Thursday 11 September 2025

Hon Dr Andrew Leigh MP
Member for Farrer
Assistant Minister for Productivity, Competition, Charities and Treasury
E: Andrew.Leigh.MP@aph.gov.au

Dear Minister Leigh,

Please accept this letter as a request for urgent action to protect Australian consumers from losing millions of dollars every year to unused and hard-to-cancel online subscriptions.

In response to this enormous and growing problem, we, a group of consumer organisations, have gathered together to jointly request that the Commonwealth Government introduce protections to safeguard Australians from these deceptive and manipulative practices that exploit vulnerabilities in all of us. Research from the Consumer Policy Research Centre (CPRC) has found that three in four Australians have had difficulties cancelling a subscription and one in ten simply give up and continue to pay for products and services they no longer need or want.¹

CPRC has estimated that Australians are losing approximately \$46 million as a result of deceptive and manipulative practices, known as dark patterns. This is based on losing only a nominal amount of just \$5.2

Australia is in danger of being left behind. It is our hope that we can look to and adopt the kinds of reforms that are being debated, and in many cases have already been legislated, in other jurisdictions including the US, the UK, India and the EU.

We have identified the need for **six common-sense reforms** for digital consumer protection:

- 1. **Introduce mandatory, simple cancellation mechanisms for all subscriptions and recurring payments** so consumers may cancel any digital or recurring service using the same method and with the same ease as sign-up.
- 2. **Ban "drip pricing" and other hidden charges during checkout** so that the full price of goods or services are displayed upfront.
- 3. **Mandate clear and timely renewal reminders for subscription services** allowing consumers to receive a standardised notification before being auto charged

¹ See Consumer Policy Research Centre's 2024 research *Let Me Out*: https://cprc.org.au/report/let-me-out.

² See joint submission from consumer organisations on unfair trading: https://cprc.org.au/wp-content/uploads/2025/01/UTP-Consumer-Sector-Submission_FINAL_DEC2024.pdf.

- 4. **Prohibit the use of manipulative urgency or scarcity tactics** and similar pressurebased design techniques that distort purchasing decisions and create artificial time pressure.
- 5. **Prevent forced account creation for one-time purchases** so customers are not forced to create and store an account which often results in future charges, data harvesting and unsolicited marketing.
- 6. **Ban dynamic pricing based on demand levels, browsing history, or device type** to outlaw businesses using algorithms to increase prices for individual consumers based on how often they've searched, what device they're using, or current demand.

These six basic protections would need to be backed by consequences and civil penalties that are enforceable by the ACCC.

The reforms address an acute problem in digital services, and the Government should prioritise advancing Treasury's proposed unfair trading practices and prohibitions.³ We urge your government to prioritise this initiative with Treasury for the benefit of all Australians.

Would you please be available to meet with us to discuss this issue further?

We look forward to your response.

Yours sincerely,

Fairer m

Fairer markets for Australians

Erin Turner

Chief Executive Officer, Consumer Policy Research Centre

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³ Department of the Treasury, 'Unfair Trading Practices – Supplementary Consultation Paper | Treasury.Gov.Au' (text, 4 July 2025) https://treasury.gov.au/consultation/c2024-602157.



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