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Dear Dr Richards

The Australian Payments Network (AusPayNet) welcomes the opportunity to respond to the RBA Issues Paper, *Review of Retail Payments Regulation*. As you are aware, AusPayNet is the industry association and self-regulatory body for the Australian payments industry. AusPayNet manages and develops regulations, procedures, policies and standards governing payments clearing and settlement within Australia.

AusPayNet's submission is structured in two sections: firstly, we provide some general comments about self-regulation; and, secondly, we provide answers to specific questions outlined in the review.

Effective Self-Regulation in the Australian Payments System

The *Payments System (Regulation) Act* was designed to operate on a presumption of self-regulation. In this context, hard regulation is best adopted where market forces or self-regulation have failed to produce the desired outcome. As outlined in the RBA's submission to the Senate Committee on Financial Technology and Regulatory Technology (the Fintech/RegTech Committee), the approach has been to impose regulation where it is in the public interest and industry has not been able to act.¹

Currently, market forces and technological change continue to effectively support innovation and new ways for consumers to pay. This was recognised by the Productivity Commission (PC) in its Report, *Competition in the Australian Financial System*:²

- *Payment systems are undergoing a wave of innovation driven by technology and the growing use of data. Incumbents are investing in innovation and there are growing opportunities for fintechs to provide complementary services to existing payment systems or compete against incumbents in their own right. New ways of authorising payments, such as blockchain, may reduce costs and improve efficiency of payment systems. And new platforms, such as digital wallets, are changing the way people pay and the market dynamics of the retail payments system.*

The RBA has recognised the importance of these changes, noting in its submission to the Fintech/RegTech Committee that the changes support "the broader economy and support Australia's transition toward a digital economy."³

¹ RBA (December 2019), *Submission to the Senate Select Committee on Financial Technology and Regulatory Technology* ([link](#)), p3

² PC (June 2018), *Final Report of the Inquiry into Competition in the Australian Financial System*, ([link](#)), p467

³ RBA (December 2019), *Submission to the Senate Select Committee on Financial Technology and Regulatory Technology* ([link](#)), p3

Through self-regulatory initiatives, industry is working proactively to improve the convenience and security of payments. Over the last year the payments industry, through AusPayNet and the Australian Payments Council (APC), initiated or completed several strategic projects, including:

- AusPayNet's *Card-Not-Present Fraud Mitigation Framework*, which aims to reduce online card fraud in Australia;⁴
- AusPayNet's *Guidelines for Accessibility in PIN Entry on Touchscreen Terminals*, which are designed to make it easier for people living with vision and/or motor impairments to make payments on point-of-sale touchscreens;⁵
- The commencement of AusPayNet's industry consultation, the *Future State for Australia's Payment Systems*, to be finalised in the first half of 2020, which looks to create a strategic view of Australia's payment systems and a plan for their sustainable evolution;
- The APC's *Trust ID Framework*, which is an open, contestable framework designed to improve the security and convenience of online transactions between individuals and a wide range of private sector entities;⁶ and
- The APC's new strategic agenda, *Payments in a Global, Digital World*, which outlines key areas for industry's strategic focus over the next period, to ensure that as the payment system evolves it continues to meet the needs of all users.⁷

These achievements demonstrate a strong collaborative and effective self-regulatory approach. The participation of Government stakeholders in several of the above projects further demonstrates the effectiveness of collaboration between the public and private sector.

Furthermore, a number of reviews in recent years have examined different aspects of the payments system. The RBA undertook a comprehensive review of card payment regulation relatively recently, in 2015-16. The PC Report, *Competition in the Australian Financial System*, made recommendations relating to payments, all of which have been progressed, or are currently underway. Finally, the Black Economy Taskforce also made recommendations around the payments system.

