Australian Banking Association

Inquiry into competition reforms in electronic conveyancing

Select Committee on Competition Reforms in Electronic Conveyancing

26 September 2025

Australian Banking Association

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Key recommendations

The ABA recommends that the Committee:

1. Recommend that ARNECC ensures the scope of work to enable interoperability guarantees functional equivalence between interoperable and non-interoperable transactions and no risk of increased settlement failures.
2. Support ARNECC in considering alternative models to interoperability, such as price regulation, if the Functional Requirements Review is not able to guarantee functional equivalence and no increase in settlement failures.
3. Examine how the NSW Government can play a role in working towards a nationally consistent eConveyancing regulatory framework.

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About the ABA

The Australian Banking Association advocates for a strong, competitive and innovative banking industry that delivers excellent and equitable outcomes for customers. We promote and encourage policies that improve banking services for all Australians, through advocacy, research, policy expertise and thought leadership.

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ABA submission to the Select Committee on Competition Reforms in Electronic Conveyancing

The Australian Banking Association (**ABA**) thanks the Select Committee on Competition Reforms in Electronic Conveyancing (**Committee**) for the opportunity to comment on the inquiry into competition reforms in relation to eConveyancing.

eConveyancing is the transferring and lodging for registration of real property dealings by electronic means. It involves two main processes: the exchange of funds (**Payment Process**) and the lodgment of land dealings with Land Titles Offices (**Registration Process**). The current system relies on Electronic Lodgment Network Operators (**ELNOs**), like PEXA and Sympli, which facilitate these transactions in their entirety.

Purchasing a home is one of the most significant financial decisions a person will make in their lifetime, and eConveyancing is critical to property transactions in Australia, impacting every Australian who buys or sells a home. Our primary goal is to ensure that the customer's experience of eConveyancing is as seamless as possible, reflecting existing or greater settlement levels. Banks have worked hard to improve settlement rates since the introduction of eConveyancing, and it is the banks' customers' expectation that settlement occurs safely, securely and on time. Banks cannot accept any compromise to settlement security or certainty.

It is therefore essential that eConveyancing is conducted as effectively, efficiently and safely as possible, with the ultimate aim being that Australians continue to have the best possible experience when transacting on property, with the greatest extent of settlement certainty possible. The States-led development of an ELNO and the development of eConveyancing more broadly have been primarily aimed at achieving this goal of effective, efficient and safe transactions.

The ABA and banks have actively engaged with Australian Registrar National Electronic Conveyancing Council's (**ARNECC**) Interoperability Program (**IOP Program**) since its inception in 2019, dedicating resourcing and time to support the IOP Program's development, and providing feedback to the ARNECC on areas that must be included in the IOP Program in order to maintain or uplift customer experience and ensure its success.

The intention of the IOP Program is to facilitate competition by allowing different ELNOs to inter-operate, giving users the choice of ELNO. A detailed background to the IOP Program is at **Appendix 1**. A detailed timeline of ABA and banks' engagement in the IOP Program is at **Appendix 2.**

Industry concerns regarding the IOP Program remain outstanding and unresolved

Throughout the IOP Program, the ABA has maintained that the Program needs to ensure that the customer experience and service is maintained. In particular, we have sought to achieve two outcomes:

1. eConveyancing transactions that are interoperable must be functionally equivalent to existing transactions under a non-interoperable framework; a subscriber should not be able to distinguish between a non-interoperable and an Interoperable transaction when participating through the subscriber's chosen ELNO.

2. Interoperability cannot increase the risk of missed settlements or instances of scams and fraud, which would present an unacceptable outcome for customers.

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Despite consistent engagement with the IOP Program since 2019, significant concerns raised by banks regarding the Program's design and scope remain unresolved. In our view, if these issues are not addressed then interoperability will not achieve the intended benefits for customers and could instead increase the risk of failed settlements, scams, and fraud to customers.

eConveyancing is a complex space and the IOP Program needed to consider the full end-to-end scope of transactions. Adding additional aspects to the ecosystem without appropriate consideration could lead to significant unacceptable risks.

Noting the significance of these unaddressed challenges, the lack of process to date, and ARNECC's limited regulatory remit, the ABA is increasingly concerned as to whether interoperability can realistically be delivered in a way that maintains safe, efficient, and effective eConveyancing, as well as whether it will genuinely deliver benefits to customers.

