



ACCC submission

Merchant card payment costs and surcharging review – Issues Paper

December 2024

Acknowledgement of country

The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.

Australian Competition and Consumer Commission

Land of the Ngunnawal people

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Introduction

The Australian Competition and Consumer Commission (ACCC) welcomes the opportunity to comment on the Reserve Bank of Australia's (RBA) issues paper on merchant card payment costs and surcharging, as part of the RBA's first phase of its Review of Retail Payments Regulation.

The ACCC is an independent Commonwealth statutory agency that promotes competition, fair trading and product safety for the benefit of consumers, businesses and the Australian community. The ACCC's primary responsibilities are to enforce compliance with the competition, consumer protection, fair trading and product safety provisions of the *Competition and Consumer Act 2010* (CCA), regulate national infrastructure and undertake market studies. The CCA also contains the Australian Consumer Law (ACL) which is enforced by state and territory ACL regulators alongside the ACCC under a one law, multiple regulator model.

The ACCC considers it is timely for the RBA to revisit the policy basis for the card payment surcharging framework and conduct a holistic review of the retail payment system to ensure fit for purpose regulation.

We consider there have been significant changes in market and consumer behaviour, and technology, since the current surcharging framework was established in the early 2000s. The ACCC considers the current system is not achieving its original policy objectives. Greater costs have fallen on the actors in the system with the least bargaining power – consumers and small business merchants.

There have been growing consumer concerns raised with the ACCC in recent years about increasing issues with card payment surcharges and other add-on payment costs. These include concerns about excessive card payment surcharges, concerns about other kinds of add-on charges, and concerns about disclosure.

Small business stakeholders, including through the ACCC's Small Business and Franchising Consultative Committee, have also raised concerns that many small businesses struggle to engage with the complex and opaque market for merchant card payments.¹ Current industry practices weaken competition by limiting the ability of merchants, including small business, to meaningfully compare and choose a merchant service arrangement that lowers their payment costs. This ultimately results in higher costs for consumers, either through higher prices for goods and services, or through increased surcharges.

These issues are all interconnected. The level of surcharges, or whether a merchant even levies a surcharge at all, is related to the level of these merchant services fees. Merchant service fees in turn are heavily influenced by the interchange fees and card scheme fees set by the card schemes. The level of complexity of the retail payment system has led to poor outcomes for consumers and small businesses.

To avoid the risk of adverse impacts on competition and unintended consequences flowing to consumers and merchants (particularly small business merchants) at other points in the retail payments system, and to promote conditions for competition, transparency and the ability of consumers and small businesses to make choices that minimise costs, the ACCC considers policymakers need to consider any proposed reforms holistically across each level of the retail payments landscape.

¹ For example, Council of Small Business Organisations Australia, 2021, [Submission to Review of Retail Payments Regulation](#), accessed 15 November 2024.

The ACCC considers that any proposed regulatory intervention in the retail payments system needs to be thoroughly analysed with a focus on the following objectives:

- **Prioritising simplicity and transparency:** Reforms should make the surcharging framework clearer and more accessible for consumers and merchants (particularly small business merchants). Measures should not increase opacity in what is already a complex and highly technical framework. Reforms should include measures that empower merchants to more meaningfully choose the merchant card arrangements that allow them to lower their payment costs. However, care needs to be taken to ensure any regulatory interventions deliver simplicity for both consumers and small business merchants, noting that simplicity for merchants could still lead to opacity for consumers.
- **Enabling competition:** Reforms should create conditions that enable workable competition for merchants and consumers. A competitive retail payments system promotes competition between payments services and providers, including by providing efficient access to infrastructure. A well-functioning and competitive payments system should facilitate dynamic and innovative markets, provide incentives for efficient investment, enhance services in response to evolving technology, business models and consumer demands, and promote good consumer outcomes across the Australian economy.

It is important that any proposed reforms to the retail payments system are thoroughly analysed with a view to any direct or indirect impacts on competition. For example, whether a proposed regulatory intervention will favour incumbents or discourage new market entrants.