The Role of Self-Regulation in Competitive Neutrality

The rapidly changing payments environment raises questions around the most effective regulatory approach. As noted by AusPayNet in our response to the RBA's previous *Review of Card Payments Regulation*, the current approach is based on designation of individual payment systems:⁸

- *This approach works well in an environment where the number of different payment methods and schemes are stable and well-defined. New entrants, new technology and deepening competition in the scheme space expose some of the difficulties of this approach. Imposing similar requirements on designated schemes is a difficult and time-consuming process, particularly where different business models and fee structures are used. As well, non-designated schemes may retain a competitive advantage.*

⁴ AusPayNet, *CNP Fraud Mitigation Framework* ([link](#))

⁵ AusPayNet, *Guidelines for Accessibility in PIN Entry on Touchscreen Terminals* ([link](#))

⁶ AusPayNet, *Trust ID Framework* ([link](#))

⁷ APC (June 2019), *Payments in a Global, Digital World* ([link](#))

⁸ AusPayNet (April 2015), *Submission to the RBA Review of Card Payments Regulation* ([link](#)), p11

If market developments “outpace” regulation, non-regulated entities may gain a competitive advantage over their regulated counterparts. This may have the unintended consequence of skewing innovation towards non-regulated marketplace segments. This underscores the importance of competitive neutrality – that like services should be regulated in a like fashion.

In limited cases there may be legitimate rationale for regulatory differentiation, for example, to foster innovation or on a time-limited or risk-assessed basis. One way in which regulators have dealt with this challenge is to adopt graduated frameworks. In AusPayNet’s submission to the Council of Financial Regulators (CFR) *Review of Retail Payments Regulation: Stored-Value Facilities*, we stated that “a graduated regulatory framework ... that offers temporary relaxation of requirements for new entrants within a restricted environment” is preferable to “a framework with permanently differentiated tiers of regulatory obligations for different entities.”⁹ APRA’s restricted ADI licensing regime and ASIC’s fintech regulatory sandbox operate in a similar way.

As noted by the RBA in its submission to the *Senate Select Committee on Financial Technology and Regulatory Technology* (the FinTech/RegTech Committee), this is inevitably a balancing act:

- *The Bank seeks to ensure that new players in the payments industry are able to compete fairly and that there are no unwarranted restrictions on their participation in payment systems. Doing so inevitably involves managing the balance between the competition new participants can bring and any additional risks that arise, particularly where new entrants are not subject to the same form of prudential regulation as incumbents. The Bank also strives to have a regulatory regime that is technology neutral and best able to support competition and innovation in the payment system.*

In AusPayNet’s view, market competition and self-regulation offer the best approach to achieving competitive neutrality. This is demonstrated by the high level of innovation in payments and the self-regulatory initiatives referenced above. The RBA’s submission to the FinTech/RegTech Committee likewise states that the scope of its regulation “has been relatively narrow” and imposed “only where it has considered it necessary in the public interest and where the industry has been unwilling or unable to act.”

Finally, effective self-regulation requires collaboration from a broad range of participants. As a network industry, payments requires agreement on non-commercial matters, such as security standards and technical standards. To deliver on this, AusPayNet facilitates collaboration between a diverse set of participants, including technology companies as well as regulated payments service providers. AusPayNet actively encourages membership among all organisations with a significant interest in payments.

Strategic Issues in the Retail Payments System

- 1) What major recent or prospective developments in the broader payments industry are particularly relevant to this review? More specifically, are there any gaps in functionality available to end users or any shortcomings in industry governance or operating arrangements that require regulation or coordinated industry action?

The consumer-led migration to new payment systems raises the question of how to best manage the decline and reduction in the number of legacy systems. Over the longer-term, this would allow more focused investment in newer, innovative systems.

⁹ AusPayNet (October 2018), *Submission to the Review of Retail Payments Regulation: Stored-Value Facilities* ([link](#)), p1

Payment Systems

As the Paper notes, AusPayNet is facilitating an industry consultation on the *Future State for Australia's Payment Systems*, which is looking to create a strategic view of Australia's payment systems and create a plan for their sustainable evolution. AusPayNet's consultation is intended to be finalised by March 2020, and we will continue to update the RBA as it progresses. Without prejudicing the outcome of that consultation, AusPayNet notes that, within the next decade, it is likely that there will be a rationalisation of payment systems. This is likely to manifest in the retirement of some systems and remaining systems' message formats being consolidated into a small number of data rich formats. Below, we have provided comments below on individual payment systems:

Cash

AusPayNet's Australian Cash Distribution & Exchange System provides rules for the exchange and distribution of wholesale cash.¹⁰ This includes buying, selling and packaging of notes and coins, audit requirements and cash movements. AusPayNet's consultation is looking at cash distribution, including implications to our frameworks of the decline of cash as a consumer payment method.

For the foreseeable future, there will be a role for cash alongside electronic payments. The importance of society's ongoing reliance on cash is illustrated by the issuance of the Next Generation Banknotes that has been ongoing for several years. The APC's new strategic agenda notes that "decline of traditional payment mechanisms [including cash] poses a challenge to ensure that all users of the payments system retain consistent access to appropriate payment options."

