Collaborative Response to the Consultation Regulatory Impact Statement (CRIS): Improving the Effectiveness of the Consumer Product Safety System

TO: Commonwealth Treasury, on behalf of Consumer Affairs Australia and New Zealand

FROM: Consumer Product Injury Research Advisory Group (CPIRAG) (Including Queensland University of Technology, Jamieson Trauma Institute, Queensland Injury Surveillance Unit, Goodstart Early Learning Centre, and Kidsafe Qld), Royal Australasian College of Surgeons (RACS), Australasian Injury Prevention Network (AIPN) and Kidsafe Australia.

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DATE: 29 November 2019

OVERVIEW

As representatives of the Consumer Product Injury Research Advisory Group, Royal Australasian College of Surgeons, Australasian Injury Prevention Network and Kidsafe Australia, we support the introduction of a new safety duty – higher safety standard (Option 6). This option has the most potential to reduce product-related injury by preventing unsafe products from entering the market by changing business attitudes to product safety, improving regulator responsiveness to any unsafe products that slip through the system and bringing Australia's product safety framework into line with international regulatory best practice.

The Australian product safety system has been the subject of numerous reviews and research has shown there is an urgent need to improve the prevention orientation of the system. Currently, this is geared towards reaction through acting on the small number of reported product-related injuries and the subsequent removal of reported unsafe products at the retail level rather than prevention through stopping unsafe products getting to market. This reactive system places a significant unbalanced burden on regulators and the health sector and exposes consumers to unnecessary and preventable product-related injury.

RESPONSES TO QUESTIONS FOR COMMENT

Do you agree with the key problems identified in the existing product safety system? Please provide any examples or evidence to explain your views.

1. We agree with the key problems identified in the existing product safety system and provide the following examples and evidence to explain our views.

2. Unsafe products are entering the market and causing harm to consumers, businesses and the economy:

   2.1. The current reactive product safety system is heavily reliant on the identification of product-related injury, but is not supported by an adequate product specific injury surveillance model:

   i) **Reporting:** Consumer complaints and mandatory reporting are important sources of product-related injury information but have limitations with consumers needing to first report the injury to either the regulator or supplier. In the case of mandatory reporting, the supplier must then follow through with reporting an injury it considers to be a 'serious injury' to the regulator. It is not clear whether consumers are aware that not all injuries, or near misses, reported to suppliers trigger a mandatory reporting requirement, or that there are alternative reporting avenues directly with regulators.

   Clinician reporting is another valuable information source. Evidence suggests that clinicians are unaware that the ACCC and State based product safety regulators have an interest in receiving advice on product-related injury. When injured consumers seek treatment from emergency departments, general practitioners or other health facilities there is no formal process for gathering product specific data. Although there is a direct reporting mechanism for clinicians to alert the regulator of a product-related injury (email address), the responsible regulator and the process required is not widely known or understood.

   These limitations result in under-reporting of product-related injuries to regulators.

   The current process of reporting an incident is too late for the individual who has been harmed.

   ii) **Product-related injury data:** Surveillance for identification and monitoring of product-related injury from health datasets is also another important source of data but has significant limitations. There is no Australia-wide health dataset that allows identification of product-related injury, and there is often a significant time lag in obtaining data from various health datasets due to procedural factors and data governance complexities. The clinical coding of the data provides challenges in identifying product involvement and all relevant injury factors, and gathering more complete information about an incident requires manual audits and data mining of non-routine/unstandardized clinical notes[1]. Vallmuur's et al., 2018 published study[2] highlighted the limitations of using health datasets to monitor injuries associated with regulated children's consumer products and identified the need for

[1] Catchpoole, J., Walker, S., & Vallmuur, K. (2016) The Extent of Consumer Product Involvement in Paediatric Injuries. *International Journal of Environmental Research and Public Health, 13*(7). doi:10.3390/ijerph13070654

[2] Vallmuur, K., Lukaszyk, C., & Catchpoole, J. (2018) Monitoring Injuries Associated with Mandated Children's Products in Australia: What Can the Data Tell Us?. *International Journal of Environmental Research and Public Health, 15*(10). https://doi.org/10.3390/ijerph15102077

improvements in current product injury recording practices in the health sector. There is also a lag of several years in obtaining coronial data which is only available once the case is closed following the inquest process.

