## In defence of Australian Standards: 15/9/25

I am an emergency paediatrician with 35 years clinical experience and work extensively in injury prevention and product safety. I have been a member of an increasing number of Australian Standards committees since starting with the HE 016: Child resistant Packaging standard committee in 2007 after treating a toddler with a severe caustic ingestion due to dishwasher detergent.

I am now a member of the following Australian Standards committees:

- HE-016: Child resistant packaging
- CS-005: Playground Safety
- CS 118: Button Batteries
- HE-011: Sharps containers
- CS-085: Child car restraints
- CS-310: Infant care products
- CS-310: Infant care products- sleep working group
- CS-088-SC4: Infant furniture (Cots/ portacots)
- CS-088-WG5: Bunk Beds

As well as the following ISO committee:

• TC-310: International childcare articles- sleep working group

Though the size and constitution of each committee varies, the exchange of ideas and discussion is robust, creating a space for innovative standards that serve both to protect the Australian public and support Australian industry.

Many of the standards produced by the above committees are voluntary with the exception of elements of the standards called up into regulation, contractual agreements or (in the case of the child resistant packaging standards) applied to select products.

AS 5347:2023 is a voluntary standard covering the safety of button batteries and products that use them. It was published after the mandatory Australian safety standards (Dec 2020) and though it is consistent with those standards, goes further in terms of consumer protection. It is novel in that it is a horizontal standard. This was necessary because of the vast array of products that utilise button batteries. Existing toy and audiovisual standards in relation to button battery safety were not sufficient.

This standard (an Australian initiative) is currently being considered for adoption as either an IEC or ISO standard. In drafting AS 5347:2023, all existing standards were cross referenced and compared to select desired specifications and identify existing gaps. In this manner, AS 5347 has built on and improved other national and international standards.

Another example of innovation is in the CS 310 Infant care products space. This committee has recently redrafted and updated another Australian first standard for firmness of infant mattresses. First published as AS 8811: 2013 and recently revised as AS 5407.1:2025, it was

mandated by the CPSC before being called up in the more recent Australian mandatory standards for infant sleep surfaces. CS 310 has also developed a firmness standard for non-standard infant sleep surfaces AS 5407.2: 2025 and is about to send AS 5407.3, another world first standard to test for carbon dioxide rebreathing from infant sleep surfaces, out for public comment.

It is common to have the Catch 22 conversation in committee that what we are doing is irrelevant because most of the Australian Standards are voluntary, particularly where suppliers are allowed to comply with international standards instead of the Australian Standard. The one significant exception in relation to my committee experience would be AS 1754:2024: car restraints. Compliance with the Australian car restraint standard (albeit older versions of this standard) is currently mandated through the CPN. This requirement has afforded the Australian paediatric population superior road crash protection largely through the unique use of the top tether strap. The 2024 standard has also addressed the evolving hazard of positional asphyxia due to excessive padding behind the infant's head. Addressing this hazard has involved application of nearly 20-year-old research from NZ showing that a device within the restraint to lift the infant's shoulders forward can significantly improve head position and oxygenation. This innovation (which, but for the CS 085 committee, would have remained unimplemented) is yet to be mandated under the CPN.

I would argue that it is not feasible, nor advisable for the productivity commission, who as far as I am aware lack the medical, engineering, forensic and industry insights available within the CS 085 committee, to deem a range of overseas standards to be equivalent in terms of protecting children. To do so would risk prioritising expediency and economics over efficacy and evidence.

One might ask, why have Australian Standards at all? Because they are innovative, influential and balanced, offering a high level of consumer protection whilst still allowing Australian industry to flourish.

Dr Ruth Barker

Emergency paediatrician
Director Queensland Injury surveillance unit
Injury Prevention lead Jamieson Trauma Institute
Kidsafe Queensland president