



AUSTRALIAN COMPETITION  
& CONSUMER COMMISSION

# Review of the safety standard for corded internal window coverings

## Consultation paper

February 2019



#### Disclaimer

The Australian Competition & Consumer Commission (**ACCC**) has developed this consultation paper to seek the views of stakeholders about the safety standard for corded internal window coverings.

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# 1. Introduction

The Australian Competition and Consumer Commission (**ACCC**) is reviewing the Trade Practices (Consumer Product Safety Standard - Corded Internal Window Coverings) Regulations 2010 (the **safety standard**). The safety standard is designed to reduce the risk of child strangulation from corded internal window coverings (**CIWC**).<sup>1</sup> This is the first review of the safety standard since its introduction in 2010.

The purpose of the review is to assess whether the safety standard has been effective. The review has considered market, regulatory and non-regulatory developments which could better promote consumer safety.

We are seeking stakeholder views on four policy options which are detailed below. Questions at the end of this paper may act as a prompt although submissions do not have to address all or any of the questions.

**This consultation 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 safety standard (status quo)
- Option 2      Make a new safety standard
- Option 3      Allow compliance with international safety standards
- Option 4      Revoke the safety standard.

## 3. Background

### Strangulation hazard

Blinds and curtains with loose, long and looped cords are a strangulation hazard to young children particularly where cots or other furniture are placed in their proximity. Most deaths occur in the bedroom involving children aged between 16 months and 36 months, with the majority aged around 23 months. Due to their stage of development toddlers are particularly vulnerable to strangulation as their heads weigh proportionately more than their bodies and they have not yet developed sufficient muscular control to free themselves if they become entangled in a CIWC. Toddlers also have underdeveloped windpipes which means that if they become entangled by a cord wrapped around their neck they suffocate quickly and silently. A young child can become unconscious in as little as 15 seconds from a cord wrapped around their neck with death occurring within two to three minutes.

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<sup>1</sup> We are not reviewing the safety standard for the professional installation of CIWC - [Competition and Consumer \(Corded Internal Window Coverings\) Safety Standard 2014](#) - although the information gathered in this consultation may inform the review proposed to be commenced in 2020.

## Death and injury data

The ACCC has investigated 21 known deaths of children in Australia caused by CIWCs from 1999 to 2018 (with no known deaths since 2014). The fatality rate has reduced from 15 deaths in the 11 years before the standard was introduced (1.36 per annum), to 6 deaths in the following 9 years (0.67 per annum). Of the six deaths that occurred since the introduction of the safety standard in 2010, all are the result of strangulation from cords to children aged 39 months and under, with five of those children aged 18 months and under. Four deaths occurred where the child was in a cot or bed in close proximity to a window where a CIWC had been installed.

Deaths also regularly occur overseas. In the United States 271 children under 6 years died from becoming entangled in blind cords in the period from 1990 and 2015 and an additional 2002 children were taken to hospital as a result of an entanglement injury.<sup>2</sup>

In the United Kingdom, the Royal Society for the Prevention of Accidents (**ROSPA**) records that 30 children died from strangulation following entanglement in looped cords between 1999 and 2015 with 18 deaths occurring between 2010 and 2015.<sup>3</sup> Since publication of these figures another child died in 2016 from a CIWC while sleeping in their cot.

From 1986 to June 2016, Health Canada received 69 reports concerning strangulation incidents related to CIWCs. Of the 69 reports, 40 reported a fatality with 22 reports concerning an injury. Fatalities continue to occur at an average rate of slightly more than one child fatality per year in Canada, with children between the ages of one and three years most at risk.<sup>4</sup> These figures highlight the high level of risk posed to children by these common household fixtures.

## ACCC safety campaigns

The ACCC has periodically engaged in consumer awareness campaigns to highlight the potential hazard to children. In 2016 Australia joined 24 countries in contributing to and actively participating in the OECD's global awareness campaign for window covering cord safety. The following year the ACCC published a [poster](#) informing parents to not place cots, beds and furniture close to windows to prevent access to CIWCs by children, to ensure cords are out of reach of children, and recommended the use of cordless or inaccessible cord window coverings in homes with young children. This followed media releases published in June 2016 and September 2014.

