



29 January 2016

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Dear Ms Yu

Retail life insurance advice

ANZ welcomes ASIC Consultation Paper 245, "Retail life insurance advice" ("CP 245").

ANZ's Global Wealth Division is one of Australia's leading providers of life insurance products and of financial advice via a network of financial planning groups and ANZ Private Bank.

ANZ supports and has contributed to the submission provided by the Financial Services Council ("FSC"). In particular we note the following concerns set out in the FSC submission:

1. Information is requested that is not currently collected and would require significant additional and costly work. For example:
 - Proposal D1(a)(iii) requiring the reporting of reasons why customers have exited policies; and
 - Proposal D1(d) requiring reporting on whether policies are sold under either personal, general or a no advice basis.

ANZ does not currently ask customers for this information and it would require contacting past and existing customers directly. This is onerous and likely to produce a poor response from clients and former customers. The FSC submission contains examples and greater detail of information requested and the implications.

2. The retrospective nature of some of the information requested is also problematic for the following reasons:
 - Historical data proposed to be reported is not currently available in the format required by ASIC and will involve systems upgrades
 - Much of the information requested under Proposal D1 does not appear to be limited to a particular timeframe. Extracting complete historical data for all ANZ life insurance customers presents a significant challenge for the business

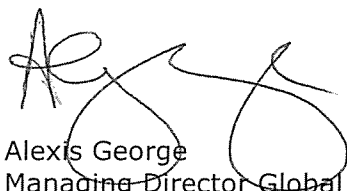
In light of the significant challenges raised above, we note that ANZ would be unlikely to be able to meet the data request, as currently framed, by 1 July 2016.

The FSC submission reflects our views of the complexities, difficulties and the industry cost estimates of the new reporting requirements. We would welcome further discussions between ASIC and industry to ensure that data required is appropriate for its purpose and is reasonably accessible, acknowledging that ASIC requires data to conduct its 2018 review of the effectiveness of the life insurance reforms.

We also note that CP 245 has been issued whilst consultations on life insurance legislative reforms are underway. The final ASIC instrument arising from the life insurance reforms would be contingent on the final legislation.

If you have any questions in relation to any of the matters referred to in this or the FSC submissions, please do not hesitate to contact Allan Hansell, Senior Manager Government and Regulatory Affairs (allan.hansell@anz.com) or myself.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alexis George', written over a circular stamp or watermark.

Alexis George
Managing Director Global Insurance
ANZ Global Wealth