

SUBMISSION TO THE AUSTRALIAN COMPETITION AND CONSUMER COMMISSION (ACCC) RETAIL DEPOSITS INQUIRY

But it wouldn't be make-believe if you believed in me. (Whisper it nicely to Bettina)

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MACQUARIE BANK AND HOUSING INDUSTRY PRACTICES APPEAR ANTI-COMPETITIVE AND SO SET TO GENERATE AND SUPPRESS CONFUSION AND LOSS WITH POTENTIAL FOR OVERSERVICING, CORRUPTION RISK AND COST AS USUAL (NO WONDER SO MANY AUSTRALIANS WOULD APPARENTLY PREFER TO LIVE IN DETACHED HOUSES ON THEIR OWN)

The current Treasurer, Jim Chalmers, directed the Australian Competition and Consumer Commission (ACCC) to hold an inquiry into the market for the supply of 'retail deposit products' (sic.). The ACCC '*will examine competitive dynamics and consumer outcomes in the supply of retail deposit products by authorised deposit taking institutions (ADIs)*'. The **ACCC Retail Deposits Inquiry Issues Paper** was produced in April 2023. One normally thinks of banks as suppliers of retail deposit products. However, there were over 90 authorised deposit taking institutions (ADIs) in Australia in 2022, according to the **ACCC Issues Paper**. In aggregate the big four banks (Commonwealth Bank of Australia (CBA) Westpac, National Australia Bank (NAB) and ANZ Bank) hold about 73% of all household deposits. The next six largest have shares ranging from 1.1% to 4.1%. These include Macquarie Bank, which has a 4.1% share of household deposits (p. 6). I discuss the Macquarie Bank relations with strata managers because they appear dangerously costly and against the interests of most Australian owners of group property on Australian grounds. I assume Macquarie Bank working with strata managers poses an even greater risk of accelerating rents for renters.

Files of evidence are attached on how some financial matters appear increasingly alarmingly treated by service providers to the collectively owned grounds of all, themselves included. The outcome of their unwise organisational aims appears to be to discourage most housing owners and renters poorer than the normal population, from owning or renting their own accommodation on a reasonable basis. The top 10% of population appear increasingly able to garner larger proportions of housing and rent control for their own advantage. This fact of life, observed by many, especially since more general consideration of the global financial crisis of 2008, makes nonsense of Australian Competition and Consumer Commission (ACCC) assumptions addressed later and attached. I don't like how Macquarie Bank and strata managers are going too opaque to challenge either.

In the current international context, I was particularly impressed by the respective speeches on housing, migration intake and education, which were given at the National Press Club on ABC free to air TV in recent weeks by the National Greens leader, Adam Bandt, and the

Minister for Home Affairs and Cyber Security, Claire O'Neil. These matters are here addressed in regional and person-based contexts of inclusive service to the Australian people, whose interests its governments are cooperatively expected to represent. They can only do so comparatively effectively with better managed competition to achieve national, corporate and individual goals, as former PM, Kevin Rudd pointed out in his book, **The Avoidable War** (2020). National challenges are often international challenges happening elsewhere. I recommend re-reading **The Money Men: Australia's 12 Most Notable Treasurers** (2015) by the Minister for Climate Change and former Labor Treasurer, Chris Bowen. As Alan Kohler wrote, *'Chris Bowen is the first candidate for Treasurer who has publicly studied his predecessors. The result is brilliant: it informs us as much as it undoubtedly did him.'* Bowen's book was a big help to me in understanding Australia's historical and economic place in the world in shared party terms. His discussion at Gleebooks showed an impressive mastery of his subject. However, the Whitlam years which produced Jim Cairns as Treasurer, thinking globally about where money for further development might come from, was far ahead, perhaps, of Bowen's time. Cairns explored the global availability of cheaper funds for Australian development and how such funds may be garnered and treated better in the national and global interest in healthier environments. The ACCC claims to have a similar interest in broadening the funding base for home building, accommodation management and renting but focuses too narrowly and wrongly to do it. The attached file entitled Economists, lawyers and psychologists shows how simpler regional service approaches of the Whitlam years gave way to multiplying professional closures as part of the US diaspora of service production. The Macquarie Bank and its cash management and payment systems DEFT and SMATA allow the comparatively old and rich investors globally to buy more dwellings in Australia. A compliant global service, which is delivered best to the Macquarie Bank and housing investors rather than Australian residents and renters results.

