



Review of the mandatory safety standards for hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles

Consultation paper

September 2016



Hydraulic trolley jack



Vehicle support stand



Portable vehicle ramp

Disclaimer

The Australian Competition & Consumer Commission (ACCC) has developed this consultation paper to seek the views of stakeholders about the safety standards for hydraulic trolley jacks, vehicle support stands, and portable ramps for vehicles.

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Contents

1. Introduction	4
2. Policy Options	4
3. Background.....	4
4. Deaths and injuries	5
5. The current safety standards.....	5
6. Compliance	6
7. Emerging issues.....	6
8. Standards assessment and comparison.....	7
9. Detailed policy options	9
10. Preliminary position.....	12
11. Key questions	13
12. Have your say	13
Glossary.....	14
Appendix A: Comparison of key features of the Australian and other trusted standards	15
Appendix B: Principles-based requirements for warnings and information	18

1. Introduction

The ACCC is reviewing the mandatory safety standards for hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles in Australia.

We seek stakeholder information that could assist in the review.

The consultation process outlined in this paper may be the only opportunity for you to provide input into this review.

We encourage you to make a submission.

2. Policy Options

This consultation paper discusses four policy options:

Option 1 Keep the current mandatory safety standards (status quo)

Option 2 Accept the superseded and current Australian standards

Option 3 Accept multiple trusted standards

Option 4 Revoke the mandatory safety standards

3. Background

The hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles supplied in Australia are essentially the same as those supplied in other major international markets.

The Australian market largely consists of products manufactured overseas, which are imported by distributors with a local network. While there are no known Australian manufacturers of hydraulic trolley jacks, there are some smaller local manufacturers of vehicle support stands and portable ramps for vehicles.

There are about 10 to 15 main importers of these products in Australia and most products are sourced from manufacturers in China and Taiwan, with some smaller imports from Denmark, Japan and Spain. In the 2010/11 financial year, an estimated 250 000 hydraulic trolley jacks were imported into Australia with an estimated value of \$10.3 million.

Hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles are sold to consumers in a variety of specialist retail outlets, such as automotive aftermarket and accessories stores, tool stores, some large retail chain stores, and through a range of online retail platforms. This online retailing has greatly increased the spread, size and range of suppliers trading in the Australian market.

4. Deaths and injuries

Since the year 2000, an average of five Australians each year has been killed at home from vehicles falling on them while they were performing maintenance underneath the vehicles. Coronial and police investigations indicate these deaths occur through the incorrect use of these products and when consumers use unstable alternatives such as bricks and wooden blocks instead of vehicle support stands.

Although national figures are not available, Victorian hospital data indicates an average of 43 injuries presenting at emergency departments each year. Injuries range from the more common open wound, strain and crush injuries to less common but more severe injuries such as traumatic amputation.

5. The current safety standards

The mandatory safety standards were introduced in 1985 due to concerns about the safety of these products. The mandatory safety standards for hydraulic trolley jacks and vehicle support stands were most recently updated in 2008; the mandatory safety standard for portable ramps for vehicles was updated in 2010.

Voluntary Australian standards

The mandatory safety standards adopt the following voluntary Australian/New Zealand standards and vary some of the requirements:

- hydraulic trolley jacks – AS/NZS 2615:2004
- vehicle support stands – AS/NZS 2538:2004
- portable ramps for vehicles – AS/NZS 2640:1994.

The key requirements of all three voluntary Australian standards relate to design, construction and safety markings and that the nominated capacity must be at least 750 kg.

The voluntary Australian standards were recently reviewed and updated.

International standards

There are a number of international standards for hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles, including the US standard ASME PASE: 2014 (which covers all three products), the European standard EN 1494:2000 (which covers hydraulic trolley jacks), and the British standard BS AU 223a:2006 (which covers vehicle support stands).

Currently, it is not legal to supply hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles that comply with international standards unless they also comply with the Australian mandatory safety standards.

Together with the mandatory Australian standards, the international standards listed above all set minimum requirements for design, construction, testing and safety markings on the products. Importantly, all of the standards prescribe overload capacity as a fundamental test to assess the strength of these products.

