

The Hon. Craig Emerson MP
Minister for Competition and Consumer Affairs
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

30 July 2009

Dear Minister

***Submission to Consumer Voice: Sustaining advocacy and research in
Australia's new consumer policy framework***

The Australian Communications Consumer Action Network (ACCAN) is a supporter of the Consumers' Federation of Australia.

ACCAN is Australia's new communications consumer watchdog. The purpose of ACCAN is to improve consumer advocacy, undertake research and analysis from a consumer perspective and to make the market work for communications consumers. The operations of ACCAN are made possible by funding provided by the Australian government.

It is very important to the effectiveness and efficiency of our work that we are connected with other organisations undertaking similar or related work on behalf of consumers. We cannot achieve this without a well-resourced peak body. We also need a sound evidence base to support our work and that takes account of the experiences of consumers in the market place.

For these reasons we support the recommendations contained in the submission made by the Consumers' Federation of Australia in response to the above Issues Paper, namely

Recommendation 1: That the Commonwealth Government provide funding of \$175,000 in start-up costs, and \$1.2 million annually to the Consumers Federation of Australia, to enable it to

- Leverage the benefit of its established presence, networks and relationships as well as the significant expertise of its membership.

- Be a source of policy ideas, and undertake policy development and advocacy across the range of consumer issues
- Provide government and industry with access to its network of consumer experts
- Contribute consumer views to policy development, standards setting and regulatory decisions
- Coordinate and support consumer representation
- Facilitate networking and information among consumer organisations
- Provide a single entry point to communicate with Australian consumer organisations.

Recommendation 2: That the Commonwealth Government, in consultation with the Ministerial Council for Consumer Affairs, develop a mechanism to support consumer policy-focused research. That mechanism should be based on the following principles:

1. Effectiveness

- a. Accountability and transparency in its governance and administrative arrangements to its funding body and to its constituents
- b. Achieve maximum outcomes for minimum resources

2. Relevance

- a. Research priorities should be developed in accordance with consumer advocacy organisations, government and regulators to ensure it addresses issues offering most benefit to consumers
- b. In line with the MCCA consumer policy operational objectives, priority should be given to address the needs of consumers who are most vulnerable or are at the greatest disadvantage

3. Responsiveness

- a. Capacity to address current and emerging issues of importance to consumers

4. Independence

- a. Organisation operates for the benefit of consumers, and without conflict of interest
- b. Research should be undertaken without direction from government and regulators

5. Sustainability

- a. Funding should be provided on a basis that enables long-term research projects to be undertaken
- An objective of the agency or funding mechanism administering the body must be to build expertise on consumer issues

ACCAN also believes that sufficient time needs to be allocated when policy makers seek consumer input for policy development. It is difficult, if not impossible, for consumer groups to provide meaningful, evidence based policy recommendations when a public comment period is often only two weeks (and on occasion less). As a peak body, ACCAN has a diverse membership base of community organisations – some of whom are unfunded and rely wholly on volunteers. Undertaking a rigorous member consultation process can be time consuming, but is necessary to ensure we represent the views of members. We recommend that all public consultations be required to have a 3 month window for comments, to ensure genuine input can be sought and advocated to ensure the best policy outcomes.

We urge the Government to act swiftly to address these significant gaps in the consumer policy framework.

Yours sincerely,



Allan Asher
Chief Executive Officer

Cc. Consumer Advocacy and Research Issues Paper
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