The articles ***Young have given up on home ownership*** and ***How the Australian Dream turned into a nightmare***, in the Sydney Morning Herald (24.4.23,) show that the proportion of home buyers tapping the bank of mum and dad has climbed from 15% in 1980 to more than 40% today. As a member of the bank of mum, I'm not surprised because it can be a great way to avoid bank or other fees and charges, thus setting your own agenda for your funds' expenditure better, without interference and cost being generated by others working to their own advantage. I guess most of us have far more reason to trust our kids than others, as long as they have good stable jobs. Since 2005 we are told, however, that in Sydney and Melbourne the median house price has climbed 3.5 times the inflation rate and 2.5 times the increase in average weekly earnings. Driven by lifestyle and building industry expectations and their global advertising to the customer through mobile phone and other new technology, expectations are naturally geared to rise all round, like daily shampoo and hair conditioning. It seems to me product and price increases are increasingly socially dysfunctional. For example, government provides some of the richest support to those buying up an increasing number of existing homes, compared with the rest of us who own one or two, as a simple and long-term investment. I want a fund manager that is far more accessible and consumer focused than Macquarie Bank, acting in company with its

supporting strata managers. Why is the ACCC focus only on the big four bank funds? See a related discussion attached where I support employer fears that the Albanese government could increasingly use the **National Reconstruction Fund (NRF)** and other funds to poorer regional and international population and environment effect because of its association with powerful trade unions seeking short-sightedly to improve their members positions. I address State Super and Aware Super funds later in this context of better service to current and future members of the society and beyond through more adequate, stable, housing.

Macquarie Bank and strata managers practices appear anti-competitive and likely to lead to increased confusion, delay, cost and related risks of corruption

As an owner of a Glebe townhouse, living in a group of 18, on the plot managed under strata plan 10775, I address *the nature and extent of price and non-price competition, in the supply of retail deposit products, including barriers to entry and expansion, innovation, and factors affecting customer switching (p.2)*. I am trapped by the Macquarie Bank and the fact that strata managers who have replied to my query, claim they all use its electronic funds transfer system (DEFT) for quarterly strata levy collection, and a related filing system (SMATA) for strata cash management business. The result is sending strata plan owners and renters costs soaring because these systems appear increasingly opaquely managed at will by those in a position to establish them, the Macquarie Bank and strata managers, who all claim to use Macquarie as their banker. The unnecessary cost in time and money seems likely to be as endless as their power to control us, the people to whom they are supposed to provide a service. This isn't a service as much as an anti-competitive trap.

All this wouldn't matter so much if we trusted that DEFT and SMATA were just going through teething problems which would sort themselves out in the end in our interests as owners of the plots, and as renters or providers of services to the plots in other fields. Some of us in Australia, as a result of experience, don't trust gamblers who play their very powerful cards very close to their chests, against the very puny interests of forced consumers of their product. This use of DEFT and SMATA appears far from the perfect information supposedly leading to perfect competition. Formerly, as owners and strata committee members on this site we got more clear and regular information about the payment systems and expenditure patterns of strata plan 10775 than we have been getting since 2022. The systems now split us owners up as much as possible to reduce our comparative knowledge and to avoid detection by anybody seeking the public good, including those wanting to live in shared accommodation without undue extra harassment from 'service' providers.

I don't trust the Macquarie Bank because I'm not particularly rich, young or stupid. I remember the causes and aftermath of the global financial crises of 2008, and I have read a lot about the role of housing management and construction in driving global instability and inequality in the interim. It isn't that I don't trust cooperation and yearn eternally for more competition, like Gina Cass-Gottlieb who heads and speaks more clearly for the ACCC in that vein, in an article entitled **ACCC steps up probe into major banks on deposits** in the Sydney Morning Herald (SMH 22.4.23, Business 2). According to Cass-Gottlieb, the ACCC is *seeking to test whether we're seeing more competitive differentiation now* because *'we do have to*

start with a level of concern about how effective competition is in Australian banking, where the big four banks hold about 73% of all household deposits.’ One needs to address the broader regional market place and potential for suitable funds to be found so as to allocate investments in the public interest instead. The ACCC focuses narrowly on the comparatively well known as usual. This is a recipe for disaster because it tends to lean to the earlier global pull of old-fashioned reliance on US and earlier British rulers, instead of including others which may see opening up to us as being more in the interests of all populations that any development is expected to serve, now and in future, as well as in the past.

