



**CONSUMERS'
FEDERATION
OF AUSTRALIA**

Developing and promoting
the consumer interest

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SUBMISSION ON CONSULTATION PAPER: DEVELOPMENT OF THE NATIONAL PREVENTIVE HEALTH STRATEGY

BACKGROUND

CFA is the peak body for consumer organisations in Australia. CFA represents a diverse range of consumer organisations, including most major national consumer organisations.

CFA advocates in the interests of Australian consumers with and through its members, supports consumer representatives to industry and government processes, develops policy on important consumer issues and facilitates consumer participation in the development of Australian and international standards for goods and services.

CFA is a member of, and co-chairs the Consumer Affairs Australia New Zealand's (CAANZ) Consumer Advocate Forum. CAANZ is the key forum for consumer affairs senior officials and supports the Legislative and Governance Forum on Consumer Affairs (CAF), which is the forum of Ministers that oversees consumer affairs matters.

CFA is a full member of Consumers International, the international peak body for the world's consumer organisations.

CFA is pleased to make this submission.

GENERAL COMMENTS

The eight consumer rights used by consumer organisations around the world to guide their activities are:

1. The right to safety - To be protected against products, production processes and services which are hazardous to health or life.
2. The right to be informed - To be given facts needed to make an informed choice, and to be protected against dishonest or misleading advertising or labelling.
3. The right to choose - To be able to select from a range of products and services, offered at competitive prices with an assurance of satisfactory quality.
4. The right to be heard - To have consumer interests represented in the making and execution of government policy, and in the development of products and services.
5. The right to satisfaction of basic needs - To have access to basic essential goods and services, adequate food, clothing, shelter, health care, education and sanitation.
6. The right to redress - To receive a fair settlement of just claims, including compensation for misrepresentation, shoddy goods or unsatisfactory services.

7. The right to consumer education - To acquire knowledge and skills needed to make informed, confident choices about goods and services while being aware of basic consumer rights and responsibilities and how to act on them.
8. The right to a healthy environment - To live and work in an environment which is non-threatening to the well-being of present and future generations.

These rights are also reflected in the UN Guidelines on Consumer Protection¹.

Most of the rights directly or indirectly affect the health and wellbeing of consumers. And protecting the health and wellbeing of consumers is an important objective for many consumer organisations, including for CFA and many of its members.

CFA is very supportive of the development of the National Preventative Health Strategy and agrees with the statements in the Consultation Paper that:

- *Our health system is focussed fundamentally on the treatment of illness and disease.*
- *there is a need to enhance the focus on prevention providing more balance in our health system.*
- *Effective prevention requires a collective and cohesive effort across sectors to better prevent disease and to promote environments that support individuals to lead healthy lives.*
- *The health sector must be enabled to play a lead role in building partnerships for prevention across sectors to address the social, economic, cultural and environmental influences on health.*

CFA and many of its members are involved (directly or indirectly) and are interested in consumer health and wellbeing issues, including those related to prevention.

CFA's direct involvements with preventative health include:

- Advocacy on issues such as: consumer protection and empowerment, misleading/deceptive conduct, unconscionable conduct, social justice, social policy, poverty, housing, energy poverty, insufficient and inadequate information, consumer education, power and information/knowledge imbalance, etc.
- Membership of the Food Standards Australia and New Zealand's (FSANZ) Consumer and Public Health Dialogue (CPHD).
- Representation on Standards Australia Technical Committees as part of the [CFA Standards Project](#). Standards ensure products, services and systems are safe, reliable and perform the way they were intended and establish the common language which defines quality and safety criteria. Standards promote environments that support individuals to lead healthy lives and CFA representatives participate in the development of standards ensuring societal issues are addressed.
 - One of our basic needs is to feel safe and CFA representatives participate in committees on product and system safety such as button batteries, children's toys, heat packs, playground equipment, electrical accessories, emergency management systems and many other.

¹ <https://unctad.org/en/Pages/DITC/CompetitionLaw/UN-Guidelines-on-Consumer-Protection.aspx>

- Representatives are also on committees supporting our wellbeing such as food products and traditional Chinese medicine, aging societies, complaints handling and others.
- Environmental changes are impacting on the quality of our health, safety and future, and CFA representatives are on committees on environmental management, greenhouse gas measurement, carbon neutrality, circular economy, and others.
- The potential impact of technology on health and wellbeing is addressed via committees on internet of things, artificial intelligence, nanotechnology, and smart cities.

Many of CFA's member organisations advocate for policies and programs, or provide services, that significantly influence the health and wellbeing of a range of consumers and have preventative health effects.

An example of an activity that has very beneficial effects on well-being is the provision of financial counselling services for consumers in financial difficulty. A 2012 study² of 225 people who had participated in financial counselling found that:

- 63% of respondents felt their mental and emotional wellbeing had improved as a result of financial counselling
- 52% of respondents worried less about money problems
- 45% stated their physical health had improved

COMMENTS ON CONSULTATION QUESTIONS

Are the vision and aims appropriate for the next 10 years? Why or why not?

Yes.

Are these the right goals to achieve the vision and aims of the Strategy?

Yes. However, CFA considers that more details are required on how the goals will be achieved, especially the goal *different sectors, including across governments at all levels, will work together to address complex prevention challenges*.

Are these the right actions to mobilise a prevention system?

Yes. However, CFA notes the statement that:

Currently, the Framework for Action does not include specific actions. Your feedback will be used to generate key actions in each element of the Framework.

CFA considers it essential that specific actions be included in the next iteration of the Strategy on how to Mobilise a Prevention System. Currently this part of the Framework, unlike Boosting Action in Focus Areas, is far too general.

CFA considers that Partnerships are required to achieve the inter-sector activities needed and that *The health sector must be enabled to play a lead role in building partnerships for prevention across sectors to address the social, economic, cultural and environmental influences on health*.

² <https://researchbank.swinburne.edu.au/items/d9786ab2-4879-4344-9533-e7f04932a438/1/>

To achieve this will require a commitment to invest significant resources to enable the sector to play this lead role. Details are required on how this will be done.

Where should efforts be prioritised for the focus areas?

CFA considers that:

- reducing obesity should be a priority for the focus area *Improving consumption of a healthy diet.*
- Improving mental health should be a focus area.

How do we enhance current prevention action?

No Comment