Focusing on these objectives is critical to ensure any regulatory interventions deliver lower costs and transparency for merchants and consumers.

The ACCC also supports the proposed amendments to the *Payment Systems (Regulation) Act 1998*, which is currently before the Parliament,² to enable fit for purpose regulation of the entire retail payments system. These important reforms would modernise Australia's payment regulatory framework, and would ensure that all entities in the payments value chain, including digital wallet services, are captured in the RBA's regulatory remit.

Surcharging and other add-on payment costs

Excessive surcharging

The excessive surcharging prohibition in section 55B of the CCA prohibits businesses (referred to in the card payments system as "merchants") from levying a surcharge that is greater than what it costs them to use that payment type ("cost of acceptance"). Unlike prohibitions against misleading pricing practices (discussed below), the excessive surcharging provisions are contained in the CCA and can therefore only be enforced by the ACCC.

Businesses can levy surcharges at amounts up to their costs of acceptance for any particular card type. Section 55B works in conjunction with the RBA Standard No. 3 of 2016,³ (the RBA Standard) as the RBA Standard essentially sets out what is permissible to include

² Treasury Laws Amendment (Better Targeted Superannuation Concessions and Other Measures) Bill 2023, Schedule 8.

³ See <<https://www.rba.gov.au/payments-and-infrastructure/review-of-card-payments-regulation/pdf/standard-no-3-of-2016-scheme-rules-relating-to-merchant-pricing-2021-11-18.pdf>>.

in calculating the surcharge that can be levied for payments for any particular card type. The RBA Standard sets out that the following can be included in the cost of acceptance:

- the merchant service fee (the transaction-based fee charged to the business by their payment service provider to deal with purchases made by card. Payment service providers may be banks, other financial institutions, or other fintech companies that facilitate electronic payments, such as Stripe or Block)
- fees paid for rental and maintenance of terminals used for card payments
- fees incurred in processing card transactions, including fraud-related chargeback fees
- fees for the costs of gateway services
- fees paid for fraud prevention services
- the costs of insurance against the failure of a principal on whose behalf a merchant sells (e.g. a travel agent selling airfares on behalf of an airline).

Each of these fees must be related to the particular card scheme for which the surcharge is being calculated.

These fees and costs should relate to the cost of the merchant in providing the specific payment service. Where one of these costs relates to more than one particular card scheme (for example, a fixed monthly terminal rental cost that allows card transactions in more than one card scheme to be made), that cost is to be apportioned amongst the different card payments on a pro-rata basis, based on the value of the different payment types processed as a proportion of the total value of payment transactions undertaken.

Some of these costs of acceptance (merchant service fees, terminal related fees, and the other fees incurred in processing card transactions) are provided to merchants on statements they receive from their bank or other payment service providers. This is typically shown as a percentage figure amount. However, if a merchant chooses to include any of the other permissible costs (gateway service fees, fraud prevention service fees, terminal fees paid to other providers, insurance costs), they need to calculate these themselves.

In the lead up to the excessive surcharging provisions commencing in 2016, the ACCC raised awareness of the (then) forthcoming prohibition by publishing guidelines and information, as well as engaging with many large businesses to ensure they were aware of their obligations.

Over the years, the ACCC has engaged with hundreds of businesses where we received reports alleging excessive surcharging, obtained information to assess their surcharges, and/or educated businesses about their obligations. In some instances, this led to businesses revising their surcharges, with no other action taken. In other instances, our enquiries determined that the level of surcharges was likely appropriate. However, there have also been cases where the ACCC has taken enforcement actions, such as:

- In July 2021, [Nine Entertainment](#) paid \$159,840 in infringement notice penalties for allegedly charging subscribers and advertisers excessive payment surcharges.
- In August 2019, the Federal Court ordered [Europcar](#) to pay \$350,000 in civil pecuniary penalties for charging Visa and Mastercard credit users fees that were higher than Europcar's costs to accept payments from those credit cards.
- In October 2018, [Lloyds Auctioneers and Valuers](#) paid \$37,800 in infringement notice penalties for allegedly charging credit or debit surcharges for online payments that were greater than its cost of acceptance.
- In September 2018, [Fitness First](#) paid \$12,600 in infringement notice penalties for allegedly charging an excessive payment surcharge by imposing a 50 cent flat fee on a

\$46 fortnightly membership payment. This equated to a charge of about 1.09% which was higher than Fitness First's costs of processing the MasterCard debit payment, which was 0.81%.

