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Australian Payments Network (AusPayNet) welcomes the opportunity to respond to the Consultation Paper for the Reserve Bank of Australia's (RBA) Review of Merchant Card Payment Costs and Surcharging (the Review).

AusPayNet is the industry association and self-regulatory body for the Australian payments industry. We manage and develop standards and guidelines governing payments in Australia. Our purpose is to create confidence in payments by: setting enforceable industry standards for a safe, reliable and effective payments system; leading transformation in payments to drive efficiency, innovation and choice; and being the home for ecosystem collaboration and strategic insight. AusPayNet currently has more than 160 members including financial institutions, payment system operators, major retailers and financial technology companies.[1]

Introduction

The Australian payments ecosystem provides the critical infrastructure that underpins the smooth functioning of the economy, enabling the safe and efficient transfer of funds between individuals, businesses and institutions. This infrastructure delivers significant value to both consumers and merchants. In 2022, the card payments system alone was estimated to have contributed $38.7 billion to the Australian economy.[2] This value is underpinned by substantial and ongoing industry investment in security, reliability and innovation, including fraud prevention capabilities that protect consumers and merchants from growing economic crime threats, infrastructure that maintains consistently high service availability, and continuous enhancement of payment services to meet evolving user needs.

It is therefore critical to ensure that any regulatory settings for the payments ecosystem genuinely enhance competition and efficiency, while maintaining the industry's ability to support economic activity through secure, reliable and innovative payment services.

AusPayNet appreciates the RBA's extensive stakeholder consultation process that has informed the proposed policy package set out in the Consultation Paper. We recognise the RBA's intention to address interconnected issues across the card payments system through a coordinated set of reforms,

1 This submission has been prepared by AusPayNet in consultation with its members. In developing this submission, interested members participated in a consultation process to discuss key issues and provide feedback to inform AusPayNet's response. References to 'AusPayNet's view' reflect the feedback agreed with these members, with the submission highlighting any key differences in views across our membership base.

2 Deloitte Access Economics (2024), *The Value of Australia's Retail Payments System*, 3 December.

and understand the rationale for adopting a package approach to help balance impacts across different stakeholders in the ecosystem.

Given the breadth of AusPayNet's membership base and the nature of the policy issues and regulatory measures being considered, the impact of this Review will vary significantly across different member cohorts, reflecting their diverse business models and roles in the payments ecosystem. AusPayNet's submission to the Issues Paper had therefore focused on key considerations from an industry-wide perspective that should inform the RBA's evaluation of potential regulatory responses, with individual members providing more details on any diverging perspectives through their own submissions.

We welcome the RBA's consideration of many of the matters raised in our earlier submission, as has been highlighted in the Consultation Paper. Rather than reiterating the feedback that has already been addressed, this submission will primarily focus on highlighting the key areas of concern and insights that members feel have not been sufficiently considered in the proposed policy package.

While there are few policy issues in this Review for which there is broad convergence of views across our membership base, there is an overarching, industry-level position anchored on the core principles of: competitive neutrality, evidence-based policy, regulatory simplicity, and appropriate phasing of major reforms. Reflecting these principles, the key considerations that our members wish to highlight in response to the Consultation Paper include:

- **Scope and sequencing:** Conducting this Review ahead of the reforms to the *Payment Systems (Regulation) Act 1998* (PSRA) creates risks of competitive distortion across the broader payments ecosystem, and limits the RBA's access to critical data required for evidence-based policy decisions.
- **Changes to interchange fee regulation**: Some members have raised significant concerns about the evidence base supporting the proposed reductions to interchange fee caps, as well as the potential competitive and economic implications of such significant changes that do not seem to have been adequately accounted for.
- **Implementation**: There are concerns that the proposed implementation timeframes will not be sufficient for the complexity and scale of changes required under the proposed policy package.
- **Transparency design**: While the industry generally supports greater transparency for merchants, further work on the design of any disclosure requirements may be beneficial to ensure that they drive meaningful competition and change.

The rest of our submission will provide further detail on these issues, as well as insights and feedback on other key elements of the proposed policy package.

