



**ACCI SUBMISSION TO  
STANDING COMMITTEE ON  
CONSUMER AFFAIRS**

**AUSTRALIAN CONSUMER  
LAW CONSULTATION**

**March 2009**



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## ACCI – LEADING AUSTRALIAN BUSINESS

ACCI has been the peak council of Australian business associations for 105 years and traces its heritage back to Australia's first chamber of commerce in 1826.

Our motto is "Leading Australian Business".

We are also the ongoing amalgamation of the nation's leading federal business organisations - Australian Chamber of Commerce, the Associated Chamber of Manufactures of Australia, the Australian Council of Employers Federations and the Confederation of Australian Industry.

Membership of ACCI is made up of the State and Territory Chambers of Commerce and Industry together with the major national industry associations.

Through our membership, ACCI represents over 350,000 businesses nation-wide, including over 280,000 enterprises employing less than 20 people, over 55,000 enterprises employing between 20-100 people and the top 100 companies.

Our employer network employs over 4 million people which makes ACCI the largest and most representative business organisation in Australia.

### Our Activities

ACCI takes a leading role in representing the views of Australian business to Government.

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.

Our specific activities include:

- Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally.
- Business representation on a range of statutory and business boards, committees and other fora.
- Representing business in national and international fora including the Australian Fair Pay Commission, Australian Industrial Relations Commission, Australian Safety and Compensation Council, International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, the Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, the Confederation of Asia-Pacific Chambers of Commerce and Industry and the Confederation of Asia-Pacific Employers.
- Research and policy development on issues concerning Australian business.
- The publication of leading business surveys and other information products.
- Providing forums for collective discussion amongst businesses on matters of law and policy affecting commerce and industry.

## Publications

A range of publications are available from ACCI, with details of our activities and policies including:

- The ACCI Policy Review; a analysis of major policy issues affecting the Australian economy and business.
- Issue papers commenting on business' views of contemporary policy issues.
- Policies of the Australian Chamber of Commerce and Industry – the annual bound compendium of ACCI's policy platforms.
- The Westpac-ACCI Survey of Industrial Trends - the longest, continuous running private sector survey in Australia. A leading barometer of economic activity and the most important survey of manufacturing industry in Australia.
- The ACCI Survey of Investor Confidence – which gives an analysis of the direction of investment by business in Australia.
- The Commonwealth-ACCI Business Expectations Survey - which aggregates individual surveys by ACCI member organisations and covers firms of all sizes in all States and Territories.
- The ACCI Small Business Survey – which is a survey of small business derived from the Business Expectations Survey data.
- Workplace relations reports and discussion papers, including the ACCI Modern Workplace: Modern Future 2002-2010 Policy Blueprint and the Functioning Federalism and the Case for a National Workplace Relations System and The Economic Case for Workplace Relations Reform Position Papers.
- Occupational health and safety guides and updates, including the National OHS Strategy and the Modern Workplace: Safer Workplace Policy Blueprint.
- Trade reports and discussion papers including the Riding the Chinese Dragon: Opportunities and Challenges for Australia and the World Position Paper.
- Education and training reports and discussion papers.
- The ACCI Annual Report providing a summary of major activities and achievements for the previous year.
- The ACCI Taxation Reform Blueprint: A Strategy for the Australian Taxation System 2004–2014.
- The ACCI Manufacturing Sector Position Paper: The Future of Australia's Manufacturing Sector: A Blueprint for Success.

**Most of this information, as well as ACCI media releases, parliamentary submissions and reports, is available on our website – [www.acci.asn.au](http://www.acci.asn.au)**

## INTRODUCTION

As a policy development and advocacy body, the Australian Chamber of Commerce and Industry submission to the Standing Committee on Consumer Affairs on an *Australian Consumer Law* details overriding principles of competition policy rather than specific sectoral issues. We expect that many of our members (listed following) will be making submissions separately highlighting more specific concerns.

We have noted recent developments in the area of competition policy as announced by the Assistant Treasurer and Minister for Competition Policy and Consumer Affairs the Hon Chris Bowen MP.

We welcome the Federal Government's commitment to achieving national consistency in consumer legislation. Nationally consistent regulation benefits businesses that operate inter-jurisdictionally by reducing red-tape and the compliance burden.

