



Clare Petre
ANZOA Chair
Energy & Water Ombudsman NSW
Phone: + 61 2 8218 5204
Email: info@anzoa.com.au

17 March 2014

CCAAC Secretariat
c/- The Manager, Consumer Policy Framework Unit
Competition and Consumer Policy Division, Treasury
Langton Crescent PARKES ACT 2600
By email: CCAAC@treasury.gov.au

Attention: Ann Bounds

OWNERSHIP OF THE BENCHMARKS DOCUMENT

Following recent discussions between members of ANZOA's Executive Committee and representatives of the Commonwealth Consumer Affairs Advisory Council (CCAAC), as part of CCAAC's consultation on the *Benchmarks for Industry-Based Customer Dispute Resolution Schemes* (the Benchmarks document), ANZOA wishes to make a further brief submission.

ANZOA is of the view that it is important there be clear ownership of the Benchmarks document, for reasons including that where necessary, amendments can be made to practices to reflect contemporary developments. In addition, regular reviews of the whole Benchmarks document (for example, at least every 7 years) could be commissioned; the value of this has been demonstrated by the current CCAAC review.

Given the importance of the Benchmarks document demonstrated by the CCAAC review, the preferable place for this ownership is with the Ministerial Council on Consumer Affairs. At a minimum, there should be a reporting line through to the Council, for example, through the Australian Commonwealth Minister with responsibility for Consumer Affairs. Reasons for this include the evolution that has seen the Benchmarks document apply equally to both Australian and New Zealand EDR offices, and the shared interest of all jurisdictions in a contemporary and relevant Benchmarks document.

In addition, given the day-to-day application of the Benchmarks by ANZOA members, and the central importance of them to EDR office practice, we recommend that any arrangements include an agreed framework whereby ANZOA can provide advice about the Benchmarks document; recommend changes to the Benchmark practices; and share responsibility for the promotion of the Benchmarks document.

We would be pleased to discuss this further if necessary.

Yours sincerely

Clare Petre
Chair, Australian and New Zealand Ombudsman Association