

**From:** Matthew Addison <matthew@icb.org.au>  
**To:** Registry Modernisation <regmod@TREASURY.GOV.AU>  
**Subject:** Review of Registry Fees

Apologies for the provision of these late thoughts

#### Context

Fees to obtain registry data have been a consequence of pre-technology registers and multiple data sources requiring significant manual intervention to provide the output of the data.

#### Concept

in 2019 and beyond technology led solutions provided to the nationwide economy should be a government provided service and not normally subject to user or activity based fees

#### Exceptions

Where a “registrar” also has a compliance role then the performance of review or compliance services may have a fee.

#### Noting

The company annual return fee collected by ASIC is considered a government “rort” as there is no human involvement and it is simply a fee for existence.

#### Proposal

Annual review should be required.

No fee for entities that review and update their information

late fees or non-lodgement fees should be applied to the non-compliant.

Search fees should NOT be required normally. Consideration may be given where the search or the download is significant however evidence and examples would be required to justify any such fee for this service.

In a full MBR system where the registry is providing business information, maybe a fee for use of the “non-registrar” services could be considered on a fee for service.

We struggle with the concept that the size of the entity should determine the fee. Would it not be more equitable for it to be subject to the amount of data being utilised.

#### Disagree

Do not replace late fees with an interest charge. Certainty of a known amount for being late is easy to comprehend.

Do not impose an infrastructure fee - this is called tax. The general tax system / budget should fund the infrastructure.

#### QUESTIONS

1. Agree.
2. No annual fee, late fee if you do not review your data.
3. No. Size of entity should not be the determination
4. Known amount provides certainty. Late fee with known timeframes is supported
5. No (do not change to interest rate) Interest on what base amount? No. poor idea
6. late review fees - yes, late payment fees - subject to what the payment was for? We would prefer a constructive penalty for late payment - removal of right to trade (eventually).

7. Normal searches - no fee. Extensive data base trawling or extraction of business use data may be subject to a fee
8. No
9. n/a
10. No - ridiculous quantum of fee has been applied to this service in the past.

kind regards

Thanks  
Matthew

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