

Senator the Hon Jane Hume
Chair
Senate Standing Committees on Economics
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: economics.sen@aph.gov.au

2 September 2025

Dear Chair,

RE: Inquiry into Micro-competition opportunities in the Australian economy in relation to e-Conveyancing

PEXA notes the decision of the Senate to re-adopt the inquiry into Micro-competition opportunities in the Australian economy in relation to e-Conveyancing. As you are aware, PEXA has provided a submission to the inquiry and we look forward to continuing to engage with the Committee's processes, including the upcoming public hearing.

While there are a number of incorrect assertions by our competitors which are addressed in PEXA's submission and the subsequent evidence to the Committee, we would like to submit the attached [REDACTED] correspondence to assist the Committee. [REDACTED]

Sympli's supplementary submission of 9 May 2025 states:

"PEXA continues to obstruct competition reforms: There is clear evidence in the public domain that PEXA continues to obstruct competition reforms. The most recent evidence of this type of behaviour is PEXA sending legal letters to the NSW Government and the major banks threatening legal action if interoperability were to be pursued. This particular action continues to be assessed by the ACCC."¹

PEXA has a respectful ongoing dialogue with key stakeholders about our position regarding the protection of our intellectual property. As you can see from the attached example, the letter is not a

¹ Sympli Australia Ltd, Submission 2, *Supplementary Submission to the Inquiry: Micro-competition opportunities in the Australian economy in relation to eConveyancing*, 9 May 2025, at 6(c).

legal threat; it is respectful and in no-way can be characterised as, “threatening legal action if interoperability were to be pursued.”

Furthermore, Sympli has provided no examples of the “clear evidence in the public domain” it references, other than a July 2024 media article which neither explicitly nor implicitly suggest that PEXA is “obstruct[ing] competition reforms.”

Our competitor continues to misrepresent PEXA’s conduct in the market and with policymakers to unfairly and inaccurately misrepresent our behaviour. We are proud of the have strong relationships with all stakeholders in the e-conveyancing system.

I trust this information assists the Committee in its inquiry.

If you have any questions, please don’t hesitate to contact me via [REDACTED] or our Senior Government Affairs Manager, Christopher Reside, via [REDACTED] or [REDACTED]

Yours sincerely,

[REDACTED]

Clare Gill

Chief Regulatory and Corporate Affairs Officer
PEXA Group

17 April 2023

Re: Interoperability Implementation Considerations

At the Interoperability Implementation Committee meeting on Monday 27th March 2023, following concerns raised by some banks about the impacts of Interoperability on their operational processes and controls and current user experience, ARNECC asked you, and the Operations teams from the other major banks, to work with the ABA and the Program Management Group to inform ARNECC on those impacts.

PEXA encourages you to participate constructively and openly in this process.

As we approach the initial test transactions in September, it is important that ARNECC has a considered view of the impacts, as we all want to ensure that regulatory changes are designed and implemented in a way that preserves the safety, effectiveness and efficiency of the property settlement ecosystem and does not have unanticipated adverse impacts on industry participants. Your active engagement in this process will help in that regard.

In considering and discussing with ARNECC the impacts on you and your operating processes and controls, we encourage you to focus not only on the current proposed scope for Interoperability Day 2 release 1, but also anticipated impacts of future phases (including broader refinances and sale & purchase) based on your understanding to date. This would include impacts outside the direct transactional activity such as incident management, reconciliations and operational controls, settlement certainty and operational efficiencies.

We provided you with information in November 2022 to assist your understanding of interoperability and are happy to provide you with further information if that would be useful. It is, however, important that you provide ARNECC with your own perspective of the impacts, their nature and significance.

We note that Interoperability has a defined regulatory scope limited to certain fields and functions necessary for lodgement activities. Through collaboration with you and other industry participants over many years, PEXA currently offers many additional features and functions beyond the scope of Interoperability that remain proprietary to PEXA.

We ask that, in participating in the current process, you do so in a way that provides ARNECC with an understanding of the impacts on your processes and business objectives but without disclosing the detailed working of the PEXA system in a way which could provide our proprietary knowledge or intellectual property to our competitor.

Yours sincerely,