Scope of the Review

One issue that we must reiterate from our earlier submission is the concern shared by many of our members about conducting this Review ahead of the passage of the PSRA reforms. These reforms, which are currently before Parliament, would bring a broader set of critical payments system participants within the RBA's regulatory perimeter. As detailed in our submission to the Issues Paper, there is a significant risk that policy changes made for specific segments of the payments industry in isolation could lead to unintended distortions in competition and efficiency across the broader payments ecosystem. This would directly undermine the RBA's statutory objectives. The Consultation Paper highlights several areas in which such competitive distortions could arise under the proposed policy package. And while the RBA has noted that it would be able to assess and act on any resulting competition or efficiency issues once the PSRA reforms have passed, even temporary distortions have the potential to lead to long-term structural changes.

Conducting this Review ahead of the PSRA reforms also means that the RBA may lack access to critical data and information necessary to support evidence-based policy decisions for the card payments system, since the RBA's information-gathering powers are limited by the perimeter of the PSRA. For example, the costs associated with digital wallet transactions – which represent a significant and growing component of card payment processing – may not be fully captured in the RBA's analysis if digital wallet providers remain outside the regulatory perimeter and are unwilling to voluntarily provide the necessary information to the RBA. Similarly, it could be difficult to comprehensively assess the competitive dynamics and cost structures of payment facilitators, payment gateways, and other emerging payments service providers (PSPs) that influence card payment pricing and routing decisions under the current legislative framework. An incomplete evidence base creates a risk that regulatory changes to card payments could be inappropriately calibrated, potentially leading to inefficient outcomes or unintended market distortions that become apparent only once the full ecosystem is under regulatory oversight.

We understand the RBA's desire to expedite its review of card payment costs and surcharging, as a result of the growing public and Government attention on these issues over the past 18 months. However, much of the evidence presented by the RBA in the Issues and Consultation Papers suggests that Australia's payments system is generally functioning well. Aside from the surcharging framework – which the RBA has determined no longer meets its regulatory objectives – merchant service fees have declined consistently over the past decade, despite rising industry investment in security and reliability; operational resilience has remained at very high levels; and innovation continues to enhance payment services and provide both consumers and merchants with access to a growing range of payment options. Many members therefore question the need for such urgency in implementing the proposed policy package. With the PSRA reforms currently before Parliament in a separate Bill, the industry is confident that the RBA's expanded regulatory perimeter should be in effect within the short term. We therefore once again encourage the RBA to consider deferring any final policy decisions for the card payments system until a comprehensive, ecosystem-wide review can be conducted.

Interchange Fees

Beyond the scope of the Review, the biggest concern raised by many of our members is the substantial reductions in interchange fee caps proposed by the RBA. We understand that the proposed changes to the regulatory settings for interchange fees are intended to help balance the impact of the proposed removal of surcharging for all card payments. However, the quantum of the proposed change is significant, and some members have raised fundamental issues about both the evidence base supporting the policy decision, and the potential competitive and economic implications that do not seem to have been adequately considered.

Evidence base

Our submission to the Issues Paper detailed some of the considerable benefits for the Australian economy provided by the payments ecosystem, as well as the substantial costs borne by the industry in delivering these benefits. To ensure that any policy decisions arising from this Review are appropriately calibrated, we asked the RBA to conduct a comprehensive analysis of these costs and benefits, including how these should be distributed among the many different participants and users of the payments system.

We therefore welcomed the RBA's attempt to conduct an issuer cost study to inform the proposed changes to its interchange fee regulations. However, many of the members involved in the study have raised questions about the robustness of the analysis, and believe that the published findings far underestimate true eligible issuer costs. This is a serious concern, as the justification for the RBA's proposals related to interchange fee regulation relies heavily on this analysis.

Firstly, while there are over 80 credit card issuers in Australia, the findings are based on a very small sample of only 11 issuers. If we assume that all of the major banks participated in this study, this means that the costs faced by all smaller issuers were estimated based on a sample of only seven providers. There is no way for members to gauge how representative this sample is, and therefore the extent to which the findings can be relied upon to assess the potential impact of the proposed cap reductions across the industry.

