

7 October 2022

Product Safety Division
Australian Competition and Consumer Commission (ACCC)
GPO Box 3131
Canberra ACT 2601

via email: productsafety.regulation@accc.gov.au

ARA SUBMISSION TO ACCC REGARDING REVIEW OF MANDATORY BUNK BED SAFETY STANDARD

Introduction

The Australian Retailers Association (ARA) welcomes the opportunity to comment on the ACCC's review of the mandatory safety standard for bunk beds. We note that the ARA unfortunately, only received notice of this consultation, by email, a few days before the deadline, which has not allowed us full opportunity to consult with our members and so the view expressed below is a preliminary view, based on a principled approach.

The ARA is the oldest, largest and most diverse national retail body, representing a \$400 billion sector that employs 1.3 million Australians and is the largest private sector employer in the country. As Australia's peak retail body, representing more than 120,000 retail shop fronts and online stores, the ARA informs, advocates, educates, protects and unifies our independent, national and international retail community.

We represent the full spectrum of Australian retail, from our largest national and international retailers to our small and medium sized members, who make up 95% of our membership. Our members operate across all categories - from food to fashion, hairdressing to hardware, and everything in between.

A principled approach

The ARA appreciates that bunk beds can pose a significant safety risk, particularly to children, if they are not constructed to an appropriate standard and used in a safe way. In principle, we therefore support the need for Mandatory Standard. Further, the Standard should be fit for purpose, up to date and able to be easily understood by and complied with by retailers.

We also note that most bunk beds for retail in Australia are imported and so we support an approach that enables the incorporation of trusted and reliable international standards. We recommend that the ACCC takes advice from Standards Australia and industry stakeholders regarding which international standards are able to be trusted and provide a sufficiently comparable level of safety to the Australian Standard.

Recommendations:

- The ARA recommends updating the Mandatory Standard to reflect the current voluntary AS/NZS 4220:2010. We suggest that to avoid confusion, it would make sense to adopt the voluntary standard in its entirety as this would simplify compliance for suppliers and retailers.
- We support consideration of adoption of trusted and comparable international standards as this will allow retailers to sell a wider range of products, given Australia is a relatively small market. As noted above, we suggest that Standards Australia is the appropriate body to advise on which

international standards offer a comparable level of safety to the current voluntary Australian standard. Further consultation with industry would also inform which international standards should be considered.

- Manufacturers and retailers will need sufficient notice of any updating of the Mandatory Standard with an implementation timeframe that considers the supply chain for furniture items and provides a reasonable period for implementation of any changes required.

Thank you again for the opportunity to provide a submission to the ACCC. Any queries in relation to this submission can be directed to our policy team at policy@retail.org.au.

Yours sincerely,



Paul Zahra
Chief Executive Officer