

10 June 2021

Consumer Policy Unit, Market Conduct Division, Treasury
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To the Consumer Policy Unit,

RE: Exposure draft of the Competition and Consumer (Industry Codes — Unit Pricing) Regulations 2021

TasCOSS is the peak body for the community services industry in Tasmania. Our membership includes individuals and organisations active in the provision of community services to Tasmanians living on low incomes and in vulnerable and disadvantaged circumstances. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage and promote the adoption of effective solutions to address these issues.

Effective unit pricing is a consumer protection measure that is vital to the many thousands of Tasmanians who:

- Have low numeracy and/or literacy. One in every two Tasmanian adults has difficulties with the literacy and numeracy tasks that are part of everyday life — including things like reading instructions and adding up at the supermarket. In these instances, unit pricing is vital to the ability to make informed choices.
- Live in poverty or on inadequate incomes. Unit pricing provides comparative pricing information quickly and reliably for people who are trying to stretch their budgets to feed their families well.

The benefits of unit pricing, however, extend across the community as a whole — including to community service organisations, whose services and operations often run on tight budgets. In our 2019 submission to the Unit Pricing Code of Conduct Review, TasCOSS argued that the question was not whether unit pricing should continue, but how it might be expanded beyond its current mandatory application (retailers of a minimum of 1000 square metre stocking all 11 of a list of specified items). We argued that the code should be expanded to:

- Make it much easier for consumers to notice and read unit prices.
- Require more grocery retailers to provide unit prices.
- Require some non-grocery retailers to provide unit prices.

We are disappointed that the Exposure Draft of the new Code does not include these or a range of other changes, such as those recommended by the Consumer Federation of Australia in their submission to the Review and to the current Exposure Draft. TasCOSS supports those recommendations and considers that, in not addressing the issues in those recommendations, implementation of the Code in its proposed form will be a missed opportunity to provide consumers and the economy, including retailers, with the benefits of effective unit pricing.

Yours sincerely,

Adrienne Picone
Chief Executive Officer