



Australian Competition & Consumer Commission

DISCUSSION PAPER

Review of the Australian mandatory standard for hot water bottles under the *COMPETITION AND CONSUMER ACT 2010*

This discussion paper details the proposed changes for updating the mandatory requirements for hot water bottles

December 2013

Closing date for submissions 3 February 2014

Australian Competition and Consumer Commission
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Contents

Contents.....	3
Purpose	4
Summary	4
Consultation.....	4
Background: The Australian product safety system	5
Background: Regulation of hot water bottles.....	5
The current regulation	6
Hot water bottle products	6
Market.....	6
Compliance	6
Hot water bottle hazards and injuries	7
Hazards.....	7
Injury data	8
Is continued regulatory intervention justified?	9
Proposed changes.....	10
Adopt all performance requirements of BS1970:2012.....	10
Enhance warnings and instructions	11
Conclusion.....	12
Appendix A Table of proposed changes to the Standard.....	13
Appendix B Proposed warnings and instructions.....	16

Purpose

The purpose of this discussion paper is to:

- inform key stakeholders of the proposed changes to the mandatory standard for hot water bottles (**the Standard**¹) and their rationale based on research findings,
- consult with key stakeholders on these changes; and
- obtain information from stakeholders to help inform the revision of the Standard.

This paper forms the basis of stakeholder consultation on proposed changes to the hot water bottle mandatory standard. The ACCC will consider feedback received via this consultation process before forming its recommendation to the Minister. If the comments received result in substantial changes to the options outlined in this paper, a second round consultation may be required.

Summary

This paper proposes that the Standard should be updated by adopting changes as follows:

- all performance requirements of the latest voluntary standard for hot water bottles, the British Standard BS1970:2012 *Hot water bottles manufactured from rubber and PVC – Specification (BS1970:2012)*², and
- new labelling and usage instructions to reduce the number of injuries caused by consumer misuse of hot water bottles, such as filling with boiling water

The possibility of removing all regulation of hot water bottles was considered but is not recommended as the Standard provides minimum specifications primarily intended to address bottle failure by bursting or leaking, which may result in serious burns.

This paper seeks responses including feedback on any potential impacts that any of the changes might have and, where possible, agreement on the changes proposed.

If the Minister agrees to amend the Standard, a lead time of at least 12 months to enable suppliers to make any necessary changes would be considered appropriate. Given that a significant proportion of hot water bottle injuries appear to be caused by consumer misuse, the amended Standard will continue to be supplemented with a robust consumer education campaign.

Consultation

Submissions are invited from stakeholders including suppliers of hot water bottles, and interested parties. The closing date to provide your feedback **is 3 February 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. **Appendix A** at page 10 provides a summary of the proposed change to this regulation. **Appendix B** provides further details of the proposed changes to the required warnings and instructions.

You may also you to respond by email to:

¹ Note that hereafter all references to the '**Standard**' commencing with an upper case 'S', will mean the **mandatory standard**. References to the '**standard**' commencing with a lower case 's', will mean the **voluntary standard**.

² Note: The detailed technical specifications proposed for the revised Standard have not been reproduced in this paper. For details of the technical specifications, this paper should be read in conjunction with the BS1970:2012. Copies of the BS1970:2012 are available for purchase from the SAI Global website at www.saiglobal.com.

Email: productsafety.regulation@accc.gov.au

Subject: Hot water bottle standard review

Alternatively you may mail your response to:

Director Regulated Products and Compliance
Product Safety Branch
ACCC
GPO Box 3131
Canberra ACT 2601

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The ACCC may be compelled by law to disclose submissions (for example under subpoena or following a request under the *Freedom of Information Act 1982*). For more information see the ACCC-AER Information Policy available via www.accc.gov.au.

Background: The Australian product safety system

Section 104 of the Australian Consumer Law (ACL) allows the Commonwealth Minister to make a safety standard for consumer goods which may consist of such requirements as are 'reasonably necessary to prevent or reduce the risk of injury to any person'. The ACL is Schedule 2 of the *Competition and Consumer Act 2010*. Safety standards made under the ACL are co-operatively enforced by the ACCC and state and territory fair trading agencies.

Section 106 of the ACL provides 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.

The mandatory safety standard for hot water bottles regulates the supply of hot water bottles.

The term 'supply' in relation to consumer goods (like hot water bottles) means supply by way of sale, offer for sale, exchange, lease, hire or hire-purchase. For hot water bottles, hire or hire-purchase are unlikely to be relevant.