Another key concern is that some critical issuer costs appear to have been excluded or significantly underestimated. For example, the study estimates that mobile wallet costs are only around 1 basis point of transaction value, compared to industry estimates of up to 15 basis points, and the RBA's own previous acknowledgment that, by early 2023 (when mobile wallet transactions made up a significantly lower share of card payments), issuers were already facing over $100 million in annual mobile wallet costs.[3] Similarly, the RBA's cost estimates suggest fraud costs have declined over the past decade. However, the fraud rate on card payments as a share of total transaction value has increased over that period, and issuers have been making significant investments into uplifting their fraud prevention tools to counter the increasing scale and sophistication of criminal activity over the past few years (as detailed in our earlier submission).[4]

More broadly, some issuers have raised concerns that certain fixed operational costs and shared overheads that are critical to an issuer's operations and should be appropriately passed on to merchants were not sufficiently reflected in the transaction-level estimates. While acknowledging that the RBA has consulted with issuers in the development of the cost study, some members nevertheless asked the RBA for further consideration of industry participants' views on some of the key assumptions, definitions, and methodology choices, including the treatment of interest-free funding periods and the corresponding cost of funds calculation. Relatedly, the limited timeframe provided to issuers for producing the requested information also raised concerns about the completeness and accuracy of the data underpinning the RBA's analysis, particularly given the complexities of allocating costs across different card types and transaction categories.

Several members have noted that the concerns around the RBA's evidence base are even more pronounced in the case of the proposed caps on foreign-issued cards. This is particularly so given cross-border interchange fee regulation is limited globally, meaning that the absence of any foreign issuer cost data represents a significant gap in the analytical foundation for these proposals.

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[3] Connolly, E. (2023), *The Shift to Electronic Payments – Some Policy Issues*, Speech to the AFR Banking Summit, 28 March.
[4] AusPayNet (2025), *2025 Australian Payment Fraud Report*, 14 August.

Given the significance of the policy changes being proposed, members have requested that the RBA conduct a truly comprehensive analysis of the costs and benefits across the entire payments ecosystem, similar to the transparent and thorough approach taken for the 2014 payment costs study. This should include sufficient time for all stakeholders to provide complete and accurate data, full transparency of the methodology and assumptions underpinning the analysis, and more detailed discussions with issuers on those assumptions prior to finalising the analysis and any resulting policy decisions. The study should also explicitly consider the numerous upcoming changes set out in the Government's Strategic Plan for the Australian Payments System that the industry will be required to invest in over the coming years.

Noting the concerns raised in the preceding section, if the RBA decides to proceed with implementing changes to interchange fee regulation ahead of the passage of the PSRA reforms, we would strongly recommend that once the reforms have passed, the RBA utilise its expanded powers to obtain the necessary additional information on costs associated with the full range of participants in the card payments system, followed by a comprehensive reassessment of the interchange fee proposals in light of any new information received.

Competition implications

Even setting aside concerns about the accuracy of the cost study, the RBA's published analysis indicates that non-major bank issuers face eligible costs above the level of the proposed caps on credit card interchange fees (even when only a small portion of the cost of funding interest-free periods is included as an eligible issuer cost, as suggested by the RBA's 'user pays' approach). This raises fundamental competition risks that warrant careful consideration.

As noted above, some members have raised questions about whether the sample of issuers included in the cost study is sufficiently representative. There are particular concerns about the likelihood of a sampling bias toward established issuers with different cost structures to those that would be faced by new entrants, who would typically face higher costs as they build scale and operational efficiency. Even when focusing only on established issuers, the estimated eligible issuer costs are based on an average across the sampled institutions. This suggests that a significant portion of established smaller issuers is likely to be bearing eligible costs that are above the proposed credit card caps. It should also be highlighted that the 0.3% cap represents the *maximum* interchange rate that smaller issuers could earn under this policy proposal. The RBA acknowledges that differential interchange rates can serve legitimate purposes, including promoting the adoption of new technologies and encouraging certain payment behaviours. Assuming that card schemes would continue to set differential interchange rates for different transactions, this would further exacerbate cost coverage for smaller issuers.

This creates serious risks for market competition and entry. If smaller issuers cannot operate viably under the RBA's regulatory settings, this could fundamentally alter the competitive dynamics of the card issuing market. We would expect this to lead to an increase in market concentration, both by precipitating the exit of existing issuers and precluding new participants from entering the market. This could have negative long-term implications for innovation, efficiency and consumer choice, in direct contrast to the RBA's regulatory objectives.

To address these concerns, some members have suggested either ensuring that the industry-wide caps sit above the eligible costs of all issuers – including new entrants – or providing appropriate exemptions for smaller issuers to preserve competition and market entry opportunities. This would help ensure that the regulatory framework does not favour incumbent large issuers at the expense of smaller competitors and new entrants.