We encourage suppliers including retailers to download the poster and other safety guidance from the Product Safety Australia website and to make it available to consumers at the point of sale to inform them of the dangers posed by CIWCs.<sup>5</sup>

## Cordless window coverings

The Product Safety Framework Handbook (the **handbook**) published by Standards Australia in 2008 is a general guideline for suppliers in managing safety risks in consumer products. The main objective of the handbook is to encourage suppliers to make products safe by design, and where this is not possible, to provide adequate warnings and information so that users are aware of the dangers and can take action to lessen the risk of exposure to the hazard and avoid death and injury.

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<sup>2</sup> *Pediatric Injuries Related to Window Blinds, Shades and Cords*, B. Onders, E. H. Kim et al, *Pediatrics*, 11 Dec 2017

<sup>3</sup> *Blind Cord Safety Campaign*, The Royal Society for the Prevention of Accidents (2015)

<sup>4</sup> *Corded Window Coverings Regulations*, Regulatory Impact Statement, Canada Gazette v. 151, no. 24 (June 2017)

<sup>5</sup> Product Safety Australia website: <https://www.productsafety.gov.au/standards/blinds-curtains-and-window-fittings>

We are aware through research and engagement with overseas product safety regulators that increasing attention is being paid to product options for window coverings that would reduce, if not remove, the strangulation hazard including cordless, spring loaded, tilt wands and motorised window coverings. By their design cordless window coverings or products that do not have exposed cords remove the strangulation hazard posed by CIWCs.

We understand the market for cordless products continues to develop and this option may become increasingly popular among consumers through cost reductions and heightened consumer awareness. To our knowledge IKEA is the only major supplier of ready-made products known to be supplying only cordless ready-made products in Australia. This move follows the lead of IKEA in the United States (US) and the United Kingdom, and other US suppliers including Target and SelectBlinds.

We expect more Australian suppliers to move to cordless options as consumer demand increases. We are interested to know the reasons Australian suppliers have not already moved to supplying only cordless options that would remove the strangulation hazard. Specifically we are interested to better understand the market including quantifying the costs and the extent to which suppliers and consumers are moving to these options and what barriers may exist in developing this product category, such as:

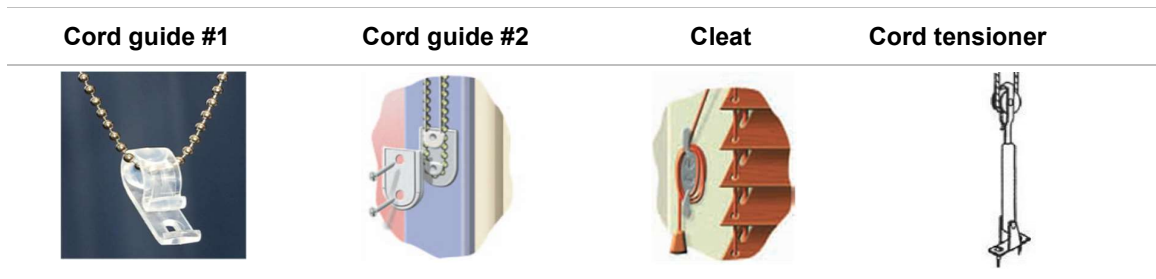
- cost and affordability
- reduced functionality
- production limitations
- design considerations
- cosmetic concerns.

## Safety standard for CIWC products

Internal window coverings such as curtains or blinds and some window fittings supplied after 30 December 2010 must comply with the [Trade Practices \(Consumer Product Safety Standard — Corded Internal Window Coverings\) Regulations 2010](#) which requires CIWCs to be supplied with:

- safety devices (e.g. cleats, cord guides) for attaching to fixtures, such as such as walls, floors, doors or window frames
- instructions for the correct installation of safety devices so that the cords or chains remain restrained and inaccessible at a minimum safe height and cords cannot form hazardous loops
- if a cord guide is supplied, the cord guide must be designed to:
  - prevent the cord from forming a loop 220 mm or longer at a height of less than 1600 mm above floor level
  - remain firmly in place when subjected to a specified tension force
- safety warnings on the packaging and cord.

