





27<sup>th</sup> May 2016

Australian Consumer Law Review – Have Your Say

Submitted online: <a href="https://www.consumerlaw.gov.au">www.consumerlaw.gov.au</a>

SUBMISSION IN RESPONSE TO THE AUSTRALIAN CONSUMER LAW REVIEW ISSUES PAPER March 2016

The Caravan, Camping & Touring Industry & Manufactured Housing Industry Association of NSW (including Caravan & Camping Industry Association, Manufactured Housing Industry Association and Land Lease Living Industry Association) is this State's peak industry body representing the interests of caravan and holiday parks, manufacturers and retailers of recreational vehicles (RVs) (motorhomes, campervans, caravans, camper trailers, tent trailers, 5th wheelers and slide-ons) and camping equipment, residential land lease communities and manufacturers of relocatable and manufactured homes.

We currently have, as members, over 700 businesses representing all aspects of our industry. More than 400 are operators of holiday parks and residential land lease communities (residential parks, including caravan parks and manufactured home estates) in New South Wales and over 200 are manufacturers, retailers and repairers of RVs and accessories.

The geographical breakdown of our association members is:

Region	Number of Businesses
Far North Coast & Tweed	60
North Coast	77
New England (North Western NSW)	21
Manning/Forster	27
Newcastle & Hunter	85
Central Coast	61
Sydney & Surrounds	96
Leisure Coast (Illawarra and Shoalhaven)	61
South Coast (Eurobodalla and Sapphire Coast)	76
Central NSW	28
Murray & Riverina	30
Canberra & Snowy Mountains	19
Outback NSW	7
Interstate	81

As an important stakeholder in this industry we welcome the opportunity to respond to the Australian Consumer Law Review Issues Paper of March 2016 (Issues Paper).

#### 1 INTRODUCTION

To assist us in preparing a response to the Issues Paper we surveyed our members posing 40 questions distilled from the information provided in the Issues Paper. A spreadsheet with the questions and the responses received is attached as is the information bulletin given to our members.

The issues identified in the responses can be summarised as:

- A. Defining major failure and the impact of delays beyond the control of the trader. The questions posed What constitutes a major failure? What is a reasonable amount of time?<sup>1</sup>
- B. Costs of attendance and involvement in proceedings and the need for a triage system.
- C. Greater emphasis on enforcement of the consumer law to get better compliance. Swift decisive enforcement action could have minimised injuries, loss and inconvenience.
- D. Clear and concise language is important, not only in the legislation but in contracts.

From our member responses and our discussions it is our view that the Australian Consumer Law is an effective legislative program that is providing elements of certainty and professionalism in the marketplace. However, there remains a concern that some adjustments are required to take account of the experience since the legislation was introduction in 2010.

## 2 WHAT CONSTITUTES A MAJOR FAILURE?

This is an issue that was considered in the decision of NCAT referred to A. above and in footnote 1.

The state of the repair industry in New South Wales at least is that there will be at least 3-4 months lead in time to get repairs carried out on caravan and motorhome products. Without specific recognition that the failure to repair within a reasonable time is not caused by the trader but by the state of the repair industry's workload which causes delays in repairs, there will be the likelihood of unnecessary and unrealistic economic expectations placed on traders.

We recommend that to get the correct balance between consumers' reasonable expectations and the ability of the industry to respond there should be a clearer recognition in supporting information and direction from the regulators about the impact of this issue.

#### 3 COMPLIANCE AND ENFORCEMENT OF THE LAW

This was a common theme in the responses we received. There is a constant call for a level playing field in relation to the requirements for Australian products against cheap non-complying imported products.

It is our view that there needs to be a national approach to ensuring that imported products comply with the required Australian Standards. These requirements are enforced against

<sup>&</sup>lt;sup>1</sup> See Ingold v Coastal Caravans Pty Ltd [2016] NSWCATCD 12 at p8, par 40 "Most repairers have a book in lead time between 3-4 months".



