but they all follow principles demonstrating the supplier's compliance according to these requirements:

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- **Child Labour** - Child labour is still a common problem in some parts of the world. Child labour in a lot of ethical audits is considered any work performed by a child younger than 15 years old unless the minimum age for work is higher by local law. Audits usually look at young workers only working outside of school hours, not working more than eight hours and children and young workers are not subject to unsafe working conditions.
- **Forced Labour** – The audit criteria usually does not allow suppliers employing forced or slave labour and withholding personal documents from workers. Staff should have the right to leave the workplace at the end of each day and terminate their employment with reasonable notice.
- **Health and Safety** – A large proportion of an audit plan would cover Health and Safety – items like those already covered in this section – in line with UK Health and Safety at Work Act.
- **Discrimination** – Audit criteria looks to protect workers from discrimination based on race, origin, caste, gender, religion, political affiliation and other attributes. A supplier should have written anti-discrimination policies/procedures followed in the recruitment, employment and termination of employees.
- **Disciplinary Practices** - Suppliers must treat staff with "dignity and respect". This requirement forbids inhumane treatment including verbal abuse of employees.
- **Working Hours** – Audit criteria can require suppliers to guarantee at least one day of rest following six consecutive days of work with the normal working week not exceeding 48 hours. Some standards also set requirements for overtime e.g. Suppliers must make overtime voluntary, and overtime cannot exceed 8 hours per week.
- **Remuneration** – The audit will investigate whether a supplier is paying a living wage to workers. Wages need to be high enough to satisfy the basic needs of staff.

Even if the factory satisfies all your requirements and you are happy with the general checks you have made during your visit, you would still need to carry out a social & ethical audit before you place any business with the factory to ensure that there are no issues that you could not see during your visit.

A social audit based on standards can help you get a clear picture of what's happening in your supplier's factory and any potential compliance issues.

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5. Process Control & Procedures – Specific Requirements for Furniture Manufacturing

There are many things to consider during the manufacturing process that relate to the actual way in which the work is carried out and the controls and measures in place to ensure that the product is legal and safe when it reaches the customer. Some processes need to be controlled and monitored to ensure that there are good measures in place to prevent any non-compliances during the production process. You need to ensure that there are robust procedures in place to ensure that the process controls that have been implemented are being carried out in practice and that this can be demonstrated through records and observation of the process being carried out in production.

Examples of some relevant procedures are as follows:

- Timber – kiln drying
- Timber – moisture content
- Fabric – broken needle procedure
- Sharps – control of knives and scissors/sharps
- Chemicals – control of storage and use

5.1 Timber – Kiln Drying

Fumigation alone will not kill insects that are buried deep within the timber. Insects can bury themselves deep within the tree/timber and then lay their eggs, which may then take several months to hatch. Once the larvae start to eat their way out of the timber, they will make their way onto other items of timber; this may be noticed by sawdust on the floor under the site of the hole. It may also be noticeable by the sound of the insect eating its way out of the timber. Once an infestation occurs in its new surroundings, it may be necessary to then consult expert advice on how to eliminate the unwanted insects.

As these insects may have originated from Asia or other worldwide countries, it may then also be necessary to inform the Department for Environment, Food & Rural Affairs (DEFRA) of the infestation, as it will need to be controlled. DEFRA will want to ensure that UK species of timber is not put at risk by the introduction of a foreign species into the environment. Kiln drying is the only way to ensure that any larvae/eggs that are at the core of the timber are killed, as the heat will penetrate through the full thickness of the timber. You must check where the timber is sourced from and ensure that it is from a

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reputable, consistent source and that the kiln drying process is documented and followed.

It is important to note, that insect infestation can occur after kiln drying if the timber is placed or stored in an area where other timbers with infestation present are stored. Therefore, the storage of goods, and how this is controlled is extremely important.

5.2 Timber – Moisture Content

The ideal % moisture content for timber used in furniture is between 8 %-12 %. Timber at lower moisture contents than this would be quite dry during manufacture, and there is the risk that when the furniture is transported or moved to higher moisture content, it could lead to the timber swelling as it absorbs moisture. This could affect the function of the furniture e.g. if the item has drawers and the runners are also wooden, then the sudden swelling could mean that the gaps are tighter and the drawer may not operate smoothly and freely.

Similarly, if an item has been produced in an area that has a high moisture content, then is transported to a climate that is much drier e.g. customer's home with central heating etc. then the timber would dry out, and this could create gaps in the joints and cracks in the timber. Top panels of cabinet furniture can bow, as it dries out and movement takes place. This is not a situation that you want to find yourselves having to deal with, as it is difficult to rectify after the furniture has been fully manufactured and delivered to the destination warehouse.

5.3 Fabrics – Broken Needle Procedures

When manufacturing using fabrics/upholstery, the covers are usually sewn first then sent to the assembly unit to be added to the product. It is a fact of life that needles will break during the normal production process. Needles inevitably become clogged with debris/coatings that are on the fabrics and therefore break during the sewing process.

As we know that this is happening, and cannot stop this from occurring, you need to find a way to control the broken needles so that the customer does not find them in the product during use. Wherever there is a risk, there needs to be a control measure in place that is checked and verified. Many factories will already have a system for dealing with broken needles. What you need to be able to do is satisfy yourself that the procedure that they have in place is robust enough to ensure that all the broken pieces of the needle are located or if they cannot all be found, the item would need to be removed from production and discarded as it would pose a risk to the consumer.

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If a needle breaks it is important to first start with collecting all the broken pieces. Many factories will have a sheet of paper, with the outline of the needle already pre-printed onto the paper. The operative will then hand all of the pieces to a supervisor, who will piece together the broken needle to verify that it has all been located. If any of the pieces appear to be missing, then a metal detector is often used on the material to see if any more pieces can be located. If all of the pieces are finally located, then these are taped to the paper as evidence that all the pieces were found successfully and a new needle is then allocated to the operative.

The supervisor should record the date and time of the broken needle incident, along with details of the batch of material where the breakage occurred. If all the broken pieces cannot be located, then the only safe thing to do to ensure no risk to the consumer is to dispose of the fabric that was being sewn at the time of the breakage and this disposal is recorded. Records should be made available for inspection at any time. If you visit a factory, and they show you a container of broken needles, you need to query how they are verifying that all the pieces have been found for each needle before being placed in the generic container. You need to have absolute confidence that the method of verification that all pieces have been located can be demonstrated. This is very difficult when the records do not show individual needles. The checklist below may help ask the relevant questions.

	Questions to be considered
	Has the business identified critical areas of the manufacturing process where needles are used and ensured controls are in place to prevent anything going wrong at that stage (Critical Control Points)?
	Does the business have a procedure for handling broken needles?
	Does the procedure cover ■ A method of retrieving all the parts of a broken needle and if parts cannot be found a method of quarantine / disposal

5.4 Control of Sharps

In the same way that a broken needle can pose a risk of injury to a customer, so can a sharp object misplaced in the product or packaging – e.g. a pair of scissors or a Stanley knife blade being left in the packaging in error. If a customer was to open the package and a knife blade fell out, if not noticed at the time of un-packaging the item, this could fall onto the floor or other surface. It could be knelt upon, or a child could pick it up and injure themselves.

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You need to ensure that the factory have a robust procedure for ensuring that these foreign objects do not end up in the product or packaging. Some factories will have a shadow-board, where all the scissors are kept, so you can easily see if a pair of scissors is missing. It is generally a good idea for a supervisor to allocate the scissors or knives at the start of the working day, and collect them from the operative at the end of the working day. That way, all the sharp items can be accounted for.

If any of the items cannot be accounted for, then the only way to locate them would be to open all the packages and check until they are located. You need to ensure that you are satisfied with the way the factory control this to ensure that no goods leave the factory until the missing sharps item is located. The checklist below may help ask the relevant questions.

