

# Submission template

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## 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 **19 March 2023**.

MBIE intends to upload PDF copies of submissions received to MBIE's website at [www.mbie.govt.nz](http://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](mailto: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](mailto:consumer@mbie.govt.nz).

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

## Your name and organisation

<b>Name</b>	Ellis Mitchell
<b>Organisation (if applicable)</b>	New Zealand Window Shades Limited

## 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 type="checkbox"/> Retailer of window coverings</li> <li><input type="checkbox"/> Installer of window coverings</li> <li><input type="checkbox"/> <b>Importer or distributor of window coverings</b></li> <li><input type="checkbox"/> <b>Manufacturer of window coverings</b></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>Manufacture: Roller Blinds, Venetian Blinds, Vertical Blinds, Pleated Blinds, Cellular / Honeycomb blinds</p> <p>Corded: All product categories listed above have a corded option</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>Imported products: Cellular, Silhouette, Lumishade, Luminette, Pirouette, Shutters  % of product imported: 15%  Countries: Australia, China, USA  Exposed cords: all products have a corded option</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>
<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>Yes. We offer all products with child safety mechanisms to reduce the risk.</p>
	<p>2. Do you believe that government intervention is suitable to address this problem?  Why/why not?</p>
	<p>Yes</p>
<b>Objective and criteria</b>	
	<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>yes</p>
	<p>5. What other criteria are important to consider?</p>
	<p>Imported ready made / custom made products. Roman blinds – worst product for exposed cords with limited options to reduce the risk</p>
<b>Options for managing potential risk</b>	

	6. Are there any options missing?
	no
	7. Do you agree with the advantages and disadvantages of the options identified in the discussion paper?
	agree
	8. Do you have further information on the advantages and disadvantages of the options?
<b>Approach to analysis</b>	
	9. What other costs or benefits need to be taken into account?
	<i>Not relevant to NZWS as we already include child safety devices. Cost of components &amp; Increased installation time</i>
	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>
	<i>5: All options have merit &amp; should be a broad approach to the issue</i>
	12. If you selected option 4, 'putting in place a mandatory standard', do you think the mandatory standard should require:

	<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>
	<p>4A. Safety labels wont add much value as the consumer will remove immediately after install due to aesthetics. Mandatory safety devices from manufactures makes sense however only useful if installed.</p>

## 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)?	
	Challenging to administer as it relies on an installer which is usually a sub contractor to the retailer.
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?	
	None – already built into the NZWS product cost.
15. What would be the impact on the industry of a mandatory standard requiring window coverings to be cordless (option 4B)?	
	Massive. The most common option for consumers is the corded option. It would cause a significant price increase to consumers to only offer cordless options as the mechanisms & labpour costs will be higher. Cordless options are also less reliable & therefore would incur a higher servicing cost.
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?	
	To difficult to substantiate. We have cordless options on all products we manufacture
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?	

	<p>Wand operation</p> <p>Automation</p> <p>Hand operated / counter balance spring technology</p>
	<p>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?</p>
	<p>Significantly more expensive. Between 30% - 100% more than corded options depending on product type</p>

### Questions specific to consumers

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

### Other comments

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