Manufactured Housing



Australian products but there must be a more concerted approach to ensuring compliance at the time of entry to the Australian market.

#### 4 CLEAR AND CONCISE LANGUAGE

Our respondents supported our experience with the legislation, documentation surrounding contracts, product description and operational instructions by asking for a greater effort in providing clear, easy to understand and relevant information.

There appears to be a difficulty in securing the linkage between the legislation and how it is implemented in the marketplace. The explanatory information provided by the ACCC could be refined to meet these needs.

## **5** THE CASE FOR Triage IN PROCEEDINGS UNDER THE AUSTRALIAN CONSUMER LAW AND THE NSW CIVIL AND ADMINISTRATIVE TRIBUNAL

The Association argues that procedures need to be improved at the preliminary stage of the application process in the NSW Civil and Administrative Tribunal (NCAT). Many members have been required to respond to NCAT applications by consumers where there is no basis in law or fact for the claim.

There needs to be a screening process implemented that will minimise losses incurred by those appearing before the Tribunal to argue on lost causes that do not have any legal basis. This is especially so where applications by consumers do not fall within the jurisdiction of the Tribunal or the orders sought in the application form are not relevant to the law, application forms are filled out incorrectly, or sometimes the wrong application form is used.

These types of matters need to be addressed prior to the matter being listed for hearing in order to reduce the time wasting and costs incurred by many traders having to prepare responses for applications that are lacking in substance and are probably a legal nonsense.

Because our members are spread throughout NSW they are often required to travel long distances in remote areas to attend NCAT sittings. Even where there are delays beyond the control of NCAT and the parties they are required to attend on more than one occasion, only to be told at a subsequent sitting that the application must be dismissed because there is no substance in law and probably in fact for the claim.

Our members have to get advice about the matter and pay for those services. In some matters they employ an advocate to appear on their behalf. In responding to these applications they are required to expend time and money to attend, sometimes on multiple occasions. What this leads to is that after appearing before NCAT, the matter is dismissed and there is usually no effective recourse to costs orders against the applicant.

We urge the adoption and implementation of a 'triage system' in NCAT where a senior Registrar or Tribunal Member will review applications before they are listed for hearing to determine whether the claim has any legal substance or merit. Applications should be vetted for jurisdiction and other errors so that parties are not unnecessarily required to appear before NCAT. This would reduce unnecessary costs to appear before NCAT to respond to futile cases. NCAT could then allocate its time more effectively by dealing with







cases that actually do need to proceed to a hearing for determination in a timely manner.

If a NCAT Member allocated a triage role reviews an application that does not on its face seem legally sustainable, the Member should be able to contact the applicant and explain to the applicant why the application is not sufficiently complete to be set down for a hearing. It is not suggested that the Member advise the applicant about how to structure their argument, or what orders to ask for but rather suggest why the application is implausible at this stage and perhaps direct the applicant to contact Fair Trading NSW, an advocacy service or a legal adviser to assist the applicant redraft and re-submit an application. If the claim in the application has no jurisdiction under legislation the applicant could be told so by the triage Member and the application not listed for hearing until the defects are removed or remedied.

As well as the economic savings to respondents in not incurring costs by travelling to the NCAT venues, taking time off work and employing an advocate to appear, NCAT itself could benefit economically by removing cases early on that have no judicial standing. NCAT would also be able to better utilise valuable sitting time to attend to more matters, quicker and inexpensively.

One of the major concerns for our members is cutting down on the costs that can easily be imposed. Applicants who are pensioners can for a fee of \$5.00 apply to NCAT and without any suitable screening process can impose unnecessary cost and disruption. There is no real or effective costs disincentive for these applicants to ensure that they have an application that can lead to a resolution of the issue or issues.

There also needs to be more effective orders and directions about the provision of evidence with a costs impact if not provided. If there is an effective triage system sorting out these issues should minimise those cases that require a first, a second (and more) appearances at NCAT.

