

Anne Larkins

From: Chris Ailwood <bridgeisle@gmail.com>
Sent: Tuesday, September 17, 2019 4:38 PM
To: Anne Larkins
Subject: Response to your Final Draft Report

Dear Anne,

This is our feedback on the Draft Final Report of your review for ARNECC of the IGA for a National Electronic Conveyancing Law released on 26 July 2019 and it can be published.

As we have discussed several times over the course of your review, our view has always been that the work needed to develop evidence-based views on what the future for ELNOs looks like and on whether ARNECC has been an effective regulator to date. We believe that it is only on such a foundation that a conclusion could be reached on whether the existing or any other arrangements are fit for purpose in the future. We cannot find that foundation in your Draft Final Report.

In the absence of such a foundation, we are left with only self-interest on which to frame our feedback to you.

In this context, we would urge you to clarify your recommendation that there be a two-year moratorium on new ELNO approvals to mean that there be no more Category 1 approvals in that time. As you know, we are in the process of gaining approval as an ELNO. We have received Category 1 approval from ARNECC and will be submitting for Category 2 approval very shortly. To have a moratorium on new approvals that would stop us from completing the approval process would, in our view, be grossly inequitable and be of no benefit to anyone. Your recent assurance that such an outcome was not your intention has encouraged us to continue with the approval process.

We trust you will be able to accommodate our singular concern in your Final Report.

Kind regards,

Chris Ailwood
for Purcell Partners

Tel: +612 9874 8355
Fax: +612 9874 8311
Mob: 0418 247 661
Email: bridgeisle@gmail.com

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