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9 February 2023

Consumer Policy
Building, Resources and Markets
Ministry of Business, Innovation & Employment
PO Box 1473
Wellington 6140
New Zealand
Via Email: consumer@mbie.govt.nz

Consultation — Draft Credit Contracts and Consumer Finance (Buy Now Pay Later) Amendment Regulations 2022

Dear Sir/Madam,

As a major Credit Reporter in the New Zealand credit landscape, illion (formerly Dun & Bradstreet Australia and New Zealand) welcomes the opportunity to provide this submission to the Ministry of Business, Innovation and Employment (MBIE), regarding the consultation paper, *Draft Credit Contracts and Consumer Finance (Buy Now Pay Later) Amendment Regulations 2022*.

illion does not have specific responses to the detailed questions posed but we do have a general comment to make with respect of the drafting of the regulations.

illion believes that creditworthiness and affordability to repay any credit should be verified in order to support better credit decisioning and to prevent consumers from taking on unsustainable credit. In order for all credit providers to be able to assess creditworthiness and affordability it is critical that the credit provider has visibility of the consumers full credit position, including all forms of lending which may cause a risk of financial hardship.

Consequently, illion welcomes the provision that BNPL amounts less than \$600 must participate in and contribute to comprehensive credit reporting and we would expect the same provision to apply to amounts greater than \$600 in conjunction with the additional CCCFA checks proposed. For the avoidance of doubt we suggest that the drafting makes clear that participation in comprehensive credit reporting is the provision of BNPL comprehensive credit information to a credit reporter for dissemination amongst all comprehensive credit providers, not limited to just BNPL providers.



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About illion

We are a leading supplier of data, analytics and software services for the banking, finance, telco and energy services sectors in Australia and New Zealand. Our market leading data solutions and unique insights enable organisations to make confident decisions across the entire customer lifecycle – from customer prospecting, credit originations and identity verification to on-going customer management and collections.

If there are any questions or concerns arising from this submission, please feel free to contact me at any time at Richard.atkinson@illion.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Richard Atkinson", written over a light grey dotted rectangular background.

Richard Atkinson
Head of Data Product