

Submission template

Options to address the safety risks of corded window coverings

This is the submission template for the discussion paper, *Options to address the safety risks of corded window coverings*.

The Ministry of Business, Innovation and Employment (MBIE) seeks written submissions on the issues raised in the discussion paper by 5pm on **5 March 2023**.

MBIE intends to upload PDF copies of submissions received to MBIE's website at www.mbie.govt.nz. MBIE will consider you to have consented to uploading your submission in full including your name by making a submission, unless you clearly specify otherwise. Please note that submissions are subject to the Official Information Act 1982.

Submission instructions

Please make your submission as follows:

1. Fill out your name and organisation in the table, "Your name and organisation".
2. Fill out your responses to the consultation document questions in the table, "Responses to discussion paper questions". Your submission may respond to any or all of the questions in the discussion paper. Where possible, please include evidence to support your views, for example references to independent research, facts and figures, or relevant examples.
3. We also encourage your input on any other relevant issues in the "Other comments" section below the table.
4. When preparing to send your submission:
 - a. Delete these first two pages of instructions.
 - b. Include your e-mail address and telephone number in the e-mail or cover letter accompanying your submission – we may contact submitters directly if we require clarification of any matters in submissions.
 - c. If your submission contains any confidential information:
 - i. Please clearly indicate this on the front of your submission or in the accompanying cover letter or e-mail. Any confidential information, together with reasons for withholding the information, should be clearly marked within the text of your submission. MBIE will take such objections into account and will consult with submitters when responding to requests under the Official Information Act 1982.
 - ii. Please provide a separate version of your submission excluding the relevant information for publication on MBIE's website.
 - d. If you do not wish for your submission to be published please clearly indicate this in the cover letter or e-mail accompanying your submission. However, please note that submissions remain subject to request under the Official Information Act 1982. MBIE will consult with submitters when responding to requests under the Official Information Act 1982.
5. Send your submission:

- as a Microsoft Word document or searchable PDF to consumer@mbie.govt.nz (preferred), or
- by mailing your submission to:

*Consumer Policy
Building, Resources and Markets
Ministry of Business, Innovation & Employment
PO Box 1473
Wellington 6140
New Zealand*

Please direct any questions that you have in relation to the submissions process to:
consumer@mbie.govt.nz.

Submission on options to address the safety risks of corded window coverings

Your name and organisation

Name	Ben Herrgott
Organisation (if applicable)	Basford Brands

Responses

Statistical Information	
	<p>Which of the following are you? (tick all that apply)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Consumer/user of window coverings <input type="checkbox"/> Retailer of window coverings <input type="checkbox"/> Installer of window coverings <input checked="" type="checkbox"/> Importer or distributor of window coverings <input type="checkbox"/> Manufacturer of window coverings <input type="checkbox"/> Health or safety related organisation <input type="checkbox"/> Regulator <input type="checkbox"/> Other interested party (please specify)
	<p>For manufacturers of window coverings:</p> <ul style="list-style-type: none"> • What kinds of window coverings do you manufacture? • What proportion of your window coverings have exposed cords?
	<p>For importers or distributors of window coverings:</p>
	<ul style="list-style-type: none"> • What kinds of window coverings do you sell? Readymade curtains, curtain tracks, readymade internal blinds • What proportion of window coverings you sell are imported? 100%

	<ul style="list-style-type: none"> • What countries do you import window coverings from? Mostly China • What proportion of your window coverings have exposed cords? Out of 5 internal blind ranges, 1 is cordless.
	<p>For retailers and installers of window coverings:</p> <ul style="list-style-type: none"> • What kinds of window coverings do you sell? • What proportion of window coverings you sell are imported? • If you sell imported window coverings, what countries are they imported from? • What proportion of your window coverings have exposed cords?
Problem	
	<p>1. Do you agree that corded window coverings in New Zealand currently present a significant safety risk? Why?/why not?</p>
	<p>We do agree that corded window covering without child safety devices installed represent a risk.</p>
	<p>2. Do you believe that government intervention is suitable to address this problem? Why?/why not?</p>
	<p>We do believe that adopting the Australian child safety regulation would be effective. It would also be a rapid process considering all Chinese manufacturers have the expertise in following this regulation. Finally it would be relatively seamless for a majority of domestic suppliers who already use the child safety devices, the labelling and the manual instructions in their products.</p>
Objective and criteria	
	<p>3. Do you agree with the proposed objective? Why?/why not?</p>
	<p>Yes</p>
	<p>4. Do you agree with the use of net benefit as the main criterion to determine suitability of the options? Why?/why not?</p>
	<p>5. What other criteria are important to consider?</p>