## Examples of safety devices



## Complying with the safety standard

The ACCC and ACL co-regulators periodically survey the market to assess that suppliers are complying with the requirements for CIWCs and to remove unsafe products from the market when they are detected. Generally, Australian suppliers are found to be aware of, understand and comply with, the safety standard. Examples of safety issues identified in surveys are mainly from online suppliers who do not provide adequate installation instructions or the required warnings, or do not provide any warnings, either on the packaging or product.

Other issues identified where clarifying requirements in the safety standard could be improved include:

- revising warnings so that they are worded and formatted in line with principles for making effective warnings
- prohibiting:
  - cleats and cord guides that are made from brittle or flimsy plastic which can easily break in the course of normal use
  - overly long cords which are not necessary for the operation of the CIWC and cannot be fully wound around or securely held by safety devices
  - cleats that have inadequate capacity to restrain a reasonable length of cord.

Suppliers enquire to the ACCC from time to time about the operation of the safety standard and have raised the following matters:

- Warning labels are required on the cords, and these can interfere with the operation of the cords when lifting or lowering blinds.
- Consumers may not appreciate the hazard and may take action that could inhibit safety including:
  - not installing cord guides and cleats as recommended
  - placing cots, beds and furniture near CIWCs
  - not using supplied safety devices correctly or consistently
  - not heeding or removing warnings.
- The safety devices required must be designed for fitting to structures, such as walls, floors, doors and window frames, which consumers may not install.
- If suppliers choose to include safety devices which did not need to be installed to a structure (i.e. could be retrofitted to, or designed into the CIWC), to comply with the current safety standard they would still need to supply the safety devices for attaching to a structure which could lead to confusion and additional costs.

- The safety standard does not allow for the provision of alternative safety mechanisms such as cords which would break, retract or detach when a certain amount of force is applied as an alternative to installing safety devices.

## 4. Adopting international standards

### International coordination and cooperation

In 2012, the ACCC, Health Canada, the US Consumer Product Safety Commission (**CPSC**) and the European Commission (**EC**) agreed to a common approach to prevent strangulation of children from CIWCs due to concerns in each jurisdiction about the high rates of strangulation.

### International standards for CIWCs supplied in Australia

When making recommendations for new and amended regulations *The Australian Government Guide to Regulation 2014* requires policy makers to consider international standards as an option for regulation. The ACCC is assessing whether to adopt the Canadian, European and US mandatory and voluntary standards for CIWCs for suitability in Australia on the basis that these standards meet the following criteria:

- they address safety concerns
- they are from a comparable jurisdiction to Australia
- they apply to the Australian context.<sup>6</sup>

### The US voluntary standard

#### Acceptable level of safety

The CPSC is responsible for product safety in the US but does not currently regulate CIWCs through a mandatory standard. The CPSC has instead worked cooperatively with the Window Covering Manufacturers' Association (**WCMA**), the major industry association for US suppliers, to review the voluntary standard for CIWCs. The industry has committed to self-regulation and voluntarily adopting the reviewed standard within the CPSCs agreed timeframes to avoid possible regulation. This follows the CPSCs 2015 announcement it was considering making a mandatory standard for CIWCs if the industry did not voluntarily review and adopt a revised standard.<sup>7</sup>

On 12 January 2018 industry association spokesperson Ralph Vasami and Executive Director of the WCMA announced '*All companies who manufacture, distribute, or sell window coverings in the U.S. must comply with the voluntary safety standard or face enforcement action by the CPSC and/or be open to legal action if non-compliant products are sold... 'Voluntary' simply signifies that industry worked cooperatively with the CPSC, safety experts, and others under the auspices of ANSI to develop the standard.*'

From 15 December 2018, suppliers of ready-made blinds or 'stock' products sold in the US will voluntarily comply with the revised ANSI/WCMA A100.1-2018 *American National Standard for Safety of Corded Window Covering Products (ANSI standard)*. The standard will apply to off-the-shelf products (approximately 80 per cent of US and Canadian markets),

<sup>6</sup> 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](http://www.productsafety.gov.au/content/index.phtml/itemId/1014180)

<sup>7</sup> Advance notice of proposed rulemaking (ANPR) under the *Consumer Product Safety Act* (CPSA) Corded Window Coverings, <https://www.federalregister.gov/documents/2015/01/16/2015-00566/corded-window-coverings-request-for-comments-and-information>



and does not apply to the remaining 20 per cent of custom-made CIWCs. The ANSI standard is comparable to the Australian safety standard as it requires:

- safety devices for restraining cords to make them inaccessible (cord guides, cleats)
- installation instructions
- safety warnings.

