

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

## Your name and organisation

<b>Name</b>	Martin Healey
<b>Organisation (if applicable)</b>	Martin Healey Ltd (T/A Martec Distribution)

## Responses

Statistical Information	
	<p>Which of the following are you? (tick all that apply)</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Consumer/user of window coverings</li> <li><input type="checkbox"/> Retailer of window coverings</li> <li><input type="checkbox"/> Installer of window coverings</li> <li><input checked="" type="checkbox"/> Importer or distributor of window coverings</li> <li><input checked="" type="checkbox"/> Manufacturer of window coverings</li> <li><input type="checkbox"/> Health or safety related organisation</li> <li><input type="checkbox"/> Regulator</li> <li><input type="checkbox"/> Other interested party (please specify)</li> </ul>
	<p>For manufacturers of window coverings:</p> <ul style="list-style-type: none"> <li>• What kinds of window coverings do you manufacture?</li> <li>• What proportion of your window coverings have exposed cords?</li> </ul>
	<p>Roman Blind (Chain drive Headrails and motorised), Curtain Tracks, Curtain Rods 50% + have exposed cords</p>
	<p>For importers or distributors of window coverings:</p> <ul style="list-style-type: none"> <li>• What kinds of window coverings do you sell?</li> <li>• What proportion of window coverings you sell are imported?</li> <li>• What countries do you import window coverings from?</li> <li>• What proportion of your window coverings have exposed cords?</li> </ul>

	<p>We import, manufacture and sell window furnishing hardware, not the coverings themselves Roman Blind Headrails, Curtain Tracks and Curtain Rods and workroom components (including safety products). Wholesale supply only. We manufacture everything we sell (using imported and locally sourced products). The products are imported from Taiwan and Europe. 50% + have exposed cords</p>
	<p>For retailers and installers of window coverings:</p> <ul style="list-style-type: none"> <li>• What kinds of window coverings do you sell?</li> <li>• What proportion of window coverings you sell are imported?</li> <li>• If you sell imported window coverings, what countries are they imported from?</li> <li>• What proportion of your window coverings have exposed cords?</li> </ul>
	N/A
<b>Problem</b>	
	<p>1. Do you agree that corded window coverings in New Zealand currently present a significant safety risk? Why?/why not?</p>
	<p>No, not really. <b>With proper use of the available safety devices</b>, corded window coverings do not pose a significant risk.</p>
	<p>2. Do you believe that government intervention is suitable to address this problem? Why/why not?</p>
	<p>No. Government assistance is required, not intervention.</p>
<b>Objective and criteria</b>	
	<p>3. Do you agree with the proposed objective? Why?/why not?</p>
	<p>I agree with making window coverings safer by using available safety products, but I do not agree with banning the sale of corded window coverings.</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>No. MBIE haven't consulted the correct businesses to obtain the actual relevant information.</p>
	<p>5. What other criteria are important to consider?</p>

	The impact on business!
<b>Options for managing potential risk</b>	
	6. Are there any options missing?
	7. Do you agree with the advantages and disadvantages of the options identified in the discussion paper?
	Not everything has been taken into account
	8. Do you have further information on the advantages and disadvantages of the options?
	Many types of window coverings simply do not have a cordless option. Also, this doesn't take into account existing coverings. Safety devices are key to solving this issue, not banning certain types of Window Furnishings.
<b>Approach to analysis</b>	
	9. What other costs or benefits need to be taken into account?
	The impact on businesses within the industry
	10. What other data could you make available, or are you aware of, that may be useful to inform this analysis?
<b>Preferred options</b>	
	<p>11. Do you think the Government should intervene through:</p> <ol style="list-style-type: none"> <li>1. information and education to educate and encourage consumer behaviour (e.g. communication programmes, social media campaigns, etc.),</li> <li>2. providing funding for household to install safety devices/replace existing corded window coverings with cordless options,</li> <li>3. encouraging voluntary modification by businesses to reduce risks (e.g. selling safety devices or cordless designs, providing advice to consumers, etc.),</li> <li>4. putting in place a mandatory standard for window coverings to be manufactured, sold and installed in the future, or</li> <li>5. a combination of the above options? Which options?</li> </ol> <p>Why do you think this option is best?</p>

	1, 2 & 3.
	<p>12. If you selected option 4, 'putting in place a mandatory standard', do you think the mandatory standard should require:</p> <p>4A. corded window coverings to include mandatory safety features (e.g. warnings, safety devices), or</p> <p>4B. prohibit window coverings with exposed cords?</p> <p>Why do you think this option is best?</p>
	<b>Definitely not 4B!</b>

## Questions for industry and consumers

### Questions specific to industry

For manufacturers, importers, distributors, retailers and installers	
	13. What would be the impact on the industry of a mandatory standard regulating the installation of safety features (option 4A)?
	A small extra cost. The safety devices are very inexpensive.
	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?
	<p>Not much, as we already provide wall safety boxes for the chain controls with each Headrail as standard.</p> <p>We also already sell the breakaway devices for the lifting cords as well.</p>
	15. What would be the impact on the industry of a mandatory standard requiring window coverings to be cordless (option 4B)?
	<p>Massive! It would destroy the industry. Business would go under. Employees would be laid off. And we would be no better of than we would be if safety devices were used on every blind.</p> <p>4B is a terribly short sighted and lazy option.</p>
	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?

	A loss of 1+ million in annual turnover. Our business would be hugely affected.
	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?
	Breakaway devices for lifting cords and chain control wall boxes basically completely mitigate the problem. They are cheap, easy to install and easy to retrofit. We currently sell them!
	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?
	Much more expensive! Quite simply, cordless options do not exist for many types of window coverings. The cost to business and retailers would be huge, and many would go out of business.

### 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?
	Yes, because the cost of the safety devices to make corded window coverings safe is very small. (About \$5 retail per blind)
	20. How much extra would you be willing to pay (percentage) for a compliant design that is safer for young children?
	\$5 - \$10 per blind

### Other comments

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