A summary of our concerns is set out below, with **Appendix 3** setting out further detail on the ABA's position:

1. Scope and functionality of interoperability

The IOP Program has not been scoped to include all of the requirements and functionality that exist under a non-interoperable transaction. As the Program stands, this will have significant consequences for ELNO subscribers, including banks, practitioners and consumers, who will bear the impacts of interruption and increased costs of multiple different processes and delayed settlements.

No end-to-end scoping or impact analysis has been delivered, and ARNECC has not yet provided a clear pathway forward that gives industry assurance that the IOP Program can and will be delivered in a way that meets these non-negotiable scope and functionality requirements.

More broadly, we note that despite the significant time and resources invested by a range of parties, the Program has not yet delivered the expected benefits, raising doubts about the Program's feasibility and effectiveness. A lack of clear timeframe for the IOP Program and how these issues will be resolved has created significant uncertainty for stakeholders, undermining efforts to improve customer eConveyancing outcomes.

2. Trade-offs in focusing on one reform area over others

The ABA and industry have long called for consistent eConveyancing requirements and practice across jurisdictions to make it more efficient for banks and customers to transact. The current approach is fragmented, with different jurisdictions implementing eConveyancing separately leading to bespoke state-based nuances creating a complex and challenging regulatory environment.

Regulatory simplification in this space would make it easier and faster to get property transactions through the pipeline. National consistency is also crucial for the success of the eConveyancing system, and ultimately interoperability. Even though we have consistently highlighted this area of reform, this has not been prioritised due to the ongoing focus on interoperability, which remains unresolved.

The IOP model

In 2024, ARNECC commenced a review of the IOP Program, highlighting these and other outstanding issues, which the ABA welcomed. ABA and banks have constructively participated in the review and provided our feedback to help ensure the IOP Program's design was fit for purpose.

The outcome of this review was a commitment by ARNECC to deliver two further reviews, which it expects to be delivered in late October 2025:[1]

1. **A Functional Requirements Review** – which is intended to be an in-depth review of the functional requirements for interoperability.

2. **An updated Cost Benefit Analysis** – to test whether the IOP model continues to be the most appropriate model.

The ABA supports further work to clarify the specific functional requirements necessary for interoperability to succeed. We also support revisiting the costs and benefits of delivering interoperability, particularly given the time that has passed since the previous cost benefit analysis in 2020 and the challenges that have emerged with the IOP Program since then. Consistent with our approach since the program's inception in 2019, the ABA and member banks continue to engage constructively in both review processes.

While the ABA remains committed to participating in these reviews, we note that the IOP Program has been underway for several years and has involved multiple inquiries, Ministerial Forums, and reviews. Given the time elapsed since the reforms were first announced and the persistent challenges, it is not certain that the current reviews will result in a clear and feasible pathway to delivering Interoperability in a way that preserves the safety, efficiency, and effectiveness of eConveyancing. In the meantime, industry continues to invest significant resources in ongoing meetings, workshops, inquiries, and reviews.

The previous cost benefit analysis

The ABA notes that previous cost benefit analyses have cited relatively modest cost savings for IOP – for example, in 2020, one analysis found the cost saving per transaction for consumers moving from PEXA to Sympli could save $15.14 per transfer. If PEXA were to reduce prices by 7.5 per cent (as modelled), consumers would save $8.56 per transfer – a relatively modest reduction in cost that has yet to be realised despite the allocation of resources and time over the past six years.

Similarly, an IPART report in 2019 noted a PEXA fee for transfer document with financial settlement of less than $112 for the average property transaction, and ultimately concluded the fees were reasonable.[2] The median loan amount for a new loan in Sydney in June 2025 was $816,000. By comparison, the current PEXA fee for a Transfer of Title is $140.58, this equates to 0.02 per cent of the value of the transaction – a very marginal sum in the overall cost involved in a person buying a home.

The ABA notes that ARNECC is currently preparing an updated cost benefit analysis and is supporting that process. It is important that as part of that process ARNECC must address the investment and impact required to implement interoperability by all of industry and government, not just ELNOs, in assessing whether the current model is fit for purpose. This will ensure more accurate analysis regarding the actual costs and benefits of any reform for customers.

Alternate Models to IOP

Depending on the outcome of the current review, the ABA believes it may be time for ARNECC to consider alternative models that can deliver genuine customer benefits and make it easier and more affordable for customers to settle property transactions. We note that the updated cost benefit analysis is considering alternative models.

