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DISCUSSION PAPER

Review of the Consumer Product Safety Standard for Household cots

This discussion paper details policy proposals under consideration in the review of the mandatory standard for household cots

August 2014

Closing date for submissions 15 September 2014

Australian Competition and Consumer Commission
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Purpose

The purpose of this paper is to consult with stakeholders on the current consumer product safety standard for the supply of household cots in Australia, *Consumer Protection Notice No.6 of 2005* (the Standard) which references the Australian Standard AS/NZS 2172:2003, and on proposed changes to the Standard.

This paper seeks relevant information and views from interested parties that will assist in determining the optimal approach for the future regulation of household cots under the *Competition and Consumer Act 2010* (CCA). Of particular interest is any evidence which will assist in assessing the potential impacts and benefits of each of the regulatory changes.

The consultation process outlined in this paper may be the only opportunity for stakeholders to provide their input into the review process and all interested parties are encouraged to make submissions on the options or other issues relevant to the review.

Summary

This paper reviews the Standard, levels of supplier compliance, various product issues and relevant injury data.

The discussion paper:

- proposes that household cots continue to be regulated via a mandatory standard,
- describes several amendments to current requirements to better address emerging industry trends, technological and testing advancements and international developments
- includes essential safety provisions related to the assessment of the strength and integrity of cots supplied with drop sides (cot sides that can be moved up and down), consistent with the most recent version of the relevant voluntary standard, *AS/NZS 2172:2013 Cots for Household Use*
- seeks stakeholder feedback on these changes
- seeks information to assist in the development of any revised regulation
- seeks information on potential impacts of the proposed changes

Please note: the complete wording of the clauses being referenced is not replicated in this paper. The full text of the voluntary standard can be obtained from SAI Global at www.saiglobal.com.au.

Household cots are a product where foreseeable use or misuse has led to serious injury or death. A mandatory standard establishes minimum safety requirements considered reasonably necessary to reduce this risk.

The removal of the Standard was considered and is not recommended. The ACCC considers that minimum safety requirements are necessary to continue to reduce the level and risk of injury to children when using household cots.

Subject to this consultation and Ministerial agreement of a revised Standard, household cots sold after a specified date must conform to the new Standard. It is expected that a lead time of between 12-18 months will be provided to allow suppliers to make any necessary changes.

Feedback is requested on all matters related to the Standard and particularly on the approach to addressing each issue identified in this paper.

Consultation

Stakeholders are invited to make submissions on the proposals set out in this paper. The closing date for feedback is **15 September 2014**.

You are encouraged to provide feedback by completing the online questionnaire at the ACCC Consultation Hub. Completing the online questionnaire is the preferred way to provide feedback, though we also welcome written submissions. The form at **Appendix A** provides details of the proposed changes and can also be used to provide feedback. Any additional feedback would also be welcome.

Submissions can be emailed to:

Email: productsafety.regulation@accc.gov.au

Subject: Household cot standard review

Alternatively, the mail address is:

Director
Standards and Compliance (Children's and Household Products)
Product Safety Branch
GPO Box 520
Melbourne VIC 3001

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Background

The Australian consumer product safety system

Section 105 (1) of the Competition and Consumer Act (CCA) allows the Commonwealth Minister to declare an Australian Standard either in whole or part, with additions or variations, to be a safety standard for consumer goods.

Section 104 of the CCA allows the Commonwealth Minister to make a safety standard for consumer goods which sets out requirements for those consumer goods which are reasonably necessary to prevent or reduce the risk of injury to any person. Safety standards made under the ACL are co-operatively enforced by the ACCC and state and territory fair trading agencies.

Section 106 of the CCA states that a person must not in trade or commerce, supply, offer for supply or manufacture for supply, consumer goods of a particular kind if those goods do not comply with a safety standard currently in force for those goods.

A safety standard for cots regulates the *supply* of cots. The term 'supply' in relation to consumer goods (such as cots) means to supply by way of sale, exchange, lease, hire or hire-purchase.

