

## Treasury's National Competition Policy Reform Consultation

### Lowering barriers to the adoption of international and overseas standards in regulation

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**Submitted to:** Director, National Competition Policy Reforms

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GS1 Australia welcomes the opportunity to contribute to the Australian Government's consultation on National Competition Policy reform. We commend Treasury's focus on removing regulatory barriers and enabling productivity uplift through smarter regulation and harmonised standards.

As Australia considers how best to modernise its competition framework, GS1 urges the Government, through Treasury and the Productivity Commission, to recognise that **product conformity and supply chain standards are now critical national infrastructure**. Global and national standards underpin the efficiency, safety, and competitiveness of our domestic industries and global trade. Supply chain data standards that support productivity growth and international trade deserve explicit prioritisation as part of **Pillar 3 of the National Productivity Strategy – Digital and Data**.

This submission builds on prior responses to the Productivity Commission's inquiries into data and digital transformation, the circular economy, sustainability claims, and packaging reform. It also draws on independent research by the **Centre for International Economics (CIE)**, which found that business use of international supply chain standards currently delivers **up to \$27.3 billion per year in GDP uplift**, with the potential to unlock a further \$22.7 billion if broadly adopted. These productivity benefits are comparable to the total impact of all 26 National Competition Policy reforms assessed in previous Productivity Commission studies. **Attachment 4 provides more detail on the CIE Report.**

GS1 Australia strongly supports efforts to improve the recognition and use of international and national standards in regulation. However, we believe more can be done to coordinate a **broad, more unified and inclusive standards and product conformity ecosystem** - one that actively involves international and domestic standards bodies, regulators, and organisations like GS1 that maintain widely adopted global data standards.

We also urge Government to adopt a **more systematic and evidence-based approach** to regulatory simplification - building on the competition reform guidelines, best practice handbook, and real-world evidence such as the CIE report- to support priority reforms and measurable outcomes.

To support this consultation, our submission includes:

- This concise **cover note** highlights key messages for government, deliberately and in the context of current productivity deliberations.
- Short, structured **consultation question responses** (Attachment 1), grounded in GS1's industry experience and **with supporting economic evidence** (Attachment 4).
- Supporting **reviews of the Competition Reform Guidelines and the Best Practice Handbook** through a global supply chain data standards lens (Attachments 2 and 3).
- Examples of **practical contributions to standards alignment** can be found in attachment 5

GS1 Australia is committed to helping unlock the value of standards-led reform and to working with regulators, industry, and government partners to deliver a simpler, more productive, and internationally aligned regulatory environment.

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## About GS1 Australia

GS1 Australia is a not-for-profit organisation that works with government, industry, and international partners to develop and implement globally harmonised supply chain data standards. Our standards, such as the common barcode containing a Global Trade Item Number (GTIN) along with other identifiers such as the Global Location Number (GLN), and EPCIS (supply chain event) traceability protocols, are used daily by over 23,500 Australian businesses and more the 2.5 million global organisations including government agencies to improve product identification, traceability, safety, and regulatory compliance. **Our mission** is to help Australian industry and government improve productivity, reduce red tape, and remain competitive in global markets through trusted, interoperable data systems.

## Submission Purpose and Support for Reform

GS1 Australia strongly supports the intent and direction of the proposed Competition Reform Guidelines and Best Practice Handbook. We believe these tools, if implemented effectively, can help governments adopt practical, performance-based regulation that supports innovation, lowers the cost of doing business, and strengthens national and international regulatory alignment.

We are also pleased to provide an independent body of evidence to support these claims (refer to Attachment 4 – CIE Report on the value and benefit of supply chain standards on the Australian economy)

## Key Messages and Recommendations

### 1. *Prioritise supply chain data standards as national digital infrastructure*

Supply chain data standards (part of the national product conformity and standard infrastructure) must be recognised as **critical national infrastructure** under Australia's National 'Pillars of Productivity' Agenda, particularly under *Digital and Data – Pillar 3*. These standards form the backbone of efficient, verifiable, and secure trade and regulatory systems.

### 2. *Apply a whole-of-economy approach to digital standards for trade*

Global data standards must be embedded across all relevant national initiatives - not only the *Digital Trade Strategy*, but also the *Future Made in Australia Strategy*, *Trade Diversification Strategy*, *Skills Reform Agenda*, *Sustainable Finance Roadmap*, and *National Productivity and Competition Agenda*. This may require awareness and training (see message 8 below).