One assumes the interests of consumers or key stakeholders in any government or voluntary funding matter, is to enjoy life while reducing its risks, including financial loss. This is not the same as the ‘keeping up with the Jones’ mentality encouraged in product advertising and industry driven legislation. (*I got bills, I gotta pay, so I can work, work, work, every day*’ as the song has it.) I will address the controlling role of the Macquarie Bank closure with DEFT and SMATA and strata managers in this international trading and personal risk management context later, but first with reference to John Kay’s book **Other People’s Money: Masters of the Universe or servants of the people**’ (2015). Kay claims that the purpose and effect of ‘fintech’ innovation has been to dump risk on those who understand least about it. Risks have been less and not more effectively managed as a result of the transfer. This criticism may be made of the technology used by the Macquarie Bank and the related lack of choice it offers the captured owners and renters of Australian property. A similar criticism may be made of the approach to competition which is taken by the ACCC in regard to Australian banking and other fund management. It isn’t wide or regional enough to inform us better about anything much that could be of use under the international and regional pressures on us and the world now and in future. I vote with the kids because I remember better days in the past. Since the eighties the problems partly created by industrial and professional capture of government globally and locally appear worse.

For example, in a copy of the Evatt Journal entitled **90 Seconds to Midnight**, (April 2023), Sharan Burrow, Former General Secretary of the International Trade Union Confederation and President of the Australian Council of Trade Unions writes about **The Quest for Peace and Common Security** as if trade unions have overwhelmingly supported this quest. Her article tends to promote an unquestioning proliferation of contradictory international conventions and their expensive proponents, rather than openly questioning any relations of the status quo, such as those found in the International Labour Organization (ILO), for example. Gearing up for war has often been good for key industries and jobs which are painted as ‘good for the country’. In the nuclear age, however, especially after the advent of dropping bombs on Hiroshima and Nagasaki, and after anti-discrimination legislation, one assumes that a lot of us would prefer to be ruled by Chinese or Americans, for example, to being ruled by our usual Anglo-Irish Christians. Much better blue or red than dead, in our case. However, in the light of the normal press treatment of the men involved in war between Russia and the Ukraine, or anywhere else, I guess our other views don’t matter.

Sharan Burrow remains true to her trade union and Australian Labor party roots, for example, by neglecting to mention that building up for war has often been good for big and

small business in mining, manufacturing, infrastructure building and other areas. The ILO survived after the First and Second World Wars by the consistently economic view that what was good for top representatives of capital and labour is good for the country. Hjalmar Schacht, for example, was a respected German economist, banker and politician who served under the Weimar Republic and then in Adolf Hitler's government as President of the Central Bank and Minister of Economics. He was globally feted for his role in Germany's economic miracle as soon as the German people began to support re-armament as government led in that direction, aided by Jewish and other international bankers and trade unions through organisations like the ILO. If a lot of people like Sharan Burrow don't clearly change their tune, the AUKUS alliance and nuclear missile agreements could easily lead down the same tracks again. Tom Uren said the struggle for nuclear disarmament is the most important struggle in the human race and I agree because the process of winning that political battle would divert a lot of funds away from the rich and other guys killing people at will. To try to pursue peace while strongly supporting our typically Western ideas about the supremacy of legal business and associated trade union closures, is likely to waste government time and money at best, while leading to the usual and expanding male orgies of killing over grievances as usual. As I said to the producers of the **Evatt Journal**, if they really wanted all politicians to read it, they could post them a free copy by email today instead of trying to get everybody to buy and sell it. This would save everybody involved in the effort a lot of time and money. (But saving others' money is not the lawyers' business.)

The Independent Committee of Inquiry which established the report **National Competition Policy** (Hilmer Report) in 1993 which led to setting up the ACCC was better than now, in its more clearly regional rather than partisan approach to competition. In corporate approaches, the interests of the consumer or owner and dweller in group housing may be comparatively ignored, as the producers of money and jobs rule the regional roost as usual, through their irregular investment returns or losses. The point of the **National Competition Policy (1993)** was to prepare the regional ground for tackling the risks of global warming and related environmental matters, eventually including housing. Its intent was to prepare the regulatory ground for regionally planned action in the light of the goals of the Environment Protection Act (1979) and other relevant acts. They must be considered together in any regional planning and related service delivery with the goal of more sustainable development in place.