Questions to be considered
Has the business identified critical areas of the manufacturing process where sharps are used and ensured controls are in place to prevent anything going wrong at that stage (Critical Control Points)?
Does the business have a procedure for handling sharps?
Does the procedure cover: ■ A register/inventory of all sharps ■ A method of allocation ■ A method of ensuring safe return of sharps

5.5 Chemicals – Control of Storage and Use

Many chemicals are used in the production of furniture items, from paints and lacquers to adhesives and bleaching agents. Many of these chemicals can be harmful if not handled correctly and need to be stored in a special environment to ensure that no accidents occur.

A starting point for assessing chemicals should be for the factory to ensure that they have a copy of the Material Safety Data Sheet (MSDS) on file. This datasheet will detail how the chemical should be stored, what protective equipment should be used by the person using the chemical, and what to do in the event of spillage etc. The factory should have a suitable means of storing the chemicals and this could be a locked, dry, dark area. Restricting access to the chemicals would help to ensure that they are not accessible to unauthorised persons. A supervisor who understands the chemicals and the risk they pose should be responsible for allocating the chemicals to the workers -

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along with the necessary Personal Protective Equipment (PPE) that they require in order to handle the chemicals. If the chemical poses a risk of damage or corrosion to the skin, eyes etc. then the appropriate measures should be available – in the area where the chemical is handled – to deal with any spillages/skin contact etc. e.g. eyewash solution/sink or shower area in case of spillage/contact with skin/clothing.

In addition to the above, you need to consider that where any chemical applications have been made to the product, there is no remaining residue on the surface of the product that the customer could come into contact with. So the product may require a washing/cleaning/sealing process to ensure that any chemical absorbed into the timber does not leach out during use.

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6. Traceability of Materials and Product

Traceability is the ability to trace all processes from procurement of raw materials to production, consumption and disposal to clarify "when and where the product was produced by whom". Necessary information such as manufacturers, suppliers and distributors must be recorded. This information is tracked in all processes from procurement of raw materials, assembly, distribution and sales to ensure histories can be traced. Traceability codes can be used to enable manufacturers and retailers, as well as consumers and authorities to identify, authenticate and track goods throughout the entire supply chain.

There are many reasons why you need to ensure that you can trace the materials used within your finished product:

- Improved compliance – Reduces risk
- Easier product recalls – Increases supply chain visibility
- Reduced 'window' for recalled products
- Higher quality products – Improves Quality Control Systems
- Streamlines inventory management
- Cost-saving and higher profits
- Improve company regulations
- Better customer retention

By keeping a record of the entire production and distribution history, suppliers can react quickly to any issues.

One example may be where there is a safety incident concerning your product.

If the item had a batch number, that was traceable back to the manufacturing process and any materials used, then you would be able to start to see how many items could potentially be affected that have used the same faulty batch of components.

E.g. If you placed an order for 10,000 units and they were all manufactured and delivered to you with the same batch number – e.g. December 2020, you would not be able to tell how many out of the production run had used the same component and therefore faulty and liable to a possible product recall. You may end up having to recall the full 10,000 units in the recall window for this example.

If you had good control of your batch codes and you could ensure traceability back through production to the raw material used, then you may be able to limit any potential recalls by using the batch number.

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The following is an example of where batch traceability:

Product	Fabric batch	Fibre filling batch	Foam batch	Timber batch	Final batch code applied to the product
Dining Chair A	123456	ABCDEF	555555	888888	001 (Dec 2020)
Dining Chair A	**222222**	ABCDEF	555555	888888	002 (Dec 2020)

In this example, you can see that the batch of fabric changed partway through production and therefore the final batch code was changed to reflect this. If you could demonstrate that only fabric batch 222222 was defective and your previous and future production was tested and were compliant, then you may only need to recall items with a final batch code of 002 (Dec 2020), rather than 10,000 items that were simply labelled as batch December 2020.

It is also good practice to put the final product batch code onto the outer packaging. This would mean that if you did ever have to carry out a product recall or rework stock that you have in your possession, then you would not need to open each and every single carton in order to locate the batch number on the product. If the final batch number was on the outer carton also, this would mean that the defective goods were easily identifiable and this would save time and money in the process.

The example shown relates to upholstered furniture, but the same traceability elements can be applied to all furniture – as you may need to carry out a recall if you have suspicions of an insect infestation in a batch of timber or if your supplier has bought one batch from an unapproved source and therefore does not comply with the UKTR Timber Regulations.

There are many reasons why you may need to have such a robust and effective control of your product and the materials used within the production of your product. You need to satisfy yourself that the processes and procedures in place at the factory are substantial enough to ensure that they can be followed if and when needed. It is always beneficial to check that the system works, by selecting a final batch code at random – even on an item that the factory is producing at the time of your visit, and verifying that they can demonstrate how that relates to the materials used in the production of the item.

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One way to do this is to use a traceability matrix for the product selected and interrogate the factory management system for the relevant traceability documents related to each part used in the construction of the product. The example below is a sofa that has been checked against the flammability regulations to see if all flammability related parts can be traced to a UKAS test report within date.

Item	Item description	Supplier	Test Report / Certificate number	Report in-date / correct test	UKAS test house	Traceable to Product	Traceable to specification
Able	Leather 2 seater sofa - Dark Brown -	A Company					
Leather	Leather - Accent Hide	A L company	MA-19709-S1	Yes	FIRA	Yes	Yes
Fabric - Split	Fabric - Split	A F Company	CA-8709-S1	Yes	FIRA	Yes	Yes
Fibre	FIR 110	A Fib Company	CA-12222-S1	Yes	FIRA	Yes	Yes
Fibre	FIR - R22123	A Fib Company	123456B	Yes	Lab1	Yes	Yes
Foam	FOM – 0021	A Foam Company	CA-10678-S1	Yes	FIRA	Yes	Yes
Foam	FOM - 0022	A Foam Company	123458B	Yes	Lab 2	Yes	Yes
Foam	FOM - R030	A Foam Company	123567C	Yes	Lab 3	Yes	No
Invisible Cover	CTH-R100	A Cov Company	CA-14078-S1	Yes	FIRA	Yes	Yes

By using such a matrix we can identify quickly if there is an issue with traceability and get to the root cause. Foam FOM-R030 highlighted in the matrix in red – No – the specification shows different foam grade used – out of date specification sheet for the product.

Good control at the start with raw material segregation, allocation of materials to production and recording of batch details used in the final product will all help to reduce the impact of a product fault where intervention and action are required.

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7. Regulation and Requirements Applicable to Furniture Products

The General Product Safety Regulations require you to assess your product to ensure that is safe and fit for purpose. A safe product could be considered as any product that under normal or reasonably foreseeable conditions of use presents no risk to the user, or only the minimal risk compatible with the products use and which is consistent with a high level of safety for the consumer.

The Regulations require you to consider:

- The products characteristics
- Packaging
- The effects on other products with which it might be used
- The category of consumers particularly at risk when using the product – for example, children and the elderly
- The risks associated with assembly, maintenance, use and disposal of the product
- Warnings, labelling and information supplied with the product to reduce/eliminate risk
- Testing of the product to ensure it fulfils any relevant safety requirements.

When carrying out the risk assessment on your product, the General Product Safety Regulations require you to consider the following when making your assessment:

- Specific product regulations (Furniture & Furnishings (Fire) (Safety) Regulations, UKTR)
- National regulations (e.g. British designated standards)
- European standards (EN Harmonised Standards)
- Standards of the International Standards Organisations (ISO)
- Industry Codes of Good Practice
- The state of art and technology and the safety which the customer may reasonably expect

It is therefore important to document your risk assessment and keep records of all testing and evaluations carried out on your product as evidence that you have considered all the risks associated with your product throughout the product lifecycle.

