

28 May 2021

Mr Darrell Channing  
Director  
Competition Exemptions Branch  
Australian Competition and Consumer Commission

**By email:** [exemptions@acc.gov.au](mailto:exemptions@acc.gov.au)

Dear Mr Channing

## Gateway Network Governance Body Ltd – AFCA Feedback

The Australian Financial Complaints Authority (AFCA) welcomes the opportunity to provide a submission to the Australian Competition and Consumer Commission (ACCC) on the Gateway Network Governance Body Ltd.'s (GNGB) re-authorisation request.

### Our feedback

AFCA appreciates the importance of governance around the mandated set of common rules (Data Payment Standards – DPS) for sending registration, contribution and rollover data messages electronically and the role Gateway Operators play in facilitating these transactions.

AFCA understands that to comply with the DPS, employers and superannuation funds use the Superannuation Transaction Network (STN) to send these transactions. In July 2016, ASFA lodged applications with the ACCC to give effect to certain Memorandum of Understanding (MoU) provisions between the GNGB and Gateway Operators regarding participation in the STN. The authorisations granted by the ACCC will expire on 10 January 2022, and GNGB has lodged an application for revocation of those authorisations and substitution by a new authorisation for a further 5 year period.

AFCA acknowledges that the proposed reauthorisation will enable GNGB to continue its important oversight role of Gateway Operators, with key involvements from the ATO and APRA. AFCA notes the expanded MoU provisions as described in the submission, and in particular the provisions relating to dispute resolution that have been developed in conjunction with the Australian Disputes Centre, with a view to simplify the disputes process.

We also note GNGB's submission that these changes do not materially impact the underlying role or functions of the GNGB nor give rise to any additional conduct that may have the effect or purpose of substantially lessening competition.

AFCA supports the continued role of GNGB in overseeing Gateway Operators and its collaboration with the ATO and the regulators in relation to matters involving the STN and DPS.

If we can assist by discussing issues, or providing further information, please do not hesitate to contact me.

Yours sincerely



**Heather Gray**  
**Lead Ombudsman – Superannuation**  
**Australian Financial Complaints Authority**