The ANSI standard differs from the Australian safety standard in that it allows alternative methods for making cords inaccessible and preventing hazardous loops. These include cord release devices that release loops from the product at a specified force and cord shrouds or wands for containing the cords. It also includes tests for durability of safety devices, requirements for products that claim to be cordless, and pictograms to be provided with warnings for products with cords.

### **Standard is made and operates similarly in Australia**

The American National Standards Institute (**ANSI**) is an internationally recognised (voluntary) standards-making body in the US. It approved the current US voluntary standard, developed and published by the WCMA.

The US is a similar jurisdiction to Australia and the CPSC has a similar authority for product safety as the ACCC.

### **Relevance for Australia**

Except for differences in warnings, a CIWC which complies with the corresponding requirements in the ANSI standard is likely to satisfy the Australian safety standard.

The ANSI standard offers more options for making cords safer than the Australian safety standard which would appear to promote industry innovation, it continues to allow supply of corded window coverings that are comparable with Australian requirements. Products with integral safety devices or those with inaccessible cords would reduce the strangulation hazard and may offer a higher level of safety than cleats and cord guides which rely on consumers installing and using them correctly.

### *Is the US voluntary standard suitable for Australia?*

The ACCC considers corded internal window covering products that conform to the ANSI standard would offer a suitable level of safety for Australian consumers.

## The Canadian mandatory standard

### **Acceptable level of safety**

Canada's current mandatory standard for CIWCs is based on the voluntary standard CAN/CSA-Z600 14 *Safety of corded window covering products (Z600)* published by the Canadian Standards Association which largely mirrors the now superseded version of the ANSI standard. The Canadian mandatory standard requires installation instructions and warnings, in both English and French and pictograms. It includes tests and performance requirements for all CIWC products, their components, and related hardware and safety devices.

Health Canada is reviewing the mandatory standard on the basis that it has not sufficiently reduced strangulation rates and leaves young children exposed to an *'unreasonable risk of injury or death'*. Health Canada proposes to *'restrict the length of reachable cords and the*

size of loops that can be created by a cord in order to help eliminate the risk of strangulation'. A [Regulatory Impact Analysis Statement](#) was published on 17 June 2017 and a 75-day consultation period has concluded. For information on the progress of the regulatory proposal see [Amending the Corded Window Coverings Products Regulations](#) and [Consumer Product Safety Consultations](#). As a new mandatory standard has not been introduced to date we cannot assess whether Canada will move towards harmonising with new US requirements, or pursue unique and stricter requirements by banning cords that are more than 22 cm long or loops with a perimeter greater than 44 cm.

### **Standard is made and operates similarly in Australia**

The Canadian Standards Association (**CSA**) under the CSA Group is an internationally recognised (voluntary) standards-making body and compares to Standards Australia.

Canada is a similar jurisdiction and Health Canada has a similar authority for product safety as the ACCC does in Australia.

### **Relevance for Australia**

Except for differences in warnings, a CIWC which complies with the corresponding requirements in the Canadian mandatory standard is likely to satisfy the Australian safety standard.

Similar to the US ANSI standard the Canadian mandatory standard offers more options for making cords safer than the Australian safety standard which appears to promote industry innovation. Products with integral features that prevent loops forming, e.g. cord release devices, may eliminate the hazard and appear to offer a higher level of safety than cleats and cord guides which rely on consumers installing and using them correctly.

### ***Is the Canadian mandatory standard suitable for Australia?***

The ACCC considers that internal window covering products that conform to the current, and proposed, Canadian mandatory standard would offer a suitable level of safety for Australian consumers.