The current mandatory standard

The Standard commenced on 3 December 2005 and is based on the voluntary Australian and New Zealand Standard, *AS/NZS 2172: 2003 Cots for household use* (the voluntary standard).

The voluntary standard has been revised several times since 2003, including in 2010 and again in 2013. The latest revision of the voluntary standard was requested and funded by the ACCC and resulted in changes to essential safety provisions relating to the testing of drop sides. This was as a result of changes in regulation overseas and changes in products in the Australian market.

The ACCC is undertaking a review of the Standard to ensure that its requirements reflect current industry safety standards and also reflect changes to the product and to product testing that have occurred since the Standard was introduced in 2005.

The Standard defines a household cot as:

3.4 Product with raised sides and ends designed as an enclosed sleeping facility for infants and babies.

This definition does not include a portable or folding cot, which is separately defined and regulated by another standard made under the CCA.¹ This paper does not propose to alter the definition of a household cot within the Standard.

The Standard establishes minimum safety requirements for cots for construction, design, performance labelling and marking, including:

- the minimum height of cot sides to reduce the risk of children falling out
- the size and shape of gaps so as to minimise the risk of entrapment
- protrusions which might catch clothing
- limiting potential footholds which might be used by a child to climb out
- the strength and integrity of cots.

The Standard also specifies marking and labelling requirements, including:

- information in relation to safe use and in particular, the recommended mattress size
- cot markings with respect to product origin and warnings

Hazards addressed by the Standard

The hazards (or risks of injury) associated with household cots which the Standard addresses include:

¹ See Consumer Protection Notice No 4 of 2008 which references AS/NZS 2195:1999

- falls out of the cot as a result of inadequate height requirements, including where a drop side may be left down or a mattress base left up at a level which facilitates movement out of the cot
- falls out of the cot as a result of footholds designed into the cot
- falls inside the cot against dangerous protrusions, points or edges
- protrusions which may snag a child's clothing and result in strangulation
- entrapment of a child's head or limbs in gaps in the cot
- entrapment of a child's face in gaps between the mattress and the side of the cot resulting in suffocation
- failure of cot mechanisms such as drop sides and drop side mechanisms which create roll out or entrapment hazards.

This paper considers whether the Standard continues to adequately address hazards and the risk of injury related to cots, given changes in the market (including voluntary standards changes) since it was introduced. It also considers the effectiveness of the Standard in identifying compliance issues and potentially impacting on injury rates and frequency.

The ACCC recognises the possibility that cots with drop sides which were intended for larger overseas markets but which may continue to be supplied in Australia, could generate safety issues given the increased concentration of overseas based suppliers towards fixed side cots and the potential to be unaware of local cot and drop side safety requirements.

This review incorporates assessment of safety hazards with respect to entrapment and falls as a result of potential cot drop side failure, particularly over the normal operational life span of the cot, to ensure the ongoing safety of drop side cots supplied in Australia.

Hazards outside the scope of the current mandatory standard

The ACCC is aware of hazards associated with the use of household cots which are not captured by the Standard. Hazards can be introduced through the use of bumpers and loose bedding, adding soft pillows or other items like toys to the cot, and positioning cots near or underneath windows or blind cords.

This paper does not propose changes to the Standard to address these hazards as it remains the ACCC's view that they are largely behavioural in nature, or relate to other products and cannot be addressed in a cot standard. The ACCC promotes 'safe sleep' messages in educative material for parents and carers to complement the work of product safety organisations and agencies such as SIDS & Kids and Kidsafe, which deliver use messages in the community.

Market

Around 300,000 children are born in Australia every year (301,617 in 2011). It is estimated that around 170,000 new cots are purchased per annum; with the remainder of newborn children using second hand cots – including 'hand me downs' from an older sibling, or cots purchased second hand.

Most household cots are of timber construction, are rectangular in shape, and are raised with fixed legs or supports. Some household cots are made of metal or plastic and may be oval.

