

18 October 2017

Button Battery Policy Statement Submissions
Trading Standards
Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140

By email: tradingstandards@mbie.govt.nz

**SUBMISSION on
Button Battery Product Safety Policy Statement**

1. Introduction

Thank you for the opportunity to make a submission on the button battery product safety policy statement. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

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2. General comments

Consumer NZ supports efforts to reduce harm caused to children by button batteries. These batteries pose a serious risk to child safety and we welcome the introduction of the product safety policy statement.

We agree the risks posed by button batteries will be reduced if button battery packaging and compartments are harder for children to get into and if products display warning statements.

However, we are concerned the policy statement is voluntary and may be insufficient to achieve change. Despite widespread publicity on button battery dangers, manufacturers have been slow to respond to minimise the risk of harm from their products.

Active market monitoring will be required to assess whether the policy statement is achieving the intended consumer protection goals. If manufacturers and retailers fail to follow the guidelines in the policy statement, a mandatory standard will be required.

To minimise risk of harm, we consider the policy statement should target all products that include button batteries, rather than only items purchased for domestic use. Items

bought for non-domestic purposes can be present in the home and children can be in environments (such as workplaces, hospitals) where these goods are kept.

Thank you for the opportunity to make a submission on the button battery product safety policy statement. If you require any further information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sue Chetwin". The signature is written in a cursive, flowing style.

Sue Chetwin
Chief Executive