Background: Regulation of hot water bottles

The mandatory standard for hot water bottles was introduced in Australia in 2008. It followed a Coroner's report in 2007 on the death of a nursing home resident after a hot water bottle she was using burst. The hot water bottle was filled with boiling water and when it burst it caused serious burns and complications leading to death. The Coroner had determined the death was 'clearly preventable.' The ACCC has since identified one more death which has occurred due to complications from scalding burns caused by a leaking hot water bottle. The second incident occurred before the commencement of the mandatory standard.

The legislative instrument enabling the Standard is the *Trade Practices (Consumer Product Safety Standard) (Hot Water Bottles) Regulations 2008*.

The Standard is partially based on the 2006 version of the British voluntary standard - BS 1970:2006, now superseded by BS1970:2012.

In 2010, the ACCC commenced a review of this mandatory standard. This review included surveying stakeholders about hot water bottle safety and possible changes to the Standard. When the ACCC learned that the British Standards Institution had commenced a review of BS1970:2006, this review was rescheduled to ensure that the mandatory standard would be in alignment with the revised British Standard.

The current regulation

The current hot water bottle mandatory standard contains a number of technical and labelling requirements. The technical specifications, which were drawn from the BS1970:2006, include requirements related to:

- wall thickness
- seam strength
- pressure resistance
- seal integrity and leakage

In addition, the current standard includes the requirement to permanently mark and prominently display a warning on the bottle: “Do not use boiling water”.

Hot water bottle products

A hot water bottle is a sealed container usually made of rubber or sometimes polyvinyl chloride (PVC) that is filled with hot water and used for easing pain, or for warming a bed or parts of the body. Hot water bottles are available in adult or child sizes.

The ACCC has observed the recent introduction of electric hot water bottles into the Australian market. Sometimes referred to electric heat pads, these products can be similar to hot water bottles with an internal heating element. The ACCC’s preliminary view is that the hazards posed by these products may be better addressed by electrical safety regulation. This paper does not propose extending the mandatory standard to capture these products.

Market

Hot water bottles are sold in a variety of market sectors, including the pharmacy, supermarket, discount variety chains, bedding and homewares and clothing sectors, and small discount variety stores (known as ‘\$2.00 shops’). Department stores and online retailers supply hot water bottles in much smaller quantities.

The Australian market for hot water bottles is based on imported product as there no Australian manufacturers of this product. The products are largely manufactured in China and some importers obtain supply from the same manufacturer.

Compliance

Various supplier education and guidance activities have been undertaken since the Standard was introduced in 2008.

In 2009, following the Standard’s first 12 months of operation, a national survey of hot water bottles was conducted by the ACCC. It resulted in a highly publicised recall of over 250,000 non-compliant bottles nationally.

Twenty four models of hot water bottles have been recalled since the introduction of the mandatory standard. Noting that a single model may have multiple defects, the most common defects identified in recalled products related to one or more physical properties of the product. This included insufficient wall thickness (18 instances) and filling characteristics (specifically aperture size defects; 10 instances).

Ongoing annual surveys by the ACCC continue to detect non-compliant bottles in the market, though not to the levels and volumes seen in 2009 – which suggests that educative activities supporting the standard have had some effect.

Nevertheless, surveys and tests conducted or commissioned by the ACCC continue to reveal non-compliance with labelling and the minimum thickness requirements. Other deficiencies detected include bottle openings and funnels being too small and inadequate strength of seams.

Whilst the ACCC has identified non-compliance across the supply chain, including in major retailers and pharmacy chains, the majority of non-compliance is generally found in:

- the discount variety sector (which tends to trade in low volumes); and
- new entrants and retailers selling hot water bottles on a seasonal or irregular basis in low volumes, for example specialist nightwear retailers, independent supermarkets, home ware and gift stores sourcing product directly from overseas.

Hot water bottle hazards and injuries

Hazards

The primary hazard addressed by the Standard is the risk of scalds and contact burns. Infants and the elderly are particularly vulnerable to burns from hot water bottles because they may not be able to react quickly enough if a hot water bottle bursts or leaks, or sense if a hot water bottle is too hot against their skin. Diabetics with reduced sensation are also particularly at risk. Further, the skin of infants, children and the aged is more delicate and vulnerable to burning than that of the general population. Injuries to these groups may be more severe than for the general population.

