
Rory Stewart OBE MP
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
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20th August 2015

Dear Minister

I write on behalf of Breast Cancer UK, with regard to the proposed amendments to the Furniture and Furnishings (Fire) (Safety) Regulations, by the Department of Business Innovation and Skills (BIS) and to enquire what discussions your Department has had with BIS with regard to the unnecessarily high use of Brominated Flame Retardants (BFRs) in furniture which has led to high levels of BFRs being found in food and our natural environment.

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 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. We are writing to BIS to try and identify 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

However, we also seek reassurance that the Department of Environment, Food and Rural Affairs is working closely with BIS to ensure that these regulations are implemented as soon as possible in order to ensure that more effective, greener and less polluting regulations are put in place.

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 and environmental 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 look forward to hearing from you.



Lynn Ladbrook
Chief Executive