



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

14 June 2019

Director Standards & Policy
Consumer Product Safety Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By Email: productsafety.regulation@accc.gov.au

Dear Sir/Madam

Review of the information standard - Care labelling for clothing & textile products

Small businesses in the dry cleaning and retail sectors rely on care labelling for clothing and textile products. For dry cleaners, the labelling means that their services do not damage goods. For retailers, care labelling provides guidance for appropriate care for items sold. Changes to requirements for care labelling will leave these businesses unprotected, presenting significant risk to these small operators and consumers.

The standard for care labelling was last reviewed by the ACCC in 2010, at which time stakeholder feedback was strongly in support of the standard remaining as it was. Professional cleaning services were (and remain) concerned that without compliant labelling they would not have the appropriate protections in the event of cleaning failures. This view was accepted and the standard was retained.

The current legislated standard is achieving high levels of compliance as assessed by the Australian Competition and Consumer Commission (ACCC), receiving only 259 reports of incorrect labelling from 2011 to 2018. It is also doing this at a low cost. The consultation paper referred to estimates 'from 0.2 cents to 2 cents per garment. In relative terms this is a very small percentage of the cost of the product¹.'

The risks of changing the standard outweigh any productivity or cost benefits. Clothing retailers and cleaners need to be able to rely on the standard, and the cost for manufacturers to attach compliant labels is small. For these reasons ASBFEO does not support a change from the current standard.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Alexandra Hordern on 02 6121 5404 or at alexandra.hordern@asbfeo.gov.au.

Yours sincerely

Kate Carnell AO
Australian Small Business and Family Enterprise Ombudsman

¹ ACCC, Review of the Information Standard – Care Labelling for clothing & textile products, Consultation Paper, May 2019