Serious burns (also known as ‘full thickness’ or ‘third-degree burns’) can require hospitalisation, skin grafts, cosmetic surgery and long periods of recovery. Full thickness burns can result in permanent and disfiguring scars which may limit mobility when located near joints, particularly fingers.

Table 1 - This table illustrates how long it takes to sustain a full thickness burn³ from water at a range of different temperatures.⁴

Water Temperature	Exposure Period
65 C	less than 1 second
60 C	5 seconds
55 C	30 seconds
50 C	5 minutes

³ ‘Full thickness burns involve all the layers of the skin, including the nerves that supply the skin.’ Torpy JM, Lynn C, Glass RM. Burn Injuries. *JAMA*. 2009; 302(16): 1828.

⁴ Public Health Association Australia, *Hot Water Temperature and Scald Burns Policy*, 2008

Injury data

In the five years since the Standard was implemented, there have been no known deaths caused by hot water bottles in Australia, though serious burn injuries continue to occur.

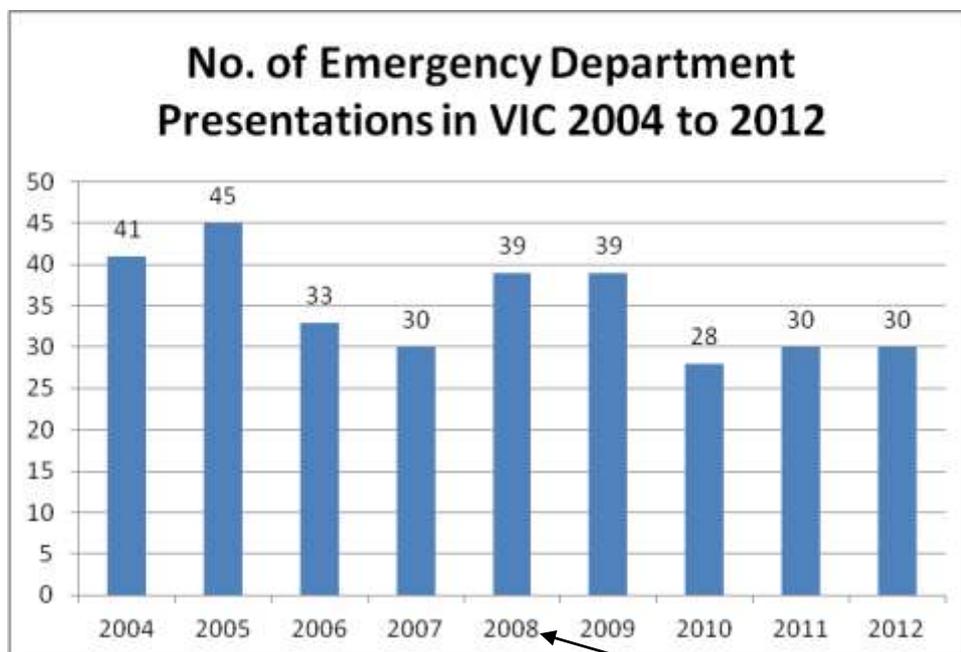
While there is currently no nationally coordinated collection of injury data that would allow a direct measure of total injuries in Australia associated with hot water bottles, data available to organisations such as the Monash University Accident Research Centre (MUARC) and the NSW Statewide Burns Injury Service (NSW SBIS) give an indication of the level and type injuries being sustained.

MUARC analyses data collected by the Victorian Injury Surveillance Unit (VISU), from select major Victorian hospital emergency departments and provides a significant data sample. Data provided by NSW SBIS is consistent with the Victorian data and also provides an indicative data sample.

Data from these datasets suggests that hot water bottle burns account for approximately 36 admissions annually in Victoria and a similar number in NSW.

From 2004 to 2012, hospital presentations in Victoria peaked at 45 in 2005 and dipped to 28 presentations during 2010. A spike in presentations in the years following the introduction of the standard (2008 and 2009) coincides with poor levels of compliance found in the market at that time, which led to the recall of 250,000 bottles in 2009. A modest drop in presentations from 2010 onwards coincides with the ACCC's "Hidden Dangers" hot water bottle safety campaign, which had a combined estimated audience in print, television, radio and online of 500,000.