These limitations negatively impact on the operation of the current product safety system which is essentially reactive to the identification of product-related injury.

2.2. There is an inability to work preventatively in the current framework due to a disconnect between the ACCC and the health sector. Clinicians and injury data collectors need to be actively engaged to identify hazardous products and gather intelligence in a proactive surveillance model. There also appears to be a lack of reciprocity between the ACCC and the agencies they rely on for data and a lack of transparency around how regulator estimates are derived with limited consultation with those with injury surveillance expertise. To work well, a surveillance system needs to inform up as well as receive information back from above on outcomes and potential areas of new interest.

2.3. Niven's et al., 2019 published study[3] of Australian and US recalls identified the growing number of recalls related to unsafe children's products in Australia. It found that Australia and the USA had a similar number of product safety recalls related to children's products over the period 2011-2017 (which is unexpected given the US consumer market is 18 times larger than the Australian consumer market). In addition, Australian recalls increased by 88% over 7 years, while US recalls decreased by 21% over the same period. The study also identified that the existing Australian Consumer Law provisions do not provide effective deterrence against the supply of unsafe children's products. It found that the majority (62%) of Australian recalled children's products failed to comply with mandatory safety requirements. In contrast, 23% of US recalled children's products failed to comply with mandatory safety requirements. The high-level of non-compliance in Australia is concerning given that these mandatory safety requirements apply to a small number of products associated with the greatest risk of product-related injury to children.

2.4. We agree that unsafe products also cause harm along the supply chain as businesses remedy safety issues, write-off stock and dispose of unsafe goods. The current system does not reward businesses that invest in safety and may place such businesses at a competitive disadvantage. The button battery case study in the CRIS highlights this issue, where the ACCC observed that: suppliers' perceptions were that the voluntary nature of the Code resulted in subscribers being unfairly penalised, whereas other retailers who did not adopt the Code suffered no consequences. Niven's et al., study (see section 2.3 above) also identified the varying levels of industry commitment to product safety in Australia as evidenced by high levels of non-compliance in recall data related to children's products.

3. The current product safety system is slow to respond when harm occurs:

3.1. We concur that there are significant time lags in exercising regulatory powers to respond effectively when risks are identified. The current system is not agile enough to respond to fast paced consumer trends, and there is a lack of ability to transfer

[3] Niven, C., Mathews, B., Harrison, J.E., & Vallmuur, K. (2019). Hazardous children's products on the Australian and US market 2011-2017: an empirical analysis of child-related product safety recalls. *Injury Prevention* Published Online First: 08 August 2019. https://injuryprevention.bmj.com/content/early/2019/08/08/injuryprev-2019-043267

knowledge gained about hazards associated with one product to other like products as it is not a horizontal framework.

3.2. Section 2.1 identified that there are significant limitations with the identification and monitoring of product-related injury from health datasets. This also impacts on the ability to proactively gather data to support a regulatory response. An improved national injury surveillance system has potential to address some of these limitations (see section 7 discussion). Even with the best system in place, clear trends may take time to emerge and regulators need to be aware of the prevention principle whereby the lack of conclusive scientific evidence does not necessarily mean no action should be taken on an emerging issue. Rather, a more comprehensive scientific risk assessment needs to be undertaken to reach a policy decision.

3.3. The heavy reliance on recalls is also of concern given their overall lack of effectiveness which means that consumers continue to be at risk of product-related injury. Niven's et al., study[4] identified a number of recommendations to improve the information in Australian recall notices, such as a requirement to include de-identified incident and injury data to improve the ability to effectively communicate the product hazard to consumers. The recall guidelines could also be updated, including more contemporary communication methods. Although such measures could improve recall effectiveness, recalls are a post-market tool that should be used more appropriately to deal with an unsafe product that slips through the system rather than the primary response of a product safety system. Suggestions are that some regulators use the recall system as an enforcement tool to remove unsafe products because the alternative options such as banning an unsafe product, are simply too time consuming and cumbersome. The product safety objective should be to reduce the number of recalls by ensuring products are safe prior to entering the marketplace. The current system is flawed in that there is little incentive (or perhaps onus) on business to ensure a higher level of safety to prevent unsafe goods entering the marketplace thus reducing the need for recalls. As there is currently no general safety requirement this somewhat haphazard approach to product safety recalls will continue.

