

SUBMISSION

LIMITED REVIEW OF THE CHILD RESTRAINT SYSTEMS FOR USE IN MOTOR VEHICLES MANDATORY STANDARD NOVEMBER 2025

The Australian Retailers Association (ARA) and National Retail Association (NRA) welcome the opportunity to provide feedback on the limited review of the child restraint systems for use in motor vehicles mandatory standard.

The ARA and the NRA (the Associations), which propose to amalgamate to form the Australian Retail Council (ARC), represent a \$430 billion sector that employs 1.4 million Australians—one in ten workers—making retail the nation's largest private sector employer and a cornerstone of the Australian economy.

Our combined membership spans the full breadth of Australian retail; family-owned small and independent businesses, which comprise 95% of our membership, to the largest national and international retailers that support thousands of jobs and sustain communities across both metropolitan and regional Australia. Our industry operates more than 155,000 retail outlets nationwide, with the majority of those also represented by an online or e-commerce presence.

A strong retail sector delivers widespread benefits to all Australians, with a significant portion of every dollar spent in retail flowing back into employees, suppliers, superannuation funds, and local communities. We are united in advocating for the policy settings, reforms and collaboration that will drive growth, resilience, and long-term prosperity for Australian retail and the millions who rely on it.

EXECUTIVE SUMMARY

The Associations support updating the mandatory safety standard to reference AS/NZS 1754:2024. While the 2024 edition does not substantially alter performance criteria or core test methods, it introduces new allowances such as chest clips and the associated additional requirements required to support their safe use. It also introduces new provisions relating to instructional information, including the use of video material supported by QR codes.

The adoption of AS/NZS 1754:2024 will not reduce the supply of non-compliant offshore restraints sold through ultra-low-cost operators. These products were already unlawful under the 2013 edition referenced in the current CPN, and updating the legislation to reference the 2024 edition will not make them any more or less acceptable for sale. However, updating the referenced edition ensures the regulatory framework remains aligned with current industry practice and supports compliant innovation.

Given significant bottlenecks in certification testing, with only one accredited laboratory (NSW RMS Crashlab) and one crash sled, the association recommends a 36-month transition period. This timeframe would allow sufficient time for suppliers to complete recertification, licence updates, and necessary production changes.

INTRODUCTION

The Associations recognise child restraints as one of the most safety-critical product categories supplied through the retail market. A robust and contemporary mandatory standard is essential to protecting children, ensuring clarity for consumers, and providing regulatory certainty regarding what may be sold. While certification bodies such as SAI Global regulate what can be produced, preventing the manufacture of restraints certified to outdated editions, the Consumer Protection Notice (CPN) determines what products may legally be supplied, including the continued use of restraints certified to earlier editions referenced in the existing legislation. Ensuring the mandatory standard remains current therefore supports both safe production and clear compliance obligations across the retail markets.

Updating the mandatory standard to reference AS/NZS 1754:2024 ensures the regulatory framework remains aligned with current technical understandings and emerging safety provisions. Referencing the latest edition also enables car seats produced to the most up-to-date regulatory framework to be sold without delay, promoting faster entry of improved products into the market for the benefit of consumers. The Associations support this limited review and welcome continued engagement with the ACCC.

BODY OF SUBMISSION

1. Updating the Referenced Standard

The Associations support updating the mandatory safety standard to reference AS/NZS 1754:2024, however it is important to accurately reflect the nature and significance of the updates. The 2024 edition introduces several substantive improvements, including updated design criteria aimed at reducing chin-to-chest risks, reforms to restraint classifications that better guide the use of restraints beyond age eight, and an increase in the minimum age before an infant may forward-face from six months to twelve. The edition also modernises information requirements through the adoption of video-based installation instructions accessed via QR codes, removes the mandatory requirement for restraints to include an anchor bolt kit, supporting lower cost and improved environmental outcomes and updates ISO-FIX-related weight limits to enable broader innovation. While performance test methods themselves have not undergone wholesale reform, they have been updated where necessary to support these new design and informational provisions.

The labelling and information requirements in AS/NZS 1754:2024 represent a significant step forward, most notably through the introduction of mandatory video-based instructional material accessed via QR-scannable codes. The new edition does not directly address the issue of non-compliant offshore restraints, which were already unlawful under previous editions and remain so, given these products are unable to meet the regulatory requirements of either the 2013 or 2024 editions. Updating the referenced standard therefore ensures alignment with the most current technical and informational provisions and enables restraints certified to the latest edition and offering its immediate benefits to be sold in the Australian market.

2. Dynamic Referencing

The Associations support exploring dynamic referencing for AS/NZS 1754 as a means of reducing delays between the publication of updated editions and their legal adoption.

To ensure clarity and predictability, dynamic referencing should allow immediate sale of the updated edition, to enable suppliers seeking to certify new or improved models, to do so quickly, while the previous edition ideally remains certifiable for a further 36 months, to allow adequate time to update certification and licensing. The model

should also be supported by formal ACCC notices when new editions or amendments take effect and by a publicly accessible change log outlining amendments and their implications.

3. Maintaining Current Scope and Exclusions

Given the focused nature of this review, the Associations support maintaining the existing scope and exclusions of the mandatory standard, including the current treatment of disability-specific restraints and integrated vehicle systems. While production of disability-specific restraints is regulated through certification bodies such as SAI Global, the CPN determines what may legally be supplied. Updating the referenced edition would allow designs certified to AS/NZS 1754:2024 including improved provisions for children with disability or postural needs to be supplied in Australia, while the broader policy settings governing disability-specific products can continue to be considered in future, more comprehensive reviews.

4. Safety, Compliance and Retail Market Considerations

The Associations acknowledge that non-compliant overseas child restraints continue to be supplied through ultra low-cost operators, although the legal framework governing these products is already clear. All Australian restraints must be licensed by an approved third-party certifier, such as SAI Global, with licensing information publicly searchable. Offshore products that are not certified to AS/NZS 1754 have been unlawful since before the introduction of the 2013 edition.

Rather than restating existing documentation or certification obligations, the association recommends enhanced ultra-low-cost monitoring and enforcement, stronger public messaging from regulators on the illegality of non-licensed restraints, and clearer, more visible compliance expectations for ultra-low-cost operators that allow child restraints to be listed.

5. Transition and Implementation Arrangements

The Associations recommends a 36-month timeframe. A 36-month transition will accommodate the practical capacity constraints at the only accredited laboratory (NSW RMS Crashlab).

CONCLUSION

The Associations support updating the mandatory standard to reference AS/NZS 1754:2024, ensuring the regulatory framework reflects the latest design improvements, instructional requirements, and enhanced provisions supporting children with disability or postural needs. To support an orderly transition the association recommends a 36-month transition period.

The Associations also support exploring dynamic referencing for AS/NZS 1754 to enable timely adoption of future editions and encourages strengthened ultra-low-cost operator oversight and clearer public messaging to address the ongoing supply of non-compliant offshore restraints. We look forward to continued engagement with the ACCC as this important safety standard progresses.

The ARA and NRA appreciate the opportunity to contribute to this important discussion.

We encourage the government to continue collaborating with business groups and service providers to ensure a practical transition to AS/NZS 1754:2024 and nationally consistent compliance across all retail channels.

Any queries in relation to this submission can be directed to our policy team at policy@retail.org.au.