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Director
Regulated Products and Compliance
Product Safety Branch
Australian Competition and Consumer Commission
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Review of the Consumer Product Safety Standard for Child Restraint Systems for use in Motor Vehicles

The Federal Chamber of Automotive Industries (FCAI) welcomes the opportunity to provide a submission to the Review of the Consumer Product Safety Standard for Child Restraint Systems for use in Motor Vehicles.

The FCAI is the peak industry organisation representing vehicle manufacturers and importers of passenger cars, light commercial vehicles and motorcycles in Australia. The FCAI and its member brands consider road safety is a high priority and promotes the use of child restraint systems (CRS) in motor vehicles. Also, the FCAI has a long history of participation in the Standards Australia Committee (CS-085) that maintains and updates the voluntary standard AS/NZS 1754 Child Restraints for use in Motor Vehicles.

The FCAI supports the ACCC's proposal to amend the Consumer Product Safety Standard (the Standard) to:

- Include AS/NZS 1754:2013 Child Restraints for use in Motor Vehicles.
- Continue to allow supply of CRS that meet either the 2010 or 2004 version of AS/NZS 1754.
- Remove AS/NZS 1754:2000.

The FCAI understands that the ACCC propose to include in the Standard, variations and exclusions from AS/NZS 1754:2013 relating to:

- child restraints designed for children with disabilities;
- child restraints suitable for use on aircraft;
- flammability , toxicity and stabilisation;
- the rebound sled used for full type testing; and
- batch testing.

While recognising the rationale behind the proposed variations and exclusions, the FCAI would like to point out that this has the potential to introduce an inconsistency between the 'sale' standard (i.e. Consumer Product Safety Standard) and the 'in-use' standard (i.e. AS 1754 called up by the Australian Road Rules as implemented by each jurisdiction).

This inconsistency has the potential to cause confusion among suppliers who need to have their CRS tested and certified to AS/NZS 1754 and also to consumers who need to be able to purchase a CRS that is identified as meeting AS/NZS 1754.

To reduce the inconsistency and potential for confusion in the future, the FCAI requests that the ACCC work with Standards Australia to develop guidelines for Australian Standards that are likely to be adopted as mandatory Consumer Product Safety Standards with the aim to allow the ACCC to adopt the voluntary Australian/New Zealand Standard in its entirety.

If you require any additional information please do not hesitate to contact me on T: (02) 6229 8214 or E: james.hurnall@fcai.com.au.

Yours sincerely



James Hurnall
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