### 3. *Use what already works – leverage the natural language of business*

Global supply chain data standards are already embedded in many supply chains and public registries. They are Australian Standards - proven, interoperable, scalable, and cost-effective. As outlined in Australia's [Digital Economy](#) and [Digital Trade Strategy](#), Governments should avoid creating bespoke systems when globally accepted solutions are readily available.

### 4. *Treat standards as pre-competitive infrastructure*

Standards like GS1 Supply chain data standards provide digital infrastructure - like the railway gauge: they provide a common foundation, enabling competition and innovation. Governments and industry need help to focus on building better engines and carriages (to drive the economy forward) rather than different sized rail gauges.

### 5. *Harmonise regulation using consistent yet flexible standards*

We recommend national coordination to harmonise regulatory requirements using GS1 and ISO-aligned standards while enabling sector-specific or risk-based application flexibility.

**6. Unlock RegTech and productivity through data and digital standards**

Referencing global standards supports automation, lowers compliance costs, and fosters the growth of RegTech solutions. The 2024 CIE report points to potential **\$50 billion annually in productivity benefits** through broader industry adoption of supply chain data standards.

**7. Promote linked data (not bigger databases) via open, discoverable, verifiable registries**

Australia should use standards like 'linked data' [AS ISO/IEC 18975:2025 \(Encoding and Resolving Identifiers over HTTP\)](#), related UN Recommendations and Advice to Nations the industry registry platforms like Verified by GS1, to make business-critical information machine-readable, discoverable, and interoperable - especially claims verification.

**8. Build capability across the public service – training in what standards are and how they work**

GS1 recommends that Treasury and the APS Academy co-develop training for policymakers and regulators on the use of standards, referencing real-world regulatory use cases.

**9. Foster government–standards collaboration – properly resource DISR**

Closer working relationships between government agencies, standards development organisations, conformity bodies, and industry are critical to ensure that regulation is effective, innovation-friendly, and future-proof.

**Why This Consultation Matters**

Government use of standards is inconsistent. Agencies like Department of Health, Disability and Ageing and Department of Climate Change, Energy, the Environment and Water have confidently adopted global standards (e.g. GS1) for vaccine distribution, device identification, and [recycled materials traceability](#) - unlocking real efficiency and safety gains. Yet others, including Department of Agriculture, Fisheries and Forestry and Australian Border Force, often refrain from endorsing standards, citing neutrality, even when global data standards are extensively adopted by industry and clearly supported by Australia's Digital Trade Strategy.

This inconsistency causes confusion and stalls investment. Industry needs direction, not prescription. Governments should set clear expectations aligned with international standards, not build proprietary systems and technology, delaying reform. This consultation is an opportunity to provide that clarity and unlock system-wide benefits through smarter, more consistent regulatory practice.

**Next steps and collaboration**

GS1 Australia welcomes this consultation as a critical opportunity to advance national productivity, improve regulatory efficiency, and strengthen Australia's position in global trade. We stand ready to collaborate with Treasury, the Productivity Commission, and all levels of government to turn these reform principles into practical outcomes. We strongly support inter-agency initiatives that address the root causes of inefficiency, rather than fragmented, siloed, or reactive reforms.

Thank you for considering our submission. We look forward to continued collaboration.



Sincerely,

Peter Carter

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## Attachment 1 - Response to Consultation Questions

### About the Competition Reform Guidelines

#### ***1. Do the Guidelines help policymakers adopt suitable international, regional and overseas standards?***

Yes. The Guidelines are a strong starting point for helping policymakers reference suitable international and industry-developed standards. GS1 Australia welcomes the recognition that ISO-aligned standards already in use by industry, such as those developed by GS1 and adopted by Standards Australia, can and should be considered. Additional clarity could be provided through case studies showing how supply chain data standards are used successfully in sectors such as healthcare, food, and logistics.

#### ***2. Do the Guidelines help harmonise mandatory standards across Australia?***

Partially. The emphasis on harmonisation is important, but more support is needed to overcome fragmentation between federal, state and territory regulations.

GS1 Australia recommends a national framework for recognition of global supply chain standards (using a ‘natural language of business’ e.g. GTIN, GLN, EPCIS) to simplify trade, ensure interoperability and consistency in product identification and traceability.

