

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

Your name and organisation

Name	Zoe Tipa Chief Nurse [REDACTED]
Organisation (if applicable)	Whānau Āwhina Plunket

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 type="checkbox"/> Importer or distributor of window coverings <input type="checkbox"/> Manufacturer of window coverings <input checked="" 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? • What proportion of window coverings you sell are imported? • What countries do you import window coverings from? • What proportion of your window coverings have exposed cords?
	<p>For retailers and installers of window coverings:</p> <ul style="list-style-type: none"> • What kinds of window coverings do you sell?

	<ul style="list-style-type: none"> • 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>Yes, these injuries and deaths are preventable. There is a clear risk to life posed by these products to young children who are exposed to them but lack the development capabilities to recognise and manage that risk themselves. It is impossible to supervise tamariki 24/7 and these blinds are often in sleeping spaces so pose a risk during this time when tamariki are not constantly and actively supervised.</p> <p>An Australian Competition & Consumer Commission (ACCC) review of safety standards for corded internal window coverings found most deaths occur in the bedroom involving children aged between 16 months and 36 months, who are particularly vulnerable to strangulation, as their heads weigh proportionately more than their bodies, they have insufficient muscular control to free themselves, and they have underdeveloped windpipes which means they can suffocate quickly and silently, losing consciousness after 15 seconds (Australian Competition and Consumer Commission 2019).</p> <p>In New Zealand, three children have died over the past ten years (2012-2021) due to cords in window coverings. This is an average of 0.33 deaths per year, equivalent to 0.12 deaths per 100,000 children under 4 years of age. Each death represents a deeply tragic loss of life for the child, their whānau, and the wider community. While the number of injuries and hospitalisations is unknown, deaths are likely to be the tip of an iceberg. Furthermore, in a recent consumer survey just over half of all respondents were able to identify air restriction from entanglement in a corded window covering as a potential cause of harm.</p> <p>For our analysis we have used the rate of 0.67 deaths per year identified in the Coroner Borrowdale's report. The risks apply mostly to roller blinds, concertina blinds and slatted blinds like Venetian blinds, which have long draw-cords that hang loosely below their cleating point. Other corded window coverings have risks but may be lower: e.g. curtain pulls often work on a closed-loop cord, kept taut by a weight on the bottom and often finishing above adult waist level rather than reaching down to the floor.</p> <p>2. Do you believe that government intervention is suitable to address this problem? Why/why not?</p>
	<p>Regulation reduces the risk- particularly when it is backed up by other interventions. Education alone is not an effective approach to reaching the entire breadth of the population. Regulation has also proven in the past to be an effective way to improve housing-this is evident in the approach taken to the healthy homes legislation particularly insulation and curtains regulations.</p>

Regulation is congruent with international best practice and evidence suggests that in the long term it saves lives and is economically based.

Objective and criteria

3. Do you agree with the proposed objective?
Why?/why not?

Yes, Whānau Āwhina Plunket agrees reducing deaths and injuries caused by corded window coverings is important. Protecting young children is a high priority for Whānau Āwhina Plunket. We acknowledge that complete elimination of all risk is likely to be impossible.

However, cost effectiveness is not the only criterion that makes something worth doing or even practical to do. We do not think cost effectiveness should be singled out to the exclusion of other criteria in the proposed objective. We also recommend that it is important that any reduction in deaths and injuries caused by corded window coverings should be equitable.

Therefore, we would suggest that one objective should be to equitably reduce deaths and injuries caused by corded window coverings, to the extent it is practical to do so.

A second objective should be to reduce exposure to corded window coverings in rented properties with children. Almost half of all families are living in rental accommodation when their children are nine months to two years old and most of those are in private rentals. This would address the split incentives between landlord and tenant, in that window coverings may be installed by people without children with little consideration for future occupants with children

However, we note that from 11 February 2021 under the Residential Tenancies Act 2020, tenants can ask to make changes to the rental property and landlords must not decline if the change is minor.

Minor changes to the property include fixtures like curtains replacing corded blinds ([Tenancy Services](#)).

A third objective should be to mitigate the risk of harm from existing corded windows coverings.