Misleading pricing practices

The ACL contains a range of provisions that prohibit misleading pricing practices including prohibitions on:

- engaging in conduct that is misleading or deceptive conduct, or likely to mislead or deceive (section 18)
- making a false or misleading representation with respect to the price of goods or services (section 29(1)(i))
- representing a component or partial price of goods and services, unless the total minimum quantifiable amount is stated with equal prominence (section 48).⁴

These prohibitions are enforced by state and territory consumer protection regulators alongside the ACCC. While there can be variations in approach, at a high level, state and territory ACL regulators address localised conduct and, in some jurisdictions, provide conciliation or dispute resolution functions for individual consumers. This complements the ACCC's focus on addressing more systemic and national matters.⁵

The ACCC finds that "surcharging" is often used as a blanket term by consumers, business and the media to cover a number of distinct issues, including:

- Excessive card payment surcharges, or the existence of card payment surcharges.
- All payments methods being surcharged but the surcharges are not reflected in the base price for the relevant goods or services.
- The existence or level of other add-on costs that are not card payment processing surcharges, for example, weekend and public holidays surcharges, late night surcharges, mandatory gratuities or tips.
- The existence of cash payment surcharges.
- Poor or no disclosure of card payment surcharges, cash payment surcharges, or other add-on costs.

Our analysis of data from reports we've received discussed in the next section includes reports covering all the above topics.

While the state and territory consumer protection regulators are unable to take any action in relation to alleged excessive payment surcharging, they can take action where there has been inadequate or no disclosure of payment surcharges. They can also take action around inadequate disclosure or non-disclosure of cash payment surcharges and other add-on costs, and where there may have been a failure to incorporate add-on charges into the base price of the good or service.

⁴ Note that despite section 48, cafes and restaurants are allowed to list their prices without including weekend or public holiday surcharges, as an exemption under the law applies to them. They must still prominently disclose on their menu or elsewhere: "A surcharge of [percentage] applies on [day or days]".

⁵ The ACCC has previously taken compliance and enforcement actions with respect to poor or no disclosure of other add-on costs. For example, court action against [Bloomex](#) for inadequate disclosure of an added fuel surcharge, and court action against [Viagogo](#) for failing to sufficiently disclose additional fees, including a 27.6% booking fee which applied to most tickets.