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7.1. Requirements for furniture products

UK Timber Regulations (UKTR)

Since 1 January 2021, the UK Timber Regulation (UKTR) prohibits the sale of illegally harvested timber and timber products in GB and creates legal obligations for those organisations first placing these products on the market to exercise due diligence. Products that contain timber and timber products must be without risk of illegality. In this respect, businesses that first place these products on the GB market have various legal obligations to meet including the duty to exercise due diligence. When visiting a factory look for evidence that the supplier shows an awareness of UKTR and whether they have assessed their duties as an operator or trader. This may include documentation that shows lists of timber suppliers, a list of timber species used in products including those in composite materials (e.g. veneers), proof of the country and region of harvest, supporting documentation that verifies the legality of the timber and timber products, documents that show evidence of due diligence, risk assessment and risk mitigation system. The Office for Product Safety & Standards (OPSS) has been appointed by DEFRA to enforce these standards in the UK. The following checklist may help with relevant questioning.

Questions to be considered
Has the supplier assessed their duties as an operator or trader?
If the supplier is a trader only, do they have written assurance from their suppliers that they comply with UKTR regulations
If the supplier is an operator only or a trader and an operator, does the supplier have a due diligence, risk assessment and risk mitigation process to help it meet its legal responsibilities under the UKTR?

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Furniture & Furnishings (Fire) (Safety) Regulations 1988 (as amended)

These flammability regulations are specific to the UK, and it is a legal requirement to ensure that all upholstered furniture is compliant. These regulations control the use of ignitable materials, such as fabrics, fillings and interliner materials, and set obligations for the products to be labelled with a permanent label with a traceable batch code. The company must be able to demonstrate they have documented system that demonstrates compliance to the relevant fire performance or flammability requirements:

For Example, domestic upholstered furniture shall comply with the requirements of the Furniture & Furnishings (Fire) (Safety) Regulations 1988 (as amended) for all fillings, interliners and cover materials. The checklist below could be used to ask relevant questions related to domestic products flammability requirements to ascertain compliance.

Questions to be considered
Is documentation available for the record-keeping of flammability test results?
Due Diligence: Is the manufacturer able to demonstrate they test independently from the suppliers?
Due Diligence: Is there evidence of testing in accordance with materials vs. consumption and risk?
Due Diligence: Is there evidence of a due diligence system in place to record the outcome of testing?
Where the product has met all the requirements of the Regulations and the cover is match resistant, then the item must carry the green square display label. Does the product carry this label?
The product must also carry a permanent label to show compliance. This label must have a batch number on it in order to provide batch traceability in the event of any problems or the need for product recall
Is this batch number traceable back to the materials used in manufacture?

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Chemical Legislation (REACH, POPs, Biocides)

Chemicals are present in many materials supplied to a business and can also be found in products used within the manufacturing process. The three key areas for compliance are:

- UK & EU REACH (Registration, Evaluation, Authorisation of Chemicals)
- BIOCIDES (GB Biocidal Products Regulations)
- POPs (Persistent Organic Pollutants, Stockholm Convention)

A supplier should be able to demonstrate an understanding of the chemicals used within their products and have evidence from the supply chain that the materials comply with the requirements of the above three pieces of legislation.

UK REACH (Registration, Evaluation, Authorisation of Chemicals)

The control of restricted substances or substances of very high concern needs to be taken into consideration. Businesses that use chemicals in the manufacture of their products (i.e. flame retardants, dyes, colourants and plasticisers) should comply fully with the UK REACH Regulations in place that apply at the point of manufacture and in the destination markets (EU REACH applies in 27 Member states EEA countries and Northern Ireland while UK REACH applies in England, Scotland and Wales). Ensure you keep up-to-date with the changes to the candidate list and understand your position in the user stream.

HSE may look for evidence in the technical file including but not be limited to the following:

- Organisations show an awareness of the UK REACH regulations and how different products are managed through that process using documented obligations.
- Organisations demonstrate component control and communications to downstream users where a component contains a SVHC (Substance of Very High Concern) in concentrations of over 0.1% w/w, including safe handling and use instructions.
- Organisation can demonstrate where an SVHC (Substance of Very High Concern) in concentrations of over 0.1% w/w and in volumes totalling over 1 tonne, that there is evidence that HSE has been notified.
- Compliance with article 33 of the REACH Regulations that require the organisation to be able to provide free of charge, when requested, information on whether a product contains SVHC (Substance of Very High Concern) within 45 days from the date of request.

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Chemical testing should be carried out where possible to ensure that no risks are associated with the product. You need to assess your products and ensure that your supplier complies with your Restricted Substance Policy and the requirements of UK REACH.

GB Biocidal Product Regulations

Businesses that use biocidal products (i.e. products that control harmful or unwanted organisms through chemical or biological means) or manufacture treated products (i.e. any substance, mixture or article which has been treated with, or intentionally incorporates one or more biocidal products), should comply with requirements of the GB Biocides Regulations. Examples of this can include (but are not limited to) timber treated with preservatives, materials with an anti-bacterial / anti-microbial function etc. HSE will look for evidence in the technical file including but not limited to the following:

- Organisation shows an awareness of the GB Biocidal Products Regulation and whether they have assessed their manufacturing processes for the presence of biocidal products or treated articles.
- Organisations that make available to the market any treated article (whether a claim is made or not) can demonstrate due diligence in checking the approved status of the active substance(s) and have records of completed diligence check(s).
- Organisations that place treated articles on the market have put labels on them that meet the requirements of Article 58 of the GB Biocides Regulation.
- Organisations that place treated articles on the market to be able to provide free of charge when requested, information on the biocidal treatment of the treated article within 45 days.

Persistent Organic Pollutants (POPs) Stockholm Convention

Businesses that use chemicals in the manufacture of their products should fully comply with the requirements of the Stockholm Convention on POPs regulations. The Stockholm Convention on Persistent Organic Pollutants is a global treaty to protect human health and the environment from chemicals that remain intact in the environment for long periods, become widely distributed geographically, accumulate in the fatty tissue of humans and wildlife, and have harmful impacts on human health or the environment.

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Exposure to Persistent Organic Pollutants (POPs) can lead to serious health effects including certain cancers, birth defects, dysfunctional immune and reproductive systems, greater susceptibility to disease and damages to the central and peripheral nervous systems. The main provision of the convention is to prohibit and/or eliminate the production and use, as well as the export and import, of the intentionally produced POPS listed in Annex A of the convention. UK legislation for POP's is The Persistent Organic Pollutants Registration 2007 and a list of POP's can be found at

https://www.gov.uk/guidance/using-persistent-organic-pollutants-pops

HSE will look for evidence in the technical file including but not limited to the following:

- Organisation shows an awareness of the POPs Regulation and whether they have assessed their incoming raw materials and manufacturing processes for the presence of POPs.
- Organization's should obtain a declaration from their suppliers that the material supplied to them does not contain any POPs or any chemicals proposed for listing under the convention.

Chemicals most likely to be listed as POPs are flame retardant chemicals, such as DecaBDE, which has been widely used on textiles for use in upholstery items.

Textile Products (Labelling and Composition) Regulations

It is a requirement to give information to the customer at the point of sale (and on actual textile products) to inform them of the fibre content of the product. The fibre content for textiles used within the product must be labelled as laid down in the Textile Products (Labelling and Fibre Composition) Regulations. The label must include information on the main fibre types used and their percentages - for example wool 80%, cotton 20%. The information given must be understandable by a consumer in the market into which you are selling – for example it is not sufficient to use labels only in English if the product is being exported to the EU. You must obtain the fibre content from the supplier and this should be advertised at the point of sale. This should also be on the label along with any cleaning/care advice. It is advisable to carry out due diligence checks to verify the information given to you about the fibre content information if possible. The following checklist may help.

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Questions to be considered
Must have evidence of textile fibre composition labelling on either the product or the packaging. Composition quoted to verifiable (e.g. be confirmed in writing by supplier).
If textile products are to be sold to the consumer, are they labelled in a durable, legible, visible and accessible way to indicate their fibre composition?
Are there any products consisting of two or more textile components not having the same fibre composition? If yes, then each component's composition must appear.
Are any labels used in the official language(s) of the country where the product is sold?
Is the product composed of several fibres? If yes, they must be labelled with the name and percentage by weight of all constituent fibres, in descending order.