4. There is confusion and misunderstanding in the market:

We agree that the public appear to have limited understanding of how the current product safety system operates and there is a presumption of safety associated with products available for purchase both in Australia and from online (sometimes international) markets. For example, research undertaken in 2013 with CPIRAG's support into infant change tables was used to drive a review by Standards Australia. This research found that over two-thirds of parents falsely assumed there *was* a mandatory safety standard for this type of baby furniture, and that parents and caregivers were unable to determine the safety of a change table by visual inspection alone. When asked to comment on 2 change tables NOT recommended by Choice in April 2013, over 71% and 50% respectively thought both models looked 'safe'. Less than 10% of parents thought their baby would have a chance of falling off a change table. Given that change table-related injuries are one of the leading causes of emergency department injury presentations in infants, the impact of this safety presumption/confusion is significant. The results of this study could arguably be replicated across numerous products from this consortiums experience: consumers have an

[4] Niven, C., Mathews, B., Harrison, J.E., & Vallmuur, K. (2019). Hazardous children's products on the Australian and US market 2011-2017: an empirical analysis of child-related product safety recalls. *Injury Prevention* Published Online First: 08 August 2019. https://injuryprevention.bmj.com/content/early/2019/08/08/injuryprev-2019-043267

understandable but inaccurate presumption of a safety requirement of products (particularly those targeting vulnerable populations) and a worrying reliance on presumed safety features which potentially contributes to their risk of injury.

Do you agree with the policy objectives outlined in this RIS? What are your reasons?

5. We partially agree with the policy objectives outlined in the CRIS for the following reasons:

   5.1. The CRIS refers to the objectives in the explanatory memorandum for the ACL bill. This memorandum states at 24.17 that "The primary objective of product safety regulation is to promote consumer confidence in the market through eliminating risks that cannot be mitigated by market forces alone, and, in doing so, to enhance demand". The economic underpinning of this objective focuses on enhancing consumer demand rather than reducing harm to consumers. A review of recent product safety bans indicates a primary justification for banning products is to protect the public, or vulnerable subpopulation, from risk of injury, not to prevent a market distortion or enhance consumer demand. While efficient operation of consumer markets is an important consideration, it should not be the primary objective of the product safety system.

   5.2. The four policy objectives identified in the CRIS are more appropriate and we suggest the following highlighted amendments to clearly identify the aim of reducing harm to consumers and shift to a more proactive approach:
   i) reduce harm to consumers by providing sufficient controls, guidance, and incentives to prevent unsafe consumer products from entering or remaining on the Australian market whilst balancing consumer access and choice of products;
   ii) be proactive, responsive and effective in dealing with potential or actual instances of harm and injury caused by unsafe consumer products;
   iii) ensure the regulating authorities have the capacity to meet ongoing challenges that an ever evolving and global marketplace brings;
   iv) anticipate, monitor and adapt to future changes or trends in products and the market;
   v) not hinder the efficient operation of consumer product markets by imposing unnecessary costs on businesses.

   5.3. Acknowledging that product safety is a public health concern could overcome some of the disconnect between the health sector and other government silos as the agencies have similar public health goals related to injury prevention. It would also provide additional justification for the product safety framework to have an injury prevention orientation (i.e. prevent unsafe products entering the market), for more weight to be given to the safety of the public from product-related injury rather than market impacts, and to engage with clinicians and injury data collectors to identify hazardous products and gather intelligence in a proactive surveillance model.

What impact will the proposed options have on product safety, risks to consumers, access to products as well as business practices and costs? Please provide details.

6. We offer the following comments on the potential impacts of the proposed reform options:

Option 1: *No change to the system:*

- **Not supported**- continuation of a reactive system with an overreliance on market forces which relies on the community as the test lab and consumers as the subjects for product safety assessment. This strategy does not arm regulators with effective tools, results in slow fragmented responses and provides ineffective deterrents to supplying unsafe products, allowing unscrupulous suppliers to profit at the expense of reputable suppliers and consumers.