Cheques

AusPayNet operates the Australian Paper Clearing System for cheques.¹¹ This system co-ordinates and facilitates the exchange and settlement of cheques and other paper-based payments between participants.

The decline of cheques has been led by consumers, who have moved to more convenient and cost-effective digital alternatives. On current trends, and as highlighted by transactions per capita graph cheque volumes will fall to near zero in the near future,¹² although there may be a long tail. In response to this consumer demand, most merchants and retailers no longer accept payment by cheque, although some cheque services are still currently offered by banks.

Industry work is already underway to manage the consequences of the decline of cheques. In 2016, the APC undertook research into consumer attitudes to cheques. The APC's report *Managing the Changing Payments Mix: Cheques as a Case Study* made recommendations for a "collaborative approach [to] ensure that appropriate payment services are available to users of the Australian payments system, prior to the removal of cheques."¹³ AusPayNet is leading the implementation of the recommendations, which (as referenced in the Issues Paper) will help ensure that appropriate digital alternatives are available and no payments users are left behind. This topic is also considered in AusPayNet's consultation.

To assist with planning and preparing for the retirement of cheques, and given that many merchants no longer accept cheques, it is likely that industry will, at the appropriate time, have to set a clear end date. This will require the public endorsement of the RBA and other government agencies.

¹⁰ AusPayNet, *Australian Cash Distribution and Exchange System* ([link](#))

¹¹ AusPayNet, *Australian Paper Clearing System* ([link](#))

¹² RBA (November 2019), *Review of Retail Payments Regulation: Issues Paper* ([link](#)), pg2

¹³ APC (December 2018), *Managing the Changing Payments Mix: Cheques as a Case Study* ([link](#)), p5

Direct Entry

AusPayNet administers the Bulk Electronic Clearing System for electronic debit and credit payment instructions.¹⁴ Also known as direct entry (DE), this system co-ordinates and facilitates the exchange and settlement of bulk electronic transactions between participants. As the Issues Paper notes, DE volume is still increasing as it continues to offer a reliable, low-cost payment option. Given the development of newer payment systems, in particular the New Payments Platform (NPP), AusPayNet's consultation is looking to establish an industry position on the future of DE. Migration of traffic from DE to NPP has already commenced and it is expected that this trend will continue and accelerate.

The New Payments Platform

The *New Payments Platform Roadmap* outlines details “of its ongoing investment in the NPP, to extend and enhance the capability of the platform to meet the needs of participating financial institutions, payment providers and users within the wider payments ecosystem.”¹⁵ It is important to let the NPP, a significant piece of national infrastructure, mature.

Other Developments

Stored Value Facilities

In September 2018 the Council of Financial Regulators (CFR) released an Issues Paper, *Review of Retail Payments Regulation: Stored-Value Facilities*.¹⁶ AusPayNet made a submission and attended the industry roundtable.¹⁷ Any further comments would need to take into account the CFR's recommendations and Government response. AusPayNet will review these documents when they are released.

Digital Currencies

There is a trend towards exploration of digital currency. These include “traditional” crypto currencies (such as bitcoin), stablecoins and central-bank digital currencies. Within markets with established digital payment systems, there are different views about the need for digital currencies. Consistent with the G7 Working Group on Stablecoins¹⁸ and the Payments System Board,¹⁹ AusPayNet's view is that further work is needed to define a global regulatory framework prior to their launch.

Systemic Resilience

This is a critical area of industry focus. The growth of digital payments (particularly in the consumer space) has led to a growing reliance on the underlying infrastructure, including energy, telecommunications and cloud services. Therefore, a cross-sectoral, or ecosystem-based, approach is increasingly important. AusPayNet is currently coordinating industry collaboration with the RBA to define standards for resilience statistics and is undertaking work to uplift resilience for Australia's high value clearing system and COIN network.

In addition to AusPayNet's ongoing operational work, the APC's new strategy identified systemic resilience as one of five strategic focus areas. Following the release of the strategy in June 2019, the APC undertook a detailed assessment of ongoing initiatives within the payments sector.

