

28 February 2019

Consumer Policy Unit
Department of the Treasury
Langton Crescent
Parkes ACT 2600
unitpricingreview@treasury.gov.au

To the Consumer Policy Unit,

Re: Retail Grocery Industry (Unit Pricing) Code of Conduct review

TasCOSS is the peak body for the community services sector in Tasmania. Our membership includes individuals and organisations active in the provision of community services to low-income Tasmanians living in vulnerable and disadvantaged circumstances. TasCOSS advocates on behalf of low-income Tasmanians who often live 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. To inform this submission, we have consulted with member organisations providing services and support to older Tasmanians and Tasmanians living with disability, as well as with carers and individuals.

Unit pricing is a consumer protection measure of vital importance to:

- Tasmanians with low numeracy and 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.¹ In these instances, unit pricing is vital to the ability to make informed choices.
- Tasmanians on low 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 sector organisations, whose services and operations often run on tight budgets. The question therefore is not whether unit pricing should continue, but how it might be expanded beyond its current mandatory application (retailers of a minimum of 1000 sq.m stocking all 11 of a list of specified items).

TasCOSS and our member organisations particularly advocate for:

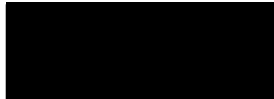
- The extension of compulsory unit pricing across smaller retailers. Many rural Tasmanians are dependent on smaller stores that do not carry the 11 types of items that bring a retailer into the scope of the unit pricing system.

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¹ <https://26ten.tas.gov.au/communicate-clearly/Pages/About-this-guide.aspx>

- The extension of compulsory unit pricing across a broader range of retailers, particularly those that sell grocery-type items (chemists, pet food stores). For people on low incomes, the ability to compare prices across all retailers carrying particular types of goods is crucial.
- Measures to ensure that all unit prices are easy for consumers to notice, read, understand and use. Legibility and the positioning of labels are both particular issues for older people and for people with disability.
- Better consumer information about unit pricing. Many older people and people with disability, particularly those who are primarily dependent on smaller stores where unit pricing is not required, are not aware of unit pricing in larger retailers. Organisations providing aged and disability care may be particularly well positioned to disseminate information.

Sincerely,



Kym Goodes
CEO