This submission outlines our policies with respect to the processes by which legislation is introduced. We urge the Federal Government to ensure that the *Australian Consumer Law* be subject to a cost-benefit analysis and Regulatory Impact Statement (RIS). We believe that both the provisions and scope of the *Australian Consumer Law* should be subject to such analysis.

ACCI also notes that the *Australian Consumer Law* discussion paper raises a widening of the definition of 'consumer' as it currently applies in the Trade Practices Act (1974) *Cwth* (TPA). ACCI is concerned that such a widened interpretation of 'consumer' has the potential to include employees who are party to employment contracts. ACCI's preliminary view is that a specific exemption for employment arrangements should be explicit in any proposed definition of a 'consumer'.

### 1.0 A NATIONALLY CONSISTENT SYSTEM OF CONSUMER LEGISLATION

The Australian Chamber of Commerce and Industry supports in principle the implementation of nationally consistent consumer law. ACCI is cognisant of the regulatory burden placed on businesses that operate inter-jurisdictionally through the need for compliance with multiple systems of regulation. ACCI considers that where some form of regulation is considered necessary, it should be developed within a context where:

- national standards and codes (including mirror and template regulation) are encouraged so that the regulation is 'business neutral' for all businesses regardless of location unless justified by differing conditions in different jurisdictions;
- conflicts, inconsistent rulings and overlaps between regulation and regulatory systems of different levels of government are identified and addressed. Similarly, differing interpretations of national regulations by different State or Territory agencies must be addressed;
- world's best practice for regulation and regulatory systems are identified and become the benchmark; and

- regulation reviews are carried out in a strategic and focussed fashion with an emphasis on industry by industry reviews and priority given to industries of major economic importance to the States and Territories along with a review of regulation which is seen as an impediment to small business.

An aligned system of national consumer legislation would reduce business' compliance costs and diminish unnecessary conflicts and inconsistent competition policy across the states.

For example, the lay-by system by which consumers purchase goods by instalments over a period of time is regulated differently in each state and territory of Australia. Retailers would benefit from a streamlined regulatory system in which compliance variations did not exist between jurisdictions.

## 2.0 POLICY FRAMEWORK

Australia seeks to gain a competitive advantage and an internationally competitive economy by pursuing a rigorous, focused, substantial and ongoing program of regulatory reform at all levels of government. As such the review of state and territory Fair Trading Acts and their amalgamation into one federal law should be of benefit to Australian business so long as regulatory decision making processes are transparent, lead to fair outcomes and involve consultation processes that are accessible and responsive to business and the community.

Consumer law reform like any other law reform should be subject to:

- a net benefit approach to new and existing regulation;
- an emphasis on the shift from a detailed and prescriptive “input-based” approach to a broader “output-orientated” approach. Business should be given flexibility in meeting the aims of regulations rather than simply having to meet set obligations;
- appropriate accountability in ensuring that essential objectives of regulation are achieved without unduly restricting or impacting on business;
- regulatory structure that involves adequate consultation, assessment of the alternatives to regulation, accurate cost benefit analysis and the monitoring of the performance of regulatory agencies.

## 3.0 THE NEED FOR A REGULATORY IMPACT STATEMENT

Given the scope of the proposed changes to current consumer law and the adoption of an *Australian Consumer Law*, ACCI believes that a full and comprehensive cost-benefit analysis as well as a Regulatory Impact Statement (RIS) needs to be prepared prior to any legislation being adopted.

The optimal use of RISs can contribute immensely to an effective and efficient regulatory system framework. However, it is clear that the use of RISs has not been as widespread or thorough as intended. A RIS must clearly indicate the costs to business of not only complying with the regulation (which is often higher than necessary due to the inflexibility of

administration), but the costs to business in terms of industry funding the regulation, lost opportunities, reduced incentives and loss of competitiveness.

The RIS process should precede, rather than follow, the consultation process so that the analysis used in balancing costs and benefits can be adequately assessed by stakeholders. The effective use of RISs must be incorporated into a broader commitment to regulation that encompasses transparency, adequate consultation and responsiveness to the needs of the private sector as well as the community.

In addition there should be a minimum exposure period for RISs and an agreed set of ways that they are communicated to the interested parties including a RIS section in the electronic Business Entry Point (BEP) of the Commonwealth and State/Territory governments.