Almost all cots sold in Australia are imported. These cots are sold in a variety of outlets, including specialist baby stores as well as in large retail chain stores and online.

Compliance

The effectiveness of the Standard can be assessed by examining levels of compliance (as well as injury rates, which are analysed later in this paper).

Supplier compliance with the critical design and performance requirements of the standard has been generally high. At the same time non-compliance with marking requirements has also been high, as evidenced by:

- ACCC Market Surveillance- Analysis of both ACCC surveillance and extensive external cot product testing since October 2009 indicates that non-compliance with informational and marking provisions of the regulation makes up most non-compliance.

Three quarters (74%) of the non-compliances identified in the testing conducted since 2009 related to one or both of two information and marking clauses in the Standard:

- Clause 11, which relates to informative labelling and includes requirements for information to be provided with the cot in a leaflet, on a swing tag or label and on the external product packaging; and
 - Clause 12, which relates to markings on the cot, as well as the legibility and durability of these markings which should remain on the cot for its typical operational life span.
- Recalls-Since 1998 there have been 19 Australian recalls involving cots and cot mattresses (see *Appendix B*). Most recalls involved single safety issues and related to mandated clauses in the Standard for marking and information and requirements for specific cot dimensions..
 - Enforcement actions- since 2007, two court enforceable undertakings have been obtained with suppliers of products with multiple mandated non-compliances.

This review has considered the information requirements to assess whether there is opportunity to amend these provisions to minimise regulatory complexity and facilitate easier compliance for suppliers (see comments on Information and Marking later in the paper).

Injury data

National data

Since 2000 the National Coronial Information System database has recorded 18 Australian child deaths in cots, with no deaths since 2007. The introduction of the Standard in 2005 is likely to have contributed to this result and the uniform safety of cots supplied. Seven of the deaths involved cots with missing or broken sides or parts, or second hand or modified cots.

The analysis of causative factors in child deaths involving a cot can be very difficult, especially for children aged twelve months and under. The lack of causative information, the presence of many variables and confounding factors and the difficulty in differentiating deaths at sleep, sudden infant

death syndrome, oxygen deprivation (anoxia) or suffocation can make identifying and attributing a death to problems with cot design, construction or maintenance highly problematic.

Nevertheless, the existence of risks that can be attributable to any design feature of a cot need to be continually minimised, given the persistence of injury to vulnerable product users.

Victorian data

Injury data from the Victorian Injury Surveillance Unit (VISU) covering the six year period 2006/7-2011/12 indicates 137 hospital admissions and a further 492 emergency department presentations (not admissions) for young children aged 0-4 years old due to injury related to cots.

Of these:

- 44% of the admissions related to children aged up to one year
- 55% of the admissions related to injuries to the head/face/neck
- 35% of the injury types in admissions were fractures
- 42% of the presentations related to children aged one year
- 84% of the presentations related to falls from (71%) or against (13%) the cot
- 55% of the presentations related to injuries to the head/face/neck

Queensland data

Data from the Centre for Accident Research and Road Safety in Queensland (currently representing approximately 72% of all ED presentations) demonstrates that 275 children presented to emergency departments because of cot related injury between 2004 and 2011. This is an average of 55 cases per year. The majority of cases were due to falls from the cot (78%). Two thirds of the cases of incidents involved a head injury.

As this sample covered some but not all Queensland hospitals, the actual number of incidents is likely to be greater than the figures stated above.

A separate dataset from Queensland covering the period 2006 to 2010 shows 106 children were admitted to Queensland hospitals due to a cot-related injury between 2006 and 2010. Over half (58%) of these cases involved injuries to the head and neck region. It is not clear what proportion of these cases related to household cots (vs. for example portable cots)—however based on analysis of similar datasets incidents related to household cots represent a significant majority.