There are, however, some differences across the standards, for example:

- warning messages and user instructions vary from standard to standard
- some standards require marking on the packaging while others do not
- some standards require the products to have a minimum capacity
- some standards require protective coatings for materials used in construction.

Appendix A provides a detailed comparison of the standards.

6. Compliance

Our market surveillance of vehicle support stands and portable ramps for vehicles in 2015/16 found significant non-compliance with warning label and performance requirements.

Since the year 2000, there have been 19 recalls of hydraulic trolley jacks, five recalls of vehicle support stands and two recalls of portable ramps for vehicles. We also accepted 13 court enforceable undertakings from suppliers who breached the mandatory safety standard for hydraulic trolley jacks in the same period.

7. Emerging issues

Consumer warning labels

The mandatory safety standards have been successful in improving the safety of these products. The main cause of injuries and fatalities is no longer product failure. Coronial and police investigations indicate that most injuries and fatalities from raised vehicles occur when consumers use unstable alternatives such as bricks or wooden blocks instead of vehicle support stands.

We have refined our understanding of what makes a warning effective. In the past five years we have:

- commissioned an expert report to review available scientific research into warning labels
- commissioned research on consumer comprehension of specific warnings
- reviewed specific warnings.

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.

The Australian mandatory safety standards require warnings (e.g. 'do not get under a vehicle that is supported by a trolley jack – use support stands'). However, these warnings do not describe the serious consequences if the product is misused. In contrast, the new voluntary Australian standards specify improved warnings that clearly state that death or serious injury could result if the products are misused.

Upper capacity limits

The mandatory safety standards only apply to consumer goods, and upper capacity limits are set to restrict their scope to products intended for use with consumer vehicles. These upper capacities are:

- for hydraulic trolley jacks: up to 2500 kg (e.g. a large consumer 4WD)
- for portable ramps for vehicles: up to 1500 kg (used in pairs)
- for vehicle support stands: up to 1500 kg (used in pairs).

In contrast, all of the voluntary Australian and international standards apply to products for heavy commercial vehicles with much higher capacities.

We seek stakeholder views about whether the current upper capacity limits of these mandatory safety standards remain adequate for today's consumer vehicles.

8. Standards assessment and comparison

As noted above, the most widely used international standards for these products are:

- the US standard ASME PASE: 2014 (which covers all three products)
- the European standard EN 1494:2000 (which covers hydraulic trolley jacks) and
- the British standard BS AU 223a:2006 (which covers vehicle support stands).

We use the following criteria when assessing international standards for use in Australia:¹

- 1) Addressing safety concerns: Is there evidence that the international standard provides an acceptable level of consumer safety?
- 2) Comparable jurisdiction to Australia: Is the international standard published or developed by a legitimate standards body or government agency from an economy or nation with comparable economic and regulatory processes to Australia?
- 3) Applicability to the Australian context: Is the international standard applicable and sufficient in the Australian context?

Our consideration of the international standards referred to above when compared with the Australian mandatory standards is set out below.

US standard

The American Society of Mechanical Engineers (ASME) developed and published the US standard in 2014. ASME is a reputable standards development body and the USA is a jurisdiction with comparable economic and regulatory processes to Australia.

The US standard has requirements for the design, construction and safety markings of trolley jacks, support stands and portable ramps. The US standard has similar performance and testing requirements to the voluntary Australian standards but does not set a minimum capacity. While a minimum capacity is unnecessary for hydraulic trolley jacks that simply will not lift vehicles that are heavier than their capacity, this could be critical to safety for vehicle support stands and portable ramps for vehicles in some circumstances. For this reason, the US standard would only be acceptable in Australia if the mandatory safety standards for

¹ ACCC, International standards for the safety of consumer products - criteria for acceptance, ACCC policy principles, 22 July 2015, www.productsafety.gov.au/content/index.phtml/itemId/1014180.

vehicle support stands and portable ramps for vehicles specified a minimum capacity of 750 kg (as in the Australian voluntary standards).

