



Pursuit Sports P/L
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Dear Product Safety Deregulation department,

My name is Greg Rule, owner of Rudy Project Australia who imports Sunglasses and Bicycle Helmet sold within Australia. I have been importing Bicycle Helmets into Australia and dealing with Australian Standards for some 17 years and in fact I first started importing “Limar” Bicycle helmets before Rudy Project Bicycle Helmets.

During this period we have supplied 35,000 helmets of mid to high end of the market that where sold with Australian standards approved. We have supplied state and national cycling and triathlon bodies with sponsorship as well as evet sponsorship in the Triathlon market. We have supplied Australian and world champions bicycle helmets as well and supported many young cyclist and triathletes in their golds.

Right now at the time of writing we have stopped fully with importing Rudy Project Bicycle Helmets

- We have lost over \$250,000 worth of sales last year in 2021 all due to Australian Standards which I will never get back and we have lost also the support of many customers that have purchased Rudy Project Helmets that required upgrading and consumers looking to experience a new Rudy Project Helmet.

There are a number of points which I would like to highlight that has caused a massive loss of sales, support from my customers, disappointment and confusion from the head office in Italy and incredible amount of cost associated with getting helmets approved for Australian Standards

1/ COST

There is no doubt that having to deal with getting Rudy Project helmets approved for Australian standards is expensive. The cost for TYPE testing, the modifications if required is expensive, the timing to get this all done plus the continuing of BATCH testing cost for each order is NOT financially sound.

At the end of the day all these additional cost is handed over to the consumers thus they are

- Paying more for helmets in Australia vs the rest of the world
- Helmets that are NOT the same weight 99% of the time when compared to CE approved helmets this complaints from consumers asking why are they heavier in wight?

2/ NOT ABLE TO GET ALL SIZES APPROVED

As per in my introduction, I also imported Limar helmets as well as Rudy Project helmets. I have had 4 times when we could NOT get the large model approved to sell in Australia without spending some 20,000 \$US to modify the moulds – So 4 times we only could sell a “small-medium” size in Australia and NOT supply any large sizes.

- This is unheard of for the rest of the world and we are the “only” country that has faced this problem.
- It’s caused disappointment with any consumer that wanted the larger helmet in those models.

3/ MIN ORDER QTY

Without a doubt, one of the major problems with dealing with Australian standards is this min order qty. 200 per size per colour and whilst low end helmets might be ok the reality is that we import and sell mid to high end helmets and this places a huge strain on ANY business when it comes to cash flow.

For example – Rudy Project make a Time Trial helmet, the best in the world and its approved world wide for CE standards. The cost for the helmet at export price is expensive. There is also 2 sizes and 2 colours. It means to get the two colours in and two sizes it would cost me over \$150,000. 800 helmets to purchase due to Australian standards BUT it would take me 3-4 years to sell all these helmets as they are a high end helmet.

Furthermore – even our normal range of Road Bicycle helmets – to offer the full size range, full colour range as per the international catalogue it places incredible pressure on anyone finances due to the stock turnover as its due to the min order qtys required.

For example – our top of the range road helmet has now 3 sizes, 6 colours. Some of those sizes and colours do NOT sell that well but we still have to purchase 200 units per size/colour. Essentially to fully support this high end model we have to purchase 3600 of helmets!

- MOQ is uneconomical
- It stops us from offering a complete range
- It places huge pressure on our cash flow
- Additional cost associated with batch testing is also expensive which is 8 helmets per 200 per size. It means 24 helmets are sent to the lab for batch testing and destroyed costing me money that I do NOT get back ever.

4/ TESTING FACILITY

This is crazy.... We have to get helmets approved for Australian Standards for both type and batch testing. We DO NOT use the Australian lab..... We send our helmets for these test to New Zealand as its cheaper and faster than using the Australian lab.....

- We use New Zealand to test our helmets both type and batch testing.

5/ TIMING / REVIEWING OF AUSTRALIAN STANDARDS

As sad as what it is – This review has been ongoing since Sept 2016. I spoke to some people working at the ACCC back in Sept 2016 trying to explain what the problems where and what needed to be

done and simply put we need to allow international standards to be sold in Australian namely the CE standards

Its now 2022 almost going on 6 years since the start of the review and still nothing..... Meanwhile I have lost sales that I will never get back.

I read the this could continue to go on for another 18 months which is to long and request that you move to allow CE standards of bicycle helmets ASAP.

6/ CONFUSING STANDARDS BY THE STATE OF QLD

Whilst its not anything to do with Bicycle helmets, you can see how confusing it is with motorbike helmets in QLD

In the state of QLD, you can officially purchase an Australian standards motorbike helmet OR a UN ECE standard.... No where else in the country offers this... Why???

See below

Motorcycle helmets

All Queensland motorcycle, quad bike riders and passengers must wear a helmet that complies with:

- Australian standards AS1698 or AS/NZS1698, or
- United Nations Economic Commission for Europe standard (UN ECE 22.05 or 22.06).

Unless exempt, the driver and passengers of utility off-road vehicles being operated on a Queensland road or road-related area must also wear a motorcycle helmet which complies with the standards.

<https://www.qld.gov.au/transport/safety/rules/motorcycle>

7/ PROOF IS IN HOW MANY COUNTRIES HAVE ADOPTED CE HELMET STANDARDS

If you consider how many countries in the world follow CE bicycle helmet standards as opposed to Australian standards then the numbers are staggering. There would be some 1 billion people riding bicycles with CE approved helmets or more covering just about all countries in the world including the USA

No country in the world follows Australian Standards period nor will they.

SUMMARY

Australian standards for bicycle helmets have caused nothing but pain, extra cost and loss of sales for me over the past 17 years. Its frustrated me, Rudy Project head office in Italy and confused the consumers

Australia Standards has STOPPED me from importing Rudy Project helmets.

By adopting the CE standards it would allow me to

- Offer a full range of bicycle helmets both colours and sizes
- Draw down from CE approved helmets from Italy stock
- Completely fix up my cash flow issues with MOQ relating to Australian standards

I strongly request that you guys move faster is allowing CE standards to be sold in Australia ASAP. There is no proof that Australian Standards helmets are safer, it just completely limits what we can offer here.

Please hurry up and get CE helmets approved to be sold in Australia. Its been going on for 5 years now and still look at the mess from consultation page.

Sincerely

Greg Rule
Rudy Project Australia