Option 2: *More education and increased industry engagement:*

- **Not supported** as a standalone option as it is unlikely to result in significant changes and therefore unlikely to increase safety for the consumer - see Option 1 comment.
- Any new reform will require an education campaign targeted at manufacturers, importers and traders to ensure they are aware of their responsibilities, and a campaign to increase consumer awareness of any new obligations and avenues for consumer complaints.

Option 3: *New enforcement instrument - would provide an additional post-market tool to allow regulators to take action in response to product safety incidents by introducing a prohibition on continuing to supply unsafe products accompanied with the power to issue a 'Notice of Risk'*:

- **Not supported**- continuation of a reactive system heavily reliant on post-market tools.
- This post-market tool still heavily relies on the identification of unsafe products and/or product-related injury (note the limitations identified in 2.1 above) and places the onus on consumers to identify and regulators to prove that the product was/is unsafe. While such a tool is likely to reduce future injuries, it cannot reduce the ones that have occurred.
- Option 3 could potentially be a complementary tool to reform Option 6, but the current compliance and enforcement tools will need to be assessed within a General Safety Provision (GSP) framework first to identify gaps and potential modification of current tools.

Option 4: *A new protection power - would give regulators the power to make direct orders to address conduct that has caused or is likely to cause significant detriment:*

- **Not supported**- continuation of a reactive system heavily reliant on post-market tools.
- This post-market tool still heavily relies on the identification of unsafe products and/or product-related injury (note the limitations identified in 2.1 above).
- Option 4 could potentially be a complementary tool to reform Option 6, but the current tools will need to be assessed within a GSP framework first to identify gaps and potential modification of current tools.

Option 5: *A new safety duty aligned with the existing ACL - would require traders to take reasonable steps to ensure products placed on the market are not unsafe*:

- **Not supported**- this is not really a new safety duty as it relies on continuation of the existing benchmark standard of safety under the ACL defective goods regime and any safety improvement would only relate to those products that do not meet this existing standard. This is a lower safety threshold to the definition of 'safe product' modelled on a UK GSP (Option 6).
- Option 5 is not consistent with the EU GSP. It was identified at the OECD Roundtable on Consumer Product Safety that different product safety requirements and inconsistent policy and enforcement frameworks used by national governments *increase the risk of product safety failure*[5]. This could result in Australia becoming known as having a 'lower safety standard' and could impact negatively on the reputation of Australian products.
- In proving a breach of the Option 5 duty, the onus is still on regulators to establish that the product was unsafe and that reasonable steps were not taken by the trader. As referred to above, there are significant limitations with identifying product-related injury. Also, under this option regulators continue to bear the economic burden of proving a product is unsafe which impacts on responsiveness (i.e. product testing and engaging product safety experts). Option 6 is preferable as it places an onus on traders to prove that the product is safe rather than on regulators to prove the product is unsafe.

Option 6: *A new safety duty with a higher safety threshold - would require traders to ensure products placed on the market are safe (modelled on the UK GSP):*

- **Supported**- reasons are provided in section 7 below.

What is your preferred reform option, or combination of options? What are your reasons?

7. Our preferred reform option is Option 6 for the following reasons:

- **Prevention orientation:** This option has the most potential to reduce product-related injury by preventing unsafe products from entering the market. Using a definition of 'safe product' modelled on the UK GSP would be a higher safety threshold than that proposed by Option 5 (based on the current defective goods regime) and opens up the possibility of using evidence from overseas jurisdictions around safety hazards which will facilitate proactive responses before preventable incidents occur.

- **International marketplace:** This option would bring Australia's product safety framework into line with international regulatory best practice and be consistent with many global partners. The majority of consumer products are imported into Australia, so many suppliers in the global supply chain would already be familiar and/or already complying with this approach.

- **Performance outcomes:** The key focus of a GSP is on safety outcomes rather than technical detail. This has the potential to give greater flexibility to suppliers because safety benchmarks would be based on performance and outcomes rather than on specific means of achieving the safety outcome. This could reduce the negative impact of the restrictive nature of the current standards-setting process which has been criticised as design restrictive, cumbersome, and to some extent ignoring what is happening outside Australia.