US deaths and injuries

The United States Consumer Product Safety Commission (CPSC) reports 147 deaths in full size cots in the 30 months between November 2007 and April 2010. Of these 40 related to cot failure or design issues—and 18 of these related directly to failures with the cot drop side.

An American Academy of Pediatrics study (*Injuries Associated with Cribs, Playpens and Bassinets Among Young Children in the US, 1990-2008, published in 2011*) reported that:

- 181,654 children younger than 2 years of age were treated in US emergency departments for injuries related to cribs (cots), playpens and bassinets during the study period. Of these cases:
 - 83% involved cots

- Nearly two thirds of cot related injuries resulted from falls
- 40% involved the head or neck as a location of the injury
- 34% involved soft tissue injury as a diagnosis

Falls from cots can occur when an object is placed in the cot (such as a soft toy) which a child may use to stand on and climb out.

All this data indicates that preventing injuries from cots (based on reducing the incidence of falls out of the product) remains difficult given the behavioural aspects of these incidents. Ensuring that the cot's design and performance remains safe continues to be the key focus of regulation.

Analysis of injury data indicates a consistent rate of incidents in cots related to growing and active children who want to explore their environment, outside the cot. The recent spike in deaths in the United States has generated the need to maintain a strong performance requirements focus on locally supplied cots.

Is the continuation of regulatory intervention justified?

There are a number of requirements in the Standard which the ACCC proposes to continue. These include requirements for cot dimensions, footholds, access fastening devices, protrusions, sharp edges and points and marking.

The ACCC is of the view that continued regulation of household cots remains justified because:

- Historically cots have been the nursery product item most commonly associated with child death
- Previous deaths have been associated with issues of basic design, particularly gaps and protrusions
- Causes of injury or death, such as the size of the gap between the mattress and the edge of the cot, will not be immediately apparent to consumers—i.e. caregivers may not recognise the hazard
- Cots are a product used extensively for extended periods by a most vulnerable group (very young children), most often while they are sleeping and are therefore unsupervised
- Although current compliance levels in supplied products with critical safety issues are high ongoing vigilance is required in order to continue to minimise injury levels related to cots.

For these reasons, continued regulation, of both the existing product safety requirements and proposed changes to the Standard is considered a reasonably necessary step to maintain compliance levels and to continue to reduce the risk of injury or death related to household cots.

Emerging issues related to household cots

Since the mandatory standard was introduced in 2005, potential cot safety issues have arisen through product developments in the areas of drop sides and mattress firmness. This review is proposing changes to the Standard to address these potential hazards. The changes are considered reasonably necessary to prevent or reduce the risk of injuries to children.

Drop sides

Many cots feature a side which can be lowered and raised in order to facilitate easy access to the child using the cot. As this feature involves a moving component with associated fasteners and

hardware, cots with this feature are a potential safety concern given the stresses placed on them during operation and use of the cot.

The Standard's requirements for drop sides are drawn from the 2003 version of the voluntary standard and include requirements related to strength and integrity which were appropriate for the market at the time that version was developed.

The ongoing strength and integrity of the drop side of a cot, given that the drop side is likely to be subject to repeated force and movement, is particularly affected by variations in the quality of inputs used and the production processes employed by suppliers.

The quality of timber used in cot construction, the processes used to insert and fix cot filler bars and rails and the mechanisms used to operate moving parts can affect the structural soundness and safety of the cot.

The primary risks with drop sides arise when mechanisms controlling their operation break, or when the drop side is adversely affected by the impact in constant operation, the drop side can separate from the frame of the cot and create dangerous gaps which can entrap a child or cause them to fall out.

The voluntary standard referenced by the mandatory standard contains a testing regime which was developed over ten years ago, before any significant issues were evident with drop side failure.

Regulatory developments in the United States

The US Consumer Product Safety Commission issued 46 product recalls covering more than 11 million cots in the period from 2007 to 2010.