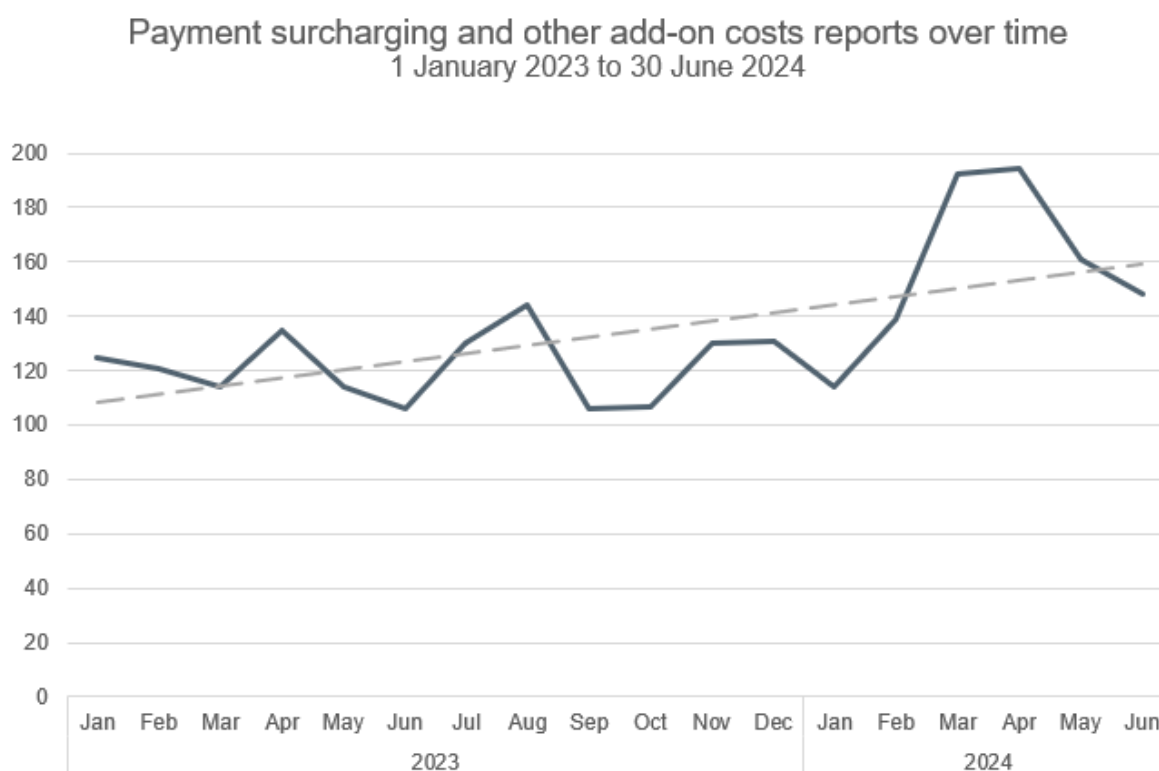
Reports to the ACCC about payment surcharging and add-on costs

The following data is derived from reports to the ACCC between 1 January 2023 and 30 June 2024.⁶ Reports received by the ACCC do not always mean a business has acted in breach of the ACL or the CCA. These figures include reports:

- about a business's conduct where the allegations have not been confirmed or verified
- where consumers have enquired about their rights on an issue (as opposed to making a complaint about a business's conduct)
- where consumers are complaining about conduct that would not give rise to a breach of the ACL or CCA.

Between 1 January 2023 and 30 June 2024, the ACCC received approximately 2,500 reports about payment surcharging and other add-on costs. These reports also include enquiries from businesses seeking guidance on complying with the law. Reports about payment surcharging and other add-on costs represent 1.65% of all total reports (excluding scams reports) to the ACCC over this period. Figure 1 below shows that reports to the ACCC about payment surcharging and other add-on costs have been recently trending upwards overall.

Figure 1 – Trend in reports to the ACCC about payment surcharging or other add-on costs from 1 January 2023 to 30 June 2024



⁶ We extracted reports from our internal database that were specifically categorised against the CCA excessive surcharge prohibition conduct category, and any reports that included the key word “surcharge”, or a derivative of that word, in the description of the reports for a range of relevant ACL/CCA conduct categories, such as component pricing, misleading or deceptive representations, and making a false or misleading representation with respect to the price of goods or services. It was filtered through manual review to omit reports that were not relevant. Given consumers may use different wording in reports made, it is possible that there may be additional relevant reports to the ACCC received in this period.

Table 1 below sets out the top ten broad sectors that feature most prominently in reports the ACCC has received from consumers on payment surcharging or other add-on costs from 1 January 2023 to 30 June 2024. The food and beverage services sector is a standout, accounting for the largest proportion of reports.

Table 1 – Reports from consumers to the ACCC on payment surcharging or other add-on costs per broad industry classification from 1 January 2023 to 30 June 2024⁷

Broad industry classification	Contacts	% of total contacts
Food & beverage services	912	38%
Supermarket & grocery	161	7%
Other store based retailing	105	4%
Personal services	104	4%
Tourism & accommodation	78	3%
Finance	48	2%
Ticketing & administrative services	45	2%
Other services	44	2%
Health & medical	43	2%
Passenger transport – air & sea	40	2%

Figure 2 below shows that the issue that most predominantly featured in reports to the ACCC from 1 January 2023 to 30 June 2024 was allegations of businesses engaging in excessive surcharging.

