

I refer to your email of 4 March seeking comment on the proposal by APRA to appoint Ms. Shirli Kirschner to 'run the ADR scheme'.

As stated in my earlier submission on this issue, I consider the ADR model proposed by Ms. Kirschner to be excessively complex and bureaucratic, and see no need for the appointment of a Dispute Facilitator. A complex and bureaucratic system will be costly to the parties, and will not encourage complainants to use it. ADR services exist via Small Business Commissioners in Victoria, NSW, SA and WA and can be used for these type of disputes. Private ADR services exist in other jurisdictions.

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