Radically, Hilmer first defined competition in **economic history terms**, as: *'Striving or potential striving of two or more persons against one another for the same or related objects.'* (Dennis, FG. **Competition in the History of Economic Thought**. (Hilmer p.2) Anything besides more money may be an object, especially for those well fed, clothed and housed enough already. This was preparation for regional program and project development in the interests of all Australian people and their trading partners. Hilmer also asked and answered the question: How should nine governments be accommodated in a single national policy? The answer was in more open cooperation between federal, state and private actors to attempt to achieve outcomes ideally designed in the broader regional interest in living in the particular place, and personal body, which democratic government in

the 1980s was setting itself up to serve increasingly well, through better managed competition. More of the same, which is the bureaucratic worship of the normally closed relations of production everywhere has continued ever since, under the obviously false guise of liberation technology in many cases. It shuts a lot of consumers up and pushes them backwards. I prefer the stand which leader Adam Bandt and many Green voters have taken to housing in Australia, as it seems more inherently educational. See related articles in daily newspapers entitled **'Young have given up on home ownership'**, **'How the Australian Dream became a nightmare'** and **'Nation has made 40 years of wrong choices on housing'** (SMH 24.4.23). It is hard to see how the ACCC treatment of ADI competition can ever improve housing except for those who are richest. It doesn't consider the potential availability and design of funds for housing in broader international interests. It doesn't so far inquire beyond an apparently narrow remit. Can it? You'll have to ask Gina Cass-Gottlieb and her daddy because lawyers and doctors trump sociologists every time. The economists are naturally most proud of having mathematics on their side, but not in community service. I address the relations between State Super and Aware Super in this context of seeking more stable and broadly comparative funding outcomes later and attached.

The current ACCC Issues paper *seeks views on issues which are relevant to understanding and assessing the nature and extent of ADI competition. The inquiry will examine the ability and willingness of consumers to shop around, compare products and switch products and providers*, (p. 10) as discussed in Chapter 7, which I address. In regard to Chapter 3, however, I first address question **3: How effective is competition in the supply of retail deposit products in delivering good outcomes for consumers?** The answer in our case, as owners of strata plan 10775 and related funds, appears to be not at all. Bank competition is unavailable to us as members of the strata committee or individual owners. This is anti-competitive and frightening given the pace of 'fintech' (sic.) product change and what it can achieve against the interests of those forced to use it or who are apathetic about their duties under strata law for any reason. (On the other hand, I have banked with NAB for decades and never had any reason to change my choice. Many years ago, Westpac was also very helpful in regard to a property in Queensland, where I had been rushed to contract in one day. Westpac pointed out all the trailing commissions in the contract that were high risk to me. In my view, owners of strata property now face a broader and more insidious inability to control their own affairs now and in future, because of the collusive power of strata managers to overrule the lot. I am a person who has lived off savings and I am very fearful of how they may be drained with ease in future by the dysfunctional collusion of Macquarie Bank and strata managers, acting in partnership with larger development interests, or not. The position of renters naturally appears far worse than that of the rest of us because the owners who live off-piste increasingly can and do set their rents much higher than normal in this desirable part of the international market, close to Sydney Harbour parklands, universities, hospitals and related schools and research institutions. I guess Australian aborigines think they have most right to live in lovely, safe and convenient places. I don't. I back those who think the acquisition rather than building of increasing numbers of

houses in desirable locations supported by government is bad and expensive for us all. Managed competition and investment ideally relate to the particular regional development in the interests of better global service. Risk, ignorance and want are produced instead. On the other hand, at 76 my death might well be viewed as a good thing by those wishing to save money, especially if I choose it myself, which I hope I may do in future. (I expected the regional direction would be understood far more broadly at the end of the 1980s but technological and professional interests have pushed back ever since. I was naively stupid.)

As a former NSW public servant and Sydney University academic in health sciences, I thought these battles about the ideal relationships between competition and regional plots, on which individuals may live together in group housing, were won in the 1980s. That was when both Australian political parties finally accepted that state workers compensation schemes and national Medicare provided more accessible, high quality and cost-effectively managed services to all Australians than US private hospital and medical cover ever could. Macquarie Bank is increasingly using its fintech, adopted by strata managers, to engage in anti-competitive conduct. The tightening use of DEFT and SMATA during 2022 and 2023 is alarming because all principles of good group housing management have been lost. Our costs, levies and duties as owners can soar and we have no choice except to meet them or get out. The ACCC states the share of ADI funding from deposits has increased significantly since the onset of the covid lockdown. In the case of the Macquarie Bank and its strata managers I'm not surprised. We owners paid a special levy of \$10,000 in 2022 for apparently minor work on a perimeter wall which was supposed to have been completed in 2019. We've been paying to store scaffolding and watching our quarterly levies rise to meet many costs generated for us by our strata managers as usual ever since. I wanted to live in this place when I first saw it in 1994 because of its location. However, I had no idea at the time of how I would be bossed around by those extracting money from me under legislation controlled by service providers acting in their own members interests rather than in the interests of those owners and renters living on the plot, without the bank of mum or dad.

