



# Product safety bulletin

## Household cots with wooden drop sides

March 2010



Since May 2009 the Australian Competition and Consumer Commission (ACCC) has been evaluating issues about the strength and integrity of wooden drop sides on children's household cots.

If you are a retailer or supplier of these cots, this bulletin will:

- give you a summary of results of some product testing we have undertaken into the performance of wooden drop sides on cots
- remind you of the requirements of the mandatory standard
- raise the possibility of new or additional test requirements for household cots
- help you understand how to ensure the cots you supply are safe for Australian consumers.

We encourage you to use the information in this bulletin to help you source safe household cots for the Australian market.

### Hazards

Reports to the ACCC during 2009 indicate that over time and with normal use, some cots with wooden drop sides may develop performance safety issues. In some instances, it seems that the repeated opening and closing of the drop sides can cause the vertical filler bars or slats to separate from a cot's drop-side rails.

When slats and bars come loose and separate from the rails, there is a high risk that children can:

- roll out of the cot and sustain injuries caused by a fall to the floor
- trap their limbs in gaps between remaining slats
- trap their heads and necks between remaining slats, which can lead to strangulation.

The mandatory standard for household cots was originally developed to overcome these hazards.

Although no injuries have been recorded to date, some incidents have been reported, both in Australia and overseas, of infants falling from cots where the wooden drop sides have failed.

### The mandatory standard

The mandatory standard for household cots establishes a minimum set of safety requirements that all suppliers of children's household cots to the Australian market must meet. Suppliers should always be alert to improvements that can be made over and above these minimum requirements.

For complete information about the mandatory standard, suppliers must read and understand the:

- Consumer Protection Notice No. 6 of 2005, available free of charge from [www.comlaw.gov.au](http://www.comlaw.gov.au)
- AS/NZS 2172:2003, *Cots for Household use—safety requirements*, available for purchase from SAI Global at [www.saiglobal.com](http://www.saiglobal.com).

Both documents are vital to ensuring that you and your business meet all requirements of the mandatory standard.

### Recent test results

The ACCC and state and territory regulators have recently tested household cots with wooden drop sides.

Performance tests were conducted against four key requirements of the mandatory standard:

- strength of the filler bars (clause 9.4, appendix C)
- strength of the bottom rail, integrity of the joints and strength of the access fastening device (clause 9.5, appendix D)

- durability of the access fastening device (clause 9.6, appendix E)
- durability of the drop-side mechanism (clause 9.7, appendix F).

The ACCC testing was based on the current mandatory requirements of AS/NZS 2172:2003. Basic tests were also conducted using increased forces and cycles to generate data about the breaking points of these cot parts.

While results indicated that products were meeting the minimum requirements, they did raise queries about the relevance and rigour of the current mandatory AS/NZS 2172:2003 test regime.

These queries led us to undertake further testing using the different methodology contained in American standard ASTM F 1169–03. The ACCC notes that some cot and crib suppliers already use this extra testing methodology.

Our use of the additional American testing methodology showed that there may be problems with the strength of the joins between the cot drop-side filler bars and the rails in some products, even though these products meet the testing requirements of AS/NZS 2172:2003.

### Your responsibilities as a supplier

Under the mandatory standard, the household cots you supply must meet the requirements of AS/NZS 2172:2003 specified in Consumer Protection Notice No. 6 of 2005.

However, you may also wish to test cots using the additional requirements as part of your own product risk or safety assessment processes. This can help ensure that your clients receive cots with minimal known risks or hazards.

The United States Consumer Product Safety Commission is considering the implementation of stronger, more targeted measures to address problems in cots with wooden drop sides.

In light of this, we urge suppliers to consider including the following in their risk assessment procedures:

- testing to increased force and/or cycle requirements as currently required in AS/NZS 2172:2003 under the mandatory standard at appendixes C, D, E and F
- the additional testing in ASTM F 1169–03 that directly focuses on assessing the strength and integrity of the fit between the drop-side filler bars or slats and the cot rails.

### Standards development

The ACCC is a contributing member of the Standards Australia Technical Committee, which develops and updates AS/NZS 2172.

We have asked the technical committee to consider the findings of this testing program to enhance the current AS/NZS 2172 testing requirements for wooden drop sides in cots.

Suppliers who contribute to the Standards Australia standards development process will also need to formulate a position on this matter for future discussions.

The ACCC is keen to hear from suppliers who have undertaken development testing of cots with wooden drop sides. If you have conducted any development testing, we would like to include your results in any consideration by the technical committee. These results could also help to inform any review the ACCC undertakes of the mandatory standard as a result of our recent investigations.

If you have any data to share about the development and performance of wooden drop sides for cots, please contact Gary Milne in the ACCC Product Safety Operations Branch, either by emailing [gary.milne@acc.gov.au](mailto:gary.milne@acc.gov.au) or by telephoning (03) 9290 1937.

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ISBN 978 1 921581 51 9

ACCC 03/10\_40059

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