



COTTON  
AUSTRALIA

*Advancing Australian Cotton*

10 June 2019

Director  
Quad Bikes Taskforce  
Consumer Product Safety Branch  
Australian Competition & Consumer Commission  
GPO Box 3131  
Canberra, ACT 2601

Dear Sir/Madam

**RE: Quad bike safety standard exposure draft**

This submission is made in response to the call from the Assistant Treasurer for submissions on the exposure draft mandatory safety standard recommended by the ACCC.

Cotton Australia is the peak industry body representing Australia's cotton growing industry; approximately 1400 cotton farming and cotton ginning businesses. Our members are situated across 152 Australian regional communities in NSW, Queensland and now into Victoria. Notably, 90% of cotton growers are small family farms that grow other crops like sorghum, soybeans, wheat and also have livestock. While cotton production does vary considerably from season to season (dependent on water/moisture availability), it usually contributes between \$1.5 billion and \$2.5 billion annually.

Cotton Australia strives to foster a world class agricultural industry that's sustainable, valued for its economic and social contributions and produces very high quality cotton in demand around the globe. The health, welfare and safety of cotton workers is of utmost importance. We promote a safety culture including via our industry's myBMP program (best management program) which contains a workplace health and safety module and ensure effective safety training is available.

Cotton Australia is an active member of the National Farmers' Federation (NFF) and fully supports their position on quad bike safety and the ACCCs Quad bike safety standard recommendations. With NFF we support the adoption of the Standard, and specifically support requirements to:

- Adopt U.S. or E.U. design/manufacturing standards, and minimum stability requirements;
- Conduct stability testing and display labels and tags notifying the user of the bike's stability limits and the risk of rollover risk; and
- Install operator protection devices on all new bikes.

Agriculture is characterised by Australia's health and safety regulators as one of the most dangerous industries, and quad bikes continue to be a leading cause of death and injury on farms. Taking action on this issue is critical and adopting the Standard would save lives and prevent injury.

We also support the NFF's long-held position to see a 5-Star Safety Rating System introduced, to enable consumers to easily compare the relative safety of available quad-bike models.



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We note that the ACCC's report indicates that the Commission "will continue to support the development of a safety star rating system", however the report does not go so far as to recommend a system. We encourage the ACCC and government to continue to work towards this and provide support to its development.

We note that introducing mandatory licensing, age limits, training requirements and requiring all operators to wear protective clothing (including helmets) are not within the powers of the responsible Minister, and can only be achieved through the state and territory laws. We acknowledge the investments made to date in quad bike education campaigns and rebates from the state and territory governments and these should continue. We agree that as part of a holistic approach to mitigate the safety risks of quad bikes, appropriate complementary regulatory measures must be in place at the state and territory level. The responsible Minister should write to state and territory ministers with a responsibility for workplace health and safety, asking them to consider these measures urgently.

Thank you for the opportunity to comment on the exposure draft mandatory safety standard recommended by the ACCC. We would be happy to provide further comment or explanation on our position if needed, and can be contacted on 02 9669 5222.

Yours sincerely

Angela Bradburn  
Policy Officer  
Cotton Australia

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