

13 June 2025

## National Competition Policy Analysis 2025

The [Consumers' Action Law Centre](#) (CALC) welcomes the opportunity to provide comments on the National Competition Policy Analysis 2025. One of the key areas under consideration is the adoption of international and overseas standards in regulatory frameworks, and how regulated standards are harmonised across jurisdictions in Australia.

### About CALC and the CFA Standards Project

CALC manages and supports the [Consumers' Federation of Australia](#) (CFA) Standards Project, which plays a vital role in ensuring that consumer interests are represented in the development of standards. In recognition of the importance of consumer involvement in standardisation, the project recruits, facilitates, and supports expert consumer representatives on technical committees responsible for developing Australian Standards, including those that mirror international standards. This work is supported through an annual grant from Standards Australia.

### Key Principles for Reform

CALC supports regulatory change that delivers robust and effective mandatory standards that protect and empower consumers. However, it is essential that such reform:

- **Maintains and improves consumer protections:** Any regulatory change must not only preserve existing safeguards but also enhance them.
- **Preserves consumer participation:** Recognising trusted overseas standards must not come at the expense of consumer engagement. Automatically adopting international standards risks sidelining the expert input that ensures standards are fit for the Australian context.
- **Ensures transparent and inclusive consultation:** Public consultation, including with consumer representatives, is a cornerstone of the standards-making process and must not be bypassed.
- **Avoids automatic adoption without review:** CALC opposes any regulatory process that allows overseas standards to be adopted without assessing their suitability for Australian conditions.
- **Supports streamlined updates to standards:** We support efforts to simplify the process of updating referenced voluntary Australian standards in mandatory regulations.
- **Introduces a General Safety Provision:** Regulatory reform should include a requirement that all products be demonstrably safe at the point of supply.
- **Prevents a two-tiered system:** Allowing overseas standards into regulation without equivalent governance risks undermining trust in the regulatory process and compromising safety.
- **Promotes national harmonisation:** Aligning regulated standards across states and territories should be a priority to address internal fragmentation and improve consistency.

CALC urges the Productivity Commission to ensure that any changes to the standards framework uphold the principles of transparency, inclusiveness, and consumer protection. We welcome the opportunity to contribute to this important review and would be pleased to provide further input as needed.

### Contact

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