Broader economic impacts and user-pays considerations

The industry generally agrees with the RBA's user-pays principle for ensuring that the costs associated with any given aspect of a payments service are borne by those who benefit from it. However, some members have raised concerns that the RBA's analysis may not fully account for the spectrum of benefits that accrue to different parties in the card ecosystem.

The economic relationships in the card payments system are complex, with merchants, consumers, acquirers, issuers, and schemes all receiving various forms of value and incurring a range of costs that may not be immediately obvious. For example, while interest-free periods and credit card rewards programs would appear to primarily benefit consumers, these features also provide some benefits to merchants through increased sales. Such economic impacts may not be fully captured in a simplified cost-allocation analysis that assumes that any given cost should only be borne by a single party.

Some members have highlighted commercial cards as a particular case where the benefits and cost allocation warrant further consideration. These cards provide distinct value propositions in business-to-business contexts, including working capital support that benefits both parties. The European Union, United Kingdom and New Zealand have all excluded commercial cards from their interchange fee regulation, recognising their different market dynamics and the greater bargaining power typically present in business relationships. Noting that several of the RBA's proposed policy options were informed by the regulatory setting in these jurisdictions, some members have suggested that Australia should adopt a similar approach, on the basis that commercial cards represent sophisticated business tools rather than consumer payment instruments.

More broadly, we acknowledge that the RBA has indicated that it was not convinced by arguments that a reduction in interchange fee cap would have negative implications for innovation and security. However, members encourage the RBA to reconsider the evidence and examples provided in our earlier submission about the value of the card payments system in Australia and the substantial costs that industry participants continue to incur to support resilience, safety and innovation. These costs are only expected to increase over coming years, to support the extensive agenda of regulatory reforms and industry transformation initiatives outlined in the Government's Strategic Plan for the Australian Payments System.

Furthermore, the RBA's distributional impact analysis also appears to overlook the potential for interchange rate convergence under the proposed caps. Many of our members generally support the RBA's overarching policy goal of reducing the disparity in card payment costs between small and large merchants. However, the RBA appropriately acknowledges in its Consultation Paper that some differential in interchange rates can be justified based on factors such as fraud risk, merchant investment in payment technologies, and other legitimate cost differences between merchant segments. Some of our members are concerned that the proposed reduction in the credit card cap to 0.3% will lead to a convergence of interchange rates at or near this level, potentially eliminating even justified differentials as card schemes attempt to offset some of the substantial issuer revenue losses by increasing strategic merchant rates. This risk is only briefly noted by the RBA in footnote 21 of the Consultation Paper, even while acknowledging that this was the outcome seen in Europe. If interchange rates do converge at the proposed cap level – which some members consider highly likely given the scale of revenue loss facing issuers under the preferred policy package – the resulting increase in payment costs for large merchants would likely flow through to consumer prices. This represents a significant distributional impact that warrants more explicit consideration in the RBA's assessment of the net benefits of the proposed policy package for both consumers and businesses.

If, after conducting a comprehensive payment costs analysis and considering all of the feedback above, the RBA determines that the proposed reductions in interchange caps remain appropriate, some members have requested that the industry be given adequate transition time for adjusting to the proposed credit card caps. This could take the form of a phased approach, rather that enforcing an immediate 62.5% reduction in the interchange fee caps. This would allow the industry time to adapt their business models, and for the RBA to monitor the implications of this rebalancing, to help mitigate any potentially irreversible industry or economy-wide issues that might arise.

Transparency of Merchant Fees

As noted in AusPayNet's submission to the Issues Paper, our members generally support greater transparency as a means of promoting competition and efficiency. However, we detailed a number of important practical considerations that could affect whether such measures would achieve their intended outcomes, or simply become an unnecessary regulatory burden.

This is particularly relevant for the merchant acquiring market, in which the Consultation Paper notes competition is already "sufficiently strong". If significant fee disparities persist in a competitive market, this may indicate that payment costs are a relatively low priority for many smaller merchants compared to other business considerations. Simply providing more information may not drive the intended behavioural changes, unless merchants are motivated to seek out and act on that information (and are able to do so).

