

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

## Your name and organisation

<b>Name</b>	Ian Gallagher
<b>Organisation (if applicable)</b>	The Warehouse Ltd

## Responses

Statistical Information	
	<p>Which of the following are you? (tick all that apply)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Consumer/user of window coverings</li> <li><input checked="" type="checkbox"/> <b>Retailer of window coverings</b></li> <li><input type="checkbox"/> Installer of window coverings</li> <li><input checked="" type="checkbox"/> <b>Importer or distributor of window coverings</b></li> <li><input 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>For importers or distributors of window coverings:</p> <ul style="list-style-type: none"> <li>• What kinds of window coverings do you sell? <i>We import curtains in block-out, self-lined, thermal-lined, and triple-weave styles; net and voile curtains; and blinds in roller, roman and venetian styles.</i></li> <li>• What proportion of window coverings you sell are imported? <i>Our curtains are predominantly imported. Blinds are a mix of our own imports, and sourced from local suppliers, who may also be importing.</i></li> <li>• What countries do you import window coverings from? <i>Our own imported products are sourced from China. I can't comment on our local suppliers' manufacturing locations.</i></li> <li>• What proportion of your window coverings have exposed cords? <i>While we have minimised the use of exposed cords where possible, we still have some that use cords. We supply instructions and warnings of the possible risks, and cleats in the hardware packs, for these models to enable the cords to be tied up out of the way of children.</i></li> </ul>

	<p>For retailers and installers of window coverings:</p> <ul style="list-style-type: none"> <li>• What kinds of window coverings do you sell? <i>See our previous responses under "For importers or distributors . . ."</i></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>
<b>Problem</b>	
	<p>1. Do you agree that corded window coverings in New Zealand currently present a significant safety risk? <i>Yes</i> Why?/why not? <i>A large proportion of existing window coverings, especially in older houses, may have lifting cords that are looped and extend to a low level, and in the case of venetian blinds may have tilting cords that also are long and looped or connected posing an entrapment hazard.</i></p>
	<p>2. Do you believe that government intervention is suitable to address this problem? Why/why not? <i>Yes. While the majority of suppliers/importers are already providing products that do meet industry guidelines on cord types and safety, there would always be outliers who need to be compelled to meet acceptable standards.</i></p>
<b>Objective and criteria</b>	
	<p>3. Do you agree with the proposed objective? Why?/why not? <i>Yes, we agree with the objective. NZ has a clearly disproportionate child fatality rate compared to the other countries cited.</i></p>
	<p>4. Do you agree with the use of net benefit as the main criterion to determine suitability of the options? <i>Yes</i></p>
	<p>5. What other criteria are important to consider? <i>No comment on this point</i></p>
<b>Options for managing potential risk</b>	
	<p>6. Are there any options missing? <i>No comment on this point</i></p>
	<p>7. Do you agree with the advantages and disadvantages of the options identified in the discussion paper?</p>
	<p>8. Do you have further information on the advantages and disadvantages of the options?</p>
<b>Approach to analysis</b>	
	<p>9. What other costs or benefits need to be taken into account?</p>
	<p>10. What other data could you make available, or are you aware of, that may be useful to inform this analysis?</p>
<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><i>We prefer to continue with the existing information programs, and safety device installation and replacement options (Options 1-3) to reduce the effect of <b><u>the inventory of older curtains and blinds that will remain in use for some time.</u></b></i></p> <p><i>We believe that <b><u>new products do need to conform to the mandatory safe design guidelines proposed in Option 4A.</u></b></i></p> <p>Why do you think this option is best?  <i>This is our current practice. It has had minimal effect on our product ranges and has been proven to be achievable.</i></p>
	<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"> <li>4A. corded window coverings to include mandatory safety features (e.g. warnings, safety devices), or</li> <li>4B. prohibit window coverings with exposed cords?</li> </ol> <p>Why do you think this option is best?  <i>Please see above – option 4A</i></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)?  <i>This is our current practice. It has had minimal effect on our product ranges and has been proven to be achievable.</i></p>
	<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?  <i>We are unable to provide this information.</i></p>
	<p>15. What would be the impact on the industry of a mandatory standard requiring window coverings to be cordless (option 4B)?</p>

	<i>We are aware of problems in getting satisfactory cordless options at reasonable cost and ensuring that they are reliable in use. This would have an uncertain effect on costs and take-up in the short term.</i>
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?	<i>We can see some costs being incurred to change to this technology, depending on whether our suppliers already have such options. We cannot estimate these costs.</i>
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?	<i>We are unable to provide this information.</i>
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?	<i>We are unable to provide this information.</i>

### 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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