



Association for Consumer Rights Malta

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1. Towards Consumer protection and empowerment in Malta

There is the need for a **National Strategy for Consumer Education** should not only cater for the 'intelligent' or 'average' consumer but also reach out to vulnerable groups. Empowering consumers to ensure access to **education** and **information** thus providing them with the necessary tools to make informed choices and take positive action

a. Structure of Consumer Education

- A **National Strategy for consumer education** should cater for all ages, in tandem with the Ministry of Education, Ministry of Health including the Health Promotion Department, Ministry for the Environment, (**interministerial strategy**) the business community and the NGO sector representing consumers
- **Involve all stakeholders** including the Business Community, Trade Unions and NGOs in constructive dialogue
- Programmes should not be a one-size-fits-all but should cater for the **needs of different sectors of society**
- **Exchange of good practice** through European and International Counterparts
- Keeping in touch with **developments in legislation** and new legislation and emerging consumer products at EU and Global level
- **Monitoring of progress** of the Strategy through regular surveys.
- Setting up a **permanent committee** within the Malta Competition and Consumer Affairs Authority (MCCAA) for the drafting and execution of the Strategy.
- The best scenario is for Consumer Education to be centralised within the MCCAA
- Building a library of **effective communication programmes** on consumer affairs as a tool for use on the media or for group activities to ensure interaction through active participation and feedback from target groups.
- Clear separation of information, (including labelling) advertising and education

Recommendations

b. In Schools

There is the need to consider a Consumer Education Framework Policy and Programme **at all levels of education**

- So far we do not have adequate evaluation of how consumer education is being addressed in schools at different levels, whether it is only information and little input of education. Information and education cannot be treated in the same manner.

- Consumer Education should also be provided **at tertiary level** for all students and not only for students attending specific courses
- The framework should also include **new communication programmes** with modern methods that would ensure active participation by the consumers in the various programmes.
- **Programmes should be monitored** and evaluated to ensure effectiveness with regards to empowerment of young people.
- The strategy should provide **adequate and effective education** through current programmes in schools (such as PSD, which is open to all students) for school children of all ages (mainstreamed) and not only for students who take up courses where consumer affairs are relevant
- Due to an overloaded curriculum it would be difficult to include it as a separate subject. As stated above it can be **integrated in a number of subjects with basic education programmes for all students and more specialised education and information according to specific courses**. The education programmes at all levels **should focus on skills acquisition which is the key concept of empowerment**
- Emphasis should be made on **media literacy**, educating and empowering consumers of all ages, in particular children and young people to become **active responsible consumers of the media and internet in particular, rather than passive consumers**.
- ACR recommends that there should be some form of recognition eg. A School Leaving Certificate
- It should also include education **on responsible consumption**
- The strategy should adequately address empowering consumers through the acquisition of skills regarding reporting consumer complaints, seeking redress etc
The strategy should seek to encourage consumers to be proactive in consumer matters

c. Consumer Education as Lifelong Learning

- It is important that Consumer Education should be part of a **Lifelong Learning Framework**
- Malta needs to set up a National Framework Strategy for Lifelong Learning
- **Training** for specialised individuals for Consumer Education and Information programmes should also be ensured before implementation
- Lifelong learning programmes are already providing consumer education in eg **digital competence for vulnerable groups** such as disabled, illiterate, or early school leavers, for all ages and for the elderly and pensioners
- Different entities and stakeholders, **including the business sector** also need to be educated in consumer affairs : rights and obligations and the concept of education which leads to more and better quality consumption which will give **a competitive edge to the business sector**

d. Post-Secondary Education

Tertiary Education involves Junior College, University, MCAST, ITS. The strategy should be two-forked:

- Consumer education to be formally implemented for all students **at Post-Secondary level**.
- More indepth highly specialised education according to the different courses, which will also involve issues of **codes of ethics**, as part of consumer education
- Consumer Education should be included in the **Systems of Knowledge**

- Addressing the needs **and the different social background of young people** should be one of the priorities
- Incentives for a stronger **involvement of Students Organisations** is one of the best ways of getting young people on board

e. **Teacher Training**

- Adequate training for **school staff to ensure skills and techniques** for the use of indepth education programmes in the curriculum; programmes methodology should go beyond information giving
- There should be a combination **of inclusion of consumer education training in B.Ed (Hons)** course as well as inservice courses (ongoing development courses for teaching staff)
- **Specialised subjects at Secondary and post-secondary level**, in particular those that deal with accounts and economics should also have some form of training in consumer education, as it goes beyond the teaching of the subject and the aim is to give a holistic development to individuals

f. **Non-formal Education**

- ACR supports models **like EcoSkola** and the further development of such models
- Initiatives through Parent-Teacher Associations can be devised to reach parents to become educated consumers

2. **The Mass Media**

- This chapter deals with the **technical skills** required to make use of the media in various ways. One needs to highlight that most programmes are simply advertising with no elements of education at all
- Therefore there is the need to introduce initiatives which **educate and empower consumers of all ages**, in particular **children** and **young people** to become **active responsible consumers of the media** and internet in a general manner, rather than passive consumers. This should be separate from specific education programmes on the marketing of different products, but should focus on the media as products in themselves