From a purely operational cost perspective, our members are generally not opposed to the two additional policy proposals around merchant fee transparency. However, there are questions around the practical utility of acquirers publishing simple averages across three very broad merchant categories. We understand that this is intended to help reduce the significant disparities in pricing faced by small businesses, by giving them an indication of whether their fees are comparable to those of similar merchants. However, given these disparities, simple average figures may still not provide meaningful guidance to individual merchants about whether they can achieve a better deal elsewhere. Many merchants will likely realise that the published averages are not relevant to their specific circumstances, and that they would need to seek individual quotes from each PSP anyway, reducing the practical value of the transparency exercise. This was the conclusion reached by the UK Payment Systems Regulator, which ultimately focused on bespoke pricing summaries and online quotation tools, on the basis that generic price publications were unlikely to be effective due to the non-uniform nature of merchant service fee pricing.

So while appreciating the RBA's consideration of relative industry implementation costs in determining its preferred policies on this issue, some members have cautioned that this approach is unlikely to deliver the RBA's expected outcomes. We note, for example, that the RBA has published very granular data on the distribution of merchant service fees for at least ten different merchant size categories several times over the past few years. If the opacity of merchant pricing was a significant issue for merchants, we expect that the disparity in pricing should have reduced as a result of those publications; if there is no evidence of this occurring, this should prompt the RBA to reconsider whether such publications of average fees would truly encourage and empower merchants to seek a better deal with their current provider or switch to another acquirer.

We also reiterate the concerns noted in AusPayNet's earlier submission about the RBA's almost singular focus on merchant payment costs as the main measure of efficiency and competition in the card payments system. Some members have noted that one of the risks arising from the proposed publication of average merchant service fees by acquirers is that this could inadvertently create a race to the bottom on headline costs, without appropriate consideration of service quality, security, innovation, or value-added services. These are factors that some merchants may not even realise can differ across acquirers, especially when presented with a pure pricing comparison table that doesn't address any other metrics. For merchants that are aware of the potential differences between acquirer offerings, each merchant will place a different value on the various features and services, depending on what is most important to them in their business. So as noted in our earlier submission, without proper context about these service differences, raw fee comparisons could be, at best, unhelpful, or worse, misleading for merchants' decision-making. If the RBA's goal is to improve both competition and efficiency (broadly defined) for merchants, transparency measures may need to account for the full value proposition, rather than reducing everything to a simple price comparison.

Given the general member support for greater transparency within the payments ecosystem, we would welcome the opportunity to work closely with the RBA on redesigning the proposed public transparency measures, with careful attention to behavioural factors and practical effectiveness. This should include testing proposed approaches with target merchant audiences, considering whether the information provided would realistically influence merchant decision-making, and ensuring that any published information is relevant and actionable.

Implementation

Given the scope and nature of the proposed reforms, many members have also raised significant concerns about the proposed implementation timeline.

The fundamental issue extends beyond just technical implementation timeframes to ensuring that such major changes to the payments system are implemented as part of a coherent, evidence-based framework that avoids creating temporary distortions while other important reforms remain pending. As outlined earlier, many members believe that finalising these policy decisions ahead of the PSRA reforms creates risks of regulatory arbitrage and competitive distortion. Furthermore, a comprehensive cost-benefit analysis – that covers the entire payments ecosystem, rather than just card networks – remains essential for ensuring that such significant regulatory changes are appropriately calibrated and balanced.

If the RBA determines to proceed with the proposed policy package despite these concerns, many members are concerned that the implementation timeframes proposed in the Consultation Paper are insufficient for the complexity and scale of change required. The proposed reforms will require extensive change and coordination across the entire payments ecosystem, including fundamental changes to payment system participants' customer relationships and communications. Card issuers, for example, will be required to not only restructure their business models and reprice products, but also renegotiate commercial relationships and educate millions of cardholders about the changes to their card products. On the acquiring side, even PSPs that support the removal of surcharging have noted that this change will require the reconfiguration of point-of-sale systems, changes in commercial terms across their merchant customer base, and extensive merchant education.

Members have therefore asked the RBA to consider a more realistic implementation window of at least 12-18 months, which would allow for proper system development, comprehensive testing, stakeholder preparation, and the development of effective education programs.

Additional Feedback and Insights

Building on our submission to the Issues Paper, this section highlights some additional member insights for the RBA's consideration in determining the final policy settings in this Review.

Surcharging

We acknowledge the wide range of views expressed by AusPayNet members and other stakeholders regarding whether the current surcharging framework should be maintained, modified, or completely removed, and appreciate that the RBA has considered all perspectives in developing its proposals.

