



British Pensions in Australia Inc. PO Box 438 Gordon NSW 2072

ABN 42 186 383 389

www.bpia.org.au

Tel: 1300 308 353

email: membership@bpia.org.au

5th September 2022

Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear Sirs,

Digital Platform Services Inquiry.

I write on behalf of British Pensions in Australia Inc. (BPiA).

BPiA is a not-for-profit organisation that campaigns on behalf of British Pensioners living in Australia. The UK Government pays a lower rate of State Pension to people living in Australia than it pays to people in other countries. We believe this is wrong.

We are not a rich organisation. We are staffed by unpaid volunteers and rely solely on subscriptions and donations from our impoverished members. We do not have the resources to employ lawyers or consultants to deal on equal terms with Facebook or its parent Meta.

We use Facebook to communicate with pension recipients who might otherwise be unaware of our existence or unaware of the efforts we are making on their behalf. We use Facebook to advise pension recipients of the rules relating to UK State Pensions and changes to those rules.

Facebook is the social media app that is most used by the demographic that makes up our audience.

Facebook has recently stopped our attempts to boost our posts. They say we are a political organisation and that, as such, special conditions apply. We believe their action raises the issue of transparency in the rules Facebook sets for itself. It is not possible to ascertain why we are classified as a political organisation because the basis for the classification is shrouded in mystery. Furthermore, it is not possible to challenge this classification because there is no appeal process. It is not possible to produce the disclaimer that Meta requires because any wording we produce is rejected without an explanation for the rejection.

In short, Facebook has a dominant and important position in our modern society. This requires it to operate in an open and accountable manner. This is not happening. Regulation is required to ensure Facebook meets its obligations to the Australian public by being more transparent in the rules it sets itself. There must be oversight of the rules and the way they are interpreted.

Yours faithfully,

Patrick Edwards
President, British Pensions in Australia Inc.