A triage function at NCAT needs to be run in conjunction with a regime where if a case is eventually dismissed and the applicant was advised by the other side that they believed the case was without substance and that they would seek costs, then NCAT should be bound to award reasonable costs to the respondent. This approach will encourage communication between the parties and the exchange of documentation before getting to NCAT so the parties have a better chance to understand the issues raised in the application and possibly result in a resolution before going to a formal hearing at NCAT.

In the past, the experience of our members has been that NCAT has described that a hearing is necessary to tease out the issues to see if there is a case, even if there does not seem to be one on the basis of the written application alone. But at whose time and expense does this occur? This is where the implementation of a vetting process comes into effect. We do not object to the applicant being contacted about the deficiencies of their case, but they should be contacted prior to any listing for hearing and be given the chance to clarify their case before any hearing takes place.

As part of NCAT's current case management system, applications should be vetted for jurisdiction and other errors prior to being listed for conciliation and hearing. At present NCAT's registry role is to provide information to the parties and the public about the practices and procedures of the Tribunal to support the dispute resolution functions and to







manage the resources of the Tribunal. These roles must be exercised to ensure the integrity of the NCAT system is maintained. The resources of NCAT would be better maintained if a triage system were in place to assess the suitability of applications for hearing.

The implementation of a triage system would not be for the triage Member to provide an opinion or tell the applicant what the final decision might or will be. Registry staff should be offered training to assess the whether there are any merits of a case and to detect errors early on, the use of incorrect forms, jurisdictional issues or clear lack of evidence. The implementation of a triage system is not to defeat the purpose of keeping the role of the Registry separate from the independent decision making role of the Tribunal.

Triage would greatly improve the current deficiencies that impact on the ability of the Australian Consumer Law to provide a ready and effective mechanism for traders and consumers.

### Triage and the Australian Perspective

In 2009, the then Attorney General (Commonwealth) said that an effective accessible civil justice system should be a system where people are able to resolve their disputes quickly, effectively and fairly, using the most appropriate method for their particular circumstances. Access to information and increasing the opportunities to resolve disputes early, either in or outside court, are important drivers for access to justice. Like a hospital, an effective justice system should have an inbuilt triage function, enabling matters to be directed to the most appropriate destination for resolution, irrespective of how people make contact with the system.

An effective and affordable civil justice system has even greater importance in the current economic climate. More than ever before it is imperative we have a well-functioning justice system better equipped to assist people when they most need assistance, advice and guidance.

#### Conclusion

What the parties using NCAT and exercising their rights under the ACL need is an integrated system focusing on reasonable outcomes for parties within a reasonable time frame at reasonable cost. Documented case management procedures (e.g. triage) assist with management of caseloads and cost and enable the effective use of limited resources.

Recommendations with respect to triage in NCAT

- 1. NCAT should adopt a policy to support a process to check applications ("the triage process") prior to listing matters for hearing.
- 2. NCAT should ensure a dedicated resource (Member or Deputy Registrar) is engaged to manage and oversee this process.
- 3. Only after triage and confirmation from the Member should a matter be listed requiring the appearances of parties.







4. NCAT should communicate as soon as possible the new processes, policies and procedures to all relevant stakeholders.

#### **CONCLUSION**

As an important stakeholder in relation to the application of the Australian Consumer Law in New South Wales we are keen to continue to participate in any further discussions on the issues we have raised or any other relevant issues raised by others. We request we be noted as a stakeholder and continue to be included in all future communications and meetings on this important review of the law and practice.

Thank you for your consideration of the issues we have raised.

Should you wish to meet and/or discuss any aspect of this submission please contact Bob Browne, General Counsel on (02) 9615 9920 or email <a href="mailto:bbb.browne@cciansw.com.au">bbb.browne@cciansw.com.au</a>.