Options for managing potential risk	
	6. Are there any options missing?
	No
	7. Do you agree with the advantages and disadvantages of the options identified in the discussion paper?
	We believe that the option of cordless window covering would be cost prohibitive, technologically challenging and overall quite impractical for new Zealand homes who often have large & tall windows. Cordless options are not widely available from offshore manufacturers and limited to certain width and height. In the case of motorised internal blinds, they represent less than 5% of all internal window coverings due to their relatively high cost and complexity of installation.
	8. Do you have further information on the advantages and disadvantages of the options?
Approach to analysis	
	9. What other costs or benefits need to be taken into account?
	<i>Depending on the timeline of rolling out the new regulations, there is a risk to make some stock obsolete (stock on retail premises and at the distributors), which may end up in landfill. Should the Australian standard be adopted, it is likely that a majority of products in the NZ market are already compliant, therefore less waste would be produced.</i>
	10. What other data could you make available, or are you aware of, that may be useful to inform this analysis?
Preferred options	

	<p>11. Do you think the Government should intervene through:</p> <ol style="list-style-type: none"> 1. information and education to educate and encourage consumer behaviour (e.g. communication programmes, social media campaigns, etc.), 2. providing funding for household to install safety devices/replace existing corded window coverings with cordless options, 3. encouraging voluntary modification by businesses to reduce risks (e.g. selling safety devices or cordless designs, providing advice to consumers, etc.), 4. putting in place a mandatory standard for window coverings to be manufactured, sold and installed in the future, or 5. a combination of the above options? Which options? <p>Why do you think this option is best?</p>
	<ol style="list-style-type: none"> 1. <i>Absolutely</i> 2. <i>Possibly</i> 3. <i>Absolutely</i> 4. <i>Yes</i>
	<p>12. If you selected option 4, 'putting in place a mandatory standard', do you think the mandatory standard should require:</p> <ol style="list-style-type: none"> 4A. corded window coverings to include mandatory safety features (e.g. warnings, safety devices), or 4B. prohibit window coverings with exposed cords? <p>Why do you think this option is best?</p> <p>4A will allow for speed of execution, and manageable cost (using the Australian regulation), and effective way of preventing death</p>

Questions for industry and consumers

Questions specific to industry

For manufacturers, importers, distributors, retailers and installers	
	<p>13. What would be the impact on the industry of a mandatory standard regulating the installation of safety features (option 4A)?</p>
	<p>Providing the timeline allows to sell through current stock (generally 1 year for a slow moving item), it should allow for a positive outcome.</p>

	14. What costs would be incurred by your business if a mandatory standard was introduced regulating the installation of safety features (option 4A)? Can you provide monetary estimates of these costs?
	We follow the Australian child safety regulations for all products sold in NZ so the cost would be nil if this is the case.
	15. What would be the impact on the industry of a mandatory standard requiring window coverings to be cordless (option 4B)?
	The level of complexity to implement cordless would be significant and would require a number a very quick technological innovation, change in supply chain to make these less cost-prohibitive to our NZ market (most other countries around the world do not use cordless because for being too costly and impractical)
	16. What costs would be incurred by your business if a mandatory standard was introduced requiring window coverings to be cordless (option 4B)? Can you provide monetary estimates of these costs?
	Giving an accurate amount is challenging but it would increase the product cost significantly. For instance, a plain roller blind fabric that cost \$39 (small 60cm wide blind) would cost about \$174 if motorised with an entry-level motor in 60cm width. For a cordless roller blind, we don't have accurate pricing but understand that the product width is limited, as well as the drop, purely due to the weight of the blind.
	17. Are you aware of any technologies offering safer, affordable, and easier-to-use alternative operating systems for window coverings? If yes, what are these technologies and how are they safer?
	Aside from motorisation, which isn't common on the readymade market, and represents maximum 5% of custom made roller blinds, we are not aware of alternative solutions.
	18. Would cordless window coverings be more expensive for the consumer than the current corded designs? Manual or motorised? Vertical or horizontal? Why? How much more expensive?
	For small size cordless blinds, we estimate (without accurate research) than the price premium would be about 20 to 30% more expensive.

Questions specific to consumers

	For consumers
	19. Would you be willing to pay a higher price for cordless or corded window coverings that are safer for young children? Why/why not?

	20. How much extra would you be willing to pay (percentage) for a compliant design that is safer for young children?

Other comments

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