Cleanliness of Fillings

There are standards/test methods to establish whether a bacterium is present in used or recycled materials such as recycled textiles or feathers etc. It is advisable to ensure that if you are using any of these types of materials in your product, you check to see if any testing has been carried out to ensure that the materials are clean, hygienic and safe to use in your products.

The Cleanliness of Fillings standard is a benchmark only - a standard to show that the filling materials used in your products meet a basic level of cleanliness. The standards below are the accepted and recognised route to compliance with the General Product Safety Regulations (GPSR), which replaced the Rag Flock Act. The standards below are also a perfect addition to include in any due diligence / technical file. Being able to provide your customer with the confidence and proof that your products and materials are fit for purpose, will show your commitment to due diligence and ensuring all materials are clean.

Fillings used within the product can comply with the requirements of the standards below.

- BS 1425: Part 1 - Cleanliness of fillings and stuffings for bedding, upholstery and other domestic articles. Specification for fillings and stuffings other than feather and/or down
- BS EN 12935 - Feather and down. Hygiene and cleanliness requirements

Testing of Finished Product for Safety, Stability, Strength and Durability

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There are many different standards applicable to furniture items that are designed to assess the safety, stability, strength and durability of the item. You need to familiarise yourself with the relevant standards for your furniture item and understand the different requirements. You also need to act upon failures encountered during product testing, to improve the safety of your product to the required level and therefore reduce or eliminate any risks for the consumer. If you ignore a safety failure or simply do not test or assess the item in accordance with the safety requirements, then you will not be able to offer a defence of due diligence if enforcement officers wish to question your product. Standards are constantly reviewed and revised and therefore it is not practical to offer a full list of standards in this guide.

WEEE Regulation - Waste Electrical and Electronic Equipment (EEE)

The WEEE regulations entered into force in August 2012 and became effective February 14th, 2014. Many types of electrical and electronic equipment manufactured, including furniture products with any electrical function, will fall into the scope of the WEEE legislation unless they are specifically excluded by way of one of the exemptions. Suppliers must confirm if any electrical equipment should be registered to the producer compliance scheme. Producer responsibilities within the WEEE directive dictate that if you put EEE on the UK market you must follow rules on both the EEE you sell and the EEE that becomes waste (WEEE). If your supplier is producing EEE products then they need to check if the products fall within the scope of WEEE (This will depend on the design of the product and electrical functions), and you need to check if they are registered as a producer at website.

https://www.gov.uk/government/publications/waste-electrical-and-electronic-equipment-weee-public-registers

Changes to the WEEE Directive in the UK came into force in January 2019. These changes concern the types of categories equipment is to be reported into. 10 previous WEEE categories become 6, with countries being able to implement their own sub-categories.

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UKCA / CE marking

The UKCA (UK Conformity Assessed) marking is the product marking that is used for certain goods being placed on the market of Great Britain (England, Scotland and Wales). The UKCA regime has been operational since 1 January 2021 and from this date, where a product is covered by the UKCA marking and meets the relevant requirements, you are able to place the UKCA marking on your product and then place the product on the GB market.

In January 2024, the government confirmed that the transitional arrangement to UKCA marking would be scrapped and they intend to legislate for continued recognition of EU requirements, including the CE marking, indefinitely for a range of product regulations around August 2024.

This will mean businesses have the flexibility to use either the UKCA or CE marking to sell products in Great Britain (GB). Accepted marking in each market – See below for product markings that can be used for goods sold in each relevant market under these rules.

Type of Product	Accepted Markings or combination of markings
Manufactured Products being Placed on the market in GB	UKCA or CE
Manufactured Products being Placed on EU market	CE

The government is also going to introduce a new fast-track provision which will allow manufacturers to place products on the GB market where they meet the EU essential requirements and, where required, have been conformity assessed by an EU recognised conformity assessment body. To benefit from this provision manufacturers will need to affix the UKCA marking (in a way that is allowed) and draw up the UK declaration of conformity, listing compliance with the relevant EU legislation. This also means that where products fall within multiple regulations, a mixture of both UKCA and CE conformity assessment procedures can be used.

This is designed to provide longer-term certainty and flexibility for businesses should the UK mandate UKCA for certain regulations in the future. The UKCA marking applies to most products for which the CE marking can also be used. By following designated standards, which the UK introduced to replace EU harmonised standards, there is a statutory 'presumption of conformity' that the product meets the essential requirements that apply to that product covered by the standard. This presumption is rebuttable and, in most cases, using designated standards is voluntary, it is just one way of showing the

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product meets the essential requirements. In cases where an alternative technical solution is followed, manufacturers will have to provide more details in your technical documentation explaining how your products comply with the essential requirements.

It is also important to note other legal requirements for consumer products includes compliance with the General Product Safety Regulations (GPSR). The GPSR is not a UKCA Regulation but the scope of it does not exclude products covered by other UKCA marking regulations. The GPSR either applies entirely to a product, if no UKCA marking Regulations apply, or partially, if UKCA marking Regulations are applicable to a product.

A list of UKCA legislation is listed below that might apply to a furniture product depending on its design and functionality / intended use.

UKCA / CE legislation	Design / Function / Intended Use
Toys (Safety) Regulations	Many items of furniture are designed and sold specifically for the use by children. You may need to consider the paints and lacquers that you have on children's furniture to ensure that they meet the toxicity requirements of the Toy Safety Regulations. Also if you have textile materials then you may need to have these materials tested to the flammability requirements of the Toy Safety Regulations.
Electromagnetic Compatibility Regulations	The EMC Regulations applies to furniture that contains electrical or electronic parts that may generate or be affected by electromagnetic disturbance.
Electrical Equipment (Safety) Regulations	The Electrical Equipment (Safety) Regulations (EER) applies to all electrical products and equipment designed for use with a voltage rating of between 50V and 1000V for alternating current (AC) and between 75V and 1500V for direct current (DC) and whose hazards are primarily of an electrical nature (Consumer goods with a voltage below 50V for AC or 75V for direct current are dealt with by the General Product Safety Regulations). This will include the majority of electrically actuated furniture products connected to a domestic power supply.
Radio Equipment Regulations	The requirements of the RER concerning the use of the radio frequency spectrum apply to radio

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	equipment within its scope that is incorporated into furniture, for example, certain remote control devices.
Gas Appliances Regulation and the Gas Appliances (Enforcement) and Miscellaneous Amendment Regulations	The GAR applies to appliances burning gaseous fuels used for cooking, heating, hot water production, refrigeration, lighting or washing, including garden furniture with gas supply incorporated.
Supply of Machinery (Safety) Regulations	As identified in the updated guidance of the Supply of Machinery (Safety) Regulations it has been confirmed that these Regulations shall be applied to electrically actuated furniture, such as beds, chairs, tables, storage furniture including kitchen furniture. These Regulations apply to all machinery and include the essential health and safety requirements for machinery to comply with the Regulations.
The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations	The RoHS Regulations sets out restrictions on the use of certain hazardous substances in electrical and electronic equipment and would apply to any such equipment in furniture.

The examples given above show a selection of requirements and regulations and this list is not exhaustive by any means. You need to seek professional advice and guidance on what is applicable to your product.

7.2 Risk Assessment

The requirement for an 'adequate analysis and assessment of the risk(s)' requires the manufacturer to first identify all the possible risks of the product and determine the essential requirements that are applicable. This analysis has to be documented and included in the technical file. In addition, the manufacturer needs to document the assessment of how he is addressing the risks identified to ensure that the product complies with the applicable essential requirements (for example, by applying designated standards).

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Risk Assessment Matrix Methodology

Risk can be assessed in different ways – the methodology below is based on the matrix risk assessment method that has been modified for the requirements of non-food consumer products. Risk is a combination of hazard and probability generally understood as something that threatens the health or even the lives of people, or that may cause considerable material damage.

