

20 October 2016

Credit Fees Submissions  
Commerce Commission  
PO Box 2351  
Wellington 6012  
By email: [creditfeessubmissions@comcom.govt.nz](mailto:creditfeessubmissions@comcom.govt.nz)

**SUBMISSION on  
Consumer Credit Fees Guidelines**

**1. Introduction**

Thank you for the opportunity to make a submission on the Consumer Credit Fees Guidelines (guidelines). This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

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**2. General comments**

Consumer NZ supports the introduction of the updated guidelines. We're pleased to see useful examples included in the guidelines to illustrate how the requirements of Credit Contracts and Consumer Finance Act (CCCFA) may apply in particular situations.

We think there is scope to add further examples to the guidelines (e.g., after paragraph 41). Given the complexities of the CCCFA, additional examples may be useful to assist lenders' and borrowers' understanding of their legal rights and responsibilities.

We also suggest the Commerce Commission looks at other ways to make the fees information in the guidelines more accessible for consumers (e.g., through simple fact sheets on its website).

**3. Specific comment**

In the example on page 8 of the guidelines, the fee in the first paragraph "*is unreasonable*" but the fee in the second paragraph "*is likely to be unreasonable.*" We are unsure why there is a distinction between these two fees.

Thank you for the opportunity to make a submission on the guidelines. If you require any further information, please do not hesitate to contact me.

Yours sincerely

Aneleise Gawn  
Consumer Advocate