Graph 1: Total yearly presentations 2004 to 2012 – VIC



Standard introduced June 2008

A significant proportion of burn injury descriptions cite incidents which allude to possible hot water bottle misuse from lack of awareness of correct usage, a user sitting on, jumping on or dropping a hot water bottle. The frequency of scald injuries involving a user filling a hot water bottle suggests that some consumers may be holding bottles incorrectly while filling, filling bottles too quickly, or expelling the air (and water) by placing bottles against their bodies, instead of on a flat surface such

as a sink or counter. The persistence of these presentations reinforces the need for ongoing consumer education.

The NSW SBIS database was queried for the period 01/01/2006 to 30/06/2010 (4.5 years) to identify patients treated in a NSW Burn Unit following injury from hot water bottles. Of the 126 presentations recorded by participating NSW hospitals for the period, 44 patients were admitted to hospital with an average length of stay of nine days and 28 patients required surgery. Other information includes:

- approximately 70 per cent of patients were female. This is consistent with the rate for Victorian and other Australian hospitals
- burns ranged in size up to 14% of the total body surface area
- the single largest group of patients (21%) were in the 40 to 49 years bracket (see Table 2 for the number of injuries by age range)
- 90 of the 126 presentations occurred in the months from May to August
- 31 were specified as occurring in the bedroom
- most injuries appeared to occur because the hot water bottles failed in some way (see Table 3)

The number of injuries associated with hot water bottles reported show small to moderate fluctuations from year to year. Although the ACCC has not analysed these fluctuations in detail, it would be reasonable to expect a correlation between number of injuries and the weather, with hot water bottle use (and therefore injuries) likely to be higher in colder winters than in milder years.

It is difficult to draw general conclusions from an analysis of available injury data due to a number of factors, including:

- changes to the practices for collecting and recording data during a reporting period
- inconsistency in the coding of the data by individuals
- whether hot water bottles are mentioned in the narratives, e.g. ‘scalded by hot water’
- changes to the level, accuracy and type of data collected through hospitals over time.

Table 2 – No. of injuries by age range

Age range	Total
0 - 9	17 (14%)
10 - 19	16 (13%)
20 - 29	24 (19%)
30 - 39	19 (15%)
40 - 49	26 (21%)
50 - 59	8 (6%)
60 - 69	7 (5%)
Over 70	9 (7%)
Total	126

Table 3 – No. of injuries by cause

Cause	Total
Burst	87 (69%)
Spill	12 (10%)
Split	10 (8%)
Contact	8 (6%)
Leak	5 (4%)
Unknown	4 (3%)

Is continued regulatory intervention justified?

Injury data supports the conclusion that continued regulatory intervention is justified and is reasonably necessary to prevent or reduce the risk of injury given:

- past non-compliance with performance requirements which are required by both BS1970 and the mandatory standard,

- ongoing hazards created by consumers not being aware of the dangers of filling bottles with boiling water as well as other misuse

During the previous consultation in 2010, respondents were unanimously in favour of revising the Standard to make it consistent with the requirements of BS1970:2012. Respondents also agreed in principle to the provision of meaningful warnings and instructions to reduce the incidence of misuse.

Proposed changes

Proposed changes to the Standard are to:

- adopt all performance requirements of BS1970:2012; and
- require enhanced warnings and instructions.

Adopt all performance requirements of BS1970:2012

BS1970:2012 includes key safety requirements that are widely accepted by suppliers and are used internationally.

As the majority of hot water bottles current available in Australia already claim conformance with this voluntary standard, adopting all or most of requirements as mandatory is likely to place only a minimal additional compliance burden on suppliers in the initial stages while transitioning from the 2006 version (on which the current Standard is based) to the 2012 version.

It is proposed that the Standard be amended to adopt all performance requirements contained in the 2012 version of the BS1970 – including performance requirements related to visual examination, the ‘tear test’ and tension set measurements not contained in the current version of the Standard.

The latest version BS1970:2012 also includes some minor changes from the 2006 version. It also rectifies an anomaly in respect of seam strength measurement requirements in the 2006 version, which was carried over into the existing Standard, which inadvertently compromised the overall strength of seams.

The ACCC commissioned research carried out in 2010 by rubber industry experts locally and in the United Kingdom which affirms that bottles made to the specifications of the BS1970 should be safe when not subject to misuse.

