
Rt Hon Anna Soubry MP
Department for Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET

20th August 2015

Dear Minister

I write on behalf of Breast Cancer UK, with regard to the consultation on the proposed amendments to the current review to the Furniture (Fire) (Safety) Regulations, which has recently come to our attention, and to seek reassurance that your Department still plans to implement the proposals that will not only address fundamental flaws in fire safety testing but also help to reduce exposures to unnecessarily high levels of Flame Retardants (FR), especially Brominated Flame Retardants (BFRs).

The UK's current fire safety regulations have led to a situation where the UK population is exposed to higher levels of BFRs than anywhere else, with the possible exception of the USA¹. Several studies have found that there are higher levels of PBDEs in UK dust, than in any other country². This is extremely concerning, given the increasing data on the adverse effects of PBDEs on health and the environment. As you may know from your time as Public Health Minister, BFRs and other FRs (e.g. organophosphate compounds) are persistent, bioaccumulative and toxic. Bio-monitoring studies show that they are widespread in human and wildlife populations, with concentrations detected at much higher levels in children³. BFRs are present at high levels in house dust and in the food chain. They have been linked to thyroid problems, autism and neuro developmental problems⁴. Some BFRs act as oestrogen mimics and have been linked in different studies to an increased proliferation of breast cancer cells as well as a potential to inhibit the anti-cancer effects of tamoxifen⁵ (see separate one page briefing of research linking BFRs to health problems.)

We were pleased to hear that proposals were underway to amend the regulations that would lead to a significant reduction in the use of FRs in furniture (a major source of exposure) whilst at the same time managing to address fundamental and serious flaws in current fire safety tests.

However, it has recently come to our notice that following receipt of the consultation responses (largely from manufacturers and retailers), instead of forging ahead, the Department has decided to put on hold plans to introduce the regulations and instead conduct a *further* review. Please could you explain why the Department has decided to wait for a further year before implementing these regulations, what evidence has been provided to the Department that supports this decision, and what the review seeks to achieve, beyond the current objectives already set out in the original consultation document?

¹ Law et al. (2014). *Environment International* 65: 147–158

² Kim et al. (2014). *Chemosphere* 106: 1-19

³ Toms et al. (2009). *Environmental Health Perspectives* 117: 1461–1465

⁴ Kim et al. (2014). *op cit*

⁵ Li et al. (2012). *Environmental Health Perspectives* 120(4): 541-546

The decision to postpone the introduction of improvements comes at a time when other countries and states are actively taking measures to phase out BFRs and other hazardous FRs (e.g. Norway and California) because of health reasons and ahead of impending EU legislation that will require products containing potentially hazardous substances including specified BFRs to be disposed of safely – which is likely to increase costs to retailers and consumers.

I notice very few environmental or health organisations on the list of individuals and organisations consulted (see Annex 6 of the original consultation document) and as a result only one or two submitted a response. Will the review seek to redress this balance?

I am also keen to understand what the Department of Environment Food and Rural Affairs and the Department of Health and Public Health England's position on this is and will therefore be raising this issue with the appropriate Ministers of those Departments.

In the meantime, I look forward to hearing from you.



Lynn Ladbrook
Chief Executive