Following deaths of children who became trapped in cots with faulty drop sides, or with drop side mechanisms that failed over time, the CPSC moved to ban the manufacture and supply of cots with drop sides in 2011. Cots with folding or movable sides to facilitate access to the child can still be supplied in the US market, if they comply with a rigorous testing process.

The ACCC understands that, in general, the drop side cots subject to recalls (and then ultimately product bans) in the United States used drop side mechanisms comprising of a plastic construction affixed to the outside surface of the frame or corner rail/posts of the cot. The plastic mechanism was then fastened onto the timber by screws. As a result, the bulk of the weight of the drop side rested on the fastener mechanism – and the strength and durability of the drop side mechanism was critically affected by the quality of the timber to which the mechanism was attached.

Australian situation

These issues seen in the US do not appear to have been replicated in Australia to date.

Cots supplied in the Australian market have more typically used a sturdier mechanism made from a combination of metal and plastic components, pins, springs and tracks which are machined and recessed into the cot frame. As a result, the weight of the drop side is supported by both the frame of the cot as well as by the mechanism itself – thus improving the durability and longevity of the drop side mechanism, maintaining a safe environment for children and reducing the risk of injury.

Australian injury data does not appear to suggest a particular safety hazard associated with drop side cots supplied here. However advancements in product innovation and product testing since the 2003 version of the voluntary standard was developed, as well as issues associated with drop side cots emerging in the United States, suggest changes to Australian requirements in this area are timely.

A revised version of the voluntary standard was published in April 2013 which includes a number of changes to requirements related to drop side testing. This ACCC is proposing that these changes be adopted in the revised Standard.

Assessment of mattress firmness

The Standard requires that the cot mattress, where it complies with the recommended size specified, shall not be more than 20mm from the cot side or ends when it is centred in the cot. This is to reduce the possibility of a child rolling face first into a bigger gap, becoming wedged in that gap and suffocating. The firmness of the mattress of a cot is potentially hazardous due to the increased risk of suffocation with overly soft surfaces.

However, up until now, there has been no accepted method for testing the firmness of mattresses to be used in sleeping products, such as a cot and so related risks have been solely addressed through the provision of general safety advice.

A methodology for assessing the firmness of cot mattresses has now been developed (AS/NZS 8811.1) and incorporated into the voluntary standard (at clause 9.12) for use when a mattress is supplied with the cot.

It is proposed that the Standard adopt the AS/NZS 8811.1 test methodology as part of the mandatory standard so as to provide a further mechanism to reduce or prevent the risk of injury arising from overly soft mattresses. The ACCC notes that this test can readily be replicated outside the lab with household products, and so has the potential to bring greater product safety benefits to users of cots once integrated into the ACCC's product safety consumer awareness materials.

Proposed amendments to the Standard

The ACCC proposes a number of amendments to the Standard in order to better address ongoing risks and the emerging hazards identified above. These changes reflect new safety developments contained in the 2013 version of the voluntary standard. The ACCC understands that many of these requirements are already being voluntarily adopted by suppliers.

Specifically, proposed changes are:

- definitional amendments, such as clarification of certain terms relating to entrapment, for example 'accessible to the child' and 'within the cot' in order to provide more certainty to suppliers about areas of potential harm
- expansion of the tests for drop sides and reordering of the testing sequence to increase the level of rigour of testing of these features
- changes to test procedures in certain appendices including increases in the test force to be applied, changes in the location of applying force, the length of time of application and the number of repetitions and the application of extra weights in certain testing processes to ensure a more onerous test regime

- an additional test for determining drop side strength involving its removal and suspension by the top rail
- clarification of what should be identified and recorded as damage to the drop side as part of the testing process to allow for clarity for testing houses and suppliers
- renaming of certain clauses and appendices to better reflect the test process
- addition of a requirement for testing the firmness of any mattress supplied with the cot to address and clarify a previously unclear requirement
- removal of a the requirement for information to be provided on a swing tag or label with the cot.

The proposed changes are set out in more detail below.