There are several steps to determine the risks in a furniture product – see the flow chart page 62 – Schematic flow of a Risk Assessment

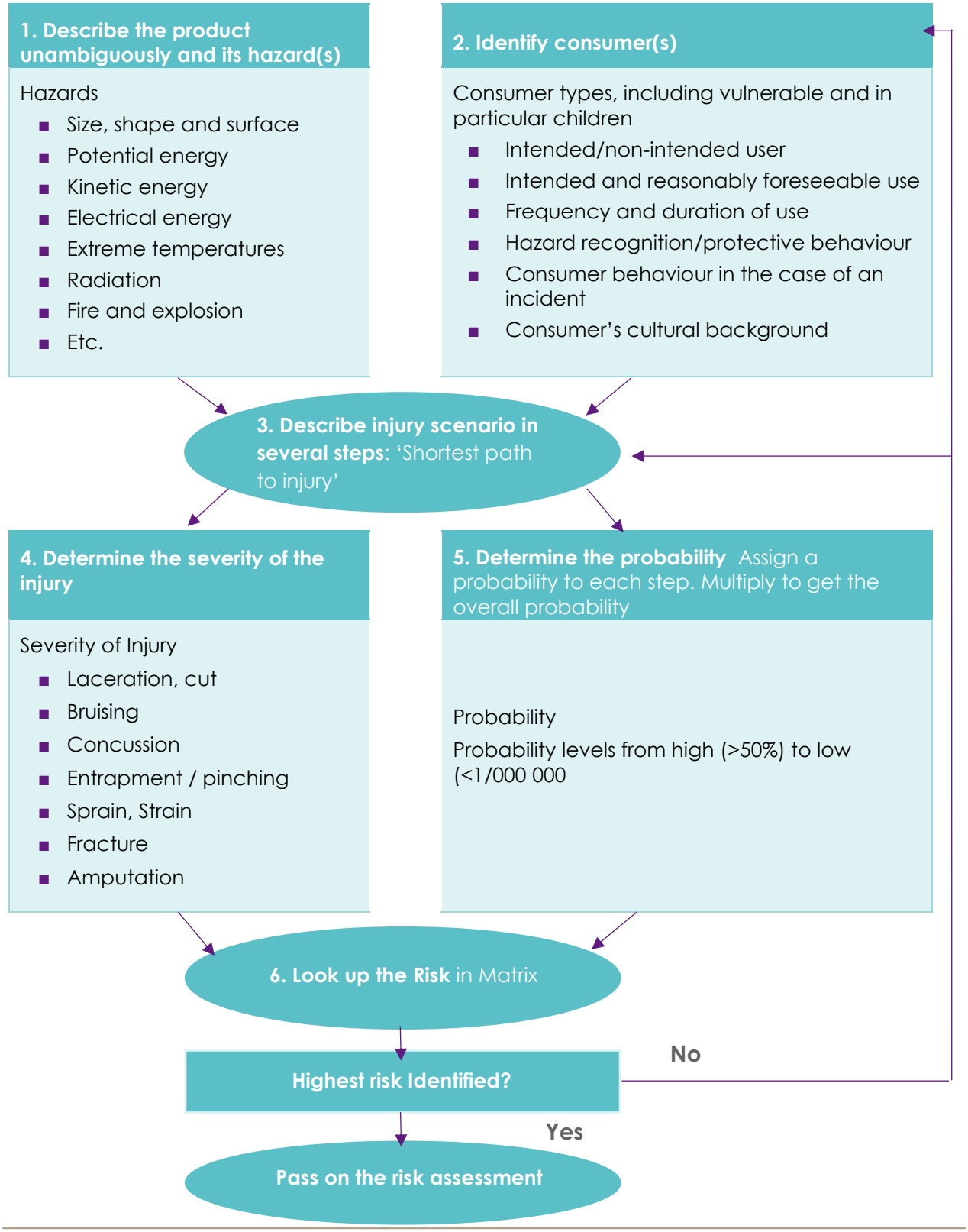
Step 1 - Describe the product and its hazard.

The furniture should be identified, including the product name, the brand, the model name, the type number, a possible production lot number, the identity of the person who placed it on the market, and the country of origin. Maybe include a picture of the product, the packaging and the marking label (if applicable). The hazard is a property of the product that may cause an injury to the consumer who uses the product. It can appear in different forms:

- Mechanical hazards, such as sharp edges that can cut fingers, or tight openings in which someone can trap their fingers
- Choking hazards, such as from small parts that come loose, which may be swallowed by a child and make the child choke
- Suffocation hazards, such as the closing loop on an ottoman may lead to strangulation
- Electrical hazards, such as from live electrical parts that can cause an electric shock
- Heat or fire hazard, such as a massage unit that overheats, catches fire and causes burns;
- Thermal hazards, such as the hot outer surface that can cause a burn
- Chemical hazards, like a toxic substance that can poison a consumer upon ingestion, or a carcinogenic substance that can cause cancer in the long term. Some chemicals may damage the consumer only after long term repeated exposure microbiological hazard, such as a bacteriological contamination which may cause a skin infection, or noise hazard, that is much too loud and can damage children's hearing capacity.

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Schematic flow of a risk assessment



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Step 2 - Identify the type of consumer you want to include in your injury scenario with the furniture product. The table below will help identify the type of consumer.

Consumers	Description
Very vulnerable consumers	Very young children: 0 to 36 months Others: Persons with extensive and complex disabilities
Vulnerable consumers	Young children: Children older than 36 months and younger than 8 years. Older children: Children 8 to 14 years Others: Persons with reduced physical, sensory or mental capabilities (e.g. partially disabled, elderly, including those over 65, with some reduction in their physical and mental capabilities), or lack of experience and knowledge
Other consumers	Consumers other than very vulnerable or vulnerable consumers

Step 3 - Describe an injury scenario in which the hazards cause an injury or negative health effect to the consumer. Describe the steps to the injury clearly, without exaggerating the detail. If there are several injuries within your scenario, include them all. When describing the injury scenario, consider the frequency and duration of use, hazard recognition by the consumer, whether the consumer is vulnerable (in particular children) and other factors that you consider important for the risk assessment.

Injury scenario	Hazardous event
Shape and/or superficial finishing of accessible parts of the furniture	Contact with rough surfaces
	Contact with sharp edges and corners, protruding parts
Moving parts of the furniture	Contact with moving parts
	Contact with rotating open ends
Kinetic energy and/or potential energy (gravity) of the furniture	Falling or ejection of objects
Stability of the furniture	Loss of stability
Mechanical stiffness/strength of parts of the furniture	Deflection or break-up during the operational lifecycle
	Excessive effort

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Workstation and/or work process design	Human errors/misbehaviour (unintentional and/or deliberately induced by the design)
	Loss of direct visibility of the working area
	Painful and/or tiring postures
	Repetitive handling at high frequency

Step 4 - Determine the probability of the consumer being injured by the hazard. While the injury scenario describes how the consumer is injured by the hazard, the scenario only happens with a certain probability. The probability can be expressed as a fraction, such as '> 50 %' or '> 1/1 000' Note the tables below can help determine the probability value.

Probability	
>1/10,000,000	Almost Impossible
>1/1,000,000	Conceivable
>1/100,000	Unlikely
>1/10,000	Unusual
>1/1,000	Could happen
>1/100	Not surprising
>1/10	To be expected
>50%	Even Chance

Step 5. The injuries that hazards cause to the consumer have different degrees of severity. The severity of the injury reflects the effect the hazard has on the consumer under the conditions described in the injury scenario. To help quantify the severity of injury see the table below taken from RAPEX guidelines which shows how to classify injuries into four categories and whether recovery from an injury is possible.