¹⁴ AusPayNet, *Bulk Electronic Clearing System* ([link](#))

¹⁵ NPP Australia (October 2019), *Roadmap Details Ongoing Plans to Extend and Enhance the NPP* ([link](#))

¹⁶ CFR (September 2018), *Review of Retail Payments Regulation: Stored-Value Facilities* ([link](#))

¹⁷ AusPayNet (October 2018), *Submission to the Review of Retail Payments Regulation: Stored-Value Facilities* ([link](#))

¹⁸ G7 Working Group on Stablecoins (October 2019), *Investigating the Impact of Global Stablecoins* ([link](#))

¹⁹ PSB (August 2019), *Payments System Board Update: August 2019 Meeting* ([link](#))

A core strategic recommendation of this assessment was the creation of a structured risk management strategy to enable the identification and management of current and future risks. This will take into account ongoing public and private sector work to uplift resilience standards, such as the Australian Government's Trust Information Sharing Network and AusPayNet initiatives (outlined above). The APC has commenced work on the creation of this strategy.

The sectoral assessment also made recommendations for additional operational work – including monitoring, coordination and crisis management planning. These recommendations have been passed to AusPayNet, which will review them in the first quarter of 2020 to determine next steps in the context of AusPayNet's existing role in crisis management and coordination.

Recurring Debits for Card Payments

As noted in the Issues Paper the customer experience in cancelling automated payments is not always straightforward and can depend on whether the automated payment is a "direct debit" from a bank account or a "recurring payment" from a credit or debit card. AusPayNet and its members have previously identified this as an issue and worked to improve both the cancellation processes and information available.

However, for recurring payments from credit and debit cards, there is no single solution that will work across all banks to cancel recurring payments in consistent and customer-friendly way.

Tokenisation offers a longer-term solution. Tokenisation is a process in which a merchant generates and stores a "token" representing a customer's card number. The token is unique to that merchant and customer and cannot be used in other contexts. While this is principally a security measure, it could also permit greater levels of direct customer control over recurring payments. Given that the merchant holds only the token (not the underlying card number), the customer would merely need to "revoke" the token associated with that merchant and recurring payments will cease.

This requires critical mass of tokenisation to be achieved in multiple areas. Firstly, a critical mass of banks needs to offer tokenisation services to merchants. Secondly, merchants need to adopt tokenisation. Finally, banks need to develop customer-facing interfaces allowing for easier management. Uptake is likely to be staggered over a period of years.

At this stage, there is no need for regulatory intervention as the market is working to provide a sustainable solution for this challenge over the longer-term.

3) Are there barriers to innovation and/or competition that may affect the costs of or provision of electronic payments and should be addressed in this review?

Payments is a network industry; the value of a payments service or product increases along with the number of people who use that service or product. Self-regulation supports this, by creating a common platform for everyone to work from and by engendering public trust in the system. This includes supporting appropriate levels of security, compliance and reliability, which carry operational servicing costs.

AusPayNet has worked with potential new entrants to better understand the payments system from their perspective and identify any potential gaps or barriers to entry. As a component of this work, AusPayNet identified that there are a range of access models already available. However, one of the key areas for improvement was greater clarity around different access models and the role of regulators. The provision of non-technical explanatory material in a more consolidated fashion would assist new entrants in navigating the payments system and we are in the process of creating this material. Other initiatives (e.g. the Consumer Data

Right (CDR)) will likewise lead to greater levels of access. The banking industry is working to implement the first phase of the CDR, currently targeted to go live in July 2020.

Competition in the Cards Market

4) How do stakeholders assess the functioning to date of least-cost routing (LCR) of contactless debit card payments? Do additional steps need to be taken regarding LCR to enhance competition and efficiency in the debit card market?

The intended policy outcome appears to have largely been met, in that acquirers now offer merchant routing. Any surcharging framework should enable consumer choice, as suggested by consumer advocates during the previous review.²⁰ Different payment methods offer different value propositions. Consumers should be entitled to choose the payment method that best suits their particular preferences. Further, as noted above, payment schemes do not compete on cost alone but also tailor product offerings on convenience, security and other services.

5) Have recent and prospective developments in technology changed the case for promoting the continued issuance of dual-network debit cards? What policy actions might be needed to promote competition and efficiency in an environment where single-network cards were more prominent? Alternatively, would it be desirable to mandate (or incentivise through interchange caps) that all debit cards issued enable at least two unaffiliated/competing networks?