When focusing specifically on the choice between the RBA's preferred and alternative policy proposals regarding the surcharging framework, many of our members support the RBA's preferred approach of removing surcharging on all designated cards, rather than only on debit cards. The reasons underpinning this relative preference were detailed in our earlier submission, and broadly align with the RBA's own assessment. These include: the changes in the payments landscape, as well as broader behavioural considerations, that suggest the current framework is no longer achieving its policy objectives; the relative simplicity and enhanced enforceability of a universal removal of card surcharging; the competitive neutrality benefits of treating all regulated card networks consistently; the value of maintaining flexibility in pricing and business models to enable continued innovation and competition across the payments ecosystem; and the significantly lower industry implementation and compliance costs.

Many members also consider that the industry-led implementation approach proposed by the RBA – through the reinstatement of 'no-surcharge' rules at the scheme level – will be largely effective. However, as discussed in our earlier submission, the public discourse about the policy issues being considered in this Review indicate a strong need for better end-user education about the payments system, including its role in the Australian economy, and the purpose and operation of existing regulatory settings. While acquirers and PSPs will play a significant role in ensuring their merchant customers understand the proposed changes to the surcharging framework (if implemented as proposed), broader end-user communication and education by the RBA, ACCC, and Government will be crucial to the success of the proposed policy. More generally, we welcome the RBA's intention to continue working with the industry, ACCC, and Treasury to monitor the effectiveness of the policy implementation, and consider additional measures at a later date, if required.

Transparency of scheme fees

Many members support the RBA's proposed industry-led approach to scheme fee simplification, recognising the benefits of allowing market participants to develop practical solutions in such a complex and commercially driven area, rather than imposing prescriptive regulatory requirements from the outset. Some members have noted that effective 'simplification' will need to consider not only the number of fee categories and average fee levels, but also the consistency of individual fee levels and categories over time. Improving consistency will be critical to helping address some of the issues identified in the Consultation Paper, including assisting acquirers in accurately apportioning scheme fees to individual merchants and transactions.

In line with earlier comments about the limitations of published averages, some members have noted that there is a risk that even if average aggregate scheme fees across the industry remain stable, the disparity in fees paid by different payment system participants could shift in ways that disadvantage smaller participants. However, we are not aware of this being a significant issue requiring immediate consideration, and the industry-led approach should provide the opportunity to monitor and address any such developments.

Transparency of merchant fees

Noting earlier comments around the importance of any transparency measures being actionable, many members welcome the RBA's decision to not require detailed breakdowns of interchange fees, scheme fees, and acquirer margins on merchant statements. For most merchants, such information would be likely to only increase complexity and confusion, rather than aid merchant decision-making, particularly since most merchants have no influence over their interchange or scheme fees, and would not base their choice of acquirer based on the relative proportions of the three pricing components. The proposal to include breakdowns for domestic versus international card transactions is more constructive, as this information could assist merchants in obtaining more accurate quotes from other providers (although we note that it will be the corresponding split provided for the *value* of domestic vs international transactions that will likely be more helpful for obtaining quotes, more so than the average fees themselves).

Education and communication

The importance of stakeholder education cannot be overstated. The success of these reforms will depend significantly on how well merchants and consumers understand the changes and their implications. This presents an opportunity for the RBA to take a leadership role in public education about the payments system more broadly. As we noted in our Issues Paper submission, there appears to be widespread public misunderstanding about how the payments system operates and the value it provides to the economy. The implementation of these reforms could provide a platform for broader education about payment costs, the benefits of digital payment infrastructure, and the economic relationships between different participants in the payments ecosystem. Such education would support more informed policy discussions and help ensure that future regulatory decisions are based on better public understanding of the complex trade-offs involved in payments system design.

AusPayNet welcomes the RBA's commitment to regularly reviewing its retail payments regulation settings to ensure that they remain fit for purpose. We acknowledge the extensive consultation already conducted by the RBA to inform the proposed policy changes for merchant card payment costs and surcharging. We ask the RBA to give further consideration to the issues and concerns raised in our submission, to ensure that the final package of regulatory reforms can enhance rather than inhibit competition and efficiency in the Australian payments ecosystem. AusPayNet and our members look forward to continuing our engagement with the RBA as it progresses this Review, to ensure that the regulatory framework achieves its policy objectives while maintaining the payments system's ability to support economic activity through secure, reliable and innovative payment services.

Please contact Kateryna Occhiutto, Head of Policy & Insights (kocchiutto@auspaynet.com.au) if you have any questions related to this submission.

Yours sincerely,

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