## The European mandatory standard

### **Acceptable level of safety**

The EC is the government body responsible for product safety in the European Union (**EU**). Requirements for CIWCs in the EU are similar and must be made safe with a safety device and visible warnings. Products with cords and chains with hazardous loops are banned which in practice means that cords must not exceed a certain length or they must be restrained by safety devices such as cord guides (similar to requirements in the Australian safety standard) where children aged up to 42 months of age are likely to be exposed to the CIWC. The EU regards CIWCs which comply with the following voluntary standards will be deemed to comply with the requirements of the General Product Safety Directive.

- EN 13120:2009+A1:2014 *Internal blinds – Performance requirements including safety*
- EN 16433:2014 *Internal blinds – Protection from strangulation hazards – Test methods*
- EN 16434:2014 *Internal blinds – Protection from strangulation hazards – Requirements and Test methods for safety devices.*

## **Standard is made and operates similarly in Australia**

The European Committee for Standardization (**CEN**) developed the European standard. The CEN develops standards for use in Europe. CEN is an internationally recognised standards making body and is equivalent to Standards Australia.

Europe is a similar jurisdiction to Australia and the European Commission has a similar authority for product safety as the ACCC does in Australia.

## **Relevance for Australia**

Except for differences in warnings, a CIWC which complies with the European standard is likely to satisfy the requirements for safety devices and installation instructions of the Australian safety standard.

### *Is the EU mandatory standard suitable for Australia?*

The ACCC considers internal window covering products that conform to the European mandatory standard would offer a suitable level of safety for Australian consumers.

## **Overview of international standards**

Existing standards and regulations in comparable jurisdictions detail similar requirements that in effect provide for comparable levels of safety as the safety standard. They also appear to include requirements that provide for a range of options to prevent the possibility of strangulation and include requirements for the maximum length of allowable cord, which the safety standard does not currently offer. These arrangements may offer greater supplier flexibility to supply products to promote consumer safety.

On their face these standards meet the ACCC's criteria for recommending the adoption of international standards. That is they offer a comparable level of safety to the safety standard, have been made by a technical association or regulatory agency operating in a comparable regulatory environment and are applicable to the Australian context.

This approach also affords suppliers with greater flexibility to meet their compliance obligations and permits products that comply with international standards to be supplied into the Australian market without requiring modification. Allowing compliance through international standards is likely to have benefits to consumers in the form of greater product choice and reduced prices due to increased competition.

On our initial assessment we consider that if international standards are adopted as an alternative means for suppliers to achieve compliance those standards would be varied so that warnings and instructions are supplied that meet the requirements detailed in the safety standard. A consistent approach to warnings would reduce the possibility of consumer confusion about hazards and the means to address these.

## **5. Detailed policy options**

### **Option 1 – Keep the current safety standard (status quo)**

#### **Description**

The safety standard would continue in its current form. CIWCs supplied would continue to comply with the current requirements.

## Benefits

Suppliers are familiar with current regulatory arrangements and retaining the current safety standard would provide regulatory certainty. Relative to the option of no standard there would continue to be a regulatory structure in place that would provide for the supply of products that meet regulated safety requirements.

## Limitations

The ACCC has identified shortcomings with the operation of the safety standard which would not be addressed under Option 1. Suggested improvements to the safety standard are addressed under Option 2. Option 1 also does not provide for the supply of products that meet the requirements of international standards proposed for adoption in Option 3.

## Option 2 – Make a new safety standard

### Description

This option would update the safety standard to address technical issues, expand options for safety devices, and improve the warnings. Proposed changes include:

- Simplifying and improving the warnings to conform to good practice for warnings, including formatting changes, e.g. using a combination of upper and lower case letters and adding a safety alert symbol.
- Allowing alternative safety devices which do not need to be attached to structures, such as cord release mechanisms, cord retractors, cord shears, or cord covers.
- Amending the standard so that when alternative safety devices are provided, devices such as cleats and cord guides are not also required.
- By reference to relevant provisions in international standards:
  - specifying a cleat must be large enough so that no loose lengths of cord remain, and it should be made strong enough to last the life of the window covering
  - clarifying requirements for the durability of safety devices.
- Specifying that operating cords should not exceed the length required for the reasonable operation of the CIWC.