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Severity of injury	
1	Injury or consequence that after basic treatment (first aid, normally not by a doctor) does not substantially hamper functioning or cause excessive pain; usually the consequences are completely reversible
2	Injury or consequence for which a visit to A&E may be necessary, but in general, hospitalisation is not required. Functioning may be affected for a limited period, not more than about 6 months, and recovery is more or less complete
3	Injury or consequence that normally requires hospitalisation and will affect functioning for more than 6 months or lead to a permanent loss of function
4	Injury or consequence that is, or could be, fatal, including brain death; consequences that affect reproduction or offspring; severe loss of limbs and/or function, leading to more than approximately 10 % of disability

Step 6. Determine the risk level. Once the severity of the injury and the probability have been determined, if possible for several injury scenarios, the risk level then needs to be looked up in the matrix below. This matrix combines both the severity of the injury and the probability, and the highest risk is 'the risk' of the product.

Risk level from the combination of the severity of injury and probability

Probability of damage during foreseeable lifetime of the product		Severity of injury			
		1	**2**	**3**	**4**
High  **Low**	>50 %	H	S	S	S
	> 1/10	M	S	S	S
	> 1/100	M	S	S	S
	> 1/1 000	L	H	S	S
	> 1/10 000	L	M	H	S
	> 1/100 000	L	L	M	H
	> 1/1 000 000	L	L	L	M
	< 1/1 000 000	L	L	L	L

S — Serious Risk H — High risk M — Medium risk L — Low risk

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Step 7 - Check the risk level is plausible.

If the risk level does not seem plausible, move one level up and down and recalculate the risk level. This will show whether the risk changes when your input changes, if the risk level remains the same, you can gain confidence in your risk assessment. If it changes easily, you may want to take the higher risk level as 'the risk' of the furniture product.

Step 8. Develop several injury scenarios to identify the highest risk of the product.

If your first injury scenario identifies a risk level below the highest risk level and if you think that the product may pose a higher risk than the one identified, in order to determine which injury scenario puts the product at its highest risk:

- Select other consumers (in particular children or vulnerable):

identify other uses (including reasonably foreseeable uses) The highest risk is normally 'the risk' of the product that allows the best risk management. As a rule of thumb, injury scenarios may lead to the highest risk level set out in this methodology where:

- The injuries considered are at least at levels 3 or 4; probability of an injury scenario is at least > 1/100.

Step 9 Document and pass on your risk assessment.

Be transparent and set out all the uncertainties that you encountered when making your risk assessment and detail them in any documentation

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8. Understanding Testing and Reports

There are many different standards applicable to different types of furniture products. For example, Domestic Seating Tests.

It is necessary to understand the different types of test standards applicable to your products and then you can understand how to interpret the results. As a basic starting point, the following could be helpful as a guide:

Product Group	Domestic Seating - Structural Testing
Product	Standard
Indoor seating – domestic	BS EN 12520
Indoor stools - domestic	BS EN 12520
Indoor manual reclining seating	BS EN 12520
Recline Chairs	BS 8474
Rise/Recline Chairs	BS 8474
Outdoor Camping Chairs	BS EN 581-1, EN 581-2 Camping Level & BS EN 1022
Outdoor Camping Stools	BS EN 581-1, EN 581-2 Camping Level & BS EN 1022
Outdoor Camping Beds	BS EN 581-1, EN 581-2 Camping Level & BS EN 1022
Outdoor Domestic Chairs	BS EN 581-1, EN 581-2 Domestic Level & BS EN 1022
Outdoor Swing Seats	BS EN 581-1, EN 581-2 Domestic Level & BS EN 1022
Outdoor Hammocks	BS EN 581-1, EN 581-2 Domestic Level & BS EN 1022
Outdoor Recliners/Sunbeds	BS EN 581-1, EN 581-2 Domestic Level & BS EN 1022
Step stools	BS EN 14183

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8.1 Safety Requirements

Safety-related tests and requirements should be adhered to.

They are there to assess the safety of a particular item and the risk that it may pose to the consumer. It has been included as a requirement specifically to cover a risk. If you have an item of furniture that fails a safety requirement, you should re-evaluate your product and try to re-design the item where possible to eliminate the safety risk.

E.g. Examples of Safety statements from Standards.

Edges of the seat, backrest, and armrests, which are in contact with the user when sitting are rounded or chamfered
All other edges accessible during use shall be free from burrs and/or sharp edges
Ends of hollow components are closed or capped
Movable and adjustable parts shall be designed so that injuries and inadvertent operation are avoided
It shall not be possible for any load-bearing part of the seating to become loose unintentionally
All parts which are lubricated to assist sliding shall be designed to protect users from lubricant stains when in normal use
Check Shear and squeeze points when setting up and folding
Check Shear and squeeze points under influence of powered mechanisms
Check Shear and squeeze points during use

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8.2 Stability

Stability tests are there to assess whether the item is stable or is likely to overturn in the event of a person using the item in its intended use, or in any inadvertent way. E.g. you would not want an item of furniture to topple if a top drawer was opened and the shift in weight caused the unit to overturn. These types of tests also take into account the safety of the item and the risk to the user.



8.3 Strength and Durability

These tests are designed to assess the performance of the product during use. There are two types of tests:

Static Loading Tests

These are high levels of loading with only a low number of cycles – to represent high levels of loading that may only occasionally occur during the product's life cycle. For example, a vertical static load test may be a high force but only 10 cycles – this may simulate a person standing on the item to reach something and would only be expected to occur a few times throughout the product life cycle.

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Durability / Fatigue Tests

These types of tests usually have a lower test load/force, but a high number of cycles to show repetition and simulate reasonable wear and tear. They are to replicate the type of use that would normally occur on a day-to-day basis throughout the product life cycle. It is therefore important to understand at what number of cycles something happened, e.g. creaking of a sofa frame, or bending of a metal drawer runner, as this may affect returns levels from the customers and should also be taken into consideration.

E.g. Examples of Static and Durability tests from Standards

Seat static load test	1300N Load x 10 applications
Back static load test	450N Load x 10 applications
Seat durability test	1000N Load x 25,000 cycles
Back durability test	300N Load x 25,000 cycles



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8.4 Test Reports

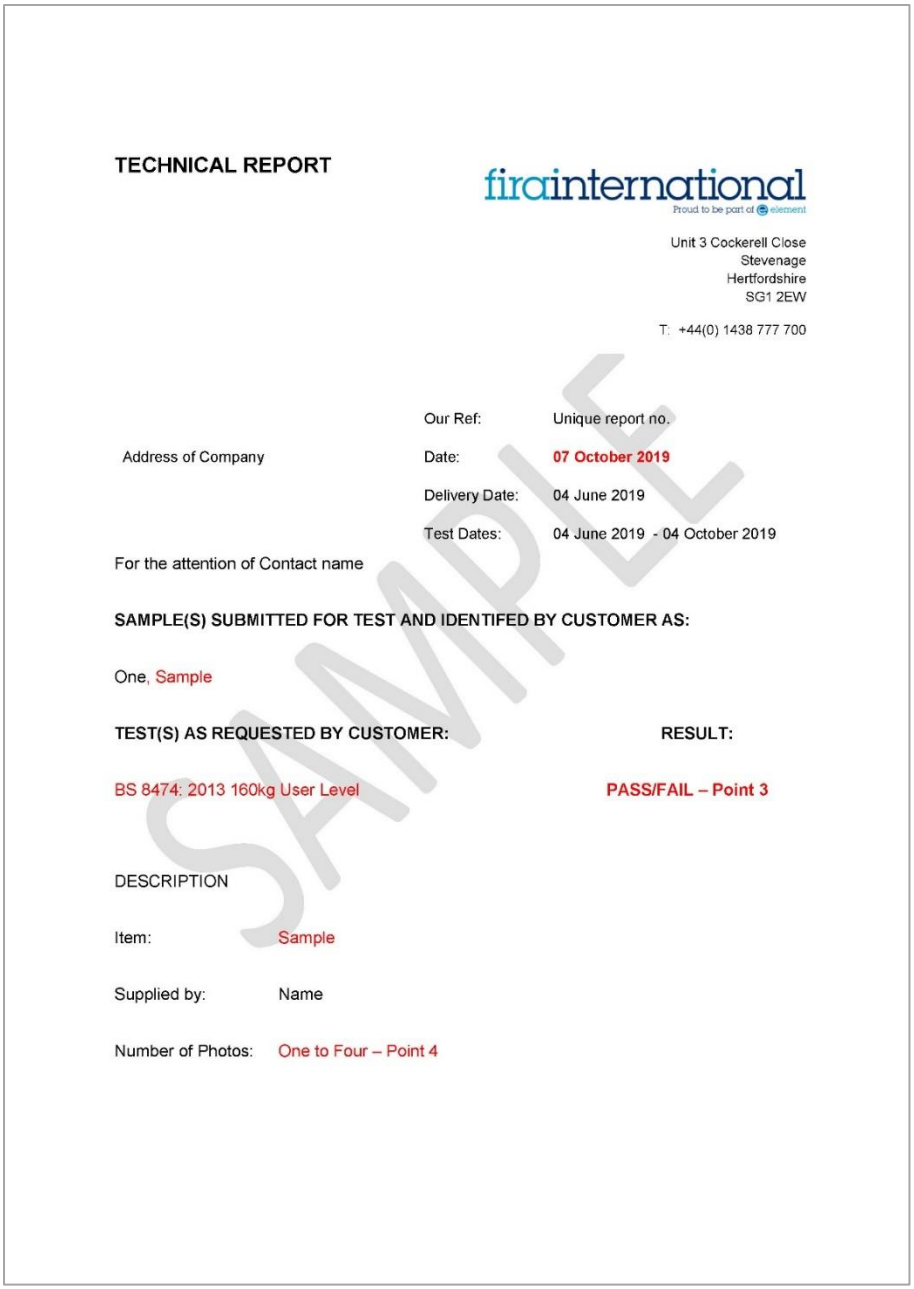
It is equally important to understand how to read a test report and be able to interpret the results contained within the report.

