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Your submission for this review:

Thank you for the opportunity to provide comment on iPart NSWs Issues Paper 2 Interoperability pricing for Electronic Lodgment Network Operators. Consumer Protection WA, a division of the Western Australian Department of Mines, Industry Regulation and Safety, regulates the licensing and conduct of settlement agents in Western Australia, including requirements concerning the disclosure of settlement agents fees. Consumer Protection WA does not have specific comment to make regarding the issues raised within the paper other than to note the following. The Settlement Agents Act 1981 (WA) requires a settlement agent, prior to being appointed to act, to provide their client with a written costs disclosure which sets out the maximum amount the settlement agent can charge for their services for the transaction. This ensures there is certainty and transparency of costs before the consumer agrees to engage the settlement agent. The maximum amount disclosed to the client must include the fee charged by an Electronic Lodgment Network Operator (ELNO). Under the Settlement Agents Act 1981 (WA) settlement agents are not entitled to receive payment for a service that exceeds the amount disclosed to the client. Therefore, it will be important to settlement agents and therefore to consumers that the pricing methodology adopted for determining fees ELNOs can charge other ELNOs and subscribers such as settlement agents, provides certainty, consistency and transparency for participants. Thank you again for the opportunity to provide feedback in relation to iParts review.