In chapter 3. entitled **Competition in Retail Deposits**, the **ACCC Issues Paper** states '*Competition between ADIs for retail purposes is essential to ensuring that consumers are able to achieve positive outcomes.*' (Sic)...Consumers of investment products don't always achieve positive outcomes. The legislative assumptions are based on the notion of fair trading being that which returns the economy to equilibrium. These people don't know what they are supposed to be doing? When in doubt rely on a lawyer and their numbers? The ACCC continues, '*This issues paper seeks views on issues which are relevant to understanding and assessing the nature and extent of this competition (p.10).*' The consumer interest is ignored in this formulation of purpose. The focus in on competition, as if too much is never enough. Surely the ACCC should be seeking contract and legislative designs to produce good outcomes for consumers, thus using a stakeholder rather than stockholder model of government and its associations. Transitioning the nation to managed competition in the consumer interest was the national goal for all Australians under PMs

Whitlam, Hawke and Rudd. Too much competition, however, fuels economic booms and collapses through disputes and competitive pressures of general ignorance and the desire for a quieter life instead. Ultimately, the matters of banking and housing as well as related living and service are personal, which is why a youth vote is increasingly Green. I address concerns about organisational corruption by increasingly powerful forces like the Macquarie Bank attached.

Many risks to human life support have continued to worsen in their definition and extent since 2008, especially some in the poorest parts of regional developments globally, nationally and locally. Others are hidden until they explode, perhaps. The continuation of investigation into health-related fields of work and trading, that was carried out in the states and nationally during the 1980s, aimed to improve health insurance systems. The aim was to provide support more effectively and cheaply to health care consumers, than market traders and their law courts normally would, because of their own protective associations. However, that era appears to have been relegated to the dustbin of history by bodies like the ACCC. They often appear to have turned the clock backwards by the professionally normal worship of the legislative assumption that more competition is always good for everybody. Gina Cass-Gottlieb's excuse for the increasing rubbish in this long-outdated competition legislation is that when she was an idealistic teenager hoping to change the world for the better, she studied economics and law to do it. Frankly, fat chance because it is the expert opinion on the ground, for any reason, which is normally more intellectually prepared to serve the regional interest more inclusively, better and cheaper than those with legal assumptions drawn from afar, ever can or will. The tendency in the use of DEFT and STRATA by the Macquarie Bank and strata managers, for example, is to divide group housing consumers so they are increasingly denied all comparative information about other owners involved in the plot or other potential service providers to it. Each owner or renter is now encouraged by the technology and the form of its delivery to deal in the dark, while being charged \$190 per hour to talk with a strata manager about their queries, while they are lucky if they ever get a written reply. Nobody can rely on unresponsive silence or words instead of text because both appear too fallible to mistakes, lies and corruption. This is addressed attached in correspondence with the Tenants Union, the Marrickville Legal Centre and others.

Since the **National Competition Policy** led to the ACCC being set up to implement its perceptions, Australia has experienced the global financial crisis and widespread introduction of the mobile phone around 2008, along with many other innovation rages trying to 'move fast and break things' like the telephone book. The latter helped the local effort in fair, relevant and simple production and trading. The absence of the old-fashioned telephone book, often presents international hold-ups and trash to the would-be consumer of services instead, for example. Many selling services or products for their producers, often flame out with many unexamined consequences for those backing or around them. The ACCC, however, seems to assume that positive outcomes are achieved for all

consumers. As Keynes once snidely remarked, markets can remain irrational longer than you can remain solvent. His widow soon had to rely on the kindness of friends – his rather than hers. If increased competition is to be introduced into the normal ADI phalanx of the four big banks, don't let it happen according to the likes of the Macquarie Bank, its industry associations and their communications technology. This now appears increasingly to be designed for extracting what they want from us in their limited interests, whatever they are.

