

Ms. Elizabeth Batten
Australian Competition & Consumer Commission (ACCC)
GPO Box 3131
Canberra ACT 2601

4 August 2023

Via email: exemptions@acc.gov.au

Australian Banking Association application for ACCC authorisation (AA1000645)

Dear Elizabeth,

Australian Payments Plus (**AP+**) strongly supports the application by the Australian Banking Association (**ABA**) who seek Australian Competition & Consumer Commission (**ACCC**) authorisation under the *Competition and Consumer Act 2010* (Cth) for their member banks to participate in discussions for the purpose of developing potential industry initiatives to prevent, detect, disrupt and respond to scams affecting their customers.

The ABA initiative includes elements which have a focus on early-intervention and information-sharing to disrupt certain scams. AP+ also notes that early-intervention and information-sharing are key features in the design of the government's National Anti-Scams Centre (**NASC**) now operating. This Government's coordinated public-private sector approach to scam detection and prevention is most welcome.

Overseas experience shows that this Australian approach of early-intervention, information-sharing, and public-private partnerships is the right approach to harden the Australian jurisdiction against fraud and scams. There is no single scheme, technology, entity, industry, or government that can prevent scams in isolation. Australia's banks are now leading in the detection and prevention of scams, but scams are a problem which requires commensurate effort and resources from telecommunication companies, digital and social media platforms, payment companies, crypto companies, device manufacturers and our Australian law enforcement agencies.

For example, the AP+ PayID solution helps prevent payment misdirection scams by displaying the linked business/account holder name on the payment confirmation screen. AP+ also continues to look at other scam prevention solutions, including the launch of ConnectID, our national trusted identity exchange to help prevent identity theft by making Australian's identities harder to steal.

AP+ would support the ACCC granting this authorisation as requested. We are available to answer any further questions.

Yours sincerely,



Aidan O'Shaughnessy.
Public Policy, Government & Regulatory Affairs, AP+

Australian Payments Plus (AP+) brings together Australia's three iconic domestic payment providers, BPAY Group, eftpos and the NPP (New Payments Platform) into one integrated entity. Operating in the public interest, AP+ is a member-owned organisation. Members include banks, some of the country's largest retail merchants, payment service providers and payment processors.

The AP+ integrated product roadmap includes products and rails that support opening the domestic payment flow, connecting next generation experiences to traditional payments infrastructure, driving innovation through QR (Quick Response) payments, building open wallet infrastructure and our national trusted identity exchange - ConnectID.