Definitional amendments

It is proposed to include the following definitions in Clause 3 of AS/NZS 2172:2013 in the mandatory standard:

- Accessible to the child (clause 3.2)
Within the reach of the child that is inside the cot, including components of the cot that are on the outside to within a distance of 300mm in any direction, except on the underside of the structure of the mattress base and directly beneath the mattress base when it is in lower position.
- Sleep surface (clause 3.12)
That part of the cot on which the infant is intended to rest
- Within the cot (clause 3.13)
In the internal space bound by the sides of the cot (drop side, fixed side, and ends) forming the walls, and the top surface of the mattress base forming the floor

Clauses 3.2 and 3.13 are linked and relate to determining the ability of a child in the cot to reach potentially hazardous areas of the cot. This change is proposed to overcome ambiguity in previous standards.

Clause 3.12 relates to defining what may be referenced when considering an adequate or safe level of firmness for an infant mattress. The proposal is informed by the development of the new standard for mattress firmness.

Safety and Performance Requirements

It is proposed to include clauses from Clause 9 of AS/NZS 2172:2013 with respect to testing of the strength and integrity of cots with drop sides in the Standard:

- Clause 9.1 which relates to the proposed sequencing of the testing to be conducted
- Clause 9.2 relating to limb and head entrapment hazards generally but which can be generated by cots with inadequate strength and integrity
- Clauses 9.3, 9.4, 9.5, 9.6, 9.7 and 9.8 which replace clauses similar to those in the current mandatory standard, but with more stringent test methodologies
- Clause 9.11 which is an additional procedure for testing the drop side of a cot
- Clause 9.12 which refers to a methodology for assessing the firmness of an infant sleep surface (and in this specific instance, a cot mattress, if supplied with the cot).

These changes are proposed in order to strengthen the testing processes required for determining the structural integrity of cots with drop sides. This enhanced test regime should only generate a minimal additional cost to suppliers of drop side cots.

Information and Marking Requirements

The paper is proposing to remove the requirement for a swing tag to be provided with the cot (in line with a change incorporated in the 2013 voluntary standard). The ACCC understands that this requirement is considered by industry to be no longer relevant in the supply of household cots as most cots are supplied in flat pack form requiring assembly by the consumer (including the attachment of any tag) and the information provided in such a tag or label is adequately provided through other requirements for markings on the cot and the packaging. The ACCC agrees with this position.

It is proposed that requirements for information and marking are modified in the Standard by removing clause 11.2 which requires a swing tag or label on the cot. This proposal is made on the basis that information required by this clause is duplicated in three other areas (it is required to be marked on the cot, in the informational leaflet and on the cot packaging). Views are specifically sought on whether its removal would diminish the strength of current consumer information.

Conclusion

This paper proposes amendments to the mandatory household cot standard based on the most recent iteration of the voluntary Australian standard for cots, AS/NZS 2172:2013.

Revisions to the existing mandatory standard which incorporate relevant clauses of the most recent voluntary standard are proposed on the grounds they will improve safety and the functionality of the standard by:

- Introducing more rigorous tests of the strength and integrity of cot drop sides
- Clarifying the test process
- Incorporating newly developed testing for mattress firmness
- Removing requirements that are duplicated elsewhere; and
- Making some editorial changes.

