



28 October 2022

Senior Adviser
Financial System Division
The Treasury
Langton Crescent
PARKES ACT 2600
By email: ASICIFMReview@treasury.gov.au

Re: ASIC Industry Funding Model

The National Credit Providers Association (NCPA) is pleased to make a submission on the review of ASIC Industry Funding Model (IFM).

On the 8th August 2022, the Government announced a review of the ASIC Industry Funding Model (IFM). The purpose of the Review is to identify any refinements to the IFM that may be required to ensure its settings remain appropriate in the longer-term.

The National Credit Providers Association (NCPA) makes the following points about the Review.

- The NCPA is of the view that where possible the Industry Funding Model continues to be applied across the 52 subsectors of the financial services sector.
- The Cost Recovery Implementation Scheme is a complex document and industry would benefit from an upfront disclosure statement that details proposed changes to the Scheme in a way that is easily identified by stakeholders who contribute to funding the regulator.
- The NCPA notes the significant increases in levies each year and urges the government to give more consideration to small and medium business entities that have limited capacity to continue to contribute higher fees. This is important given the number of fees entities pay are compulsorily required to pay to other government bodies, with more to come in the future.
- In addition, the government give consideration to the collection of industry levies being applied at a time of year that is in sync with entity reporting periods and that foreshadows any changes to industry levies well in advance of any changes.

- The NCPA is also of the view that the government continue to determine what levies the regulator can charge.

For further information or if you have any questions, please don't hesitate to contact me on 0401 695 030 or email me at support@ncpa.net.au

Yours sincerely

A handwritten signature in black ink, appearing to be 'Michael Rudd', written in a cursive style.

Michael Rudd
Chairman