3. **Public Authorities**

- Most public authorities provide information rather than education. Education involves more **expertise in communication skills** dealing with a variety of consumer affairs, preparation of suitable programmes for interactive activities, relevant funds etc
- Although information is very useful, there is the need **to educate consumers** to have the skills to apply the information they receive themselves
- With regards to **the Consumer Claims Tribunal**, there is the need for **better trained** and informed individuals presiding over Tribunals (although often they are lawyers and therefore should know the law) to be able to interpret the law, to take just decisions especially when dealing with traffic issues and insurance claims.
- **Local Councils** should be involved to reduce bureaucracy, that is as intermediaries but should not be responsible for investigating and taking decisions, unless an expert is employed with a Local Council. This role and service should be covered by relevant legislation
- A **One-stop-shop** can be considered, however, the **MCCAA** should be the overall Authority; to coordinate the various initiatives of different stakeholders, to ensure

education programmes are standardised, to ensure development of expertise, technical and financial assistance to NGOs working in this field and other necessary initiatives to be taken in a fast changing scenario of consumer affairs

- The members of the **Consumer Affairs Council** need to be committed, ensure that they regularly update themselves regarding information, changes in amendments in laws, new legislation, modern methods of communication in reaching the public etc. So far there is provision of information rather than education . NGOs need funds to operate effectively in the above proposals

4. Non-governmental Organisations/Private Sector

a. The Business Community

- **The business sector** plays an important role. There is the need for training and education, including also officials in human resources management (perhaps co-ordination with FHRD could be one suggestion). **Educated consumers are an asset to business.(win-win situations)**
- Employers themselves need to **change their perception of consumer education**; this can be done through specific programmes tailor-made for them, which in the end will serve employers to see the economic and social value of consumer education
- Providing **consumer education in marketing departments** in the private sector can provide for better marketing skills and techniques for their products; ethics is a very important area when dealing with production and marketing

b. Consumer Organisations

- **Members of Consumers Associations need time, expertise and commitment**; they need to keep themselves constantly informed of developments, new issues that rise from time to time and have acquired communication skills.
- To work efficiently they **need funds** to employ experts and other necessary human resources, as well as use modern technology, including the social media.
- However **personal contact** and **exchange of experiences of consumers** is an essential method of **empowerment** and I think this should be one of the priorities of a Consumer Association

5. Emerging challenges

Digital Competence

There is the need to reach vulnerable groups, not only persons with disability (children, youths, adults and elderly) but also persons with social problems, persons with illiteracy problems, persons involved in criminal activities, inmates of prisons etc. Narrowing the digital divide should be a priority

6. Financial Education

Financial Education –Educating the Consumer

- The setting up of a **Commission for Financial Education** is a very important step forward. Responsible Consumption should be part of its remit.
- The aim should not only be to pass on knowledge and skills (financial education),¹ but also to ensure people are **sufficiently financially literate** to be able to take the right

¹ EESC ECO 297, July 2011 Financial Education and responsible consumption

- decisions on **managing their personal finances** in the real world (financial empowerment).
- Financial education will allow consumers to make informed decisions, and promote the **intelligent consumption** of financial products. This issue is becoming a common objective for governments, regulators and supervisory authorities.
 - **Financial Education on Products and Services** to know which products and services can be offered and the different terms and conditions, what to watch out for, what is suitable for the various lifestyle needs and risk attitudes.
 - **There is the need to develop a network of NGOs for capacity building training. NGO education should be developed further in coordination with the Council for the Voluntary Sector**
 - **Initiatives to develop responsible consumption**

7. Food Safety – educating the consumer

- In Malta we need to elaborate on the "**farm to fork**" approach, which covers all sectors of the food chain, from seeds and plants, to animal reproductive material, to feed production, primary production, food processing, storage, transport and retail sale.
- This approach, both in the EU Internal Market and the global market is increasingly providing food safety, through **hazard analysis, traceability and effective enforcement**, including official controls and action based on the precautionary principle.
- ACR supports public health priorities to promote **healthier diets** and Malta's participation in the initiative of The High Level Group on Nutrition and Physical Activity", a group of European government representatives seeking European solutions to obesity-related health issues and the importance of **nutrition programmes in schools**.
- Ensuring National legislation will incorporate the new EU legislation on **food labeling** aiming to ensure mandatory efficient labeling on energy, fats, carbohydrates and proteins, which is due in November 2014.
- More information on foodstuffs, in particular those intended for nutritional use.
- Health services and **safe consumption of medicine** at all ages.

8. Genetically Modified Organisms

There is the need for more accurate information, education and protection for consumers specifically based on reliable evidence on Genetically Modified Organisms and **their impact** on:

- Overall health of consumers and health illnesses that have been linked to consumption of GMOs
- The impact on **the environment**
- The Malta Environment Authority is urged to provide more information, **guidance and evidence based information** on the country of origin of GMOs, both European and international.
- The products known so far may have been genetically modified and **precautionary measures** need to be taken to ensure that the consumer is in a position to know what foodstuffs are safe to consumer
- The need to **strengthen legislation** to prohibit their dissemination in Malta

Concluding Comments

- Strengthening and enhancing structures that are already in place should be the first step.
- **MCCAA to be the 'umbrella' co-ordinator** of the wide range of structures, agencies and departments in place is a priority

- **Creating new key structures** where a vacuum exists should ensure implementation measures to reach our objectives against deadlines
- Ensuring that the tools used to reach objectives are translated **into well-targeted outcomes**

Grace Attard
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