#### ***3. What other principles should the Guidelines include?***

- **Recognition of standards as national digital infrastructure**, particularly supply chain data standards – this has a specific meaning in terms of critical national registries (legal entities, location and product registries, national IP and other registries etc.
- **Pre-competitive use of industry adopted common data standards** (e.g. GTINs as a common language, not competitive advantage) – in alignment with Australia’s Digital Trade Strategy.
- **Investment in public sector training and capability-building** through the APS Academy or state and territory training platforms, in partnership with national/international product conformity and standards bodies

#### ***4. What risks or challenges may arise in applying the Guidelines?***

- Risk of agencies defaulting to “custom” approaches rather than re-using proven standards
- Risk of regulatory “lock-in” if undated referencing is not promoted
- Lack of technical capacity in government to assess digital standards suitability

### About the Best Practice Handbook

#### ***5. Does the Handbook encourage policymakers to use international standards?***

Yes. The Handbook offers important guidance, especially in its promotion of international and industry-developed standards. However, real-world application examples would help improve usability. GS1 could be a useful candidate as a case study if needed.

#### ***6. Does the Handbook help harmonise standards across Australia?***

It supports this in principle but would benefit from stronger tools or templates to assist coordination across jurisdictions. When it comes to supply chain data standards, GS1 suggests a model clause or regulatory template that references Australian Standards or ISO Standards in a performance-based regulatory context – as is often the case for international healthcare agreements.

### 7. What additional tools should the Handbook include?

- Checklist for assessing whether a standard is already used by industry
- Guidance on using registry-based digital identifiers (refer to GS1 Digital Link Standard and related United Nations advice to nations on linked data and certificate exchange standards)
- Map of standards bodies with links to their policy engagement portals
- List of standard bodies and the topics that they are relevant for (for example, GS1 Standards are relevant for supply chain digitisation, labelling, traceability etc).

### 8. What risks or unintended effects may arise?

- Policymakers may interpret "suitable standards" too narrowly without guidance
- Lack of familiarity with industry-driven standards (like GS1) may lead to confusion
- Over-reliance on technical committees without economic efficiency review

Mitigation of these risks is important as it negatively impacts all members of the national and international product and standards community. There is a need for a united ecosystem and active alliance that promotes simple, clear, non-competitive messages about the important role of standards infrastructure (not individual actors) to support effective public policy outcomes.

### About Priority Sectors for Reform

#### 9. Which sectors benefit most from applying the Guidelines and Handbook? What are the benefits and costs of applying them in that sector.

Packaging and Labelling, Food and Beverage, Building Materials, and Healthcare. GS1's CIE report found that adoption of interoperable supply chain data standards could deliver up to **\$50 billion in productivity gains per year**, especially in sectors where regulatory compliance is high.

- In **food and beverage**, estimates savings of **\$6.5 billion to \$10.8 billion annually**, driven by more efficient compliance with labelling, traceability, and food safety regulations.
- In **building and construction**, potential gain is **\$5.6 billion to \$10.2 billion per year**, particularly through improved digital traceability of materials and conformity documentation.
- In **healthcare**, existing use of GS1 standards has already demonstrated benefits in patient safety and inventory control. Further harmonisation across regulation could enhance these benefits – **up to \$5.5 billion/year**

These sectors already have high levels of private-sector standards adoption, and applying the Guidelines to formalise their use in regulation would accelerate benefits, reduce compliance duplication, and support innovation.

#### 10. What other sectors should be considered?

- **Recycled Materials and Circular Economy** – Standards support material tracking and verification (GS1 submission to Productivity Commission, 2024)
- **Agriculture and Sustainability Claims** – GS1 standards underpin credible, machine-verifiable ESG claims (DAFF consultation 2023–24)

#### 11. What can Australia learn from overseas approaches?

- **EU**: Digital Product Passport pilot programs use GS1 and ISO standards to support circularity
- **Singapore**: International Chamber of Com. integrates global standards, logistics and trade
- **US FDA**: The Food Safety Modernisation Act uses GS1 standards for traceability compliance

## Attachment 2 - Review of Competition Reform Guidelines (2025)

Focus: Role of Supply Chain Data Standards and how GS1 can help

### Context and Government Priorities

The Guidelines aim to:

- Lower barriers to the adoption of international and overseas standards in regulation
- Encourage risk-proportionate and performance-based regulation
- Enhance regulatory consistency across jurisdictions and reduce business compliance costs
- Enable greater recognition of global conformity assessments and certification

This work aligns with international obligations (e.g. WTO TBT Agreement) and responds to recommendations from the Productivity Commission's 5-Year Productivity Inquiry.