The US standard requires the following warning labels:

- Hydraulic trolley jacks: Use the jack on a flat surface; support the vehicle appropriately; and do not move the vehicle while it is on the jack.
- Vehicle support stands: Use as a matched pair only; do not exceed load capacity; use only on a hard level surface.
- Portable ramps for vehicles: Do not exceed rated capacity; use only on a hard level surface; use as a matched pair.
- Hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles: Warn the user that a failure to heed the safety warnings could result in personal injury and provide instructions for safe use.

Additionally, the ANSI 'z335' standards guide manufacturers about the colour, size and general requirements of these warnings.

We believe that the warning messaging requirements in the US standards are inadequate for the Australian market, as they do not prescribe a specific warning that incorrect use may result in injury or death. However, other than needing to specify a minimum capacity for vehicle support stands and portable ramps, the construction and performance requirements of the US standard are suitable to be included in a policy option allowing compliance with trusted international standards.

European standard

The European Committee for Standardization (CEN) developed the European standard. CEN develops standards for use in Europe. CEN is a reputable standards development body and the Europe is a jurisdiction with comparable economic and regulatory processes to Australia.

The European standard specifies design, construction, performance and safety marking requirements for hydraulic trolley jacks. The European standard has similar performance and testing requirements to the voluntary Australian standard for hydraulic trolley jacks. It does not set a minimum capacity but this is unnecessary for hydraulic trolley jacks that simply will not lift vehicles that are heavier than their capacity.

The European standard for hydraulic trolley jacks does not require specific warning wording but describes a "minimum marking" requirement – a list of types of information that must be marked on the product. In terms of safety information, the list includes the rated load (including rated loads for each configuration of the hydraulic trolley jack, if applicable) and must "hint on residual risks".

The European standard does not sufficiently describe the serious consequences of product misuse. We therefore do not consider the warning requirements in this standard to be adequate for the Australian market. However, the construction and performance requirements of the European standard are suitable to be included in a policy option allowing compliance with trusted international standards.

British standard

The British Standards Institution (BSI) published the British standard. BSI is a national standards body similar to Standards Australia. BSI is a reputable standards development

body and Britain is a jurisdiction with comparable economic and regulatory processes to Australia.

The British standard for vehicle support stands covers requirements for minimum capacity, stability, structural integrity, overload capacity, safety warnings and instructions for use. The British standard has similar performance and testing requirements to the voluntary Australian standard for vehicle support stands and sets a 1000 kg minimum capacity above the 750 kg minimum capacity of the Australian voluntary standard.

The British standard requires a 'warning notice' on each vehicle support stand with its rated capacity, a minimum set of warning messages about safe use, and pictograms may be used. However, the messages do not state that incorrect use may result in injury or death.

The British standard does not sufficiently describe the serious consequences of product misuse. We therefore do not consider the warning requirements in this standard to be adequate for the Australian market. However, the construction and performance requirements of the British standard are suitable to be included in a policy option allowing compliance with trusted international standards.

9. Detailed policy options

Option 1: Keep the current mandatory safety standards (status quo)

Description

Maintaining the status quo would mean no changes to the mandatory safety standards. Hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles would remain subject to the long-standing mandatory safety requirements that currently apply.

Benefits

The penalties associated with breaching the mandatory safety standards would continue to apply and provide an incentive to suppliers to supply products in compliance with the requirements of the mandatory safety standards.

There would be no additional compliance and regulatory costs.

Limitations

The mandatory safety standards do not recognise the updates to the voluntary Australian standards that have improved consumer warnings. Suppliers are limited to complying with the outdated standards.

The ACCC review of other voluntary standards – the updated Australian standards and the previously mentioned international standards – suggests that these standards specify similar, and in some cases superior, safety requirements in comparison to the superseded voluntary Australian standards. To continue to base regulations solely on the superseded voluntary Australian standards imposes additional regulatory burden on suppliers where there does not appear to be good reason to do so.