Yours sincerely

Lyndel Gray

Chief Executive Officer





## TRADE NEWS



## May Trade Meeting

Date: 4th May 2016 Location: CCIA Offices Time: 8am - 10am

#### More Information:

Jason Beckford - 02 9615 9999 or jason.beckford@cciansw.com.au

# Motor Dealer & Repairer Workshops

Conducted by Fair Trading NSW.

- 3rd May Wagga Wagga
- 10th May Dubbo
- 7th June Epping
- 26th July Revesby

More information at <u>Fair Trading</u> NSW

## **HAVE YOUR SAY**



The Australian Consumer Law is being reviewed by the Australian Government to determine whether it is operating as intended, how effectively the law is being administered and whether the framework is sufficiently flexible to respond to new and emerging issues in the marketplace.

The Association is preparing an industry response to the Issues Paper however, we want to hear from you about your experiences and your views about the ACL and how it could better serve our industry.

We have prepared an online survey summarising the information and questions in the Issues Paper for you to have your say. Your input is vital and we would be very grateful for your time.

Click here to undertake the survey before 13th May 2016.

NOTE: you don't have to complete every section of the survey, just those important to you. For example, RV manufacturers may just want to complete the sections about consumer guarantees, lemon laws and product safety.

If you would like to review the Issues Paper click here.

If you have any questions please contact the Association's General Counsel, Bob Browne, on (02) 9615 9920 or email bob.browne@cciansw.com.au.

## PARK MATTERS











## LAST CHANCE :: HAVE YOUR SAY

## **Australian Consumer Law Review**

The Australian Consumer Law is being reviewed by the Australian Government to determine whether it is operating as intended, how effectively the law is being administered and whether the framework is sufficiently flexible to respond to new and emerging issues in the marketplace.



The Association is preparing an industry response to the Issues

Paper however, we want to hear from you

Paper however, we want to hear from you about your experiences and your views about the ACL and how it could better serve our industry.

We have prepared an online survey summarising the information and questions in the Issues Paper for you to have your say. Your input is vital and we would be very grateful for your time.

Click here to undertake the survey before 13th May 2016.

NOTE: you don't have to complete every section of the survey, just those important to you. For example, RV manufacturers may just want to complete the sections about consumer guarantees, lemon laws and product safety.

If you would like to review the Issues Paper click here.

If you have any questions please contact the Association's General Counsel, Bob Browne, on (02) 9615 9920 or email bob.browne@cciansw.com.au.

www.ccianswmembers.com.au

You received this email as a member of CCIA/MHIA NSW

Update Profile

eview of the Australian Consumer Law - Caravan & Camping Industry Association of NSW - Member Survey Results May 2016 In the includation of a general probletion in order to result more controlly in . (So you finds the ACC, presents a special under convening presents or business models exercised by a special controlled by the controlled present for business models exercised by a state of the controlled by the contro (S) you think have objectives remain.

Only to think have objectives remain.

Only to think have objectives remain.

Only to think have provided by the first of the ACL to the objective of the ACL t Do you think the ACL product safety

Could the handling of unasie products that
provides respond effectively to new

in this thin the scope of the ACL and a
proclact safety issues, and to the changing
pecialist regulatory regime be more
send of businesses in today is materiplaced feeting.

The provides regulatory is the provides of again we come in front or a me-use own opinion. I believe this is very untain o the consumer and retailer. Also the ap this well hearing could be to Broken down being "Invancial service" is very broad. Have a segment for learn & lending services, another for live street 4. superiors authors about a do on for insurance covering income protection, injury, tile and other teamsnoon. those cases where genuine honest mists made. If the company is a repeat offende 12 month period then they will be found o charged accordingly I such as computers, stereos, sent & household", "One off such as ers, caravans etc" different ruling due Tipe the debt of those who were wroughy given framos with no rectimination. That is when self regulation will work. Why is there little support for 'business' consumers purchasing from other business'. now and nothing to pay for two years et-cept for 'dim' people needs to be looked : Last minute reduction in briffs for unsold accommodation could be considered "balt 6 They are mainly relevant but I feet that they reeffere needs to be more studius to the in-to resure that the consumer is assess that they so you can all least come up with a slide have responsibility as self.

