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June 1 2019

**Director, Quad Bikes Taskforce
Consumer Product Safety Branch
Australian Competition & Consumer Commission
GPO Box 3131, Canberra, ACT 2601**

Dear Sir,

Re: Exposure Draft Consumer Goods (Quad Bikes) Safety Standard (2019)

The Royal Children's Hospital, Melbourne (RCH) is the state-designated major trauma service for the Victorian State Trauma System. The Victorian State Trauma System one of the most highly regarded trauma systems in the world, and places high priority on both the organised delivery of effective and quality trauma care, as well as injury prevention (<https://www2.health.vic.gov.au/hospitals-and-health-services/patient-care/acute-care/state-trauma-system>).

RCH has a mandate to provide a centre of excellence in all aspects of trauma management. This includes the definitive care for the most severely injured children in Victoria, including those sustaining quad bike injuries, as well as leadership in childhood injury research, prevention and advocacy.

The RCH Trauma Service has advocated consistently on the dangers faced by children due to quad bikes. This included two previous submissions in support of the ACCC consultations on quad bikes, detailing the remarkable burden of childhood trauma due to quad bikes with, on average, one Victorian child injured on a quad bike every 5 days.

The RCH Trauma, and other advocacy groups, consider that an effective and proportionate response to the current burden of quad bike trauma in Australia requires a complementary suite of behavioural, regulatory and legislative changes. Whilst such a comprehensive suite of changes was better represented by 'Option 5' of the ACCC Quad bike safety *Consultation Regulatory Impact Statement (2018)*, we consider the proposed *Exposure Draft Consumer Goods (Quad Bikes) Safety Standard (2019)* to be an important and positive step towards reducing the burden of quad bike trauma.

Response to Exposure Draft Consumer Goods (Quad Bikes) Safety Standard (2019) cont...

This support notwithstanding, RCH and others remain concerned that measures set out in the *Exposure Draft Consumer Goods (Quad Bikes) Safety Standard (2019)* stop well short of affording sufficient protection of children from quad bike trauma.

We wish to highlight the ongoing, significant risks of injury and death faced by children, and would affirm the following statements:

1. **Children and quad bikes are a toxic mix.**

Whether in terms of all injuries or fatalities, children are disturbingly over-represented. Children under 16 years of age account for 17% of all 258 reported quad bike fatalities from 1 Jan 2001 until 17 April 2019 (*AgHealth Australia. National Farm Injury Data Centre: National Coronial Information System, 2019*).

2. **Children are physically and cognitively ill-equipped for quad bike use.**

Safe use of a quad bike is both a physically and cognitively demanding task, the requirements of each of which are poorly met by those younger than 16 years of age. This risk is not off-set by use 'youth-sized' quad bikes, as is borne out by deaths of Australian (and other jurisdiction) children using 'youth-sized' quad bikes, as well as in the literature.

RCH and other child-focused health advocates call upon the ACCC and Australian Government to continue to consider and implement further regulatory and legislative changes that will provide children with sufficient protection from quad bike trauma.

Sincerely,



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Director, Trauma Service

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