AusPayNet reiterates our earlier position outlined in our submission to the RBA's 2016 inquiry, *Dual-Network Cards and Mobile Wallet Technology*.²¹ Key points include:

- *Given the rapidly evolving nature of digital technology, the RBA should avoid a regulatory solution that either locks in certain technological or customer-experience options or is easily avoided by creative technical solutions. If the RBA decides to pursue a regulatory option, a technology-neutral, principles-based approach should be considered.*
- *The RBA should consider how any regulatory intervention would affect consumer choice. Customer experience is a key competitive advantage of mobile wallet offerings and mobile wallet providers should be allowed to compete to attract customers via product differentiation.*

While the market has changed since that inquiry, AusPayNet's view is that the principles of self-regulation, consumer choice and technological neutrality remain appropriate principles to inform regulatory approaches.

6) Is there a case for further policy action to enhance competition in the provision of acquiring services to merchants? If so, what form could this action take?

Recent years have seen a growth in the number of new entrants into the acquiring space, illustrating that there is already scope for competition and innovation. This includes both new acquiring services and device/service providers: In 2019, AusPayNet issued approvals for 43 new devices. Examples of new acquirers that have entered the market in recent years include Adyen, Windcave, EFTEX and Advam.

²⁰ CHOICE (May 2015), *Submission to the Review of Card Payments Regulation* ([link](#))

²¹ AusPayNet (January 2016), *Submission to the Dual-Network Card and Mobile Wallet Technology Consultation Paper* ([link](#))

In response to the changing market, AusPayNet is undertaking a detailed review of our device approval process and international payment security standards. In the interim, we are working with companies on a case-by-case basis. Additionally, AusPayNet has a pilot and approval process for non-standard devices that can be used where there is no relevant international standard for device assessment.

9) What are the implications of the growing importance of mobile devices and digital platforms for the retail payments system in Australia? Are there issues that arise for the Bank's regulatory regime for card payments or that are relevant to competition, efficiency and risk?

The Issues Paper refers to AusPayNet's ongoing consideration of QR code standards and their relationship to industry rules. To date, our work has included:

- Investigation of customer-presented QR Codes. AusPayNet assessed the Rules for the Issuers and Acquirers Community (IAC) and determined that they already support customer-presented QR Codes.
- Consideration of merchant-presented QR Codes and the Universal QR Code standard, which allows multiple embedded QR Code payments. This work is underway.

Research by Roy Morgan has identified that, at EOY2018, around 6.8% of the Australian population had used contactless/cardless mobile payments, and around 5.8% had used banks' own mobile payments.²² There are several options for payments via mobile devices, including QR Codes and digital wallets.

The shift to mobile payments raises the question of whether there is sufficient choice and competitive pressure available in the market or whether new cost pressures will be introduced into the ecosystem. In some international jurisdictions, regulators are investigating competition concerns.²³ Notably, proposed German legislation would reportedly require "operators of electronic money infrastructure" to "offer access to rivals for a reasonable fee."²⁴

10) Is there a case for a further lowering of the credit or debit interchange benchmarks or any change in the way they are applied?

As indicated in the Federal Reserve Bank's most recent (August 2019) update, Australian interchange rates are already (and remain) low relative to other jurisdictions.²⁵ The current arrangements have underpinned a high level of investment in security and innovation in the Australian payments system.

Further, AusPayNet reiterates our earlier position outlined in our submission to the PC's inquiry, *Competition in the Australian Financial System*.²⁶ Key points include:

- *Issuers and card schemes have invested heavily in innovation, including contactless cards and in growing their networks.*
- *Without a revenue stream from interchange fees there may be less incentive to introduce or invest in innovative technologies, which in turn, could negatively impact competition. Further, as the [Draft PC Report] notes, the 2014 Financial System Inquiry (the Murray Report) considered banning interchange fees altogether but decided not to proceed on the basis of high transitional costs in doing so.*

²² Roy Morgan (January 2019), *Majority of Australians now use digital payments – a potential threat or opportunity?* ([link](#))

²³ Reuters (October 2019), *EU Antitrust Spotlight as Regulators Seek Details* ([link](#))

²⁴ Finextra (November 2019), *German Rule Change on Mobile Payments* ([link](#))

²⁵ Kansas City Fed (August 2019), *Credit and Debit Interchange Fees in Various Countries: 2019 Update* ([link](#))

²⁶ AusPayNet (June 2018), *Submission to the PC Inquiry into Competition in the Australian Financial System* ([link](#))