Option 2: Accept the superseded and current Australian standards

Description

The mandatory safety standards would accept either the recently superseded or the updated voluntary Australian standards. To ensure a smooth transition to the new standards, suppliers would have two years, during which products complying with the old mandatory safety standards could continue to be sold, while preparing to comply with the new standards. Suppliers would also be given the option of complying with the new standards immediately.

Benefits

This option would not introduce any new regulatory requirements but would recognise multiple ways for suppliers to comply with the basic safety requirements: safety warning labels and weight bearing performance requirements. Suppliers would find it easier to comply with mandatory safety standards that referenced the current voluntary Australian standards.

Limitations

Only accepting Australian standards in a global marketplace is at odds with fostering competition among suppliers and increasing product choice for consumers.

The ACCC review of trusted international standards suggests that these standards – especially the US standard – specify similar, and in some cases superior, safety requirements in comparison to the voluntary Australian standards. To continue to base regulations solely on the voluntary Australian standards imposes additional regulatory burden on importers where there does not appear to be good reason to do so.

Option 3: Accept multiple trusted standards (preferred option)

Description

This would build on Option 2, in that it would not introduce any new regulatory requirements and would recognise multiple ways for suppliers to comply with the basic safety requirements: safety warning labels and weight bearing performance requirements.

As with Option 2, suppliers would have two years, during which products complying with the old mandatory safety standards could continue to be sold, while preparing to comply with the new standards. Suppliers would also be given the option of complying with the new standards immediately.

This option would allow the supply of products that meet the:

- performance requirements of either the superseded or the updated Australian standards, the US standard ASME PASE: 2014, the European standard EN 1494:2000 or the British standard BS AU 223a:2006. However, all vehicle support stands and portable ramps for vehicles must have a nominated capacity of at least 750 kg.
- principles-based requirements for warnings and information. The mandatory safety standards would specify principles (outlined in Appendix B) and suppliers would draft warnings and information that satisfied those principles. The marking requirements prescribed in the new voluntary Australian standards would be one way to satisfy the principles.

The following table outlines how products could comply under this option:

Products	Performance requirements	Warning requirements
Hydraulic trolley jacks	<ul style="list-style-type: none"> ✓ Updated Australian standard ✓ Superseded Australian standard* ✓ US standard ✓ European standard 	<ul style="list-style-type: none"> ✓ The principles-based approach to warnings and information outlined in Appendix B, including: <ul style="list-style-type: none"> • warnings stating that incorrect use may result in death or serious injury • option to include pictograms • nominated capacity • label permanence & durability • warning legibility & prominence during use (including that all required information and warnings are in English) • instructions for safe use • marking on the packaging <p>✓ The updated Australian standards would satisfy the principles.</p>
Vehicle support stands	<ul style="list-style-type: none"> ✓ Updated Australian standard ✓ Superseded Australian standard* ✓ US standard – but must have a nominated capacity of not less than 750kg. ✓ British standard - but must have a nominated capacity of not less than 750kg. 	
Portable ramps for vehicles	<ul style="list-style-type: none"> ✓ Updated Australian standard ✓ Superseded Australian standard* ✓ US standard - but must have a nominated capacity of not less than 750kg. 	

** Over time, test laboratories may no longer provide test services for the superseded Australian standards and market forces may push suppliers to the updated standards.*

Benefits

Suppliers would benefit from greater flexibility under this option which would minimise their regulatory burden, potentially reduce time to market, and encourage competition. Testing to other standards can also be less expensive than testing to voluntary Australian standards.

This could mean a wider choice and cheaper products that are safe for consumers.

Limitations

Enforcement of the amended mandatory safety standards by the ACCC and State and Territory ACL regulators could potentially be more onerous than the current mandatory safety standard. To address this, suppliers would be required to declare which of the voluntary trusted standards they are meeting in order to demonstrate compliance with the mandatory safety standard. This declaration would need to be available at the point of sale (e.g. on the product, on the sales literature or assembly/use instructions, or on the internet).