[5] Organisation for Economic Co-operation and Development (2008) *OECD Roundtable on Consumer Product Safety: Summary Report*, 5, http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?doclanguage=en&cote=dsti/cp%282009%291/final

Transitioning to a hazard-based framework whereby standards, industry codes and regulations are developed to reduce known risks rather than introduce prescriptive and technical detail should come as no surprise to many businesses. There are already standards, guides and codes available with a hazard identification and risk reduction focus that industry currently rely upon and could be drawn upon to demonstrate compliance with the Option 6 obligations. These include: *AS/IS10377-2017 Consumer Product Safety – guidelines for suppliers, ISO/IEC Guide 50 Safety aspects - guidelines for child safety in standards and other specifications, AS/NZs/ISO Safety standard for toys, Industry Code for Consumer Goods that Contain Button Batteries,* and *Standards Australia Handbook HB 295.1 – Product Safety Framework, Part 1 – Hazard Assessment for Product Safety.*

- **Clarity:** Businesses will look to government for safety guidance under this option. The proposed inclusion of prescriptive obligations similar to the UK GSP would bring clarity to the framework so that businesses understand how to demonstrate that products are safe depending on their role in the supply chain. The publication of supporting guidance or directives from regulators would enhance this understanding and provide a tool for regulators to communicate their expectations regarding emerging safety issues in the marketplace.

- **Improved responsiveness:** This option has the most potential to improve regulator responsiveness to unsafe products, as it places an onus on traders to prove that the product is safe rather than on regulators to prove the product is unsafe. This may also assist in dealing promptly with 'fly-by-night' traders before they exit the market.

- **Improved national injury surveillance system:** The development of an improved product specific injury surveillance system is a key priority of the ACCC, regulators, and injury prevention advocates alike. Under Option 6, industry is also likely to lend a voice to this priority as it will require improved evidence of product-related injury or safety incidents to inform their risk assessments. This additional voice may drive change more expediently.

  An improved product specific injury surveillance system could include a national product safety incident database and innovative surveillance methods. The development of a national incident database could more precisely identify, assess and monitor product-related injury and there is great potential for such a database to draw together disparate sources of product-related injury data from mandatory reports, recalls, consumer complaints and health datasets. There is also a need for more innovative methods to quickly identify and monitor hazards in real time such as crowd sourcing/social media surveillance/trauma clinical networks/responsive surveillance approaches. The development of an improved injury surveillance system should draw broadly on injury surveillance expertise and be a tool that is developed for the benefit of regulators, health services, industry, academia and the community to facilitate knowledge generation and sharing of expertise.

- **Fairness:** This option appropriately applies to all businesses in the supply chain to a degree that is proportionate with their ability to affect the safety of products and would fairly distribute compliance costs across the supply chain.

- **Consumer choice:** the CRIS indicates that Option 6 may result in a potential negative impact on the cost and range of products available to consumers. It is unclear if this assessment is based on evidence from the EU or Canada and focused on the initial implementation impact. Any negative impact needs to be weighed up with the positive impact related to reduction of harm to consumers, and also potential longer-term positive impacts on consumer choice as standards focus on risk reduction rather than prescriptive technical detail.

- **Consumer support:** the 2018 CHOICE Consumer Pulse survey of 1,029 households found that 79% of Australians believe that businesses are currently required by law to ensure the products they sell are safe before releasing them for sale. This result lines up with this consortiums experience (see 4 above). The public consensus is in favour of product safety being ensured and this should be respected. Establishing legislation to support pre-market safety would reflect this public expectation.

8. We offer the following model considerations if Option 6 is approved as the preferred option:

    - **Regulator powers:** An assessment of the existing powers should be undertaken to ensure that regulators have the tools to allow them to take swift and comprehensive action when unsafe products slip through and reach the market. This assessment should include whether the current tools require modification to allow regulators to be more responsive (i.e. delegation of powers to agency head, less stringent procedural requirements, inclusion of additional orders (e.g. stop sale orders) or extended interim ban timeframes) or whether additional tools such as Option 3 or 4, or those prescribed in Part 3 of the *General Product Safety Regulations 2005* (UK) are required.