Australia appears to have been urged to further innovation effort, irrespective of who was captured in the multiplying global aims of making a '*fintech*' (sic.) buck from consumers, forced or not. The ACCC states '*consumers play an important role in driving effective competition*'. Effective for whom? This ACCC formulation of competition seems not to be designed to our advantage as owners and managers of strata plan 10775, or as renters.

Chapter 7 of the ACCC Issues paper is titled **Consumer Information and Switching**. It states that *the ability and willingness of consumers to shop around, compare products and switch products and providers are important determinants in driving effective competition*, (which appears unhelpfully accepted by the ACCC as usual, as an unalloyed good). I particularly address **question 18: How easy or complex is it for consumers to switch from a retail deposit product to an alternative product that better meets their preferences? What impediments do they face?** It seems impossible for any owner of strata property who fears and loathes the Macquarie Bank and strata managers who use it, to escape their joint fate at their hands, if all strata managers have decided to use the Macquarie Bank, or are out of our knowledge. **Question 20 asks: How are consumer outcomes in relation to retail deposit products affected by impediments to searching and switching?** The answer from experience is badly, as there appears little or no consumer choice in group housing industry. Renters bear the brunt so the landed rich may increasingly be most easily served in global markets. They claim to have done it for themselves especially through '*fintechs*'.

THE ACCC ON FINTECH AND ADI INNOVATION (Sic.) AND THE ROLE OF THE STRATA COMMUNITY ASSOCIATION (GOOD AND BAD IN PARTS LIKE POWERFUL TRADE UNIONS)

In a section entitled **Fintech and ADI Innovations** the ACCC states: '*Whether innovation introduced by fintechs is likely to improve consumer outcomes across the sector depends on a range of factors including how incumbents respond. In particular, whether incumbents are actively identifying these innovators and responding with their own innovations on an ongoing basis, or taking steps to hinder competitors from making use of these innovations*'. I am responding to the 2022 and 2023 use of DEFT and SMATA by the Macquarie Bank and its strata managers with fear and loathing partly because their use mirrors the kind of problems and expenses which may typically appear as a result of favouring private health care insurance products, compared with the use of Medicare services, for example. The latter are more accessible, as high or higher quality, and cheaper than private insurances. The problem of unnecessary costs being visited on comparatively powerless consumers who can't avoid them, now appears worse in relation to housing rather than health care. This appears partly because the comparatively poor and young appear increasingly likely to be living in group housing forms now and in future, especially as renters without choice.

The **Issues for Consultation** in this ACCC chapter have already been addressed by the former Australian Treasurer, Josh Frydenberg, from the Liberal Party and related coalition views. See more in an address entitled, **Competition, cooperation and the regional interest in associations** at www.Carolodonnell.com.au under the Heritage Way side-bar. As the former treasurer pointed out, *our lives depend on the safety, efficiency and effectiveness of our payment systems*, so he held a review of the 'regulatory architecture' of the payment system 'to ensure it is fit-for-purpose and responsive to advances in payments technology.' That was shortly before the change to Labor governments at national and state arenas.

In the case of the Macquarie Bank and DEFT and SMATA cash payment and management systems, however, no bank competition exists for owners, renters or others living or working on strata plans, as strata managers have decided together to use these particular banking products. Macquarie is also a backer of the **Strata Community Association (SCA) which is the peak body in Australia and New Zealand for Industry Managers, Lot Owners, Tenants and Stakeholders living in or affected by Strata Title, Body Corporate, Community Title and Owners Corporation** according to its website. Its industry partners include Macquarie Bank and CHU insurance. The SCA (NSW) website states it is the peak industry body for the strata industry and that they use their organisations' depth of strata knowledge, expertise, education, and approachability to benefit members. They state their mission (goal) is to be the peak association in the Strata Industry fostering the highest professional standards for all stakeholders. In this they see the stakeholders as their members, which is a partial case from any government perspective which seeks to serve all the Australian people through its key stakeholders, which are those who live in housing and those who fund it. Interestingly, from the perspective of the ACCC, the vision of the SCA NSW is to be through '*a collaborative rather than a competitive approach to providing continuing professional development and best practice procedures to support the consumer experience.*' In this national and state context, SCA is more like a trade union which represents only a proportion of its members interests well, and especially NOT those of group housing owners or any renters. I guess it doesn't meet a lot of lesser service providers interests either, because DEFT and SMATA levy collection and cash management systems appear to have produced late, troublesome and unnecessarily expensive payments in the cases of some service providers to our plots. **Instead of following ACCC assumptions about the desirability of endless, rather than managed competition, in the service of consumers, the SCA(NSW) appears to have produced itself as body designed in the interests of its most influential members, strata managers, backed by Macquarie Bank and CHU insurance.**