Appendix A- Table of options for stakeholder response

#	Issue	Existing mandatory requirement- AS/NZS 2172 2003 (as modified by CPN No 6 of 2005)	Proposed changes to mandatory requirement-based on changes to AS/NZS 2172:2013	Agree/Disagree with proposed changes. With comments
1	Definitions	- - 3.10 Within the cot	3.2 Accessible to the child 3.12 Sleep surface 3.13 Within the cot	
2	Safety and performance	9.1 General	9.1 General	
		9.2 Entrapment hazard test	9.2 Entrapment hazard test	
		9.3 Impact test (and App B)	9.3 Impact test (and App B)	
		9.4 Strength test (and App C)	9.4 Filler bar, filler panel and corner post strength test (and App C)	
		9.5 Drop side load test (and App D)	9.5 Access fastening device and drop side mechanism strength test (and App D)	
		9.6 Durability of the access fastening devices (and App E)	9.6 Access fastening device durability test (and App E)	
		9.7 Durability of the drop side mechanism (and App F)	9.7 Drop side mechanism durability test (and App F)	
		9.8 Stability test (and App G)	9.8 Stability test (and App G)	
		-	9.11 Drop side strength test (and App K)	
		-	9.12 Mattress or other sleep surface firmness test	
3	Informative labelling	11.2 Information on swing tag or label	-	

The use of the ACCC's Consultation Hub (www.consultation.accc.gov.au) by stakeholders in providing responses is encouraged.

For convenience and ease of reference, the key questions posed on the Hub are replicated below.

- Do you support all of the proposals listed in Appendix A of the consultation paper, being: reference to the new definitions ('accessible the child', 'sleep surface' and 'within the cot'); the range of new strength and integrity tests in various clauses under clause 9 (and related appendices) and removal of swing tag requirements?
- Do you support some of the options in Appendix A of the consultation paper and if so which ones?
- Do you support introducing the various clauses from the voluntary standard AS/NZS 2172:2013 relating to the strength and integrity of drop sides and the revised entrapment clauses into the mandatory standard?
- Do you have any comments on the introduction of these performance requirements into the mandatory standard? Are these revised requirements sufficient?
- (Several clauses of the mandatory standard remain unchanged). Do you support the continuation of the inclusion of the existing clauses in the mandatory standard?
- Do you have any other comments about the requirements of a revised Consumer Protection Notice referencing the Australian standard for household cots AS/NZS 2172? Are there other issues which you believe should be part of the mandatory standard?
- Do you agree with the proposal to remove the swing tag or label requirement from the mandatory standard?
- Would you like to make any comments on whether the regulatory changes will create any additional compliance costs for your business? If so, would these be greater than any costs associated with the current voluntary standard? How would you quantify the costs?

Appendix B- Summary of cot recalls and enforcement actions

Recalls

Year	Supplier and model	Issues
1998	Target- Metro and Abbotsford cots Australian Nursery Distributors- Contemporary and San Remo cot	Rails in drop side loosening (glue) Entrapment- rail and base
1999	Endeavour Emily cot	Drop side slats detaching
2003	BabyLove- Wooden cot GroYears- Infant cot	Protrusions Small parts
2004	Boori- Paddington cot	Assembly- wrong assembly
2005	Skippy Australia- cot model 507 and 512	Multiple issues
2006	34 Degrees South- Home Creation cot Oz Auction- Wooden cot	Mattress size info incorrect Multiple issues
2007	IGC Dorel- Mothers choice cot mattress	Mattress size info incorrect
2008	DVN- Pinewood cot	Dimensional and Informational issues
2009	IGC Dorel- Kensington cot	Slats loosening
2011	Boori- Kingparrot cot mattress Bobby Bebe- Tee Baby Rimu cot	Mattress size incorrect Entrapment gaps
2012	Super A Mart- Sweet Dream cot and mattress	Mattress size issues
2013	Incy Interiors- 5 models Oz Plaza Living- Wooden Sleigh 3 in 1 Saving for Aussie- Canterbury cot	Gaps and entrapment issues Limb entrapment and labelling Depth of cot and labelling
2014	Koala Securities- Avoca Baby Cot	Missing label

Enforcement actions

Jinlong Sten and ATI Enterprises Pty Ltd (April 2008)

Issues: sharp points and edges, protrusions, limb entrapments, footholds, incorrect height requirements, strength, impact and durability issues, lack of information and labelling- court enforceable undertakings and product recall

Ausia Australia Pty Ltd (March 2007)

Issues: protrusions, incorrect height requirements, lack of information and labelling -court enforceable undertakings and product recall