A revised mandatory safety standard based on the key design and performance requirements of BS 1970:2012 *Hot water bottles manufactured from rubber and PVC – Specification* would address safety hazards and reduce consumer injuries by **continuing** to require hot water bottles to have:

- the minimum wall thickness necessary to provide adequate performance
- adequately sized filling apertures to help prevent spillage and splashback
- secure closures which do not separate and allow escape of hot water
- a force test (as revised in BS 1970:2012) to ensure that the strength of the seams on the bottle is sufficient to prevent failure and escape of hot water content
- appropriate use instructions provided with the hot water bottle
- the conspicuously marked warning “Do not use boiling water”

The ACCC’s 2010 research supports the inclusion of additional requirements from the BS1970, which are not currently prescribed.

A revised Standard would include **new mandatory** specifications for:

- a visual examination test, as required by the BS1970:2012, to detect defects that could adversely affect the safe performance of the hot water bottle, such as where trimming of the neck-body intersection results in a nick which acts as a stress raiser that weakens the product in this area
- tear resistance
- tensile stress-strain
- tension set
- a prescribed methodology for measuring thickness is desirable to provide certainty for suppliers, consistency and validity in results obtained from test laboratories and for the equitable enforcement of the regulations

This proposal is supported by research findings that the strength and integrity of hot water bottles depends on all technical elements of the BS1970 being satisfied.

Enhance warnings and instructions

The ACCC would like views on whether BS1970 should be varied to enhance the required warnings and instructions. Evidence suggests that a significant portion of injuries are associated with possible hot water bottle misuse. A revision of the instructions in plain English could serve to alert consumers more effectively and provide more meaningful guidance than current requirements.

The ACCC has developed new warnings which provide more detailed general warning information, as well as expanded filling instructions, usage instructions and storage instructions. These revisions represent an opportunity to prevent more injuries, and reduce the severity of any injuries which occur.

The ACCC is seeking your views about each of these new warnings, which are provided in the online questionnaire as well Appendix B. Please provide your input by completing the online questionnaire or by written submission.

Improved warnings against filling with boiling water

Market research commissioned by the ACCC into user behaviour indicates that misuse by filling hot water bottles with boiling water from the kettle is common practice. There is scope to improve warnings to address the potential for filling misuse and related hazards.

ACCC surveillance of hot water bottles indicates that where hot water bottles are supplied in packaging, suppliers do typically provide instructions for care, use and storage on the packaging which mostly accords with the BS1970. The problem is that even if these warnings are read (and understood) at the time of purchase or at the first use, the instructions are likely to be discarded and may not be remembered for the next time the bottle is used. Packaging is not typically designed to be retained for later reference.

For this reason, the ACCC would like to consider ways of including a more visible warning that is either on the hot water bottle, or attached to the hot water bottle. In previous consultation with suppliers, the ACCC was advised that the characteristics of rubber may make it unviable to produce hot water bottles with a highly contrasting, visible and permanent warning. Suppliers have also advised that this could affect the integrity of bottles in other ways, though these were not defined. The ACCC would like to consider whether such a change would unnecessarily limit the ability of suppliers to supply into the Australian market.

However, that is not to say that such warnings will not be considered in addition to those accompanying bottles. For example, as an alternative to the warning as currently provided i.e. embossed or relief moulding on the bottle without contrast, a permanent warning might be provided attached to the bottle by means of a disc, or tag, such that it would be prominent and legible and will be evident on each use of the bottle.

If you have a view on whether a safety warning could or should be permanently on hot water bottles, please include it in your response to the ACCC on this consultation paper.

Filling hot water bottles with hot water from the tap

Consumer education provided by the ACCC recommends users do not fill hot water bottles with hot water from a tap. This is because rubber is vulnerable to compromise from the use of hot tap water which contains traces of copper from hot water systems. The ACCC advice is for consumers to use heated (but not boiling) water from the cold tap, or to partially fill the bottle with cold tap water before adding some boiling water. This can be confusing for consumers—so the ACCC also plans to review its consumer education material once the mandatory standard has been revised.

The ACCC is aware of the potential for anti-copper additives to increase the tensile strength of a hot water bottle. The ACCC considers that the BS1970:2012 tensile strength test adequately addresses the potentially vulnerability of hot water bottles from copper traces in water and does not propose a specific additional requirement for anti-copper additives at this time.

Conclusion

This discussion paper proposes amendments to the hot water bottle standard based on the most recent and detailed injury information available to the ACCC and on research conducted into the use of hot water bottles in the community.

