

## REVIEW OF THE AUSTRALIAN CONSUMER PRODUCT SAFETY SYSTEM

Submission by Standards Australia

Standards Australia wishes to offer comments on the following sections of the Discussion paper.

### **General safety provision (GSP)**

In general we support this proposal and would agree that it at least provides an opportunity to improve the current system.

### **Definition of Safety**

It is important that the definition of safety is clearly made and an efficient regulatory force backs this, allowing it to both meet the consumer's current perception of the system and provide the conscientious manufacture & supplier of products with some tangible benchmarks to follow.

It is understood that under this kind of regulatory framework, Australian Standards will be one important means of proving compliance to the GSP. There are, however some questions that are not addressed in the discussion paper and will be central to this system working effectively:

How will it be determined which Standard will prove compliance to the GSP and which will not? What will the status of an Australian Standard be, a deemed to satisfy solution, or simply evidentiary?

If deemed to comply, how would Australian Standards aligned internationally be treated, eg those for toys? In considering this question it is important to note that international standards need to take account of diverse regulatory regimes around the globe and the issues covered may not align exactly with those nominated as key safety hazards in Australia?

### **Potential benefits of a GSP & Potential challenges in introducing a GSP**

Standards Australia would need to understand whether the proposed GSP would imply a change to the way standards are traditionally developed by Standards Australia? For example, Will the language need to change?

It is stated that the introduction of a GSP, particularly one under which compliance with voluntary standards is taken into consideration, could reduce pressure on regulatory resources. This pressure would be transferred to a number of other areas including the development of voluntary standards. The increase in the number of standards developed would be driven not only by the GSP but also by the industrial and manufacturing sector.

Depending on the answers to these questions, there may be additional resource implications for Standards Australia. The sales of consumer safety standards have always been extremely low and have never come close to recovering the development

costs. Standards Australia has now disposed of many of its commercial activities, so the ability to raise additional money through other business ventures to subsidize consumer safety work is no longer available. If the changes to the system would imply an increased burden on Standards Australia, we believe it would be appropriate to provide a mechanism for funding this additional standardization activity, as happens in the European system.