    - **Mandatory reporting:** Could be aligned with the GSP as per the UK GSP model (section 9 of the *General Product Safety Regulations 2005* (UK)). This would provide consistency with international models and broaden the number of unsafe products that will come to the attention of the regulator.

    - **Clarity:** Consideration should be given to the interaction of Option 6 with specialist product safety regimes and whether amending the definition of "consumer goods" could add clarity to the operation of the regimes.

    - **Relationship with mandatory safety standards:** It is unlikely that the introduction of a GSP will reduce the need for some form of mandatory safety standards for specific products that have significant hazards associated with them or for products that are aimed at high risk injury populations such as children. However, adopting a risk management approach may reduce technical detail and allow the focus to shift to standards or parts of standards that have an injury prevention component. It may also allow comparable overseas standards or parts of standards to be more relied upon as a safety benchmark.

    - **Customs and border control:** The current system appears to have a disconnect with customs and border control to be aware of what products are coming into the market. As Option 6 is focused on reducing the risk of unsafe products entering the marketplace, there will be a need for product safety to be more formally linked with the customs and border control agencies. Perhaps a formal import safety plan can form part of the implementation strategy for Option 6. Also, given the high level of non-compliance

with mandatory standards identified in Niven's et al study, does the model need to include conformity certification requirements for products subject to mandatory standards? The USA has this requirement and shipments are denied importation access if the conformity certificate is not supplied.

- **Cultural change:** Regulators will need to have the capacity and resources to effectively manage the cultural shift to a proactive product safety system through:
  i) **Providing guidance to industry** in a clear and consistent manner by product safety regulators will be critical for the successful introduction of a GSP, in particular educating micro and small business on meeting their obligations under a GSP system and providing data and other resources to inform businesses about injury risks, hazards, means of meeting their obligations under a GSP, impacts and outcomes.
  ii) **Formalising training** of personnel advising on product safety both in the public and private sector. For example, services are available for testing against prescriptive standards but there are limited providers to give opinions about the safety of products and no current regulation or accreditation of the consultant industry to ensure quality of their services.
  iii) **Educating consumers** about the new obligations under a GSP and avenues for consumer complaints and capture of injury reports. The CRIS identified that there is consumer confusion and misunderstanding in the market. It could be considered that one of the fundamental components of a general safety requirement is for suppliers to ensure consumers are made fully aware of how to use their products safely as well as assembling, maintaining and disposing of products in the safest manner, and how to report safety incidents.
  iv) **Developing relationships** with frontline health staff who are in a position to rapidly identify and report significant product-related injuries together with details of injury mechanisms which are often unavailable from clinical notes when examined retrospectively. This relationship needs to foster a shared understanding of intent such that reporting meets the needs of regulators and responses meet the expectations of reporters.
  v) **Building capacity of regulating agencies** and providing additional resourcing for product safety compliance and enforcement, as well as a more comprehensive approach to policy development and safety research using risk management strategies. There is no formal qualification to become a product safety officer in Australia. While this may be acceptable under the current framework, if regulators are to be more proactive and take a more advisory role to industry, then more advanced initial training and continuing in service training may need to be considered in the future.
  vi) **Utilising contemporary communication principles** to reach and impact on a broader range of consumers, in particular those more vulnerable consumer groups. Simplified language, gamification of safety concepts, utilisation of social media platforms and tools such as infographics or animation are communication methods known to assist in the acceleration of product risk messaging.

Thank you for the opportunity to comment on the CRIS.

APPENDIX A:

Australasian Injury Prevention Network (AIPN): is the peak national body advocating for injury prevention and safety promotion in Australia. https://aipn.com.au

Consumer Product Injury Research Advisory Group (CPIRAG): has a broad-based membership drawn from stakeholder groups that have an interest in reducing product-related injury and death. This includes government bodies, non-government bodies, industry, consumer groups, academia and medical institutions.

Kidsafe Australia: the child accident prevention foundation of Australia. https://kidsafe.com.au

Royal Australasian College of Surgeons (RACS): is the leading advocate for surgical standards, professionalism and surgical education in Australia and New Zealand. https://www.surgeons.org/about-racs/about-the-college-of-surgeons