The primary purposes of the proposed changes are to bring the Standard into line with the most up to date and relevant industry standard for hot water bottles and to provide simpler and more meaningful labelling for users of these products.

Appendix A Table of proposed changes to the Standard

This table lists the clauses of the BS1970:2012 proposed to be adopted and the current and new specifications of the reviewed Standard. Details of proposed labelling requirements to be provided with hot water bottles are at **Appendix B** on page 15.

Proposed change		Current	New
1	When the new standard has been made, allow a lead-in period of 12 months before the new requirements commence	N/A	N/A
2	Adopt BS1970:2012 Visual Examination		✓
3	Adopt Clause 4.2 BS1970:2012 Thickness (mm)	✓	
4	Adopt Clause 4.3 BS1970:2012 Filling characteristics (mm)	✓	
5	Adopt Clause 5.1 BS1970:2012 Closures, General	✓	
6	Adopt Clause 5.2 BS1970:2012 Test for separation of screwed closures	✓	
7	Adopt Clause 5.3 BS1970:2012 Rubber components (IRHD)		✓
8	Adopt Clause 6.1 BS1970:2012 Leakage	✓	
9	Adopt Clause 6.2 BS1970:2012 Strength of seam	✓	
10	Adopt Clause 6.3 BS1970:2012 Pressure resistance	✓	
11	Adopt Clause 6.4.2.2 Tensile stress- strain (before aging)		

Proposed change	Current	New
12 Adopt Clause 6.4.2.3 Tensile stress- strain (after aging)		✓
13 Adopt Clause 6.5.1 Tension set for HWB (%)		✓
14 Adopt Clause 6.6 Tear strength		✓
15 Adopt General warnings according to Appendix B	✓	
16 Adopt Filling instructions according to Appendix B		✓
17 Adopt Usage instructions according to Appendix B		✓
18 Adopt Storage instructions according to Appendix B		✓
19 Provide warnings and instructions on the packaging	✓	
20 Provide warnings and instructions as a separate insert or pamphlet accompanying the bottle		✓
21 Provide a permanent warning “DO NOT USE BOILING WATER” on a specified location on bottle, in a specified font size, in a contrasting colour to the bottle	✓	
22 Provide a permanently attached and permanent warning “DO NOT USE BOILING WATER” in a specified font size attached by means of a disc, tag or similar.		✓
23 Provide illustrations for using, filling and storing		✓
24 Extra labelling must be according to Clauses 8 & 9 of BS1970:2012		✓

Proposed change	Current	New
25 Adopt Usage instructions which do not prohibit the use of hot tap water		✓
26 Adopt Usage instructions which recommend the use of hot tap water (in preference to boiling water)		✓
27 Adopt Provide the week, month and year of manufacture on the front of the packaging		✓
28 Adopt Provide a Use By Date on the front of the packaging		

Appendix B Proposed warnings and instructions

Made from Natural Rubber (if applicable)

GENERAL Warnings

- NEVER fill with boiling water, it can cause damage and bottles may burst
- NOT recommended for children or anyone with reduced feeling or delicate skin
- REPLACE at least every 3 years
- REPLACE earlier if damaged or worn, e.g. cracked, splitting, colour has changed, feels brittle, stopper leaks

IMPORTANT Filling instructions

1. POUR cold water into an equal volume of boiled water in a kettle or jug
2. HOLD bottle over sink and away from your body, POUR water into funnel, taking care not to splash water onto hands or body
3. FILL slowly to two thirds full, DO NOT overfill.
4. REMOVE air in bottle by gently LOWERING onto flat surface until water can be seen at opening
5. SCREW in stopper until JUST TIGHT
6. HOLD bottle upside down over sink, away from body, SQUEEZE LIGHTLY to check for leaks

IMPORTANT Usage instructions

- WRAP in a towel or covering - do not place bottle in direct contact with skin
- DO NOT lean on, sit on, rest your legs on or put pressure or weight on bottle
- DO NOT sleep with bottle overnight, remove before getting into bed
- NEVER heat bottle in oven or microwave oven

IMPORTANT Storage instructions

- EMPTY bottle and HANG upside down to dry. Allow to fully dry BEFORE storing
- STORE with stopper REMOVED
- STORE in cool, dark, dry place, HANG upside down, or lie flat
- DO NOT place any items on top of bottle
- KEEP AWAY from moisture, sunlight, oil, grease and heat



KEEP THESE INSTRUCTIONS FOR FUTURE REFERENCE