



Australian  
Competition &  
Consumer  
Commission

# Review of mandatory standard for elastic luggage straps

## Consultation paper

September 2016



### Disclaimer

The Australian Competition & Consumer Commission (ACCC) has developed this consultation paper to seek the views of stakeholders about the mandatory safety standard for elastic luggage straps.

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## **Table of contents**

1. Introduction .....	3
2. What we propose .....	3
3. The impact of the safety standard .....	3
4. Reasons for changing the warning text .....	3
5. Adopting international standards .....	4
6. Transition period .....	4
7. Consultation questions .....	5
8. Have your say .....	5

## 1. Introduction

The ACCC is reviewing the mandatory safety standard for elastic luggage straps and proposes to change the text of the mandatory warning label for elastic luggage straps in line with research findings on good practice for effective warnings.

## 2. What we propose

### Existing warning

**WARNING. Avoid eye injury. DO NOT overstretch. ALWAYS keep face and body out of recoil path. DO NOT use when strap has visible signs of wear or damage.**

### New elastic luggage strap warning

**WARNING. Rebounding hooks cause blindness. Place hooks with care.  
Keep face and body out of recoil path.**

Apart from the change in text, we propose no other changes. The scope, definitions, requirements for the permanency of the label, the formatting of the text and the warning's background remain the same.

## 3. The impact of the safety standard

The mandatory safety standard for elastic luggage straps<sup>1</sup> was introduced in 1989 to alert consumers to the hazards associated with using the product.

At the time, based on Victorian hospital data, there were an estimated 170 eye injuries from luggage straps in Australia annually. Using updated Victorian data, we estimate the number of injuries in Australia fell to 28 in 2015.<sup>2</sup>

The ACCC is aware of one death associated with the product. Injuries associated with use of elastic luggage straps continue. On the basis that the rate of injury has reduced significantly but an unreasonable risk of injury remains, the ACCC concludes that the warning label is still required.

## 4. Reasons for changing the warning text

We review mandatory standards periodically to verify they are effective, up to date and continue to be relevant.

Since the last review of this mandatory standard in 2004, the ACCC has obtained significant information on the effectiveness of warnings. In the past five years, the ACCC has commissioned an expert report on available scientific research into warning labels, has reviewed specific warnings, and has commissioned research on consumer comprehension

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<sup>1</sup> [The Trade Practices \(Consumer Product Safety Standards\) Regulations 1979 - Elastic luggage straps](#)

<sup>2</sup> Victorian hospital data (2009 – 2015) show an average of 7 injuries per year and Victoria's population represents roughly one quarter of Australia's total population. Approximately 25% of the cases require admission to hospital for treatment, 80% of the injured are male, 67% are aged 25 years or over and 20% are children under 14.

of specific warnings. We applied this experience to the text of the warning for elastic luggage straps and found strong justification for improving the existing warning.

The expert report on research into the effectiveness of warnings showed that effective warnings:

- start with an alert word to draw attention and signal the degree of risk
- identify the risk
- specify a positive action to reduce the risk.

DANGER, WARNING, CAUTION are common alert words in upper case, with the remaining text in lower case and key words can be in bold font.

The existing warning focuses on overstretching (which suggests misuse of the product) and the use of worn and damaged products. However, these are not significant causes of injury. The warning does not direct consumers to the most frequent cause of injury, the detachment of hooks placed with insufficient care or hooks detaching when the user is putting the strap on or taking it off during normal use.

The existing warning to 'avoid eye injury' is general and could contribute to the user misunderstanding the potential severity. The new warning replaces this with 'Rebounding hooks cause blindness'.

In 2015, the ACCC drafted the new warning and commissioned Kidsafe to survey consumers to see if they understood it. The substantial majority of the 106 people surveyed understood the warning and the action to reduce the risk. The interviewers reported consumers had a strong and informed response to the warning.

## 5. Adopting international standards

The only known comparable international standard for elastic luggage straps is the voluntary British standard *BS AU 258:1995 Specification for elasticated straps*, published by the British Standards Institute, a national standards body similar to Standards Australia.

The safety warning from the British standard is:

<p style="text-align: center;"><b>WARNING</b></p> <p style="text-align: center;">Do not stretch beyond the maximum usable length of....</p> <p style="text-align: center;">Keep eyes, face and unprotected areas of the body out of possible rebound path.</p> <p style="text-align: center;">Keep out of reach of children.</p> <p style="text-align: center;">Do not use to secure heavy or large (wind resistant) loads.</p>
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This warning does not explicitly identify the blindness hazard and if used in Australia, would misdirect consumers. None of the issues in this warning is a substantial cause of injury in Australia and the key issue (detachment of hooks) is not part of the warning. We therefore do not regard the British standard as a suitable policy option for Australia.

## 6. Transition period

This consultation seeks information on the cost to businesses to change the text of the warning and the time that suppliers will need to make the change and to sell all stock with the existing warning labels.

Subject to this consultation, the ACCC intends to advise the Minister to permit the supply of products using the revised warning label and to set a date after which it would not be legal to use the superseded warning label.

The costs associated with the change are likely to be small. With enough warning, suppliers could change the text of the warning in their next order for labels with minimal cost.

We invite stakeholders to provide information and opinions on the proposed change and the timetable for change. This will inform our advice to the Minister.

## 7. Consultation questions

1. How long should be allowed for the changeover?

How long will it take to change the label to the new warning and to sell all products that have the current warning?

2. The ACCC is of the view that the change in text will involve minimal difficulty and cost to suppliers. Is this correct?

If you believe there will be costs, please indicate for what and how much.

3. Do you have any other comment or information relevant to this change?

Do you have any other comments?

## 8. Have your say

The ACCC invites stakeholders and interested parties to comment on these policy options.

Consultation is open from Wednesday 28 September 2016 to Friday 21 October 2016.

The ACCC prefers submissions via the ACCC consultation hub at [consultation.accc.gov.au/](http://consultation.accc.gov.au/).

The ACCC will alert stakeholders and interested parties to the consultation through the Product Safety Australia website [www.productsafety.gov.au/](http://www.productsafety.gov.au/) and [www.business.gov.au/](http://www.business.gov.au/).

Alternatively, email submissions to [productsafety.regulation@accc.gov.au](mailto:productsafety.regulation@accc.gov.au) or via post:

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Submissions will be published on the ACCC website at the end of the consultation period.

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