Option 4: Revoke the mandatory safety standards

Description

Most consumer goods in Australia are not regulated by mandatory safety standards. Revoking the mandatory safety standard would mean suppliers would still need to have regard to the consumer protection provisions of the Australian Consumer Law (ACL). The ACL provides consumers with specific protections for consumer transactions called statutory consumer guarantees every time they purchase goods or services. One of those guarantees is that goods will be of acceptable quality, meaning they are safe and fit for purpose.

Consumer protections also exist to safeguard against suppliers engaging in conduct that is likely to be misleading or deceptive. Additionally, there are provisions for injury reporting, recalls and product liability. These provisions give suppliers an incentive to ensure that the goods they supply are safe. The ACCC would still be able to take safety action if needed – for example, through recalls.

Benefits

There would be no direct compliance costs for industry under this option. Any international trade restrictions resulting from the current mandatory safety standard would be removed, making it easier for businesses to import products to Australia. This may result in lower priced and a wider range of products becoming available to Australian consumers.

Limitations

Without the mandatory safety standards, the general ACL provisions may be insufficient and some manufacturers could stop safety activities to reduce costs. Suppliers adhering to voluntary standards could potentially lose market share. This could also lead to an increase in death and injury. Consumers may also need to assess the safety of these products in more detail. This could reduce consumer and retailer confidence in the automotive aftermarket industry and in the safety of these products.

10. Preliminary position

The ACCC is currently of the view that Option 3 (accept multiple trusted standards), is likely to provide the greatest net benefit for consumers, suppliers and regulators. Stakeholder submissions to this consultation will help us test the position and to recommend the most appropriate option to the Minister.

The Office of Best Practice Regulation (OBPR) has advised that a Regulation Impact Statement (RIS) is not required as the proposed changes are administrative and minor.

11. Key questions

Please consider the following questions when making a submission:

1. Should suppliers improve the consumer warnings on these products?
2. Do the upper capacity limits of these mandatory safety standards remain adequate for today's consumer vehicles?
3. Are there any other safety issues to address?
4. Do you agree with our assessment and comparison of voluntary standards for these products?
5. What is your preferred option, and why?
6. Are there any other policy options that the ACCC should consider?
7. Do you have any other comments?

12. Have your say

The ACCC invites interested parties to provide information and comment on this review. Consultation is open from 28 September 2016 to 18 November 2016.

The ACCC prefers submissions to be made via the ACCC consultation hub at consultation.accc.gov.au.

Alternatively, email submissions to productsafety.regulation@acc.gov.au.

Submissions can also be posted to:

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

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Glossary

Term	Definition
British Standard	British standard for vehicle support stands – BS AU 223a:2006
European standard	European standard for trolley jacks – EN 1494:2000+A1:2009
Hydraulic trolley jack	<p>A device designed to raise a part of a vehicle via the vehicle's chassis. A trolley jack usually comes with:</p> <ul style="list-style-type: none"> • wheels for manoeuvring the trolley jack • a handle for positioning the trolley jack under a vehicle and for pumping the hydraulic cylinders • hydraulic cylinders for lifting the vehicle.
Mandatory safety standards	<p>The Australian mandatory safety standards for:</p> <ul style="list-style-type: none"> • Hydraulic trolley jacks (Consumer Protection Notice No. 10 of 2008) • Vehicle support stands (Consumer Protection Notice No. 12 of 2008) • Portable ramps for vehicles (Consumer Protection Notice No. 2 of 2010)
US standard	US standard for hydraulic trolley jacks, vehicle support stands and vehicle ramps – ASME PASE: 2014
Vehicle ramp	A device consisting of an incline and a platform onto which a vehicle is driven for the purpose of maintenance (usually by a mechanic) or display, for example at vehicle road shows or car sale yards.
Vehicle support stand	Tools used to support the axle or chassis of a vehicle. Vehicle support stands come in fixed or adjustable heights. The vehicle is lowered onto the vehicle support stands, creating access to the underside of the vehicle for maintenance or storage purposes.
Voluntary Australian standards	<p>The current edition of the voluntary standards:</p> <ul style="list-style-type: none"> • AS/NZS 2615:2016 for hydraulic trolley jacks • AS/NZS 2538:2016 for vehicle support stands • AS/NZS 2640:2016 for portable ramps for vehicles.