Self-Consumer to the self-c eplace lemons robably would be good but I feel it would be repossible to control and would lead to a lot of abse claims in an attempt to return something It would appear that the legislation applies to
Australian providers and Australian consumers. Abustless and MPT. That they are a change
should have a voice concerning offither. MPF should not provide them exemption from
providers and their Australian partners providing should precious.

New York of the Committee of the Committ fig. 18 bits a general lemon has would be appropris to lierar other than come. Palare by several small delects is just as detrinerable to custome satisfaction as major failure. Possibly more so artiess connected, the failures remain penishers for the Ne of the product. I think action takes too long to occur. Prohibitio of supply of unsale goods is a good idea but could be problematic - I might best be worded unsale if used for un-intended purposes. Eg: a lostile is inherently unsale unless used for cuttin is target object. series of innocuous provisions taken together on be unlair. I think regulators taking a class action is problematic unless done so on behalf of identified consumers. to foresee modern practices. A Financial Service might be better defined as any transaction involving a non-tangble asset. Some things are not enforceable and it falls to to consumer to take legal action. By including goods and services bought at auction. There is always room for improvement in the writen word. Examples and flow chart diagrams chapter sussally assist. he cannot see how another regulation would possibly- quite often fines are paid but the po problem of ignorance still continues Yes-most definitely. Replacement after a certail ehistever is number of attempts—any 3-to resolve serious seuces. BY then the punchaser has lost confidence in the product anyway. ters should be an opportunity to rec informal attendance if the claim is n apported or genuine in nature. Where inclusiny specific consumer protects laws include specific and comprehensive disclose requirements, why does the ACL, to include a "Its Mabo, its Wik, its the whe" catchall approach. Yes, commercial arrangements need to be it. for business to be able to be profitable for all parties concerned. Yes, but consideration of consumers that have. Consumers need to know there are alternate motives needs to be protected against consequences for making makeading or as well. and in the event of a refund the nearest to back stamp duties, rego costs etc. on the vehi once it is prepared for re-sale again but the manufacturer did get their full wholesale prio I do not agree with lemon bases as it unhally blobis a product line as faully when it may easible to a particular model (et. and not loc all product. There is also adequate current consumer production to cover this. Improve can come from having the laws relating to the common through the laws relating to sale of motor vehicles and caracters be constatent nationally. The effectiveness of any law and then subsequent enforcement depends on the State or being slighted with the restoral agends otherwise incidents occur where one authority will override arother. This creates contained to reveryone. One restoral authority whould lead the States or dare I say it .....aboths the States. We are over governed by too many for too few. yes, more clarity in required and clear definitions. It should be expressed a neural-facture has an alternate right to require or replaces point refund; a major feath—unless it list a major design hand or batch (would) that. These traines and values should be lormalatic. EX amongly is Committe, ACL and SON is 18 semently is Committe, ACL and SON is 18 semently in Committe, ACL and SON is 18 refund values would be 60% of semelate and in the refund values would be 60% of semelate and in the

open to interpretation, opinion & misunderstanding - and often not able to be resolved without mediation or ACCC tribunal

