Submission template

### Regulating to reduce Merchant Service Fees

### Instructions

This is the template for those wanting to submit their response to the *Regulating to reduce Merchant Service Fees* discussion document.

The Ministry of Business, Innovation and Employment (MBIE) seeks written submissions on the issues raised by 10 am on Friday, 19 February 2021. Please make your submission as follows:

1. Fill out your name, organisation and contact details in the table, “Your name and organisation”.
2. Fill out your responses to the discussion document questions in the table, “Responses to discussion document questions”. Your submission may respond to any or all of the questions in the discussion document. Where possible, please include evidence to support your views, for example references to independent research, facts and figures, or relevant examples.
3. If you would like to make any other comments that are not covered by any of the questions, please provide these in the “Other comments” section.
4. When sending your submission, please:
	1. Delete this first page of instructions.
	2. If your submission contains any confidential information:
		1. Please state this in the cover page or in the e-mail accompanying your submission, and set out clearly which parts you consider should be withheld and the grounds under the Official Information Act 1982 that you believe apply. MBIE will take such objections into account and will consult with submitters when responding to requests under the Official Information Act.
		2. Indicate this on the front of your submission (eg the first page header may state “In Confidence”). Any confidential information should be clearly marked within the text of your submission (preferably as Microsoft Word comments).

Note that submissions are subject to the Official Information Act and may, therefore, be released in part or full. The Privacy Act 1993 also applies.

1. Send your submission as a Microsoft Word document to competition.policy@mbie.govt.nz

Please direct any questions that you have in relation to the submissions process to competition.policy@mbie.govt.nz.

Submission template

### Regulating to reduce Merchant Service Fees

### Your name and organisation

|  |  |
| --- | --- |
| **Name** |  |
| **Email** |  |
| **Organisation/Iwi** |  |

[Double click on check boxes, then select ‘checked’ if you wish to select any of the following.]

[ ]  The Privacy Act 1993 applies to submissions. Please check the box if you do not wish your name or other personal information to be included in any information about submissions that MBIE may publish.

[ ]  MBIE intends to upload submissions received to MBIE’s website at [www.mbie.govt.nz](http://www.mbie.govt.nz). If you do not want your submission to be placed on our website, please check the box and type an explanation below.

I do not want my submission placed on MBIE’s website because… [Insert text]

### Please check if your submission contains confidential information:

[ ]  I would like my submission (or identified parts of my submission) to be kept confidential, and **have stated below** my reasons and grounds under the Official Information Act that I believe apply, for consideration by MBIE.

I would like my submission (or identified parts of my submission) to be kept confidential because… [Insert text]

|  |  |
| --- | --- |
|  | Do you have any feedback on our proposed approach to this project?  |
|  | *[Insert response here]* |
|  | Have we described the retail payments system accurately? Is there any additional information that you would like to provide? |
|  | *[Insert response here]* |
|  | Please provide information on your understanding of the levels of merchant service fees in New Zealand, any trends in relation to those fees, and how they compare to merchant service fees in overseas jurisdictions.  |
|  | *[Insert response here]* |
|  | What is your view on charges incurred by cardholders for the use of payment methods? |
|  | *[Insert response here]* |
|  | What impacts do you believe rewards and inducements have on the retail payments system? |
|  | *[Insert response here]* |
|  | What is your view on charges incurred by merchants for the use (acceptance) of payment methods? |
|  | *[Insert response here]* |
|  | Please provide your views on barriers to merchants steering consumers to lower cost payment methods and the extent that steering occurs? |
|  | *[Insert response here]* |
|  | Please provide your views on the barriers to merchants surcharging and the extent that surcharging occurs?  |
|  | *[Insert response here]* |
|  | What is your view of the wealth transfer by merchants passing on merchant service fees in the price of goods and services to all their consumers? |
|  | *[Insert response here]* |
|  | What barriers do small businesses face to obtaining competitive merchant service fees? |
|  | *[Insert response here]* |
|  | What information or assistance would assist small business to obtain better deals?  |
|  | *[Insert response here]* |
|  | What cost differences are there for providing merchant services to small businesses compared with larger businesses? |
|  | *[Insert response here]* |
|  | How much competitive discipline does EFTPOS provide on scheme debit card merchant service fees and are there any barriers to domestic EFTPOS providing more competitive discipline on merchant service fees? |
|  | *[Insert response here]* |
|  | What impact is product innovation having on merchant service fees? |
|  | *[Insert response here]* |
|  | Is open banking likely to provide sufficient competitive discipline on scheme debt and credit fees? |
|  | *[Insert response here]* |
|  | Do you agree that there is a gap in regulatory governance of the retail payments system relating to promoting competition and outcomes that are in the long term benefits of end-users? |
|  | *[Insert response here]* |
|  | Please feel free to provide information on any other issues of concern with the performance of the retail payments system.  |
|  | *[Insert response here]* |
|  | Do you agree with the objectives for the retail payments system in New Zealand? |
|  | *[Insert response here]* |
|  | Please provide feedback on the aspects of the proposal for interchange regulation, including any changes that would improve the impact of it, with supporting evidence of any benefits or costs.  |
|  | *[Insert response here]* |
|  | Please provide feedback on which body or bodies would be best placed to act as the regulator for interchange fee regulation. |
|  | *[Insert response here]* |
|  | Please provide your views on the impacts of the above classes of options, with supporting evidence of the benefits and costs. |
|  | *[Insert response here]* |
|  | Please provide your views on any other feasible options that should be considered, with supporting evidence of the benefits and costs of these options.  |
|  | *[Insert response here]* |
| **Other Comments**  |
| *[Insert response here]* |