

Milano, January 19th, 2022

Subject:

Consultation of: Supporting business through improvements to mandatory standards regulation under the Australian Consumer Law

Brief introduction of the association represented

**ANFAO Associazione Italiana Fabbricanti Articoli Ottici
(ITALIAN OPTICAL GOODS MANUFACTURERS ASSOCIATION)**

Established in Milan in 1954 by a group of businessmen to group companies in the sector into an association affiliated with Confindustria. The association, which has more than 120 member companies, currently brings together all the leading Italian eyewear companies. The sector has more than 900 companies and 16,000 employees (not including temporary workers). It is a world leader in the high-end segment. It exports 80% of its production.

Activities and objectives of the association:

- stronger relations between companies and government bodies;
- to represent and safeguard the interests of the sector at an economic and trade union level;
- to support the promotion and internationalization of its member companies;
- it is a member of Eurom1, European Federation of Optics and Precision Mechanics, whose objectives are to represent the various interests of the optical and precision mechanics industry and to promote cooperation among the member states;
- the organizer of MIDO, International Optics, Optometry and Ophthalmology Exhibition, the leading event in the industry and in every respect the most prestigious eyewear showcase worldwide;
- it cooperates with CERTOTTICA, National Institute for the Certification of Optical Products.

The current president is Giovanni Vitaloni.

Answer to the consultation

The proposed changes to standards referred to Australian legislation have a potentially significant impact to both manufacturers and consumers. As Optical manufacturers association representing more than 120 companies exporting worldwide, the option 2, preferably with the adoption of ISO standards exclusively, appears to be the most appropriate option in the Australian context and will reduce the regulatory burden without compromising wearer safety by leveraging a trusted international standard.

Generally speaking, the ISO standards are made with the active contribution of many countries taking in strong consideration the Essential Safety Requirement to protect the users

and the consumers' needs in terms of good performing products, safe and affordable in terms of cost.

Q1. Do you agree with the identified problems?

Yes. We agree with the identified problems, in particular increased barriers to entry and cost for manufacturers who need to conduct additional testing and analysis and relabelling of products, with negative impact on cost for the users that can be avoided. Option 2 provides the opportunity for ISO standards to be assessed and adopted for Australia in cases where Australia has participated extensively in development of these standards.

Q2. Are there any other problems that you think should be considered?

With the adoption of specific international standards, clearly this approach will require significant consultation and input from appropriate experts within Australia and internationally.

With regard to option 3, in this scenario companies would be allowed to comply with any standard, this would lead to consumer confusion, as consumers are not well equipped to identify the technical differences and therefore characteristics of products complying with standards. We discourage Option 3.

Conclusion

In summary we recommend the following option:

Option 2: Amend the ACL to allow the Commonwealth Minister to more easily declare trusted overseas standards.

We recommend the adoption of the ISO standard as much as possible as representing the results of the contribution of many countries and moving in the direction of encouraging a global market and free circulation of the products, with strong advantages for the users.

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