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Dear Interested Party

### **Suncorp Group Limited and Ors application for authorisation AA1000485—SME policyholder relief – interested party consultation**

On 2 April 2020 the Australian Competition and Consumer Commission (the **ACCC**) granted interim authorisation to Suncorp Group Limited (**Suncorp**), Allianz Australia Limited, QBE Insurance Australia Limited, and other insurers and brokers who wish to engage in the conduct and who notify the ACCC in advance of doing so (**Participating Insurers**), to enable these insurance companies and brokers to coordinate and implement relief measures for small and medium-sized businesses (**SME policyholders**) suffering hardship due to the COVID-19 pandemic (the **conduct**). Suncorp is seeking authorisation on behalf of the Participating Insurers to engage in the conduct until 30 June 2020, with the effect of the relief measures allowed as part of the conduct potentially continuing until 31 December 2020.

The ACCC is seeking submissions on the conduct authorised in the interim authorisation and the subject of Suncorp's substantive application for authorisation. In particular, the ACCC is interested in your views on two main issues:

- Firstly, if you have been directly impacted by the conduct authorised under the interim authorisation granted by the ACCC on 2 April 2020, what is your experience to date.
- Secondly, do you have any comments in relation to the likely public benefits and detriments should the ACCC authorise the conduct until 30 June 2020, and whether any conditions should be placed on the authorisation.

Details on how to make a submission to the ACCC are provided below.

You are welcome to pass this letter on to others who may wish to make submissions. A full copy of the application for authorisation, including the relief measures available as part of the conduct, is available on the [ACCC's Public Register](#).

### **The application for authorisation**

On 1 April 2020, Suncorp lodged an application for authorisation to allow insurance companies and brokers to coordinate and implement relief measures that would have the effect of:

- enabling SME policyholders to: defer payment of insurance premiums for up to 6 months, cancel their insurance policies with no cancellation or administration charge and a refund of all unused premium, and/or, for those SME policyholders who need to close their insured premises, continuing insurance coverage over the premises with no change to premiums;
- offering policyholders (consumer, SME or larger businesses) a credit or refund for unused travel insurance premiums with no cancellation or administration fees applying; or

- reducing payment times for suppliers and contractors involved in servicing claims for Participating Insurers to no more than 15 days.

Suncorp also requested urgent interim authorisation so that it could commence making the relief measures available as soon as possible.

A copy of the ACCC's interim authorisation decision is available on the [ACCC's Public Register](#).

### Request for submissions

If you intend to provide a submission please do so by **Friday 8 May 2020**. Submissions should be emailed to [adjudication@acc.gov.au](mailto:adjudication@acc.gov.au) with the subject 'Suncorp Group Limited - AA1000485 - Submission'. In addition, should you wish to make a submission beyond 8 May 2020 in relation to your experience with the impact of the conduct, please contact the ACCC at [adjudication@acc.gov.au](mailto:adjudication@acc.gov.au) or on the number below.

We recognise that the COVID-19 situation may be causing disruptions to your normal operations. For this reason we are taking a flexible approach to receiving feedback on the conduct. You may wish to contact us by phone to discuss your views or submission before the deadline.

If you would like to provide comments orally, please contact Kobi Maybury on 02 6243 1222 to organise a suitable time. Submissions, including a record of oral submissions, will be placed on the [ACCC's public register](#) subject to any request for exclusion (see the [ACCC guidelines](#) for more information).

### Timetable

An indicative timetable is below. This timetable is subject to change. The most up to date indicative timetable is available on the [ACCC's public register](#).

<b>9 April 2020</b>	Public consultation process begins.
<b>8 May 2020</b>	Closing date for submissions on the substantive application for authorisation from interested parties.
<b>June 2020</b>	Applicant responds to issues raised in the public consultation process.
<b>July 2020</b>	Draft determination
<b>July 2020</b>	Public consultation on draft determination including any conference if called.
<b>September 2020</b>	Final determination.

This letter has been placed on the ACCC's public register. If you wish to discuss any aspect of this matter, please do not hesitate to contact Kobi Maybury on 02 6243 1222 or [adjudication@acc.gov.au](mailto:adjudication@acc.gov.au).

Yours sincerely



Susie Black  
Director  
Adjudication