

# Submission template

## Submission on options to address the safety risks of corded window coverings

### Your name and organisation

Name	Sharon Mimilo
Organisation (if applicable)	Bunnings NZ Limited

### Responses

Statistical Information	
	Which of the following are you? (tick all that apply) <ul style="list-style-type: none"><li><input type="checkbox"/> Consumer/user of window coverings</li><li><input checked="" type="checkbox"/> Retailer of window coverings</li><li><input type="checkbox"/> Installer of window coverings</li><li><input type="checkbox"/> Importer or distributor of window coverings</li><li><input type="checkbox"/> Manufacturer of window coverings</li><li><input type="checkbox"/> Health or safety related organisation</li><li><input type="checkbox"/> Regulator</li><li><input type="checkbox"/> Other interested party (please specify)</li></ul>
	For manufacturers of window coverings: <ul style="list-style-type: none"><li>• What kinds of window coverings do you manufacture?</li><li>• What proportion of your window coverings have exposed cords?</li></ul>
	N/A
	For importers or distributors of window coverings: <ul style="list-style-type: none"><li>• What kinds of window coverings do you sell?</li><li>• What proportion of window coverings you sell are imported?</li></ul>

- What countries do you import window coverings from?
- What proportion of your window coverings have exposed cords?

N/A

- For retailers and installers of window coverings:
- What kinds of window coverings do you sell?
    - Roller blinds
    - Vertical blinds
    - Venetian
    - Blind Works Wood Look Blind
    - Plantation shutters
    - Curtains
    - Roman Blinds
  - What proportion of window coverings you sell are imported?
    - 100% manufactured overseas for ready-made.
    - 100% local for made to measure.
  - If you sell imported window coverings, what countries are they imported from?
    - China
  - What proportion of your window coverings have exposed cords?

		NZ Made	Enclosed Cords	Come with Tensioners
Ready made	Yes	0	8	188
	No	196	188	0
Made to Measure	Yes	535	0	535
	No	0	535	0

**Problem**

1. Do you agree that corded window coverings in New Zealand currently present a significant safety risk?  
Why?/why not?

	Yes. It's been proven at an international level that the safety risk/s needs to be addressed.
	2. Do you believe that government intervention is suitable to address this problem? Why/why not?
	Yes, as per above
<b>Objective and criteria</b>	
	3. Do you agree with the proposed objective? Why?/why not?
	Yes. Reducing and/or eliminating deaths/incidents to children due to window coverings is a priority.
	4. Do you agree with the use of net benefit as the main criterion to determine suitability of the options? Why?/why not?
	No comment.
	5. What other criteria are important to consider?
	If the market is already complying by providing safety devices and safe installation instructions, there is the opportunity to invest in consumer education around benefits of installing the tensioning devices when purchasing corded blinds.
<b>Options for managing potential risk</b>	
	6. Are there any options missing?
	No.
	7. Do you agree with the advantages and disadvantages of the options identified in the discussion paper?
	Yes.
	8. Do you have further information on the advantages and disadvantages of the options?
	No.
<b>Approach to analysis</b>	
	9. What other costs or benefits need to be taken into account?

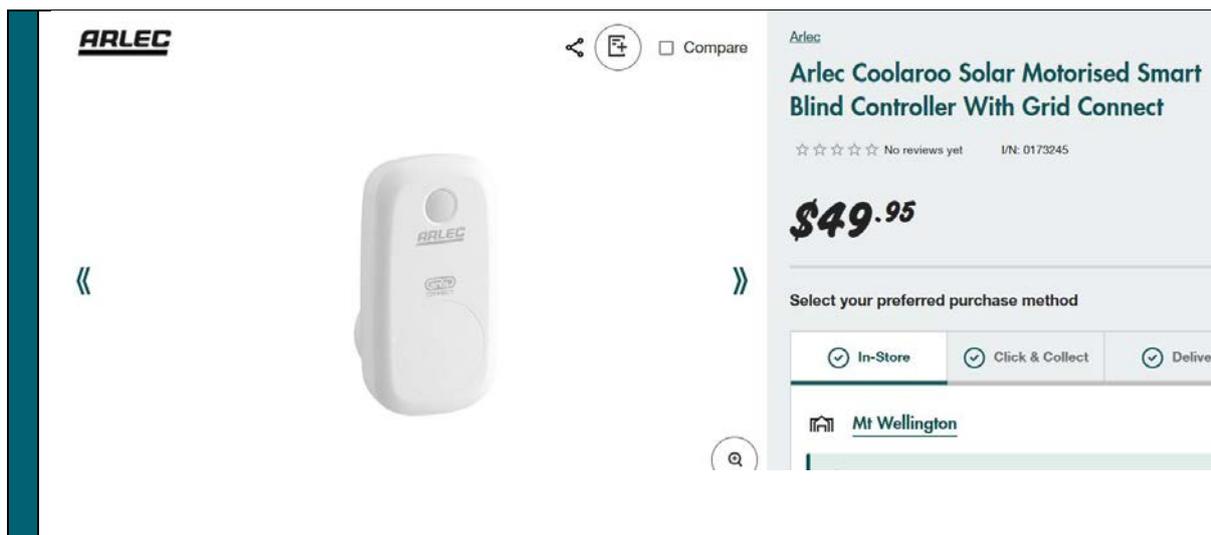
	The cost to business to audit and ensure compliance with the proposed options.
	10. What other data could you make available, or are you aware of, that may be useful to inform this analysis?
	Refer to response to Q18.
<b>Preferred options</b>	
	<p>11. Do you think the Government should intervene through:</p> <ol style="list-style-type: none"> <li>1. information and education to educate and encourage consumer behaviour (e.g. communication programmes, social media campaigns, etc.),</li> <li>2. providing funding for household to install safety devices/replace existing corded window coverings with cordless options,</li> <li>3. encouraging voluntary modification by businesses to reduce risks (e.g. selling safety devices or cordless designs, providing advice to consumers, etc.),</li> <li>4. putting in place a mandatory standard for window coverings to be manufactured, sold and installed in the future, or</li> <li>5. a combination of the above options? Which options?</li> </ol> <p>Why do you think this option is best?</p>
	Option 2.
	<p>12. If you selected option 4, 'putting in place a mandatory standard', do you think the mandatory standard should require:</p> <ol style="list-style-type: none"> <li>4A. corded window coverings to include mandatory safety features (e.g. warnings, safety devices), or</li> <li>4B. prohibit window coverings with exposed cords?</li> </ol> <p>Why do you think this option is best?</p>
	<p>As a business if MBIE were to implement a mandatory standard, we would be comfortable with option 4A. Option 4A would be aligned with international major trading partners.</p> <p>This option would therefore be best due to the costs associated with option 4B.</p>

