

## Interim Statement: Release of reports; Functional Requirements Review and Cost Benefit Analysis.

### Background

- ARNECC supports competition amongst Electronic Lodgment Network Operators (ELNOs) in the Australian eConveyancing market.
- In February 2025, ARNECC announced its intention to conduct three strategic reviews to inform the future of the Interoperability Program and the e-Conveyancing regulatory framework.

These strategic reviews are:

- An in-depth review of the technical **Functional Requirements** for direct-connect interoperability
- An updated **Cost Benefit Analysis** to test whether the direct connect interoperability model continues to be the most appropriate model as compared to other identified interoperability models; and
- A review of the current eConveyancing **regulatory framework** to identify improvements that can be made to enhance ARNECC's regulatory oversight.

### Update

Following our last update on 20 October 2025, the **Functional Requirements** and **Cost Benefit Analysis** reports are now complete.

ARNECC is pleased to release these two independent reports on the costs, benefits and functional requirements of implementing interoperability in eConveyancing in Australia – available here: [Functional Requirements Report](#) and [Cost Benefit Analysis Report](#).

Given the delays previously advised in receiving information to finalise the reports, ARNECC and its independent report reviewers have worked to finalise and release these reports prior to Christmas so we could provide stakeholders with this important update.

### Insights on the Functional Requirements and Cost Benefit Analysis reports

The reports show that, notwithstanding potential benefits, implementing interoperability is expected to be complex, require close coordination with the banking industry and potentially result in some degradation of service, at least in the short term. The reports further indicate that implementation would be time consuming, costly, and involve significant risks.

The reports confirm ARNECC's previous observations of the significant challenges in implementing interoperability that led to ARNECC's pausing of the interoperability reforms program in September 2024. These challenges included the need to address the concerns of the financial institutions (banks) in implementing interoperability with all electronic lodgment network operators.

ARNECC, as a Council of all Australian State and Territory land registry representatives is unable to address all of these matters – for example, regulation of financial institutions falls within the regulatory remit of the Commonwealth Government.

ARNECC looks forward to continuing to collaboratively engage with the Commonwealth Government and other stakeholders to seek to resolve these issues.

### **Next steps**

ARNECC is still conducting a detailed review of these reports. Once it has completed the review and assessed key findings and recommendations, and subject to endorsement by state and territory governments, ARNECC will issue a formal statement of its position. This process is expected to be concluded in the first quarter of next year.

ARNECC would like to thank all stakeholders who have contributed to these independent reviews.

Dated: 23 December 2025