## 4.0 THE FORMULATION AND SCOPE OF A NATIONAL CONSUMER LAW

ACCI considers that a nationally streamlined *Australian Consumer Law* should only be implemented with reference to the policies outlined above and once both a comprehensive cost-benefit analysis and RIS are carried out. ACCI members have particular concerns about some of the provisions identified for inclusion in the *Australian Consumer Law*.

For example, the *Australian Consumer Law* discussion paper suggested that Victorian unfair contract legislation be applied across Australia. ACCI has some concerns about the relatively recent introduction of this legislation in Victoria in 2003 and whether it has been proved to be of sufficient benefit that it should be introduced nationally. In addition, Victorian unfair contract regulation presents some difficulty for business in passing on genuinely increased supply chain costs to their consumers. Other concerns relate to the net benefit of the 'naming and shaming' provisions under the regulation.

In addition, the RIS should consider the scope to which the new *Australian Consumer Law* should apply and consult with industry on this issue. For example, our submission should be read alongside that of ACCI member Master Builders Australia detailing its argument for the building industry's exclusion from *Australian Consumer Law*. Master Builders Australia are of the view that comprehensive state based legislation (in addition to state and territory Fair Trading Acts) sufficiently regulates the building industry and that further legislation would only add to red-tape and compliance costs.

## 5.0 EMPLOYMENT ARRANGEMENTS

ACCI understands that the policy intention of the consumer protection provisions of the Trade Practices Act (1974) *Cwth* (and other legislation in the States/Territories) was and is to cover transactions by consumers of goods and services in the traditional sense. It does not appear to have been the intention that the consumer protection aspects of such legislation would cover transactions involving contracts for services (independent contractors) or contracts of service (employees).

However, the definition of 'consumer' under s.4B(1)(b) of the TPA appears to cover the situations referred to above, if those services are under the prescribed threshold. Therefore, ACCI's preliminary view is that a specific exemption for such employment arrangements should

be explicit in any proposed definition of a ‘consumer’. A statutory note or wording in the explanatory memorandum may also provide a sign-post to readers of the legislation that this is the intention of these provisions.

Page 76 of the *Australian Consumer Law* discussion paper raises a question with respect to ss.52 and 53B of the Trade Practices Act (1974) *Cwth*. The Government’s recently introduced Fair Work Bill (the bill) contains a similar provision in the form of clause 345, in Chapter 3, Part 3-1 General protections, Division 3 Workplace rights which provides as follows:

#### 345 Misrepresentations

(1) A person must not knowingly or recklessly make a false or misleading representation about:

- (a) the workplace rights of another person; or
- (b) the exercise, or the effect of the exercise, of a workplace right by another person.

Note: This subsection is a civil remedy provision (see Part 4-1).

(2) Subsection (1) does not apply if the person to whom the representation is made would not be expected to rely on it.

The clause would apply to all employers and employees within its constitutional reach, in a similar manner to the TPA (however, it would go further than the TPA to cover all employers and employees in the Territories and Victoria). Clause 341 of the Bill provides the definition of a ‘workplace right’, which includes under clause 341(1)(a) a ‘workplace law’ or ‘workplace instrument’. Workplace laws are in turn defined under clause 12 of the bill. The provisions are intended to cover prospective employees (see clause 341(3)).

Given that the Fair Work Bill appears to provide for similar legal rights and remedies with respect to misleading representations, and whilst reserving the rights of ACCI members to provide further input, ACCI’s preliminary view would be to encourage a re-examination of existing ss.52 and 53B of the TPA and limit the potential double regulation of such remedies in future. ACCI is of the view that the above definition should not be widened to include more business to business contracts. We are particularly concerned that if the definition of ‘consumer’ were widened in this way, current Victorian unfair contract legislation could be applied to employer-employee contracts. Industry would be opposed to this measure and we do not consider that employment contracts should be subject to provisions in an *Australian Consumer Law*.

## 6.0 CONCLUSION

ACCI supports in principle the implementation of nationally consistent consumer law. However, we emphasise the need for a comprehensive cost-benefit analysis and Regulatory Impact Statement to be undertaken to ensure that *Australian Consumer Law* represents best practice legislation that will produce the desired benefits to Australian businesses as well as consumers. Such analysis of an *Australian Consumer Law* should particularly include an examination of the scope to which the legislation should apply, and to which sectors, as well as which provisions should be included from current state and territory based legislation. Finally, ACCI is concerned that any expanded definition of ‘consumer’ under contract law provisions of the legislation should explicitly exclude employment contracts.

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