It is important to consider how existing blinds will be addressed - while the provision of products is an option, that doesn't help if the family do not have the tools (physical) and skills or full understanding of the issue to install them. We would recommend that option would need to include funded install of safety gear. We would also raise the issue that Rental properties will pose a challenge - in general they won't change unless mandated, renters unwilling to ask for change as already feeling vulnerable around being asked to vacate, Kainga Ora homes should all be following best practice and should be required to make the changes regardless. Review of current emergency housing - needs to be a requirement that they either retrofit existing with safety devices or replace with options that do not have exposed cords.

	<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 – Net Benefit based on the current estimate of the ‘statistical value of life’ of \$5.8 million is not suitable to use in the context of infant and toddler deaths. It is based on estimating the value of the life of a median aged person in good health. These deaths and injuries do not occur to median aged people in good health. The distribution of these injuries is almost exclusively in pēpi and tamariki under 3 years old. Equity requires that all QALYs be equally valued, and therefore likewise for all lives with the same residual life expectancy and quality of life. The residual life expectancy of pēpi and tamariki is much greater than the residual life of a median aged person. Therefore, the statistical value of the life of pēpi and tamariki should reflect their residual life expectancy not that of a median aged person. This would significantly increase the ‘statistical value’ of an infant or toddlers’ life.</p> <p>Whānau Āwhina Plunket’s Vision is that in the first 1,000 days setting the path of wellness in our communities, for generations to come. This recognises that pēpi and tamariki are the source of all future generations. In the context of the lives of pēpi and tamariki Net Benefit should also consider the ‘statistical value of future lives’.</p> <p>We note that costs benefit analysis has several limitations. Costs are frequently easy to define and monetise and the benefits are much harder to monetise. The cost benefit framework implies that a cost or a benefit of the same value has the same impact on society which in many cases is not true. There is considerable uncertainty in the outcomes. The benefits often extend much further into the future (including future generations) and these future benefits are discounted in cost benefit analysis. This is problematic especially when the benefits cross generations.</p> <p>Furthermore, cost benefit analysis typically ignores equity. According to the standard net benefit framework, a program is cost-effective if its benefits are greater than its costs. Nevertheless, if it harms equity then a cost-effective program might not be worth implementing. And if a cost-ineffective program improves equity, then it might be worth implementing.</p> <p>More holistic criteria are required. Net Benefit could be one criterion if the statistical value used equitably reflects pēpi and tamariki residual life expectancy, ideally includes some allowance for the value of future lives, and values equity.</p>
	<p>5. What other criteria are important to consider?</p>
	<p>It is critically important to also consider the impact of losing a child on wider whanau. Equity is an important issue for Whānau Āwhina Plunket. Māori and Pacific children tend to be exposed to a greater number of risk factors for vulnerability than other New Zealand children. This is true of risk factors in the home environment (Growing Up in NZ) and is likely to be true of the frequency to which children are exposed to corded window coverings. Although we are not aware of data to support this. Regardless of whether there are inequities in the deaths and injuries from corded window coverings or exposure to them any interventions to reduce deaths and injuries must not create inequities in the distribution of the benefits. So, equity is an important criterion.</p> <p>For example, whānau living in areas of high deprivation are less likely to benefit from interventions that target new window coverings because they are less likely to be purchasing</p>

	them. People living in areas of high deprivation are more likely to be living in rental accommodation where they have less influence over the type of curtains.
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?
	Each death represents a deeply tragic loss of life for the child, their whānau, and the wider community and there are far reaching impacts on that wider whanau which are difficult to quantify, but which will impact over a long period of time.
	8. Do you have further information on the advantages and disadvantages of the options?
	No
Approach to analysis	
	9. What other costs or benefits need to be taken into account?
	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>
	<p>Option 4 combined with 1 and 2:</p> <p>We suggest this because option 4 is Prospective - regulation deals with this issue in a regulated way for all future generations. We would suggest combining it with 1 and 2 – this will address existing blinds especially for high need whanau. (The issues surrounding</p>

	installation and ongoing maintenance as we outlined above will need consideration for number 2).
	<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>
	4B as 4A would still require installation and maintenance. These issues are problematic as we have outlined above.

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)?
	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?
	15. What would be the impact on the industry of a mandatory standard requiring window coverings to be cordless (option 4B)?
	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?

	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?
	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?

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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