The SCA (NSW) website nevertheless provides a welcome plain English alternative to the Strata Management Act and Regulations, including in its opening explanation that *An Owners Corporation for a strata scheme may appoint a person who is the holder of a Strata Managing Agents licence under the Property and Stock Agents act 2002 to be the Strata Managing Agent of a scheme.* I am certainly of the opinion that the wider and deeper the pools of funds for housing Australians, the better and cheaper the housing will be for its owners, as long as the funds are managed with their interests topmost in mind, as the main legislation appears to require, most of the time. However, SCA NSW, supported by Macquarie Bank, and perhaps CHU insurers, appear to have the housing construction and

management game sewn up in their limited interests, which are not necessarily those of the strata owners and renters who are expected to be the legitimate drivers of their own trading in economic theory and legislated fact.

On their website, the Marrickville Legal centre wants to extract a lot of information from those filling in their forms which is not about any particular complaint and question. So, it is hard to answer to their satisfaction to get through to any promised help. Also, there is little room to give the Marrickville Legal centre any information about any problem being experienced by any consumer seeking advice. If I can write about my problems, as a consumer, it seems lazy, fearful and stupid of Marickville Legal Service to deny me the privilege and risk. **My problem is I don't know if there is any alternative to using a strata manager who banks our quarterly levies with Macquarie Bank. Where can I find an alternative, if it exists?** I should get a decent reply, to meet my status as a property-owning individual in company with others who ideally can choose a strata manager and bank without being trapped into serving their interests on the plot. This situation may be reformed to meet the SCA plain English version of legislation ruling over us in regions we treat as democratic.

WHO KNOWS WHAT KEY POTENTIAL FUNDING POOLS EXIST IN AUSTRALIA OR INTERNATIONALLY TO SUPPORT REGIONAL GROUP HOUSING DEVELOPMENT AND MANAGEMENT?

The concept of having an industry organisation to handle stakeholder affairs that is designed in the interests of key stakeholder (those who fund and live in housing) rather than those who buy and sell housing, is very important for developing projects which produce less environmental risks for the building organisation and those around it. Many may be left behind by the leading technological changes pursued in the interests of the comparatively rich, who typically live off buying and selling more land. Those who appear comparatively poor cannot afford the constantly related demands for expensive additional purchases, whether they appear related to their particular personal satisfaction, or not. (I don't think I want or need central heating or cooling or a car and I choose to have a garden with trees and vegetation instead of concrete all over, for example.) In 2018, the Independent Review of the NSW Regulatory Policy Framework chaired by former Premier, Nick Greiner, found there was far too much expensively conflicting red tape. His Panel agreed with the Auditor-General's assessment that overall, NSW Government initiatives to reduce red tape were not effective for long. Reading ACCC reports one easily sees why almost anything could be made of what they do. At least they have a go? Inviting and pressing more open responses would be better.

The Senate Standing Committees on Education and Employment has recently inquired further following the **More Jobs, Better Pay** bill and associated matters at the Treasurer's **Jobs and Skills Summit**. Apparently, employers voiced fears that the Albanese government could increasingly use the **National Reconstruction Fund (NRF)** and other funds to poorer national, regional and international population and environment effect. According to the AFR front page article **ACTU wants unions first in \$15b fund** (AFR 13.2.23) the National Reconstruction Fund (NRF) is, *'one of the country's largest peacetime investments.'* Employer representatives accuse trade unions of wanting to use the fund to pursue their industrial relations goals first, including to increase their association membership dues and voting rights. Liberal Senator from WA, and former small business and industrial relations minister, Michaelia Cash, sees it as wrong that any grants should depend on a business

being unionised, the Australian Industry Group agrees, and I do too. It seems a dysfunctional restraint of trade designed for administrative forms which are partially managed and against the consumer and owner interest. This seems like any collusion between the Macquarie Bank and strata managers, whether those who appear the legitimate consumers of their services, appear caught up in more powerful plots to their collective detriment or not.

