



Submission 006a
Supplementary
A non-profit, volunteer
organisation, advocating to
advance the interests of
consumers in Queensland

Secretary:
Max Howard
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27 August 2012

**SUPPLEMENTARY SUBMISSION TO THE HOUSE OF
REPRESENTATIVES STANDING COMMITTEE ON
SOCIAL POLICY AND LEGAL AFFAIRS: INQUIRY IN TO
THE DO NOT KNOCK REGISTER BILL 2012**

The Queensland Consumers' Association (QCA) is a non-profit organisation which exists to advance the interests of Queensland consumers. QCA members work in a voluntary capacity and specialise in particular policy areas. QCA is a member of the Consumers' Federation of Australia, the peak body for Australian consumer groups.

QCA very strongly supports the provision of effective protections and choices for consumers in relation to door to door marketing of products and services.

QCA wishes to supplement its submission dated 6 August 2012 as follows:

Use of statistics on consumer complaints to measure consumer detriment

We note that the supplementary submission from Energy Assured Ltd (EAL) claims that a reduction in the number of door to door marketing complaints to EWOV since the July –Sept 2011 quarter indicates the success of the EAL Code of Practice.

We welcome this reduction. However, as indicated in our submission, statistics on consumer complaints is an imprecise and potentially misleading way to measure consumer detriment at a point in time or over time. This is particularly so for door to door to marketing about which, it is widely recognised, only a very small proportion of dissatisfied consumers complain to anyone, let alone to an ombudsman scheme.

Also, the extent to which consumers complain about specific door to door marketing experiences/outcomes probably varies greatly. This means that, if consumers tend to complain mainly about certain types of door to door marketing conduct/outcomes and not others (but which also cause substantial detriment), consumers can still be experiencing unacceptably high levels of detriment despite a reduction in the number of complaints.

We consider that the only accurate and reliable way to assess levels of consumer detriment caused by door to door marketing at any point in time, and over time, is to survey consumers who have experienced such marketing activity.

Obstacles to consumer use of Do Not Knock stickers

In our submission we mentioned several reasons why stickers may not be as effective as a Register in allowing consumers to indicate that they do not want to be approached by a door to door marketer.

We wish to add to the reasons mentioned that many consumers do not have an easy and automatic right to put a sticker on their entry door. Many consumers share a common entry door, for example when living a block of apartments/flats/units, and may have to apply to and get permission from the body corporate to put a sticker on the common door. This may involve significant work for a consumer and the application may be unsuccessful.

Recent report on door to door marketing commissioned by the ACCC

We wish to draw the committee's attention to a report, Research into the Door to Door Sales Industry in Australia prepared for the ACCC by Frost and Sullivan released by the ACCC on 17 August 2012, and to the ACCC's media release.

The report is available at:

<http://www.accc.gov.au/content/index.phtml/itemId/1070526>

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