### Key Reform Messages and GS1 Alignment Opportunities

#### ***Review and update mandatory standards to reduce net regulatory costs***

Relevance to GS1 Standards and how to help :

- Assist regulators with replacing bespoke product identifiers and legacy classification schemes with GS1 GTINs, GLNs and GPC codes, reducing cost and improving accuracy.
- Example: National Product Catalogue (NPC) already enables digital sharing of verified product data across multiple sectors (health, grocery, agriculture).

#### ***Evaluate alternatives to mandatory standards, including open data registries***

Relevance to GS1 Standards and how to help :

- Recommend use of registry-based data sharing using GS1 Global Registries and Digital Link/QR-based identifiers, improving discoverability, auditability and verifiability of regulated product and business data.
- Example: Use of Digital Product Passports to link regulatory and sustainability credentials to GS1 identifiers.

#### ***Adopt international or overseas standards where feasible***

Relevance to GS1 Standards and how to help :

- Highlight GS1 standards as:
  - o ISO-recognised (e.g. ISO/IEC 15459 for unique identifiers)
  - o Adopted globally in regulated and non-regulated sectors
- Support government efforts to meet WTO TBT and APEC interoperability commitments

#### ***Accept foreign conformity assessment results and promote risk-based regulation***

Relevance to GS1 Standards and how to help :

- Facilitate use of GS1-compliant barcodes and RFID/EPCIS data for traceable, cross-border compliance verification (e.g. for origin, batch/lot, expiry, or certification status).
- Promote machine-readable structured identifiers that can be verified across jurisdictions (e.g. GLNs for certified facilities).

### ***Use performance-based and appropriate references in legislation***

Relevance to GS1 Standards and how to help :

- Promote flexible referencing of GS1 system components using version-independent specifications (e.g. “GTIN as defined by GS1 General Specifications”) to ensure standards remain current without regulatory amendment.
- Offer guidance language for drafting performance-based regulatory clauses using GS1 identifiers (e.g. "Products must be uniquely and digitally identifiable at pack level").

### ***Support regulator and industry capacity building***

Relevance to GS1 Standards and how to help :

- Partner with APS Academy and sector regulators to deliver practical training for public servants on:
  - o Global standards development and governance
  - o How GS1 standards are used in regulation and trade
  - o Sector-specific case studies (e.g. healthcare, food, building materials)

### **Strategic Recommendations for GS1 Australia**

Reform Area	GS1 Action – How GS1 Standards can Help
Standards recognition	Seek more formal recognition of GS1 identifiers (GTIN, GLN, GPC, EPCIS) as accepted regulatory standards in key sectors
Regulatory consistency	Offer to map existing regulations against GS1 standards to identify opportunities for harmonisation
Trade facilitation	Align messaging with DFAT’s Digital Trade Strategy and Australia’s WTO/FTAs - promote GS1 as enabling interoperable data exchange
Sector collaboration	Identify 2–3 priority sectors (e.g. health, packaging, environment) to pilot regulatory use of GS1 standards through reform programs
Pre-competitive infrastructure	Promote GS1 standards as foundational public infrastructure - enabling competition on product/service quality, not on incompatible data models (rail gauge analogy)

Refer to **Attachment 5** for examples of practical contributions GS1 makes to promote and support global standards alignment internationally



## Attachment 3 - Review of the Best Practice Handbook (2025)

Relevance to GS1 Australia and industry use of supply chain data standards

### Purpose of the Handbook

The Best Practice Handbook is designed to help policymakers:

- Better understand how to assess and use standards in regulation
- Apply risk-based approaches and conformity assessment mechanisms
- Align domestic regulation with international practices to reduce trade frictions

The handbook accompanies the Competition Reform Guidelines and is aimed at all levels of government involved in regulation design and review.