## Questions for industry and consumers

### Questions specific to industry

<b>For manufacturers, importers, distributors, retailers and installers</b>	
	13. What would be the impact on the industry of a mandatory standard regulating the installation of safety features (option 4A)?

	Minimal costs as all of our blinds already have safety features included.
14.	What costs would be incurred by your business if a mandatory standard was introduced regulating the installation of safety features (option 4A)? Can you provide monetary estimates of these costs?
	These costs would sit with manufacturers/importers so unable to quantify additional costs at this time.
15.	What would be the impact on the industry of a mandatory standard requiring window coverings to be cordless (option 4B)?
	<p>From a retailer perspective this would limit the market and a number of Suppliers would probably be unable to comply due to costs.</p> <p>Could restrict our ability to source from overseas as NZ is a small market and there may be limited products available given this requirement is not in place for many countries.</p>
16.	What costs would be incurred by your business if a mandatory standard was introduced requiring window coverings to be cordless (option 4B)? Can you provide monetary estimates of these costs?
	<p>Unable to specify additional costs at this time. However, we envision there would be costs relating to the following activities:</p> <ul style="list-style-type: none"> <li>• Time taken to source new products and confirming compliance</li> <li>• Exit plans for existing stock</li> <li>• Higher cost of product.</li> </ul>
17.	Are you aware of any technologies offering safer, affordable, and easier-to-use alternative operating systems for window coverings? If yes, what are these technologies and how are they safer?
	<p>Internal window coverings which are battery operated, or smart technology. Includes technology to retrofit to motorised as per example below:</p> <p><b>Pricing is accurate as at date of submission and is subject to change.</b></p> <p><a href="#">Arlec Coolaroo Solar Motorised Smart Blind Controller With Grid Connect - Bunnings New Zealand</a></p>



18. Would cordless window coverings be more expensive for the consumer than the current corded designs? Manual or motorised? Vertical or horizontal? Why? How much more expensive?

**Pricing is accurate as at date of submission and is subject to change.**

We do have a range of motorised blinds in our range but quite costly by comparison - [Smart Home Products 120 x 210cm White Motorised Roller Blind - Bunnings New Zealand](#)

Motorised			Manual		
Item #	Description	Price	Price	Item #	Description
0135998	BLIND ROLLER MOTOR++60X210CM GRID WHITE	\$ 179.00	\$ 24.98	0183205	BLIND ROLLER CLASSIC++60X210CM BLACK
0135999	BLIND ROLLER MOTOR++90X210CM GRID WHITE	\$ 189.00	\$ 34.99	0183206	BLIND ROLLER CLASSIC++90X210CM BLACK
0136000	BLIND ROLLER MOTOR++120X210CM GRID WHITE	\$ 199.00	\$ 44.98	0183207	BLIND ROLLER CLASSIC++120X210C M BLACK
0136001	BLIND ROLLER MOTOR++150X210CM GRID WHITE	\$ 209.00	\$ 54.99	0183209	BLIND ROLLER CLASSIC++150X210C M BLACK
0136002	BLIND ROLLER MOTOR++180X210CM GRID WHITE	\$ 229.00	\$ 65.99	0183210	BLIND ROLLER CLASSIC++180X210C M BLACK
0136003	BLIND ROLLER MOTOR++210X210CM GRID WHITE	\$ 239.00	\$ 74.99	0183212	BLIND ROLLER CLASSIC++210X210C M BLACK

## Questions specific to consumers

For consumers
19. Would you be willing to pay a higher price for cordless or corded window coverings that are safer for young children? Why/why not?

N/A
20. How much extra would you be willing to pay (percentage) for a compliant design that is safer for young children?
N/A

### Other comments

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