

Brussels, 21 January 2022

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

Brief introduction of the association represented: EUROM1

EUROM I Optical Industries is the European non-profit Federation, which brings together the National Associations of Manufacturers of optical lenses, frames, sunglasses and equipment for opticians. It is established in accordance with Belgian law.

Delegates of National Associations of Manufacturers, importers and distributors of ophthalmic optics, which operate in countries of the European Community and other European areas, have been meeting since 1958.

It was decided to form a Federation of National Associations, EUROM 1, to ensure full representation and greater effectiveness in international co-ordination on matters of common interest.

EUROM1 is however a totally independent group, with direct access to the Commission of the European Communities and with responsibility only to inform the EUROM General Committee of action and policy, as and when necessary.

The countries it represents are: France, Italy, Germany, UK, Spain, Switzerland and USA.

Answer to the consultation

The proposed changes to adoption of standards referred to Australian legislation have a potentially significant impact to both manufacturers and consumers. As European Optical manufacturers association, the option 2, preferably with the adoption of ISO standards exclusively, appears to be the most appropriate option in the Australian context. It represents a good opportunity to reduce the regulatory burden without compromising wearer safety by leveraging a trusted international standard.

The ISO standards are made with the active contribution of many countries with the scope of defining the specifications that guarantee the covering of the Essential Safety Requirement to protect the users with 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.

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

With the adoption of specific international standards, this approach will require consultation and input from appropriate experts within Australia and internationally, as is already happening at the ISO level.

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.

Summary

We recommend the **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.

On behalf of
EUROM1

