

18th September, 2019

Director Button Battery Taskforce
Consumer Product Safety Branch
ACCC
GO Box 3131
CANBERRA ACT 2601

Dear Sir,

Re: Button Batteries Consultation

Thank you for the opportunity to comment on the issues paper relating to button batteries.

In summary, INPAA strongly supports the need for a mandatory safety standard. Whilst it is recognised that substantial improvements have been made in making the supply and use of the products, there is still widespread non-compliance to this voluntary guideline. Without a mandatory regulation there is major concern that products associated with button batteries will continue to create an unsafe environment, particularly for toddlers.

INPAA strongly supports a General Safety Provision (GSP) however, this may not guarantee safe supply, particularly when there is a high amount of product bought by consumers online that use button batteries but are not supplied with any safety framework.

As a strong advocate for the horizontal hazard approach, INPAA believes that any mandatory regulation should use this approach. It is most probably the only effective manner to regulate these products given their diverse nature.

In relation to the specific questions asked in the issues paper I provide the following answers:

1. No available data
2. No available data
3. None
4. The Industry Code is a positive start to reduce injuries but does not go far enough in introducing horizontal hazard management.
5. Yes. Action should be mandatory. The impact would be positive and would introduce clear requirements for supply which would greatly benefit suppliers.
6. Not applicable
7. Not applicable
8. Impossible to determine but would logically improve risk management and reduce accessibility by infants to dangerous situations and products.

9. Unable to provide definitive response but it can be assumed that it is a sound risk management approach.
10. Yes. The child resistant packaging should be across all button batteries as this would improve compliance and improve the consistency of safety messages.
11. Any product that has button batteries that may be accessed by children should be banned. Only products that safely contained button batteries should be allowed. This should be straightforward to implement as test procedures are currently used to evaluate this risk.
12. Minimal cost
13. Not applicable
14. No
15. Not applicable

About INPAA

The Infant & Nursery Products Alliance of Australia (INPAA) is the peak industry body representing suppliers, retailers and injury prevention stakeholders. As an Alliance our group is committed to ensuring that product safety is not used as a competitive aspect but rather a driver to reduce infant's injuries. We do this by developing best practice guidelines, consulting widely to improve supply channels and working together to deliver articulate and consistent safety messages.

The Alliance works closely with all stakeholders that have an interest in injury prevention and is active in identifying emerging hazards and creating solutions to address them before injuries occur.

INPAA is a member of Standards Australia committees and is leading the development of industry guidelines that will improve the safe supply and use of nursery products.

Yours sincerely



Tim Wain
Director