### *Warnings – current and proposed*

The safety standard currently requires CIWCs to be supplied with a warning on the packaging and another warning on the cord. The proposed standard would improve these warnings by introducing the hazard alert symbol and pictograms making them more consistent with international warnings. Following feedback from the consultation, the ACCC will arrange for the proposed warning/s to be tested for ease of reading and understanding with consumers. The current and proposed warnings are listed on the following page.



Current warning on the package

WARNING: CURTAIN AND BLIND CORDS HAVE CAUSED THE DEATH OF YOUNG CHILDREN AND MUST BE INSTALLED SO THAT THEY ARE NOT A STRANGULATION HAZARD.FOLLOW THE INSTALLATION INSTRUCTIONS.



Current warning on the cord

WARNING: Young children have died by wrapping loose curtain and blind cords or chains around their necks. Secure cords or chains with cord guides or keep them out of reach by winding them around a cleat. Move cots and furniture away from window covering cords or chains. Do not remove this label.

Proposed warning on the package<sup>8</sup>

	<b>WARNING</b> STRANGULATION HAZARD	
<p>Curtain and blind cords have caused the death of young children. This product includes safety devices and installation instructions. Follow all instructions. Always install and use safety devices.</p>		

Proposed warning on the cord

	<b>WARNING</b> STRANGULATION HAZARD	
<p>Babies and young children have died by wrapping loose curtain and blind cords or chains around their necks. Secure cords or chains with cord guides or by winding them around a cleat. Move all furniture, beds and cots away from cords and chains. Always keep cords and chains out of reach. Do not remove this label.</p>		

**Benefits**

This option addresses issues that have been reported to the ACCC and which the ACCC has identified about the operation of the safety standard. These recommended improvements to the safety standard would address identified technical issues with the existing standard and increase the range of safety devices that could be used and the methods for attaching them. The changes should assist suppliers to allow for different window designs and construction, to increase choice for consumers. The addition of symbols to warnings and the use of red font is intended to highlight the dangers and attract attention to the warnings to improve the likelihood they will be noticed, understood, and followed. These improvements are intended to reduce the rate of death and injury from CIWCs.

<sup>8</sup> The warning strangulation symbol (ANSI/WCMA A100.1 *American National Standard for Safety of Corded Window Covering Products* (the ANSI standard) has been reproduced with the express authority of the (US) Window Covering Manufacturers' Association (WCMA). Copyright provisions apply and the images depicted may not be reproduced without the express consent of the WCMA or relevant authority. The ANSI standard is available for purchase from the WCMA.

## **Limitations**

This option would require suppliers to familiarise themselves with the new requirements, although our initial assessment and that of the Office of Best Practice Regulation is that the regulatory impact is likely to be minimal. Compared to option 3, this option would allow for the supply of CIWCs that comply with recommended international standards.

## **Option 3 – Allow compliance with international safety standards**

### **Description**

The current safety standard would be updated as for Option 2 and also allow CIWCs to be supplied where the product complies with international standards (see Attachment 1). Products would still need to comply with the Australian warning requirements to ensure that consumer warnings about the hazards of CIWCs remain consistent.

### **Benefits**

Suppliers who source CIWCs made for the US, Canada and EU markets would be able to supply them into Australia without making changes to make them comply with the Australian safety standard, except for the safety warnings. This would reduce the compliance burden on suppliers which may lead to decreased prices for consumers.

This option would likely increase the range of products available for supply into Australia which would increase consumer choice.

### **Limitations**

There is some possibility that allowing the supply of products that are compliant with international and Australian standards could lead to confusion among market participants. We have assessed that the likelihood of this occurrence is low and is offset by the benefits of allowing compliance with international standards.

## **Option 4 – Revoke the safety standard**

### **Description**

The safety standard would no longer apply to CIWCs supplied to Australian consumers.

### **Benefits**

This would remove the cost of compliance for suppliers of CIWCs.

Products made to other standards could be imported into Australia without changing warnings and installation instructions to Australian requirements, reducing prices and increasing the range of products available to Australian consumers.

### **Limitations**

The cost of complying with Australian requirements is generally low, so removing this cost is unlikely to reduce the cost or increase the range of CIWCs significantly, if at all.

This option would result in Australia being misaligned with the major international jurisdictions EU, US and Canada that currently regulate or are increasing safety requirements for CIWCs.