### Key Handbook Messages and GS1-Relevance

#### ***1. Use standards to reduce regulatory complexity and cost***

Standards should be used in regulation where they support efficiency, transparency and reduce the need for overly prescriptive legal drafting.

Relevance to GS1 Standards and how to help :

- GS1 standards reduce the need for prescriptive identifiers or documentation in regulation by enabling interoperable product, location, and transaction data (e.g. GTIN, GLN, EPCIS) that can be automatically validated and exchanged.

#### ***2. Select standards that are open, internationally recognised, and widely adopted***

Policymakers should prioritise standards developed by internationally recognised bodies and already in use by industry to minimise compliance burdens.

Relevance to GS1 Standards and how to help :

- GS1 is an ISO-recognised standards organisation. Its standards are embedded across key Australian sectors (healthcare, retail, food, agriculture, logistics). Regulators can leverage these instead of creating bespoke systems.

#### ***3. Foster alignment across jurisdictions***

The use of consistent standards can enable harmonised regulation between jurisdictions and reduce duplicative compliance.

Relevance to GS1 Standards and how to help :

- GS1 standards are designed for cross-border compatibility. They can support national harmonisation (e.g. across state/territory laws) and international regulatory coherence—especially in sectors like food, health, and environmental sustainability.

#### ***4. Apply standards proportionate to risk and regulatory outcomes***

Regulation should reflect the level of risk posed by products or services and should not be unnecessarily burdensome.

Relevance to GS1 Standards and how to help :

- GS1 supports risk-proportionate traceability (e.g. by batch, lot, or serial number), enabling scalable compliance from SMEs to multinationals. This flexibility supports low-risk innovation while maintaining public protection.



## 6. Promote regulatory interoperability and innovation (e.g. RegTech)

Standards should enable, not block, innovation - especially the use of digital tools, APIs, and AI in compliance.

Relevance to GS1 Standards and how to help :

GS1 standards are foundational to emerging RegTech applications in:

- Product recall and safety compliance
- ESG claims and digital product passports
- Smart customs, e-certification, and paperless trade

### Practical Recommendations for GS1 Engagement

Handbook Principle	GS1 Action – How GS1 Standards can Help
Use what's widely adopted	Advocate for government recognition of GS1 identifiers in food, health, agri, packaging, and sustainability regulation
Risk-based compliance	Provide examples of EPCIS and batch-level traceability models adapted to different risk categories
Digital verification	Demonstrate use of Digital Link and NPC in structured data disclosure for conformance, recall, and environmental claims
Regulator education	Partner with the APS Academy to offer modules on how GS1 standards support real-world regulatory outcomes
Inter-jurisdictional alignment	Offer support to jurisdictions seeking to harmonise regulation using consistent, ISO-compliant identifiers

Also refer to **Attachment 5** for examples of practical contributions GS1 makes to promote and support global standards alignment internationally

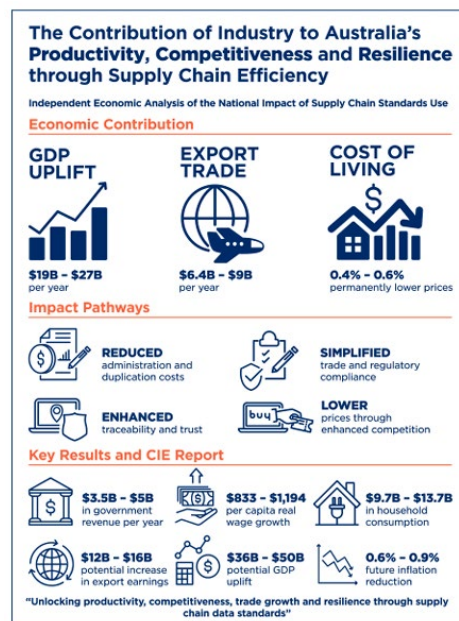
## Attachment 4 – Independent Analysis of the Impact of Standards Use

With a view to providing evidence-based support for submission responses, GS1 Australia is pleased to share the results of an independent economic analysis conducted by the Centre for International Economics (CIE). This landmark study quantifies the value of supply chain data standards to Australia's economy, revealing a contribution of up to \$27 billion per year in GDP uplift, driven by industry-led adoption.

