

Telephone: 07 3900 6000
Reference: OPS – TF22/1016 – D22/19041

Ms Gina Cass-Gottlieb
Chair, Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2301

Email: gina.cass-gottlieb@accc.gov.au
Cc: kim.beauchamp@accc.gov.au; ps@accc.gov.au

Dear Ms Cass-Gottlieb

As Principal Commissioner, one of my duties is to maintain a register of all child deaths in Queensland, and to analyse and report on trends and patterns in child mortality over time. I do this to make sure that, as a community, we may learn valuable lessons in how best to reduce and prevent future child deaths. This responsibility also makes sure the performance of the system of services designed to keep our children safe and well is actively monitored and any areas in which improvements can be made are identified and addressed as soon as possible.

I am aware of the integral role that the Australian Competition and Consumer Commission (ACCC) plays in monitoring product safety and enforcing product safety provisions in Australia, incredibly important work to help keep Australians safe. For this reason, based on the evidence provided from the Queensland Child Death Register, I wish to bring to your attention three areas that are currently a concern to me in context of product safety for consideration by the ACCC:

1. Reducing the risk of child deaths and injuries from heat stress in vehicles;
2. Infant swaddle suits; and
3. Aerosol deodorants.

Reducing the risk of child deaths and injuries from heat stress in vehicles

The Queensland Family and Child Commission (QFCC) is calling for a review of Australian car seat standards, with the view to embed safety measures to prevent heat stress injury and death. It is also coming up to 10 years since child car seat standards were updated, so it would be timely to review existing standards as there may be other aspects of design that also warrant attention. Evidence in support is noted below.

- 10 Queensland children have died in vehicle heat stress related incidents since 2007, with most instances of deaths attributable to a child being accidentally left in the vehicle by a parent or caregiver. A further 4 children have died in other states and territories in similar settings in the last 5 years.



- One Queensland fatality involved a child left in a childcare bus. There are also media reports of non-fatal 'near misses' in Queensland and other Australian locations. [One child a month left on a bus across Australia over the past five years | Australia news | The Guardian](#)
- Tests conducted by RACQ under average Queensland Summer weather conditions has found that temperatures took as little as one to two minutes to rise from air-conditioned levels to ambient and as little as seven minutes to reach 40 degrees. In the opinion of medical experts, temperatures exceeding 40 degrees can lead to death or serious injury for the occupants with young children and infants being particularly vulnerable due to limited ability to self-regulate their body temperature.
- An opportunity to prevent deaths and injuries would be to mandate technologies incorporated into child car seats and capsules which would alert a carer in the event a child has been left buckled into their seat within a vehicle.

Infant swaddle suits

The QFCC has a niggling concern about swaddle suits. These sleep suits keep the child's hands close to the body inside the suit, and are meant to replicate the effect of swaddling to reduce a baby's startle reflex.

- Our concerns relate to instances where an infant rolls from lying on their back to their front. Once lying on their stomach they may not be able to lift themselves enough to move their face away from the sleep surface or other suffocation hazards as their hands and arms are secured inside the suit.
- Queensland has recorded five infant deaths between 2017 and 2022 (to end November) where the infant was wearing a swaddle suit and was found lying on their stomach (prone position). Three infants were aged 0–1 month while two were aged 3–4 months.

Aerosol deodorants

In Queensland we have recorded 10 deaths in the 10 years 2009–2019 where the young person has died from volatile substance misuse (also known as chroming). The substances used in most incidents were aerosol deodorants. Anecdotal information reveals some brands of aerosols are 'favoured' by young people as they don't have a bad taste. Similar to actions regarding helium balloon kits, the QFCC queries whether some action could be taken to address the issue.

Thank you for the opportunity to provide feedback, I look forward to working with you further to enhance product safety and safety provisions.

Yours sincerely

Luke Twyford
Chief Executive and Principal Commissioner
Queensland Family and Child Commission

12 / 12 / 2022

