



Law Council
OF AUSTRALIA

Office of the President

23 September 2025

Ms Heather Dear
Principal Analyst
Independent Pricing and Regulatory Tribunal
PO Box K35
HAYMARKET POST SHOP NSW 1240

By email: ipart@ipart.nsw.gov.au

Dear Ms Dear

Review of Electronic Lodgment Network Operator service fees

The Law Council appreciates the opportunity to contribute to the Independent Pricing and Regulatory Tribunal's Review of Electronic Lodgment Network Operator (**ELNO**) service fees.

The Law Council has had the benefit of reviewing the submission by the Law Society of New South Wales (**LSNSW**). The Law Council broadly supports the positions expressed in the LSNSW's submission. In particular, the Law Council agrees that:

- while the implementation timetable for interoperability remains uncertain, and until there is sufficient competition in the market to create adequate pressure on prices, it remains appropriate for ELNO service fees to continue to be regulated;
- the current approach to regulating ENLO service fees, as set out in Requirement 5.4 of the Model Operating Requirements, is appropriate;¹ and
- the current approach should be extended to 30 June 2028, with a review of ELNO service fees conducted in 2027.

The Law Council would welcome the opportunity to discuss these matters further. In the first instance, please contact Mr John Farrell, Executive Policy Lawyer [REDACTED].

Yours sincerely

Juliana Warner
President

¹ Australian Registrars' National Electronic Conveyancing Council, *Model Operating Requirements* (Version 7.1, February 2025).