[1] There is a third review, Regulatory Review Uplift, which the ABA has not been invited to participate in to date, see ARNECC Project Update 2025.
[2] Review of the pricing framework for electronic conveyancing services in NSW.

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Prior to the commencement of the IOP Program, different models for introducing competition were considered. One example is the Infrastructure Model, which involved a single registration and payment process provided by the incumbent ELNO, with other ELNOs differentiating on the user facing services offered to subscribers. At the time, the ABA supported this model, noting that it would be more efficient to implement, and likely lower costs compared to the most recent IOP proposal. Given the changes to the eConveyancing ecosystem since 2019, any future support for a similar model would be contingent on it being safe, efficient, and effective.

Any alternate model would need to ensure functional equivalency, have clarity on service levels, responsibilities, and chargebacks between stakeholders.

Price Regulation

In our view, another viable alternative is enhanced price regulation, which could achieve similar cost savings for consumers without the complexities and risks associated with interoperability.

We note that IPART is currently considering the fees ELNOs may charge for eConveyancing services as part of its Review of Electronic Lodgment Network Operator service fees.[3]

The ABA noted in our submission to that review that given the market dynamics have not changed since the introduction of the current regulations these settings should remain in place. Further, the ABA supports further pricing regulation in circumstances where the current market concentration remains without any move towards competition.

The ABA understands that, under the existing Model Operation Rules, ELNOs are allowed to raise the prices outlined in their pricing schedules once a year on 1 July, by up to the year-on-year CPI growth. They are also allowed to pass through additional 'Government Charges' with approval from each State and Territories' Registrar General.

Further discussion of the existing regulation in eConveyancing is at **Appendix 4**.

Price Controls Consultation and Governance

Beyond the Price Control mechanism, the ABA is concerned that there has been insufficient transparency and consultation around the 'passing through' of government charges. In addition, the application of the Model Operating Rules appears to be inconsistent across different states and Territories.

An example that highlights these concerns is the recent introduction of a fee relating to the National Electronic Conveyancing Data Standard (**NECDS**) and its ARNECC-owned holding entity NECDS Ltd. The ownership and responsibility for all eConveyancing technical and data standards was transferred from PEXA to NECDS Ltd. This involved ARNECC paying PEXA for the eConveyancing technical and data standards. The aim of this transfer was to ensure fair and equal access to the standards and objective oversight and management of the standards, therefore facilitating interoperability.

The ABA considered the consultation on the NECDS fee inadequate and the process overly complex. ARNECC set the fee, ELNOs decided whether to pass it on, ELNOs applied to each Registrar General for approval, each Registrar General made an individual determination, and ELNOs then notified subscriber. It is unclear why only NSW has currently not approved passing the fee on given states and territories are applying the same Model Operating Rules. This inconsistent outcome is another example of the need for national consistency and the need for greater price transparency. As a result, there are additional costs resulting from interoperability without any of the supposed benefits and no clear pathway to those supposed benefits.

[3] See, Review of Electronic Lodgment Network Operator service fees.

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Appendix 1 – Background

Below, we set out relevant background information for the Committee to refer to when considering competition in eConveyancing.

Overview of eConveyancing

eConveyancing is the process of transferring and lodging for registration interests in real property by electronic means. This entails two distinct but non-severable processes, namely:

1. The payment process permits the exchange of funds in connection with real property transactions (**Payments Process**).

2. The registration process permits the lodgment with LTOs of dealings in connection with real property transactions (**Registration Process**).

Subscribers originate these processes in an ELNO approved by Land Registrars (PEXA or Sympli).

Financial institutions (including the Reserve Bank of Australia) handle the Payments Process, while LTOs handle the registration of dealings following their lodgment via an ELNO.

Overview of Electronic Lodgment Network Operators

The first ELNO, PEXA, was established in 2010 by state governments to enable conveyancing to take place electronically as an end-to-end process.

To enable this single process approach, PEXA has over time developed tightly integrated systems with LTOs and banks. This enables very high rates of eConveyancing transactions to take place without fail (success rate is close to 90 per cent), which reflects a steady increase since the inception of eConveyancing.

In 2018, the relevant government parties sold their stake in PEXA. In recent years Sympli has emerged as alternate ELNO. Both these ELNOs enable settlements on their own tracks. For a PEXA settlement, all parties to a transaction must use PEXA. For a Sympli settlement, all parties must use Sympli.