	Do you have any views or suggestions on the issues raised above? If yes, please provide details.	Do you think there are any barriers to consumers and businesses enforcing their rights and seeking access to remedies unde the ACI 2 was what me though	What low-cost actions do you think consumers and businesses could use more readily to enforce their rights? For example, what we your thoughts no sombulesses.	What is your experience in dealing with ACL regulators? Could they take action in other areas that would help consumers enforce their rights under the ACL?	L Do you think there are barriers to private action that need to be addressed? If yes, what are your suggestions for removing these borriers?	How do you think the ACL or other Australian laws could be improved to provid Australians with better protection when transaction with corrected transaction with	Do you think the ACL adequately addresses doonsumer have from unsolicited sales? Whyleby not?	Should protections apply to all sales conducted away from business premises, or just all sales involving 'pressure selling'?	What areas of the law, if any, do you think need to be changed?	Or you think it is enough for a business to disclose the total minimum price before making a payment, or should optional fees and observes also he disclosed undered.	Are there any other changes that could be made to the ACL to improve pricing transparency?	On you think the existing provisions of the ACL adequately ensure that online sellers provide safety information about products and sandows or do you think extra steep and sandows are do you think extra steep	Do you think the existing ACL provisions (including provisions on false or misleading representations) adequately address issues representations.	Do you think the existing ACL provisions (including provisions on false or misleading representations) adequately address the course representation of the mislead of the box	Do you think the ACL provides consumers with clarity and adequate protections when engaging in the 'sharing' economy, without shibiblish intercetting? Whelaby en??	What areas, if any, do you think need to be addressed, and what types of personal transactions should be excluded?	Do you think consumers want greater access to their consumption and transactional data held by businesses? If yes, how do you think the ACI and the resultance could support	Do you think the existing disclosure requirements of the ACL are effective? If not how could they be refined?
		and According to	scheme for the ACL or do the NSW and Commonwealth Small Business Commissioners deal with this issue	man rights under the ACLT	See Carrier	and and the seasons				and the gas and or unclass species.		could be undertaken to ensure this information is displayed prominently at the point of sale?	websites? If not, how could this be improved?	could this be improved?	and an order of the second		mis?	
	No	Yes. Consumers seem to go to VCAT or similar	r Better information available and a choice of	Yes	No	Consumers need to be aware of their rights an	fres	Al naises		Eventhing should be disclosed upfront. No	10	Yes	Yes	Yes	Yes	N	No.	Yes
		for the slightest thing these days instead of first negotiating with the relevant company etc	resolutions			what protection do they have from buying overseas.				hidden.								
		it is so hard when product is purchased				Make some decent strong laws and enforce												
		intensiate when Fair trading are involved, the consumer is forced to travel to that state to try and get justice, why not have a National Fix?				them.												
										Uphort darbage remined			Consumers must be made warm of the 1	· · · · · · · · · · · · · · · · · · ·				
													numberiquality of suppliers included in the comparisons					
		no no			no.	no i feel if you choose to purchase from overseax, it should be a case of buyer beware,				no				simply by adding a prominel disclaimer that the review is on a product that has a comercial		if you bid on it it is an auction so not warranty or act		
														amongoment with the person or company doing the review				
	Regulation should have the ability to restrain misconduct nationally. Charities should not benefit from ill-gotten funds.	No opinion	No opinion	No opinion	I am in twour of a less formal initial system, perhaps using an Ombudaman like approach individual cases, and only going to the formal system for class action or "significant" cases.	Pursue the current activities. Any sensible to gatem will be difficult as long as we and other have import tarrifs in place.	No - do not call registers are toothless as marketeers have trivial methods to circumvent them.	Van	Targeted marketing should be opi-in nationally with serious penalties for offenders including cancellation of their means of access.	Of course all costs (even optional ones) should be known.		Yes	Nes.	Online reviews are impossible to regulate - for every detection there are thousands of misses. The ACL may be best served by advising consumers to ignore reviews by anyone other	Nes.	There is no practical way to regulate this - buye became.	Yes -supplying the data should be a cost of doing business - not an added charge.	The problem arises where the information is provided in a way that is not understandable - eg: technical meta data. There needs to be a perogative for disclosure to be in readily
