



**Australian Government**  
**Australian Radiation Protection  
and Nuclear Safety Agency**



2 February 2022

Ref: D224272

Director, Consumer Safety and Sustainability Unit  
Market Conduct Division  
Treasury  
Langton Cres  
Parkes ACT 2600

**Re: Consultation Paper – Supporting business through improvements to mandatory standards regulation under the Australian Consumer Law**

Dear Director

I am writing in response to the public consultation on amendments to the Australian Consumer Law (ACL), being developed to make it easier to recognise up-to-date trusted overseas product standards in Australia. The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) has reviewed Treasury's consultation regulation impact statement in order to provide our feedback on the proposed policy options.

ARPANSA is involved in the development of various standards relating to radiation safety in Australia. In considering the implications of mandatory safety and information standards for the purposes of ACL, where trusted overseas standards may be used, we note the ongoing importance of considering differing Australian safety requirements where they are reasonably necessary.

To this end, ARPANSA supports Treasury's proposal to retain safeguards that would protect against the lowering of safety standards for consumers, in circumstances where Australia imposes more stringent safety requirements on certain products due to unique Australian conditions, such as a higher threshold for UV protection in the mandatory standard for sunglasses (Consumer Goods (Sunglasses and Fashion Spectacles) Safety Standard 2017).

Thank you for the opportunity to contribute.

Yours sincerely

Dr Carl-Magnus Larsson  
CEO of ARPANSA