In referring to the NRF, however, the Australian Manufacturing Workers Union (AMWU) apparently wants the fund, among other things, to start with the guarantee of a secure jobs code on any project contract that would also include an enterprise agreement with unions as a precondition of tender. Small business, home owners and renters already face many rising and multiplying difficulties and mandated costs of doing business. This is especially in regard to the legally expected and unhelpfully closed and indirect treatments of communication, land and housing. Examples of such problems are addressed in regional terms attached, including in regard to the future of waste management, housing management, risk management, insurance and development along the Illawarra Coast. **I consider the interests of small businesses and wider regional communities in national and international contexts** to make related points about the shortcomings of occupational closure and advance for achieving any better informed and broader regional goals. These appear better achieved by more direct and open action designed to serve more people better than is likely to occur by gambling on the supposed investment returns to any people of any current or future action. Risk and insurance against personal and environment calamity, whether man-made or not, are best judged in broad and particular regional terms.

As a member of State Super, retired since 2007, I am grateful to be on such a reliable, clear and regular pension, which is indexed to rising costs of living until I die, whether I'm rapidly going gaga or not. As a former public servant taught to see government services as best designed when they inclusively serve the key stakeholders (those who live on and provide the funds) I am disgusted by the advertisement from **Aware Super** in the **State Super Calendar for 2022**. It encourages the kind of gambling greed that easily becomes increasingly pathetic and expensive for the rest of the family and society beside the self-deluding gamblers, with too much free time and money supposedly on their hands. One wonders why tax minimisation (which might be called tax avoidance if we had the money to find out more about it); or soaking the government for more, should be encouraged in any population, especially one of former public servants like teachers, nurses, and other community service workers. The dominant advertising trope from **Aware Super**, in a nation such as Australia, where industry superannuation funds are supposed to support members first, surely should not be:

Are you making the most of your retirement? Learn how to invest to minimise tax and maximise any government entitlements. Meet with an Aware Super financial planner to understand how it all works and get financial advice tailored to your situation.

The construction of the will, including power over the equity in any related housing, appears increasingly in the hands of lawyers and their financial mates, whose goal draws the market up, rather than producing the kind of planned stability with managed competition that may

benefit people in the lower end of markets, not the tops. The financial professionals appear to be always secretly driving for the more broadly powerful top clients as usual, who may either walk away from the oncoming crash relatively unscathed, and/or pick up more money and property then as well.

The selling technology which is universally known as 'information' technology (IT) provides a platform for sucking more money out of any client it chooses, once it has their sticky details on its books. I guess the legal and financially driving operations increasingly look forward to using the retirement funds of stupid old dying people like me, with little or no voice. If I lost everything I own, would I find myself asking the government for the old age pension and possibly the house I once owned and lost to others? As a former public servant working in industrial relations, employment, health and rehabilitation care and insurance, I am disgusted that **Aware Super** can't and won't support its members better, in the interests of the stability of the whole Australian estate as well as providing better individual choice. I address this attached in regional context and in relation to my will because their initial plain language training and overheads on will and estate planning revealed a good cheap way for simple wills like mine. Cut out the middle men and speak plain English wherever possible if multiplying professional groups who mystify and multiply their similarities and differences to each other in secret and to their own advantage will allow it.

A perfect market requires perfect information. Secrecy is merely ignorance for others under another name. Ignorance may be bliss but is demonstrably unhealthy. However, the driving forces of IT have wiped out any assumed right to reliable information or product transfer between traders in many unknown places with unknown needs. In this context, I salute Microsoft Office functions, particularly email, clear and reliable website information and comparatively reliable national sources such as the ABC and SBS TV and radio, as well as other free to air national media and Wikipedia.

The Macquarie Bank and strata managers appear engaged in anti-competitive behaviour which captures all strata plan owners against the will of those owners or renters or service providers to the plot. An unknown number may fear and hate the Macquarie Bank as much as I do, yet equally appear to have no banking or strata management choice other than to sell up and get out of the group housing market. (You'd have to be mad to waste money on lawyers?) Renters commonly appear most enslaved by their strata and bank capture. The Strata Community Association (SCA) (NSW) is the peak industry body for Strata and Community Title Management in NSW. Membership includes professional strata managers, support staff, committee members and suppliers of services to the industry, according to its website. It is supported by the Macquarie Bank. This is anti-competitive and forced association, with potential for fuelling losses to the public purse as well as corruption in political parties and associations. I appeal to Greens, teals and others elected to govern us.

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