A [summary report](#) is available via the GS1 Australia website and the full report entitled '**the impact and value of supply chain standards on the Australian economy – a whole of economy analysis**' can be [accessed by CIE directly](#)

The study finds:

- **Gross Domestic Product** - current use of GS1 standards contributes \$19–\$27.3 billion annually to GDP – up to 1.0% of Australia's total GDP.
- **Cost of living** - prices are 0.4–0.6% lower than they otherwise would be due to efficiencies enabled by standards.
- **Export Growth** – between 6 to 9 billion pa.
- **Government revenue** – an additional 3.5 to 5 billiona pa.
- **Real wages** – uplift of \$833 to \$1,194 per person
- Expanded use of standards—including digital labelling—could lift GDP by an additional \$17–\$22.7 billion per year, generate \$3.3–\$4.3 billion more in tax revenue, and improve affordability for consumers.



The reported national benefit of current GS1 Standards use is the same order of magnitude as the 26 National Competition Policy Reforms (contribute about \$26 to \$45 billion to GDP) identified by Australian state and territory governments across five themes identified in the study undertaken by the Productivity Commission in late 2024.

These benefits for data have largely been driven by industry adopting global standards to drive efficiencies. Importantly business which use global standards and contribute to the cost of maintaining them, are not the only beneficiaries.

GS1 standards are an example of the network effect – where the productivity benefits from standards adoption are only realised as more user groups across the supply chain adopt the standards. Many of these markets however suffer from coordination failures – a lack of co-ordinated decision making by firms to achieve mutually beneficial outcomes. Market dynamics can mean that coordination is possible in some cases, such as retail. However, in other sectors, this is a market failure where Government can play an active role to help coordinate players to realise productivity benefits for the whole economy.

Standards may seem invisible, but their impact is profound. From the barcode on a retail product to digital traceability in healthcare and agriculture, GS1 standards support efficient, transparent, and interoperable supply chains.

For more information visit <https://www.gs1au.org/partners/government/cie-report>

## Attachment 5 - Practical Contributions to Standards Alignment by GS1

Below is a list of practical examples of how GS1 is actively helping to align and advance international standards, particularly in support of regulatory coherence, digital trade, and sustainability

### Input to ICC Digital Standards Initiative (DSI) on Paperless Trade

- GS1 contributes to the **ICC DSI Standards Toolkit for Cross-Border Paperless Trade**, which provides a mapping of open global standards for digital trade transactions - including GS1 identifiers and messaging standards.
- GS1 standards such as **GTIN**, **GLN**, and **EPCIS** are recognised as critical to enabling digital product identification and trade documentation exchange.
- [ICC DSI Standards Toolkit](#)

### Development of discoverable, interoperable registries (e.g. Verified by GS1)

- GS1 has launched Verified by GS1, an open, global registry that allows regulators and business partners to verify the identity and key attributes of products using GS1 GTINs.
- This supports real-time access to structured, authoritative data - minimising the need for redundant or manual checks.
- [Verified by GS1 – Explained](#)

### Linked Data Architecture and Digital Link Standard

- GS1's Digital Link standard turns barcodes and product identifiers into web links, enabling products to connect directly to data such as safety instructions, certifications, and regulatory credentials.
- This helps ensure machine-readable, multilingual access to compliance information - critical for global interoperability.
- [GS1 Digital Link standard](#)

### Collaboration with UNCEFACT on global data models and sustainability

GS1 actively contributes to the UN/CEFACT Supply Chain and Traceability Projects, including:

- The UN Transparency Protocol (Recommendation 49) which supports decentralised, standards-based data exchange across borders.
- Sustainability-related projects on circular economy and digital product passports, using GS1 identifiers for traceable data linkage.
- [UN/CEFACT Recommendation 49 – Transparency Protocol](#)

### Support for Circular Economy and EUDR compliance – Digital Product Passports

- GS1 standards are being adopted in EU-aligned frameworks for Digital Product Passports, including for textiles, electronics, and batteries - leveraging traceable product data from manufacturing through recycling.
- [GS1 contributes to EU policy dialogues via GS1 in Europe and GS1 Global Office.](#)

### Adoption in ISO, WCO and WHO reference frameworks

- GS1 identifiers and data standards are embedded in international frameworks for product safety, trade documentation, and public health, including:
  - World Customs Organisation (WCO) Data Model
  - ISO 22383 on supply chain traceability
  - WHO UDI (Unique Device Identification) and Vaccine Traceability standards