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**From:** Siobhan Meerman  
**Sent:** Friday, 20 October 2017 12:31 PM  
**To:** publicsubmissions  
**Subject:** Response to 2017 ECCC Draft review

Good afternoon,

I'm writing on behalf of the Financial Counsellors at Midlas who have reviewed the proposed changes. In general, we gladly support them all and were impressed to see that in many cases, it appeared that the proposed code changes were reflecting standards already upheld by our local retailers.

Comments:

**6.3 – Consultation with relevant consumer representatives during review or amendment of financial hardship policies:**

We feel it is more suitable for the Hardship Guidelines than the Code.

**7.2 - Notifying life support customers of planned interruptions:**

Although no major issue was noted, there was concern as to whether the cost savings balanced out the slightly increased risk. Bills may go to a carer's preferred address for everyday management while the one actually on life support is at the supply address. A Carer may be reasonably considered as more mobile than the one on life support and thus more at risk of not noticing the notice/being untimely. Sending a duplicate copy to the supply address seems worth the cost of an extra 440 stamps.

**9.1 - Allowing flexibility in how recharge facilities are provided**

We first acknowledge that we have no personal experience of customers on pre-paid facilities but wish to note our concerns.

With respect to retailers, up to 40 km between a customer and the capacity to buy credit for their power seems unreasonable. That's a 9-10 hour walk for customers without cars which, according to the Bureau of Statistics (2010) is the reality for around 32% of Indigenous customers in remote communities. Those with cars also face extra expenses for the round-trip required to purchase credit, never mind the fact that they may only be entitled to access of recharge facilities for 'at least 3 hours per day'. Is there any easy reporting or complaint process for these customers if the facilities do not keep to the code/are not working? Is there compensation?

That said, we do not know the norm for other, comparative services in these areas. We wonder if there are closer services – such as food stores – that cannot be utilised as recharge hubs or if credit cannot be purchased by mobile or fixed public phones. Perhaps a toll-free number would assist the most vulnerable? Or those on Centrelink incomes could set up automated pre-paid amounts and be issued whatever tokens or codes are needed by text or mail.

Thank you for your time.

Kind regards,

Siobhan Meerman

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# Midlas

*Building Resilient Communities*



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*I acknowledge I am working in Whadjuk country and pay respect to Elders and all Noongar people, past and present.*

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