



National Competition Analysis 2025  
Productivity Commission  
Online Submission Form

### **About Us:**

The Australasian Injury Prevention Network (AIPN) is an independent, non-government network representing all-age, all-cause injury prevention and safety promotion in the Australasian region. We strive to promote knowledge of the causes of injury and safety promotion to minimise injury-related harm and reduce inequities. The AIPN is the leading professional body for practitioners, researchers, academics and allied professionals working in injury prevention and safety promotion across Australia and New Zealand. Many AIPN members contribute their injury prevention expertise to Standards Australia technical committees to ensure that a public health voice is heard in the development of safety standards.

### **Submission on International Standards:**

The Productivity Commission is seeking feedback on proposed reforms to adopt international and overseas standards in regulatory frameworks. The AIPN provides the following feedback on reforms related to mandating overseas safety standards.

Regulatory frameworks often mandate a range of standards that set out detailed specifications, procedures, and guidelines for products, services, and systems to minimise safety risks. While the AIPN supports initiatives to improve regulatory efficiency and reduce compliance burden, safety must remain the overriding priority. Any effort to align or streamline mandatory safety standards must not compromise existing safety thresholds, particularly where safety standards have been specifically tailored to address regional factors such as climate and environmental conditions. For example, electrical safety requirements are often shaped by these local considerations.

Reforms should not be fast-tracked through the regulatory process. A cost-benefit analysis is essential before adopting overseas safety standards. Broad stakeholder engagement is also necessary to allow input on safety requirements. To facilitate this, the regulator should ensure the availability of any data that formed part of the overseas standard development. For example, where data has demonstrated an injury risk in a particular setting or data produced from rigorous testing. This consultation should include the relevant Standards Australia technical committee, as its members have both expertise and international connections to inform the process. A requirement for a cost-benefit analysis will ensure that not only are business costs fully considered, but also the costs for consumers and the public health system if there is an impact on injury risk.

If it is determined that it is appropriate to reference overseas safety standards in a regulatory framework, it is essential that:

- there is a labelling requirement that identifies the manufacturer/supplier and a clear indication of which standard it complies with. For example, ABN and statement of compliance to [specify standard].
- it is clearly articulated how such adoption addresses any differences for the Australian context. An example of this is the Appendix ZZ of AS 4685.1:2021, which lists the variations to EN 1176-1:2017 for its application in Australia. This specifically addresses normative references.
- if the regulatory reference calls up overseas safety standards that exist from time-to-time (i.e., automatic adoption of revised standards), that regulators are required to conduct regular reviews to determine if any updates impact on key safety requirements, and a safeguard mechanism is included allowing the update to be disallowed if it introduces a lower safety threshold.

It is acknowledged that some businesses face significant challenges with cross-border trade, including duplicative conformity assessment and approval processes, and associated insurance implications. At the same time, Australia is under increasing international pressure to reduce trade barriers. While adopting overseas safety standards may offer some business relief and advance harmonisation, it should not come at the expense of safety and expose Australians to increased injury risks.

Regards,

Dr Catherine Niven

AIPN – Chair of the AIPN Product Safety Subcommittee

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