														than an endorsed impartial reviewer - eg Oholos.				consumer understandable formats.
		In my experience - It could not be enforced by	Yes, Ombudarran scheme.	The ACL regulators like NSW Fair trading were	a Having been on the receiving end as the	Can't see it being enforced.				Disclosed uniforit	Enforce unfair price depins	- they aroue it is contained in manuals and	Draws	Impossible to 'bolica' reviews based on persons	not dear	Should be all significant financial - but it is very	ves, why do they insist on size 4 font 7	Not always in plain endish.
		authorities and the legal avenue was cost prohibitive.		extremely helpful but they couldn't enforce a breach interstate. Interstate authority couldn't enforce the breach due to the information remoted by the hydrogen and refund in.	consumer though it was a business motor vehi purchase - people are deterred from pursuing action fearing it will be too slow and costly.							Instructions - complex		experience and the reviewers own opinion - expecially if financial incentive to write positive reviews.		complex when purchasing second hand items and private accommodation deals.		
				Compensate.														
	no comment	people not knowing how to access ACL and not	t not sure	no comment	making the entire process simpler for the	YES	no comment	no comment	no comment	all fees should be disclosed	7	ok at present	possibly	77	to comment	no comment	so comment	so comment
The proposal control process of the control p		teeing instructed to compain			average person-paperwork and trouties are intimidating for many													
The production of the first production of the control of the contr	No																	
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p																		
The proposal control process of the control p					-	-												
The proposal control process of the control p					+	+												
The properties of the responsibility of the properties of the prop																		
The proposal control process of the control p																		
The proposal control process of the control p		No	Easier consumer mediation to be first port of cr	Not much	Mediation should be the first port of call, but bo	of Overseas traders need to be bound by our rule	Not sure, sufficient cooling off periods need to	Yes, direct marketing or pressure sales need to	not sure	All fees and charges need to be disclosed early	Total price needs to be clear and highliphied.	Not sure, oversess traders need to comply with	Not sure	False reviews do need to be dealt with, a	Yes they do, the problem is with new innovation		Yes, consumers want to know what information.	
The proposal control process of the control p							be clearly expressed.	have larger cooling off periods.		in a transaction.		all Australian safety regulations.		business lacks authority or power to combat malicious reviews that are unburnded. Suninesses that produce or after reviews need to be dealt with as well.	etc. as they evolve the bass and guidelines around those businesses need to evolve.		held of them and who has access to this.	
	The inconsistency and interpretation by different	There is a general lack of understanding of the	As above. Better information is definitely needs					Yes	Plarmonise laws relating to the sale of high value								Yes	
	regulators and non harmony between State Legislators is very confusing for everyone.	entite process by both consumers and business owners.		with no Orders against us to date. File No. MY10/44716 should be considered when reviewing Tribunal process. The business own should also have ************************************	firstly review the breach, explain the process. Then fully informed the decision can be made aproceed or not.	4	conduct and minor breaches occurring at Trade Shows.		goods in all States.									
				weatious claims where there was no attempt is the Respondent to comply with the process or outcome of the Hearings which commenced in	9													
				October 2010 and concluded on 18 June 2012. No costs as awarded have been paid by the Applicant. The process is costly, disruptive and stressful for husbass caspers who encounter.	d d													
	[			consumers of this nature. I refer to this case to highlight that the consumer has adequate protection in these Tribunals, however business														
		I .		convent are loss even shough the claims are dismissed. For legitimate consumer claims, I think there is a misunderstanding of different State regulations that govern the sale process t														
with large peoply communities for account ACL person and companies properly from an ed people people from an ed people people from a companies from the continue of the contin						1	1	I	I	I		1	I		I		1	
Will have prompt for commence to because ACL per law money, and the commence of the commence to be commenced				Tribunal Members.														
The straining the Commonwealth Confidence of Commonwealth Commonwealth Confidence of Commonwealth Confidence of Commonwealth Confidence of Commonwealth Confidence of Commonwealth Commonwealth Confidence of Commonwealth Confidence of Commonwealth Commonw				Tribunal Members.														
				Tribural Members.														