

Tasmanian Climate Collective (TCC) is grateful for the opportunity to provide feedback on the ACCC draft guidance on environmental and sustainability claims.

The ACCC draft guidance on environmental and sustainability claims is commendable for its thoroughness and attention to detail. However, we have concerns about the third-party certification process. It is crucial that businesses are required to provide clear and concise information to enable consumers to quickly assess the credibility of their environmental claims. In order to enhance the effectiveness of the certification process, it is imperative that it be formalised.

The ACCC draft guidance could be improved if it included clarification on how the independence of third-party certifiers is enforced. Are there any legal ramifications in place to address conflicts of interest between the certifiers and the companies seeking certification? It is crucial to ensure that third-party certifiers are not unduly influenced or financially supported by the companies they certify. A lack of enforcement measures in this regard could undermine the credibility and trustworthiness of the entire certification process.

TCC members are also concerned about the absence of clear rules regarding who can represent themselves as certification providers. Are there any legal requirements or processes that these providers must go through in order to obtain approval or a license? Without such safeguards, there is a risk of unscrupulous entities offering certifications without conducting proper audits. This would undermine the integrity of the certification process and compromise the validity of environmental claims made by businesses.

While the draft legislation is promising in its efforts to combat greenwashing, TCC would like to see the ACCC maintain a database of approved businesses that are authorised to provide certifications. This additional measure could enhance the integrity of the third-party certification process. A centralised database would enable companies to easily verify the credibility of the certification providers they engage with. Moreover, it would offer reassurance to consumers that the certificates they encounter are indeed legitimate and trustworthy.

TCC members and member organisations largely support the ACCC draft guidance on environmental and sustainability claims. Inclusion of our suggestions above would future proof the legislation and protect it from abuse of potential loopholes.

About Tasmanian Climate Collective

[Tasmanian Climate Collective](#) is a group of passionate and committed organisations and individuals from across Tasmania who advocate for strong action on climate change. The

Collective is made up of climate change, social and environmental groups and grassroots organisations. The Tasmanian Climate Collective has no political affiliation and is composed of scientists, farmers, doctors, teachers, nurses and other concerned citizens calling for more action on climate change.

OUR VISION

lutruwita Tasmania is a world leader on climate action, prioritising environment and people.

OUR PURPOSE

Tasmanian Climate Collective connects groups and individuals to encourage, promote and initiate climate action across lutruwita Tasmania through cooperation, influence and knowledge sharing.