Clubs Australia

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Payments Policy Department
Reserve Bank of Australia
GPO Box 3947
Sydney NSW 2001

By email: pysubmissions@rba.gov.au

Review of Payments System Regulation Issues Paper

Clubs Australia appreciates the opportunity to provide a submission in response to the Reserve Bank of Australia's Review of Payments System Regulation Issues Paper.

Clubs Australia represents more than 5,000 not-for-profit, member-owned licensed clubs across Australia, employing more than 140,000 Australians. Clubs provide sporting, recreational and community infrastructure and make a significant contribution to local economies across metropolitan, regional and remote Australia.

Position

Clubs Australia supports the RBA's objectives of promoting competition, efficiency and financial safety within Australia's payments system. Payment regulation should deliver a fair and transparent system that reduces unnecessary costs for clubs and consumers.

Clubs Australia also supports the submission made by the Independent Payments Forum (IPF), particularly its focus on merchant choice, least-cost routing, payment cost transparency and competition.

This submission focuses on the issues that are the most relevant to the club sector.

Key concerns and recommendations

Integrated payment platforms and bundling

Clubs Australia supports the RBA's examination of integrated payment platforms and bundled payment services. Payment services are increasingly incorporated into broader point-of-sale and software products. While these arrangements may create efficiencies, they can also make it difficult or uneconomic for merchants to select or change payment providers.

Clubs should be able to choose the provider that best meets their operational and commercial needs without facing unnecessary technical restrictions, additional charges or other barriers to switching.

Recommendation 1	**Merchants should receive clear information about restrictions, fees and practical barriers associated with choosing or changing payment providers. The RBA should consider measures that promote interoperability and reduce unnecessary switching barriers.**

Transparency and payment costs

Clubs continue to incur significant payment acceptance costs. Clubs may have limited visibility over the composition of these costs, including scheme fees, processing fees, mobile wallet fees and other intermediary charges. Opaque fee structures and blended pricing arrangements can make it difficult to compare providers and determine whether regulatory savings have been passed through.

These issues can have a greater impact on smaller and regional clubs, which generally have less bargaining power and fewer resources to assess complex payment arrangements.

Recommendation 2 **The RBA should strengthen transparency requirements across the payments value chain and monitor whether fee reductions and least-cost routing savings are passed through to merchants.**

Future developments and emerging technologies

Emerging technologies, including tokenisation, digital wallets and AI-enabled payment solutions, may create new efficiencies. Regulatory settings should nevertheless remain focused on competition, interoperability and merchant choice, regardless of the technology used to initiate or process a payment.

Recommendation 3 **The RBA should apply technology-neutral regulatory principles that protect competition, interoperability and merchant choice across established and emerging payment systems.**

Concluding remarks

Clubs Australia reiterates its support for the IPF submission and would welcome further consultation with the RBA on the implications of payment system reform for community clubs.

Yours sincerely,

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