Without the safety standard, some suppliers may not continue to provide labels and/or safety devices in order to reduce costs. This would reduce the safety of CIWCs and could lead to increased injuries and deaths to infants and young children.

## 6. Key questions

Please consider the following questions in your submission. You are not required to address all the questions in order to make a submission.

1. Can you provide information about the market for cordless window coverings? This may include the cost of cordless options compared to corded products, the development of the market and consumer preferences for cordless products.
2. What are your views concerning the matters raised by suppliers in section 3 of this paper entitled 'Complying with the safety standard'?
3. What are your views on the proposed warning labels?
4. Do you have a view on the maximum 'safe' length of a cord/loop?
5. Do you agree with allowing safety devices which do not need to be attached to structures, such as cord release mechanisms, cord retractors, cord shears, or cord covers?
6. Do you have a view on the durability of safety devices and how it should be measured?
7. What is your preferred option, and why?
8. Do you have any information on the likely costs, benefits or issues with any changes?
9. How long would suppliers need to change over to new requirements?
10. Do you have any other comments or suggestions for the warnings?

## 7. Have your say

The ACCC invites you to comment on this review. The consultation is open from Wednesday 13 February 2019 to Wednesday 13 March 2019.

The ACCC prefers that you submit your answers and other feedback online on our consultation hub at [consultation.accc.gov.au](http://consultation.accc.gov.au).

However, you can email submissions to [productsafety.regulation@acc.gov.au](mailto: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
<b>Corded internal window covering (CIWC)</b>	A window covering (such as a curtain or blind) or fittings used with a window covering (such as a traverse rod or track) that can be used inside a building and has a cord.
<b>The safety standard</b>	<i>The Trade Practices (Consumer Product Safety Standard – Corded Internal Window Coverings) Regulations 2010</i>
<b>ANSI</b>	ANSI approved standard ANSI/WCMA A100.1– 2018 <i>American national standard for safety of corded window covering products</i>
<b>Canadian standard</b>	CSA standard CAN/CSA– Z600– 14 <i>Safety of corded window covering products</i>
<b>European standards</b>	CEN standards: <ul style="list-style-type: none"> <li>• EN 13120:2009+A1:2014 <i>Internal blinds – Performance requirements including safety</i></li> <li>• EN 16433:2014 <i>Internal blinds – Protection from strangulation hazards – Test methods</i></li> <li>• EN 16434:2014 <i>Internal blinds – Protection from strangulation hazards – Requirements and Test methods for safety devices.</i></li> </ul>
<b>Cleat</b>	A safety device designed to be attached to a structure, such as a wall or window frame, resembling a hook onto which a cord can be wound around and secured out of reach.
<b>Cord shears</b>	A safety device which automatically cuts a looped cord when a certain force is applied.
<b>Cord guide</b>	A safety device designed to retract, tension or secure a cord.
<b>Cord cover</b>	A safety device which encloses a cord such as a wand, or sheath so no hazardous length of cord is exposed or hazardous loop is formed.
<b>Cord retraction device</b>	A safety device designed to retract a cord so that the cord is restrained from forming a hazardous length or loop.
<b>Cord release mechanism</b>	A safety device which is designed to release a cord from a CIWC automatically when a certain force is applied.
<b>Hazardous (cord length or loop)</b>	A length of cord or loop that is accessible to a child that can create a strangulation hazard to a child.

## Attachment 1 – International standards for corded internal window coverings

The following table compares the current Australian corded internal window covering safety standard with standards from the US, Canada and Europe:

STANDARDS	AUSTRALIA	US	CANADA (CURRENT)	CANADA (PROPOSED)	EUROPE
<b>Agencies</b>	Australian Competition and Consumer Commission (ACCC)  State & Territory Australian Consumer Law co-regulators	Consumer Product Safety Commission (CPSC)	Health Canada	Health Canada	European Commission
<b>Mandatory standard</b>	Trade Practices ( <i>Consumer Product Safety Standard - Corded Internal Window Coverings</i> ) Regulations 2010, <a href="https://www.legislation.gov.au/Details/F2010C00801">https://www.legislation.gov.au/Details/F2010C00801</a> .	The Window Covering Manufacturers' Association (WCMA) has committed to adopting the voluntary standard industry-wide.	<a href="#">Corded Window Covering Products Regulations (PDF)</a>	<a href="#">Corded Window Covering Regulations - Regulatory Impact Analysis Statement</a>	Commission Decision of 27 July 2011, safety requirements to be met by European standards to address risks posed to children by internal corded window coverings and safety devices pursuant to Directive 2001/95/EC of the European Parliament and of the Council, (2011/477/EU), <a href="http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:196:0021:0024:EN:PDF">http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:196:0021:0024:EN:PDF</a> .
<b>Voluntary standard</b>	N/A	ANSI/WCMA A100.1-2018 <i>American National Standard for Safety of Corded Window Covering Products</i>	CAN/CSA-Z600 <i>Safety of corded window covering products</i> , published by the Canadian Standards Association. (CAN/CSA-Z600)	N/A	EN 13120:2009+A1:2014 <i>Internal blinds - Performance requirements including safety</i>  EN 16433:2014 <i>Internal blinds - Protection from</i>

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					<p><i>strangulation hazards - Test methods</i></p> <p>EN 16434:2014 <i>Internal blinds - Protection from strangulation hazards – Requirements and Test methods for safety devices</i></p>
<b>Scope</b>	<p>Corded internal window covering means:</p> <p>(a) a window covering, such as a curtain or blind; or</p> <p>(b) fittings used with a window covering, such as a traverse rod or track; that can be used inside a building and has a cord.</p>	<p>All ready –made (stock) interior corded window covering products sold in the United States and includes, but is not limited to, cellular shades, horizontal blinds, pleated shades, roll-up style blinds, roller shades, Roman style shades, traverse rods, and vertical blinds. Excludes custom made coverings.</p>	<p>Corded window covering product means an interior window covering that incorporates a bead chain, cord or any type of flexible looped device in its operation.</p>	<p>Corded window covering means an indoor window covering that is equipped with at least one cord.</p>	<p>Blinds which have cords or chains fitted with a hazardous loop that could create a hazard in premises where there are children aged between 0 and 42 months who are likely to have access or be present.</p> <p>Any device used for internal blinds or curtain tracks including but not limited to, vertical blinds, roller blinds, Roman blinds and plantation shutters.</p>
<b>Broad requirements</b>	<p>Information, warnings, installation instructions for avoiding forming dangerous cords, and safety devices with corded internal window coverings.</p>	<p>Durability and performance testing of the tension/hold down devices, anchoring, use instructions and warnings, warning label and pictograms on the outside of stock packaging and</p>	<p>As for the US, excepting cord shears, which are not included.</p>	<p>Regulations specify requirements for construction, performance, labelling and other information, without reference to the CAN/CSA- Z600.</p>	<p>Safety devices for preventing any cords or chains from creating a hazardous loops, tests of blinds and safety systems, fitting of safety devices on cords or chains at the point of manufacture, limits</p>

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		merchandising materials, tests for cord accessibility, hazardous loop testing, roll-up style shade performance, and durability testing of all safety devices.		Length of accessible cords limited and the size of loops that can be created. Any cord that can be reached must not more than 22 cm in length or form a loop more than 44 cm in perimeter. Cords must remain unreachable throughout the useful life of the product.  Warning for the strangulation hazard required on the product, packaging, instructions, and on advertisements.	for cord or chain lengths, warnings and instructions on packaging and point-of-sale.
<b>Safety devices</b>	Cleats, tension devices	Cord shear, release, shroud, tensioning, or restraining devices.	Cord release, shroud, tensioning, or restraining devices.	N/A	Non-integral devices, e.g. cleats and cord guides, must be pre-installed on cord.
<b>Labelling product</b>	✓	✓	✓	✓	✓
<b>Labelling packaging</b>	✓	✓	✓	✓	✓
<b>Cord length, loop, inner cord limits</b>	✓	✓	✓	✓	✓
<b>Installation instructions</b>	✓	✓	✓	✓	✓

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<b>Use instructions</b>	✓	✓	✓	✓	✓
<b>Tests</b>	x	✓	✓	x	✓
<b>Durability</b>	x	✓	✓	✓	✓