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**Sent:** Wednesday, 19 January 2022 6:33 PM  
**To:** Product Safety  
**Subject:** Consultation about Adopting Trusted Overseas Product Safety Standards

FAO Director Consumer Safety and Sustainability,

Thankyou for the opportunity to comment on potential changes to Australian regulations. The proposed changes to standards referred to in Australian legislation have a potentially significant impact to both manufacturers and consumers. As a sunglass manufacturer with a considerable international footprint Option 2, 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.

**Q1. Do you agree with the identified problems?**

Yes I 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. Option 2 provides the opportunity for ISO standards, as the default international standard, 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 ill equipped to identify the technical differences and therefore characteristics of products complying with standards. We strongly discourage Option 3.

Regards,

**Stewart Walton**  
*VP Product and Supply Chain ANZ*



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