

From: [Paul Zahra](#)
To: [Wu, Connie](#)
Cc: [Merger Authorisations](#); [Basile, Mark](#)
Subject: FW: Proposed amalgamation of BPAY, eftpos and NPPA [SEC=OFFICIAL]
Date: Friday, 7 May 2021 10:17:12 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Dear Connie,

Thank you for sending your query.

The ARA notes that eftpos is progressing with new product developments for retail industry use, which have been developed while operating as a separate entity. Our concern is regarding the uncertainty of arrangements in a consolidated structure, as there is no commitment to products beyond implementation of the prescribed services. As an independent entity, eftpos has maintained an ability to fund investment in these developments through its own revenues. However, in a consolidated structure, it is unclear whether future revenues would continue to be diverted towards products for retail use.

Yours sincerely,

Paul Zahra
CEO
Australian Retailers Association



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From: Wu, Connie <connie.wu@acc.gov.au>
Date: Friday, 30 April 2021 at 3:48 pm
To: Paul Zahra [REDACTED]
Cc: Merger Authorisations <MergerAuthorisations@acc.gov.au>, Basile, Mark <mark.basile@acc.gov.au>
Subject: Proposed amalgamation of BPAY, eftpos and NPPA [SEC=OFFICIAL]

OFFICIAL

Dear Paul,

Thank you for providing a submission to assist with the ACCC's assessment of ICA's merger authorisation application for the proposed amalgamation of BPAY, eftpos and NPPA. We appreciate it.

Your submission raises concern regarding the future investment funding in, and development of, eftpos payments products and services in the medium/long term beyond June 2022 (among other issues). That is, your submission notes that future funding may not necessarily be diverted to eftpos.

In order for us to better understand these issues and assess the impact of the proposed amalgamation, we would like to ask you the following questions:

1. Could you please clarify the extent to which the concerns you have raised about eftpos might apply regardless of the proposed amalgamation, and whether – and if so how – the proposed amalgamation would increase those concerns. More specifically, how would the proposed amalgamation change the incentives of the banks (and separately, NewCo) with regards to the future investment funding in, and development of, eftpos payments products and services?

If you are inclined to provide a response to the above questions, we would really appreciate it if you could do so by **7 May**. As this review is a public process, please note that we intend to publish this email and your response to our questions on the ACCC's merger authorisations [register](#).

If you have any questions or require any clarification regarding this email, please don't hesitate to let me know.

Thanks in advance for your assistance.

Kind regards

Connie

Connie Wu

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The ACCC acknowledges the traditional custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.