Overview of the IOP Program

In 2018, the NSW Government looked into the possibility of establishing interoperability between multiple ELNOs. States considered different models for introducing competition, including a direct connect model which caters for 2 ELNOs, an infrastructure model and a hub and spoke model which would scale to multiple ELNOs. Subsequent cost benefit analyses (although limited in which costs/benefits they included) also explored alternative options, such as price regulation.

At the time, the ABA supported an infrastructure model where there was a single Registration Process and Payments Process used by all ELNOs, with ELNOs differentiating on services offered to subscribers like law firms and banks.[4] In the ABA's view, the infrastructure model had potentially lower costs, risks and complexity, and would have been easier to implement for all parties. ARNECC ultimately proceeded with a different model, reflecting today's work on IOP.

Since then, there has been a string of industry working groups, investigations, consultations and reports over more than six years on how implementing the IOP Program could best be achieved. The ABA and its member banks have participated in or contributed to these working groups, investigations and

[4] 8 July 2019 -ABA-submission-on-Interoperability-Report.

consultations, expending considerable resources throughout the process. Despite this there still significant obstacles to Interoperability.

Issues with national consistency

ARNECC was established by the 2011 Electronic Conveyancing National Law Agreement (**Intergovernmental Agreement**) entered into by the State and Territory governments to provide governance for the development, implementation and management of the regulatory framework for electronic conveyancing in Australia.[5]

The Intergovernmental Agreement states that one of ARNECC's functions is to "*ensure that, as far as is practicable, business practices with respect to national eConveyancing are consistent when implemented in each jurisdiction."* The ABA notes that some LTOs appear reluctant to adhere to the principle of national consistency for eConveyancing requirements. This continues to result in greater regulatory burden, operational complexity and reduced efficiency for all parties involved, but especially customers.

In our view, national consistency is key to the success of eConveyancing and any model of interoperability. The ABA has maintained this view since the commencement of the Interoperability Program, stating in 2019, *"any model for interoperability among ELNOs should fit within a nationally consistent framework for eConveyancing*."[6]

The ABA has written to various State and Territory Land Titles Offices and raised this with ARNECC on numerous occasions, seeking national consistency of eConveyancing regulation to be adopted, and in the interim, for individual States and Territories to work more closely together to align the roll out of eConveyancing and related requirements. Our view is this has not been achieved.

The ABA recommends the Federal Government play a role in working towards a nationally consistent eConveyancing regulatory framework.

Appendix 2 – Timeline

IOP was due to be completed in late 2021.[7] This timeframe was extended to mid-2023 because of stakeholder concerns. The timeline was then extended again to December 2025 to provide more time to scope, design and test the IOP Program and resolve outstanding issues. In September 2024, ARNECC paused the design, build and test working groups for the IOP Program and stood down the IOP Project Team for an unspecified time period to conduct a review into the issues.[8]

In February 2025, ARNECC released a statement outlining its next steps on the IOP Program.[9] The outcome of the review is a further review and a second cost benefit analysis to assess different models. ARNECC's statement on review noted that *"most stakeholders consulted continue to support competition generally and interoperability specifically provided it does not result in significant changes to their existing processes, increase risks or increase costs."*

The statement accepted that *"Further work is required to finalise a functional scope for any interoperability program which will maintain an equivalent subscriber experience for interoperable and non-interoperable transactions, with subscriber feedback and engagement beyond ELNOs required…[and] an uplift in governance of projects is required to facilitate any further analysis and to ensure appropriate risk management and decision making."*

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[5] Intergovernmental Agreement For An Electronic Conveyancing National Law.
[6] 8 July 2019 -ABA-submission-on-Interoperability-Report.
[7] 7 September 2020, Ministerial direction on a competitive market structure in the eConveyancing market.
[8] 20 September 2024, ARNECC's Decision on Interoperability.
[9] 19 February 2025, Next Steps on Interoperability.

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Importantly, the statement found that *"given the previous cost benefit analysis was conducted in 2020, it is appropriate to refresh the cost benefit analysis to confirm that the current interoperable model remains the best and most cost-effective model."*

For the Committee's benefit, a timeline of key events is set out below, noting industry meetings with ARNECC and government on the IOP Program continued on an ongoing basis throughout this period.

