

Telephone: 07 3900 6000  
Reference: FCR F18/872 - D19/3591



Queensland  
**Family & Child**  
Commission

Director  
Standards & Policy  
Consumer Product Safety Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

Dear Sir or Madam

The Queensland Family and Child Commission (QFCC) welcomes the opportunity to make a submission to the Australian Competition and Consumer Commission in relation to the *Review of the safety standard for corded internal window coverings*.

The QFCC was established on 1 July 2014 with a role to promote and advocate the safety and wellbeing of children and young people, particularly vulnerable young children. As part of this, the QFCC has a statutory responsibility to maintain the Queensland Child Death Register (CDR), which contains information relating to the deaths of all children and young people in Queensland since 1 January 2004, and report annually on trends and risk factors. The QFCC also has functions to reduce the likelihood of child deaths including: making recommendations, arising from keeping the register and conducting research about laws, policies, practices and services.

The Queensland CDR contains information relating to the deaths of two children who died from injuries caused by corded internal window coverings (CIWCs) in Queensland since 2004. The age of these two is consistent with that identified within the Consultation Paper. One of these deaths occurred subsequent to the introduction of the *Trade Practices (Consumer Product Safety Standard – Corded Internal Window Coverings) Regulations* (the safety standard) in 2010.

The QFCC supports Option 2 (Make a new safety standard) as outlined in the Consultation Paper. The proposed changes in Option 2 are well-considered and address shortcomings in the existing standard. The option includes: changes to warning labels; options for alternative safety devices; minimum requirements for cleats and durability of safety devices; and restrictions of cord lengths.

#### *Maximum 'safe' length of cord loop*

The QFCC is of the view there is a need for the safety standard to have more stringent requirements in relation to the length of reachable cords and the size of loops that can be created by a cord. The QFCC advocates to adopt the Canadian proposed CIWC safety standard which requires any cord that can be reached must not be more than 22cm in length or form a loop more than 44cm in perimeter. Cords must remain unreachable throughout the useful life of the product. These requirements have the highest likelihood of reducing window cord-related injuries, and would address the risk factors identified from the information held within the Queensland CDR.

Level 22, 53 Albert Street,  
Brisbane Qld 4000  
PO Box 15217,  
Brisbane City East Qld 4002  
**Telephone** 07 3900 6000  
**Facsimile** 07 3900 6050  
**Website** [www.qfcc.qld.gov.au](http://www.qfcc.qld.gov.au)  
[www.talkingfamilies.qld.gov.au](http://www.talkingfamilies.qld.gov.au)

If you or your officers have any queries in relation to this submission, they may contact the Manager Child Death Prevention, on 07 3900 6030 or by emailing [child.death.prevention@qfcc.qld.gov.au](mailto:child.death.prevention@qfcc.qld.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cheryl Vardon', written in a cursive style.

Cheryl Vardon  
**Principal Commissioner**  
**Queensland Family and Child Commission**

11 MAR 2019