You should consider the following pointers when reviewing a report:

- The date of the report – ensure that the test date is valid and does not relate to something tested many years ago that may no longer be valid or representative. Some materials need to be tested to a minimum test frequency so the date can be critical in terms of product compliance – Date field in report
- The description of the product on the report – you must ensure that all the relevant information is given to the test laboratory in order for them to put it on the report. A full description of the item and all relevant batch numbers are needed to ensure that you can demonstrate that the test report relates to your finished product. – Point 2
- The results – try to gain an understanding of the test requirements and how they relate to your product. Understand where there is a failure and what that means. Do you need to re-design the product / can you take a commercial decision? – Point 3
- An image of the product included in the report will assist you in demonstrating that the product described in the report is the product that you have manufactured and are selling. – Point 4

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Example Test Report



TECHNICAL REPORT

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Unit 3 Cockerell Close
Stevenage
Hertfordshire
SG1 2EW

T: +44(0) 1438 777 700

Address of Company

Our Ref: Unique report no.
Date: 07 October 2019
Delivery Date: 04 June 2019
Test Dates: 04 June 2019 - 04 October 2019

For the attention of Contact name

SAMPLE(S) SUBMITTED FOR TEST AND IDENTIFED BY CUSTOMER AS:

One, Sample

TEST(S) AS REQUESTED BY CUSTOMER: **RESULT:**

BS 8474: 2013 160kg User Level — **PASS/FAIL – Point 3**

DESCRIPTION

Item: Sample

Supplied by: Name

Number of Photos: One to Four – Point 4

SAMPLE

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Clause	Test	Result
7	Control system requirements	Pass
7.2	Control devices	Pass
8	Marking	Fail – Point 3
9	Information to be supplied by the manufacturer	Pass

CONCLUSION

The Sample, as previously described, failed to satisfy the applicable test requirements of BS 8474: 2013 160kg User Level.

Tested by: A person

Reported by: A person

Approved by: A person

Section Head - Structural Testing

SAMPLE

Qty	Item – Point 2	Material- Point 2
1	Seat	4 x 3mm Diameter Metal S-Springs
1	Back	18mm Thick Wood
2	Arms	80mm Thick Wood
1	Mechanism	Metal – Various Sizes
1	Base with Castors	2mm Thick Metal
	Joints	Bolted

BS 8474: 2013 - Furniture – Chairs With Electrically Operated Support Surface – Requirements

Initial Inspection: No apparent faults

Clause	Test	Result
4	**General requirements**	
4.1	Edges and corners	Pass
4.2	Tubular components accessible during use	Fail – point 3

Clause	Test	Result
5	**Strength and durability**	
6.4	Seat static load test	Pass
6.4	Back static load test	Pass

Clause	Test	Result
5.3	**Stability**	
6.2	Forwards overbalancing, all seating.	Pass

SAMPLE

9. Creating a Technical File for your Product

It is important that when you are developing a new product, you start to create a technical file, sometimes referred to as technical documentation in the Regulations. The manufacturer/supplier compiling the technical documentation needs to provide information on the design, manufacture and operation of the product'. The complete set of technical documentation is referred to as a technical file. However, it is not essential that all documentation for the file should be permanently available in material form, but it must be possible to make it available on request.

The term 'technical file' thus refers to a body of information that can be stored on paper or in electronic form in one or several places. There is no need to duplicate documents that are common to different products, however, it is recommended that the information is organised, classified and stored so that the manufacturer/supplier, can without delay, communicate the relevant elements of the technical file in response to a duly reasoned request from market surveillance authorities. This documentation may be part of the quality system documentation.

The details included in the file depend on the nature of the product and on what is considered as necessary, from the technical point of view, for demonstrating the conformity of the product to the essential requirements of the Regulations or, if the designated standards have been applied by indicating the essential requirements covered by the standards. The technical file will contain information for the product that may be relevant to you, if you ever have a query with the supplier, and, it may also be relevant in the event that you are asked to demonstrate due diligence if questioned by an enforcement officer.

Suggested items for inclusion in your technical file (as a minimum) are:

- The supplier details and factory manufacturing site address
- The report from any factory visit and assessments made during the visit
- A risk assessment of the factory based on information and visits made
- A copy of the design brief (if applicable)
- The agreed specifications for raw materials
- The agreed specification for the finished product
- A technical drawing of the finished product and key components
- An image of the product
- A risk assessment of the product

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- Product evaluation forms where you have assessed the product and given any test requirements
- Test certificates to show that you have carried out testing on the raw materials and/or finished product to demonstrate compliance
- Information on the timber used and the traceability documentation to show compliance to UKTR
- A declaration that the product and its components comply with any requirements for REACH, Biocides & POPS Regulations
- Labelling requirements for both product and packaging
- Details of packaging and drop tests carried out
- A copy of the approved assembly instructions/care guide
- Results of factory pre-shipment inspections

Checklist for Technical File

Type of Product	Furniture
Location / Address	An Address
Manufacturer/Supplier	A Company
Description / Model Number	A Product
Serial Number, if any.	XX12345

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1.	Overall drawings and specifications	Y	N	NA	Comments
1.1	**General description of the product and/or Images**				A general description usually includes a technical description of the product including the intended use and application environment. Images of the product, actual or computer generated renderings.
1.2	**Overall drawing of the product (General Arrangement) - agreed specification**				The general assembly drawing of a product may include a list of all the parts or components that make up the complete product, the general arrangement of these components and how they fit together. The drawing may also include the overall dimensions of the components/product.
1.3	**Electrical wiring diagrams**				Electrical Specifications DWG, Connections for all the parts of the electrical system.
2.	**Detailed design information and Specifications**				
2.1	**Product parts list – Bill of Materials**				The bill of materials or product structure (BOM) is a list of the raw materials, sub-assemblies, intermediate assemblies, sub-components, parts, and the quantities of each needed to manufacture an end product.
2.2	**Component Parts drawings and Specifications of raw materials**				Detailed individual component DWG's' or Specifications. Most components / raw materials have detailed drawings/specifications within their product datasheets.
2.3	**Component / Raw materials data sheets**				A component / raw material data sheet is a document that summarises the performance and other characteristics in sufficient detail that allows a buyer to understand what the product is and a design engineer to understand the role of the component in the overall system.
2.4	**Warning label drawings**				If any warning labels are used on the product the drawings, illustrations, text size and colours may be included in the technical file – graphical representation.