Item	Date	Detail
ARNECC establishment	2011	ARNECC is constituted under an Intergovernmental Agreement among the State and Territory Governments. ARNECC's purpose is to provide advice (among other things) about matters relating to eConveyancing.
States sell stakes in PEXA	2018	
NSW Premier letter to IPART	29 January 2019	Then NSW Premier, Gladys Berejiklian, writes to IPART (cc'ing Minister Dominello) requesting the Tribunal conduct a review into the pricing framework for eConveyancing services in NSW. The letter notes the findings would be shared nationally via ARNECC.
NSW Government commences IOP Program	February 2019	The NSW Government published a Directions Paper on a proposed eConveyancing interoperability regime. The NSW Government expressed an in-principle decision that interoperability between ELNOs should be mandated in NSW.[10]
IPART review	November 2019	IPART review finds that eConveyancing market is highly concentrated, and that interoperability would improve competition and reduce barriers to entry in the conveyancing market.
ACCC report	December 2019	The ACCC published a report on e-conveyancing reform, noting that enabling competition via interoperability was its preferred approach. It stated that the Australian Registers National Electronic Conveyancing Council (ARNECC) was best placed to carry the reform forward.[11]
Review of IGA on eConveyancing national law	December 2019	The review, commissioned by ARNECC, recommends that national regulators determine the regulatory, governance and management requirements for competition in the ELNO market, as a matter of urgency. ACCC concurrently undertakes work on market structure options.
ARNECC action	June 2020	ARNECC undertakes to compare the costs, risks, and liabilities of various eConveyancing market structures. The Office of the NSW Registrar General commissions a Cost Benefit Analysis comparing interoperability with alternative structures.
Joint Commonwealth, State and Territory Ministerial roundtables	10 June, 7 September, and 7 December 2020	Three Ministerial Roundtables are held on IOP, with the following outcomes: - Ministers ask ARNECC for a proposal to implement a national interoperability regime, including the benefits and costs of potential regulations. - Ministers support interoperability being part of the eConveyancing national law and ARNECC's work to implementing legislative changes to facilitate interoperability by mid-2021.
Joint statement	12 March 2021	Commonwealth, State and Territory Ministers, ELNOs and stakeholder peak bodies publish a joint statement supporting interoperability and a proposed timeframe to implement legislation by mid-2021 and go-live with a first interoperable transaction by the end of 2021. **Note – first 'test' transaction occurs end of 2023. Live transactions are yet to occur.*
Madate Interoperability	May 2022	The NSW Parliament passed the Electronic Conveyancing (Adoption of National Law) Amendment Act 2022, which required ELNOs to ensure networks are interoperable.
Ministerial Forum	February 2023	Ministers met to discuss progress of interoperability implementation. Ministers noted that a limited scope 'Day 1' transaction was expected for September 2023, with the scope and timetable for 'Day 2' (the delivery of interoperability functionality to market) still to be settled. Day 2 would be delivered in three stages ('releases').

[10] February 2019, NSW Government commences IOP Program
[11] December 2019, ACCC report

Item	Date	Detail
Ministerial Forum	November 2023	Ministers noted a Day 1 transaction took place in September 2023. Ministers noted the timing for the three releases for Day 2, with full interoperability functionality set to be developed by end-2025. The ABA outlined its significant concerns with the IOP Program. The ABA noted it had raised the same concerns throughout the IOP Program.
Timetable for interoperability	31 January 2024	ARNECC formally publishes timeline for IOP with go-live in December 2025.
IOP pause	September 2025	ARNECC pauses the IOP Program and commences a review into the IOP Program to-date.
ARNECC update on next steps	February 2025	ARNECC announces the results of its review and announces further consultation on the next steps of the IOP Program, being an in-depth review of the functional requirements for interoperability and that it would create a new governance structure to oversee the review. The review will include a further cost benefit analysis The review is expected to be completed in around October 2025.
ARNECC update on reviews	July 2025	ARNECC provides an update on the timing of the Functional Requirements Review and Cost Benefit Analysis, including that it expects these reviews to conclude in late October 2025.

Appendix 3 – ABA position on the IOP Program

Australian banks have long supported the IOP Program, including its potential competition benefits. However, our support for the IOP Program is strictly contingent on eConveyancing transactions under interoperability being substantively the same as those under a non-interoperable framework. These contingencies, known as our **Core Requirements**, include:

- Maintaining the current functionality of eConveyancing; and
- Not increasing the risk of missed settlements nor scam and fraud incidents. That is, ensuring customer experience is at a minimum maintained and ideally uplifted.

