

Senator Sarah Hanson-Young
Chair
Senate Environment and Communications References Committee
Submitted via email: ec.sen@aph.gov.au.

12 September 2025

Dear Senator Hanson-Young,

Re: Inquiry into Greenwashing

ACCAN thanks the Senate Environment and Communications References Committee (**the Committee**) for the opportunity to respond to the Inquiry into Greenwashing (**the Inquiry**). ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services. ACCAN supports telecommunications providers making substantiated environmental and sustainability claims about their products and services which can make them distinct within the market.

Green claims may influence the purchasing decisions of some consumers. As such, they need to be accurate so consumers can have confidence in the validity of these claims. The nature of green claims in the telecommunications sector has not shifted significantly since ACCAN's submission to the previous inquiry held by the 47th Parliament.¹ Currently, some smaller market participants use green claims as a core feature of their marketing while large telecommunications providers may inform their customers with regular reporting. Both uses of sustainability claims impact consumer's purchasing decisions and should be accurate and clearly substantiated.

ACCAN considers that greenwashing practices in Australian markets may be addressed through the government's forthcoming legislation of a general prohibition on unfair trading practices.² ACCAN welcomes the government's reforms which will help ensure consumers are more informed about their purchases, foster a healthier marketplace and ensure more equitable economic transactions.³ This would allow for the inclusion of greenwashing practices that are not deemed to meet the criteria of misleading or deceptive conduct.

A general prohibition on unfair trading practices can be tailored to ensure that greenwashing practices such as using generic environmental claims without evidence, misusing third-party certifications and making excessive or unhelpful green claims are illegal.⁴ This reform would greatly assist in mitigating the market inefficiencies associated with incorrect or fraudulent environmental claims and promote more sustainable purchases by Australian consumers.

¹ ACCAN, 'Submission to the Senate Standing Committees on Environment and Communications Inquiry into Greenwashing' (Submission, 2023)

² 'Albanese Government to Stop the Rip Offs from Unfair Trading Practices | Prime Minister of Australia' (15 October 2024) <<https://www.pm.gov.au/media/albanese-government-stop-rip-offs-unfair-trading-practices>>.

³ Consumer Policy Research Centre, 'Treasury: CRIS – Protecting Consumers from Unfair Trade Practices' (Submission, 2023) <<https://cprc.org.au/submission/make-unfair-illegal/>>

⁴ 'Unhelpful green claims may be present where claims about an entire product are made when the claims only relevant to a specific aspect of the product.'



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Consumers should have confidence that the businesses they choose for their sustainability claims are appropriately substantiating their claims.

We thank the Committee for the opportunity to submit to the Inquiry. Should you wish to discuss any of the issues raised in this submission, please do not hesitate to contact Con Gouskos, Policy Adviser

Yours sincerely,

Carol Bennett

CEO