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2.5	**Product and Packaging label drawings**				Any labels attached to the product/packaging related to traceability, legislative requirement i.e. flammability labels, delivery info etc.
2.6	**Chemical Declarations**				Chemicals are present in many materials The three key areas for compliance are UK REACH (Registration, Evaluation, Authorisation of Chemicals), POPs (Persistent Organic Pollutants, Stockholm Convention) BIOCIDES (GB Biocidal Products Regulations) Understanding of the chemicals used within their products and having evidence from the supply chain that the materials comply with the requirements of the above three pieces of legislation.
2.7	**UKTR Declarations**				The UK Timber Regulations require the supply chain to ensure that there is a full chain of custody and traceability of timber materials used in the product, from production back to the forest where the timber originated. Understanding of the wood-based materials within products and having evidence from the supply chain that the materials comply with the requirements of the UKTR
3.	**Record of risk assessment and any residual risks**				
3.1	**Risk assessment analysis/ documentation**				The manufacturer needs to document the assessment of how he is addressing the risks identified to ensure that the product complies with the applicable essential requirements (for example, by applying designated standards). This analysis has to be documented and included in the technical file.
3.2	**Factory visit Risk Assessment**				Risk assessment of the factory based on information and visits made;
3.3	**Measures taken to satisfy safety where standards not fully applied**				Elimination of the hazard based on design measures (inherently safe design measures) including Geometry (e.g. minimum distances between movable parts, no sharp edges, angular parts), Physical aspects (e.g. limitation of the actuating force, speed or emission of noise), general technical design (e.g. stress, materials),

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					selection of suitable technology, stability, ergonomics for reduction of stress, electrical safety.
3.4	**Identification/description of any residual risks**				Warning against residual risks (information for use). On the product (warning signs, warnings, warning devices); In the handbooks (commissioning handbook, transport handbook, instruction handbook, service and maintenance handbook).
4.	**Design Brief**				
4.1	**Design Brief / List of Standards and other specifications used**				Design Brief document used by the manufacturer to create a product from supplier information. To demonstrate designer/specifiers have an understanding of any product specific regulations/requirements that they may need to incorporate into the design specification. A list of all the standards used to provide proof of conformity as well as any other specifications used.
5.	**Inspection and Test reports**				
5.1	**Conformance test reports**				Copies of any Test reports carried out by third-party test houses showing proof of conformity with the standards chosen to satisfy the related Regulations. Packaging and drop test reports.
5.2	**Other inspection/test reports**				Copies of any other evidence/test reports adding to the body of evidence that the product satisfies the essential Health and Safety requirements. Copies of flammability test reports, industry scheme audit reports, Trading Standards visit reports, factory visits and assessments made during the visit report.
6.	**Quality control and manufacturer's commissioning procedures**				
6.1	**Quality/factory production control procedures**				For products that are produced in volume, the manufacturer must ensure that each piece remains in conformity with the provisions of the Regulations. The manufacturer must carry out necessary research and tests on components, fittings and/or the completed product to

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					determine whether, by its design or construction, it is capable of being assembled and put into service safely.
6.2	**Functional/operational / safety test procedures and pre-inspection reports**				Written documents or procedures relating to the inline quality checks, final inspection and pre-shipping inspection performed on the product. Pre-shipment reports/databases recording sign off before dispatch.
7.	**Instructions**				
7.1	**Instructions for use document**				Copy of the user instructions
8.	**Miscellaneous other items**				
8.1	**Sales literature**				Copies of any marketing/sales literature in which any claims are made relating to the product.
8.2	**Serial numbering scheme description**				If the product contains a serial number – a description of what the various digits mean within the code of the serial number to aid in traceability.

If you have all the information, then in the event of any queries, you can go right back through the history of the product and you will have a record of what was agreed, what was tested, what was produced and what was shipped to your premises. As seen in the checklist above there are many things that you could add to your technical file (you may not need everything listed above). It is really for you to be confident, that if the need arose to obtain information related to your product, either to settle a dispute or to demonstrate due diligence, your file contains all the relevant information that you may be required to produce as evidence.

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10. PAS 7100: 2022 Code of practice on consumer product safety related recalls and other corrective actions.

However well a business is run, a product quality or safety issue can happen at any time, therefore it is essential that there is a plan in place to ensure any potential issues are dealt with quickly and effectively. UK Regulations (GPSR) outline the specific obligations for producers and distributors in placing only safe products on the market including initial risk and product assessments; monitoring product safety and recording product information; taking action to protect consumers from potentially unsafe products and communicating product issues to consumers and the relevant authorities as well as the wider supply chain.

The results of any monitoring and measuring, whether positive or negative, should be fed back to the distributor/supplier so that they can make any necessary product improvements in the future. There are several ways in which you can monitor and measure throughout the life cycle of the product:

- Inspection of product on arrival
- Recording of information from customers - e.g. customer satisfaction levels or product reviews
- Recording of information from product returns – did the customer not like the item, was it not as described, was it faulty?
- Investigation into any safety related complaints
- Monitoring sales figures to see if the item sells well – have we made a great product but it is not commercial? Do we need to learn from the customer – what do they want?
- Carrying out spot checks on goods on sale – this could include testing to ensure the goods produced are still representative and compliant of the original goods tested and supplied.

Previously it had been left to individual businesses, often in partnership with their local authorities to undertake corrective action in the event of a product safety issue, resulting in a wide range of differing approaches to due diligence and almost all reactive as opposed to proactive.

In order to standardise the approach taken by both business and enforcement, and following research into the need for corrective action planning and the issue and effectiveness of public recall of consumer products, a 'Publicly Accessible

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Specification', or PAS 7100: 2022 was published by the UK's National Standards Body, BSI, in March 2018.

The primary aim of the document is to ensure any issue or potential issue affecting product safety is identified and dealt with as promptly and effectively as possible.

The document is divided into 2 parts, with Part 1 offering practical guidance on what may be reasonably expected from manufacturers, retailers, importers or distributors in the event of a product issue and to help businesses meet their legal duties, in relation to the General Product Safety Regulations SI 2005 No.1803, to:

- Place only safe products on the market, supported by information on correct usage
- Warn consumers about potential risks associated with the use of the products
- Monitor the safety of products
- Take corrective action if a product safety issue is identified.

PAS 7100: 2022 Part 1 focusses on the need for a proactive approach, identifying key steps that should be in place to facilitate the monitoring, assessment, notification and correction of unsafe consumer products including through public recall or other corrective action and includes detailed information on:

- Preparing to manage a possible safety related product recall or other corrective action by implementing a product safety incident plan or PSIP
- Establishing mechanisms to monitor the safety of products
- Investigating any potential product safety issue
- Establishing mechanisms to deal with any product safety issue identified
- Review any corrective action policies or plans to ensure that product safety responsibilities continue to be met.

Part 2 of the PAS 7100: 2022 gives guidance to supporting regulators and market surveillance or enforcement authorities on the assistance that should be made available to businesses to support them in meeting their obligations in relation to issues involving the safety of consumer products including:

- Monitoring and analysing incident data
- Supporting businesses in preparation of their product safety incident plan or PSIP and by
- Supporting businesses in their own monitoring of incidents and implementation of corrective actions.

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The PAS also includes clear terms and definitions, with reference from original source legislation, as well as a series of informative annexes covering regulatory context, risk assessment methodologies and corrective action plan examples including checklists and methods of communication.

If the product is designed and specified correctly right from the start, and you work with your supplier to build a good relationship with them, this will help to achieve a good quality product at the right price, delivered on time. The ultimate end goal is to create a product that is loved by the customer and kept within the customer's home with no reason for return and a truly satisfied customer may choose to return to you for their next purchase.

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