We have significant concerns about the ability for the current IOP Program to deliver these Core Requirements. In our view, the previously proposed models for interoperability would have created a poorer experience and increased the financial risks to ELNO subscribers and consumers.

One of the key factors that enables banks to complete the vast majority of eConveyancing transactions and settlements without delays is the degree to which banks are tightly integrated with all aspects of the User Interface features/triggers for one incumbent ELNO, including lodgment, payment, settlement, and reconciliation. Collectively, these items make up the scope of an eConveyancing transaction. This integration and scope greatly facilitate the banks' management of and preparation for large numbers of transactions in an efficient and timely manner. Without the same level of integration and scope for an Interoperable transaction as a non-interoperable transaction, transactions may break and result in settlements being delayed.

Based on current state, the ABA estimates that delay rates and fraud rates for eConveyancing transactions could increase, posing an unacceptable risk to customers and banks. Beyond delays, the current level of integration also supports participants in addressing fraud and payment risks. To achieve interoperability and meet the Core Requirements, all ELNOs need to have the same integration to LTO and bank systems.

Banks have raised concerns at multiple stages of the IOP Program, highlighting deficiencies in the scope of the IOP Program, the lack of functionality that interoperability will deliver, and the consequent worse outcome for consumers. These concerns have not been adequately addressed. In part, this is due to there being no responsible body to deliver interoperability for the benefit of all parties involved,

including ELNOs, banks and conveyancers. While ARNECC is overseeing the IOP Program, it has stated that its remit and focus is limited to the registration of real property dealings. Notwithstanding ARNECC's attempts to address these issues over several years, including through the 2024 pause and review of the IOP Program, these issues have not been resolved.

In the ABA's view, ARNECC must take responsibility for developing a clear program to deliver of the full scope and functionality of interoperability and achieve national consistency. ARNECC would need to be appropriately funded to achieve this.

More broadly, the ABA submits that based on the nature of ongoing issues and the amount of time that has passed, the Committee should explore alternative models such as price regulation. The ABA is working with the Functional Requirements Review to explore this and other models as part of its review to inform whether the current model is fit for purpose.

Appendix 4 – eConveyancing Regulation

In 2022, the Electronic Conveyancing National Law (ECLN) was amended to support the introduction of interoperability. We draw the Committee's attention to the amended ECLN which requires an ELNO to establish and maintain interoperability, stating that:

> *A person approved as an ELNO under section 15 must, in accordance with the operating requirements, establish and maintain interoperability between the ELN operated by the person and each ELN operated by another ELNO.*[12]

Section 22 of the ECNL states that the Registrar may determine the operation requirements for an ELNO, which can include requiring an ELNO to enter into agreements with other ELNOs with respect to interoperability, and specifying matters to be dealt with, and standard provisions to be included, in those agreements.[13]

In the ABA's view, the powers granted to the NSW Registrar under ECNL have not been sufficiently used to advance interoperability.

Under the ECNL, ELNOs are required to comply with operating requirements made by the Registrar in each State and Territory. ARNECC has developed Model Operating Requirements (**MOR**) which are then implemented as the operating requirements required by the ECNL in each participating electronic conveyancing jurisdiction.

Relevantly, the MOR restricts ELNOs' price increases to being aligned with CPI. Therefore, competition is not the sole mechanism for determining pricing in eConveyancing.

We note the focus of the ECNL, and the operating requirements and participation rules made under it, is the Registration Process. The other crucial element of the eConveyancing system, the Payments Process, is managed through agreements between the ELNOs and financial institutions and by the Reserve Bank of Australia's rules for payments through the RITS system. Since 2023, financial institutions and ELNOs have been working with AusPayNet on the development of an eConveyancing Payments Code which is due to come into operation in the near future.

However, there is no end-to-end oversight of the entire eConveyancing process. In addition, each jurisdiction has specific nuances to the implementation of eConveyancing. This creates a complex and challenging regulatory environment.

[12] *Electronic Conveyancing (Adoption of National Law) Act 2012* (NSW), Appendix section 18A.
[13] *Electronic Conveyancing (Adoption of National Law) Act 2012* (NSW), Appendix section 22.

The ABA considers the Committee should look at the powers available to LTOs with respect to interoperability and regulation of eConveyancing more broadly and whether they have been appropriately used to improve customer outcomes.