- *International experience has shown that interchange fee reform can have unintended consequences, as business models shift to recover costs from other areas. Sharp interchange reductions in the United States (US) resulted in a shift of costs onto individual customers.*²⁷

This rationale has not substantially changed in the intervening period. Issuers and schemes continue to invest heavily in innovation and bringing new products to market. From a consumer perspective, the 2019 European Central Bank (ECB) Report, *Card Payments in Europe*, noted that the introduction of the Interchange Fee Regulation had seen an increase in issuer fees to customers without seeing a corresponding decrease in merchant prices.²⁸ More recent research into the effect of the US interchange reduction found that, while the intention was to increase consumer welfare, in practice there was “little evidence of across-the-board consumer savings,” suggesting that “consumers [were] not helped by this interchange regulation.”²⁹

Finally, part of the original justification for interchange regulation was that it effectively represented cross-subsidisation between payment methods. However, since the RBA’s last round of reforms, there has been a significant compression in interchange rates, which are now some of the lowest in the world. Further, debit has emerged as the most commonly used payment method and merchants have the right to surcharge up to the cost of acceptance. Therefore, there is a question as to whether this justification can be used to support a further reduction of rates.

- 11) Should regulation of interchange be extended to inter-regional interchange fees (i.e. interchange fees applying to transactions in Australia using foreign-issued cards)? What is the typical cost of transactions on foreign-issued cards, and how much of this is attributable to interchange fees?
- 12) Is there a case for applying regulation to three-party card systems? What form could this take?

These two issues go to the question of competitive neutrality and illustrate the challenges of using hard regulation within a rapidly changing payments market. If one scheme is regulated, this gives rise to the expectation that other schemes providing similar services should be regulated in a like manner. As outlined above, AusPayNet’s suggests greater exploration of alternatives to hard regulation. Further, it is not clear what (if any) additional consumer benefit would result from further regulation of three-party schemes. These are generally seen as “optional” for both consumers and merchants. Merchants are free to choose not to accept them or to charge a higher fee for acceptance. This indicates that the market may be solving for itself.

Finally, AusPayNet is not aware of significant increases in foreign-issued cards, or their use to circumvent RBA rules.

- 15) Is the surcharging framework working well? Are there any changes that should be considered?
- 16) Is there a case for policymakers to require that BNPL providers remove any no-surcharge rules, consistent with earlier actions in regard to card systems that applied such rules?

As a result of the RBA’s surcharging framework, merchants have a right to surcharge for payment methods. The policy context behind surcharging is to ensure that more expensive payment mechanisms are not subsidised by people who choose to use less expensive ones. The intended effect is that when presented with the surcharge cost at the point of sale, a customer may choose to pay with a lower-cost option. In theory this

²⁷ NerdWallet (August 2018), *The Durbin Amendment Explained* ([link](#))

²⁸ ECB (April 2019), *Card Payments in Europe: Current Landscape and Future Prospects – A Eurosystem Perspective* ([link](#)), p17

²⁹ Mukharlyamov, Vladimir and Sarin, Natasha (January 2019), *The Impact of the Durbin Amendment on Banks, Merchants and Customers* ([link](#))

therefore keeps merchants' costs down and results in a lower total price for goods and services. The decision to actually surcharge customers for using a payment method is a commercial decision for merchants.

However, a merchant cannot surcharge all payment methods – it must offer at least one non-surcharged method of payment; given the cost of cash, this non-surcharged method may change over time; self-regulation is therefore likely to be the most adaptive way of responding to this.

It is worth noting that other jurisdictions like the EU have taken a different approach where consumers cannot be surcharged. In part, this is because interchange reforms have reduced the need.

Conclusion

Market forces and technological change are underpinning a wave of innovation in the payments industry and offering new ways for consumers and business to pay and accept payments. Self-regulation is working effectively to identify and solve potential challenges over the medium-to-longer term. As the self-regulatory body for the Australian payments system, AusPayNet is continuously reviewing and improving on this model to ensure it evolves to meet the needs of the rapidly change payments landscape. Finally, existing government initiatives (such as the consumer data right and CFR review of stored-value facilities) will complement industry initiatives in helping to provide a foundation for future innovation.

We welcome the opportunity to continue to work with the RBA on this ongoing review. In particular, AusPayNet will continue to update the RBA on the progress and outcomes of our consultation, given the potential relevance.

Yours sincerely



Andy White

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