

Safekids New Zealand: Comment on the Australian Product Safety Commission Issues Paper



Introduction

Safekids New Zealand is a national service of Starship Children's Health which focuses on the prevention of unintentional injury and death of children aged 0-14 years.

Safekids works to raise public awareness of child injury issues and advocates for the adoption of policies and strategies that will advance child safety. This work involves Safekids working collaboratively with government agencies, non-government organisations and community groups throughout New Zealand and internationally.

Safekids Product Safety Involvement

Much of Safekids' work relates to preventing and reducing the injuries generated through product safety issues. Safekids work in product safety has contributed to achieving improved outcomes over a broad range of consumer issues related to New Zealand children, such as:

- A mandatory product safety standard for baby walkers and cots;
- A mandatory safety standard for cigarette lighters that includes a requirement for child resistance;
- Improvements in safety standards of new Housing New Zealand homes;
- Inclusion of safer hot water management requirements in the Building Code.
- Development of Guidelines for '*Safer Electrical Installations in Homes: For Children, the Elderly and People with Disabilities*';
- Inclusion of specific guidelines for vehicle access to driveways in the Safer House Design Standard (NZS402-1996);
- Development of an All Terrain Vehicle (ATV) safety helmet standard;
- Sits on the Standards Committee for the development of revised New Zealand playground equipment safety standards;
- Sits on Australasian Standards Committees for toys/child restraints
- Public awareness campaign on the dangers of using infant bath seats.
- Public awareness campaign on the dangers of caustic automatic dishwashing powders.

Product safety issues relevant to Safekids can arise at any time and originate from many different sources. Safekids has been alerted to product issues from industry sources, coroner's reports, media coverage, statutory committees, non-government organisations and individuals contacting Safekids with specific concerns. Latterly these have included concerns about child car seat restraints, vehicle use, food products, children's bath products and automatic dishwashing powders.

Comment

Safekids acknowledges the benefits that can be achieved through greater Trans Tasman harmonisation of product safety measures and values the opportunity to be involved in the process.

Impact Groups

Safekids is aware that child injury statistics related to product safety can be influenced by the specific socio-economic and demographic characteristics of populations such as age, income and gender. Safekids considers it is important to identify and acknowledge such differences throughout product safety policy development and implementation of programmes. This provides the greatest likelihood of achieving the intended programme and policy outcomes.

New Zealand's historic, legislative and regulatory environment must also be accounted for in over arching policy development. Safekids recognises the Treaty of Waitangi in the development of injury prevention and safety orientated policy for New Zealand communities.

For example Safekids suggests the 'specific impact groups' listed in the Productivity Commission's Issues paper includes identification and acknowledgement of indigenous groups and provides opportunity for New Zealand to specify groups related to New Zealand's legislative, cultural, social and historical environment.

The Case for intervention and system objectives

Safekids involvement with product safety is instigated through a wide range of sources and in relation to a broad range of consumer issues.

Questions of unsafe use that are raised in the Commission's paper are important. Safekids supports further consideration of this aspect of product safety. Certain products are argued as being safe by some interests, yet Safekids' position is that they provide an unsafe environment, do not provide benefit commiserate to harm and that this justifies their removal from the market. Two examples of this are baby walkers and infant bath seats.

Assessment of the Current System

Safekids supports assessment of the current product safety system within New Zealand. IN particular Safekids supports the Commission's identification of the need to respond more swiftly to product safety concerns, inconsistencies, information sources, foreseeable misuse and the provisions covering second hand goods.

Safekids would also encourage the consideration of the challenge provided by direct marketing and sales over the internet from international sources.

Conclusion

Safekids values the Commission's providing an opportunity to contribute to the process and to comment on the Issues Paper. The Commission has requested the provision of supporting data and tables to substantiate input. Safekids would be pleased to meet with the Commission to identify relevant and useful material.

Safekids looks forward to participating in future discussion.

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