Appendix A: Comparison of key features of the Australian and other trusted standards

Hydraulic trolley jacks

Key requirement	AS/NZS 2615:2004 Old Australian standard	AS 2615:2016 New Australian standard	ASME PASE – 2014 US standard	EN 1494:2000+A1:2009 European standard
Design and construction				
Head cap	Yes	Yes	Yes	Yes
Overload protection	Yes	Yes	Yes	Yes
Prevention of over travel	Yes	Yes	Yes	Yes
Minimum capacity	Yes	Yes	No	No
Performance				
Ease of operation	Yes	Yes	Yes	Yes
Loss of height under load	Yes	Yes	Yes	Yes
Lowering	Yes	Yes	Yes	Yes
Overload capacity	Yes	Yes	Yes	Yes
Eccentric load and stability	Yes	Yes	Yes	Yes
Marking				
Safety marking on the jack	Yes	Yes	Safety markings and messages required; form is prescribed in ANSI Z535 standards.	Yes
Package marking	Yes	Yes		No
Instructions	Yes	Yes		Yes

Vehicle support stands

Key requirement	AS/NZS 2538:2004 Old Australian standard	AS 2538:2016 New Australian standard	ASME PASE – 2014 US standard	BS AU 223a:2006 British standard
Design and construction				
Minimum capacity	Yes	Yes	No	Yes
Stability	Yes	Yes	Yes	Yes
Engagement head	Yes	Yes	Yes	Yes
Adjustable height – locking pin	Yes	Yes	Yes	Yes
Finished surface	Yes	Yes	Yes	Yes
Wheels	No	Yes	Yes	No
Performance				
Structural integrity	Yes	Yes	Yes	Yes
Overload capacity	Yes	Yes	Yes	Yes
Marking				
Instructions for assembly	Yes	Yes	Safety markings and messages required; form is prescribed in ANSI Z535 standards.	No
Instructions for use	Yes	Yes		Yes
Safety marking on the stand	Yes	Yes		Yes
Package marking	Yes	Yes		No

Portable ramps for vehicles

Key requirement	AS/NZS 2640:1994 Old Australian standard	AS 2640:2016 New Australian standard	ASME PASE – 2014 US standard
Design and construction			
Minimum capacity	Yes	Yes	No
Design	Yes	Yes	Yes
Prevention of roll off	Yes	Yes	Yes
Prevention of over travel	Yes	Yes	Yes
Surfaces	Yes	Yes	Yes
Performance			
Overload capacity	Yes	Yes	Yes
Marking			
Instructions for assembly	Yes	Yes	Safety markings and messages required; form is prescribed in ANSI Z535 standards.
Instructions for use	Yes	Yes	
Marking on the ramp	Yes	Yes	

Appendix B: Principles-based requirements for warnings and information

The current mandatory safety standards for hydraulic trolley jacks, vehicle support stands and portable ramps for vehicles call up all the marking requirements in the corresponding old Australian voluntary standards. These marking requirements cover a range of safety information including warning labels, user instructions and package marking.

Under a principles-based approach, the safety standards would require safety warnings and instructions that do not reference specific wording of an Australian or other voluntary standard. Instead, the safety warnings and instructions would need to satisfy the following:

- warnings stating that incorrect use may result in death or serious injury
- the option to include pictograms to illustrate correct or incorrect use
- the nominated capacity of the products
- permanence and durability of the labels
- prominence of the warnings on the product during use
- legibility of the warnings on the product (including that all of the required information and warnings are in English)
- instructions for safe use to be supplied with the product in English
- marking on the packaging of the product in English.

The supplier must also nominate the Australian or other voluntary standard used to comply with the performance requirements of the safety standard (i.e. Australian/ US/ European standard) in writing at the point of sale (e.g. on the internet product page, on the packaging of the product, or on signage at the point of sale).

Products that comply with all of the prescriptive marking requirements, including warning labels, user instructions and package marking, of the new voluntary Australian standards would comply with the principles for warnings and instructions specified in the new mandatory safety standard.