However, this data should be treated with caution, as consumer reports regarding alleged excessive surcharging do not often mean that the business in question is levying an excessive surcharge. The ACCC notes that given the complexity involved in “cost of acceptance” calculations, and that consumers would not have any knowledge of any business’s internal costs, it is impossible for any consumer to know that a particular surcharge is excessive, or even if it’s likely to be excessive.

To assist, the RBA published guidance on average costs of acceptance across the various payment methods.⁸ However, given the different things that can be included in calculating a business’s “costs of acceptance”, and that different industries will face different costs, the RBA guidance is indicative only. Further, as noted in the RBA’s issues paper, smaller merchants generally face higher payment costs than larger merchants so they will generally have higher “costs of acceptance” when calculating their surcharge.

The “Other” category in Figure 2 includes reports about businesses:

- not specifying a surcharge on a receipt
- not refunding a payment surcharge

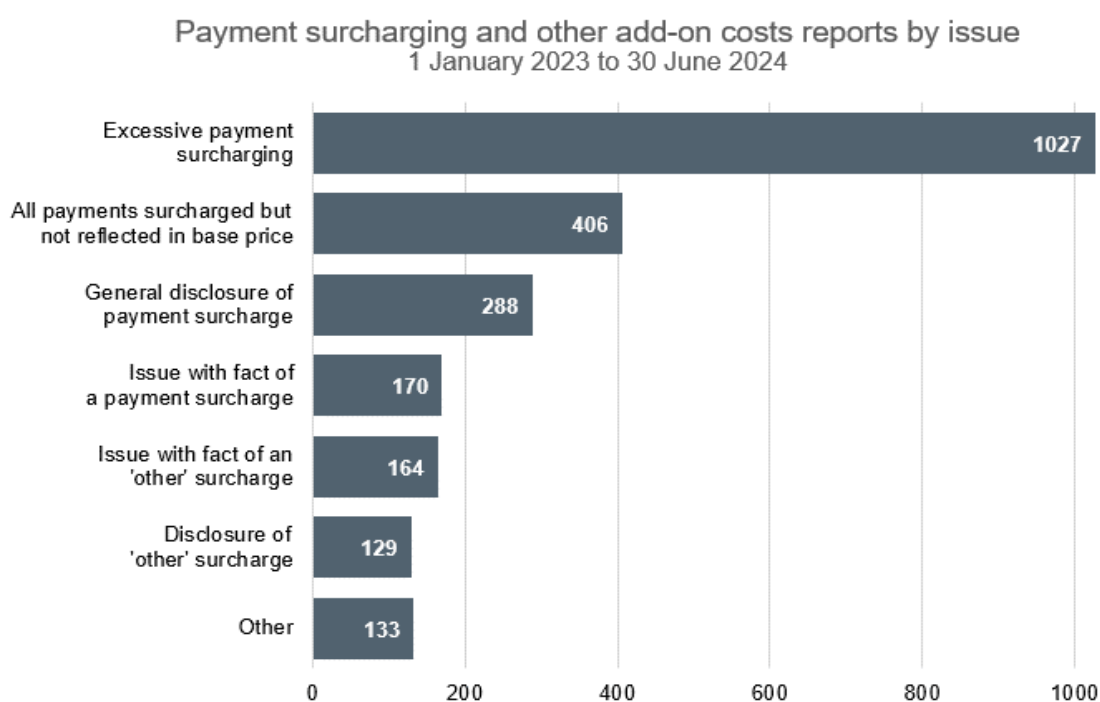
⁷ Other broad industry classifications collectively make up 18% of reports from consumers to the ACCC on payment surcharging or other add-on costs from 1 January 2023 to 30 June 2024. There were also 377 reports to the ACCC in this period that did not have an industry code assigned to them. These account for 16% of the reports from consumers to the ACCC on payment surcharging or other add-on costs from 1 January 2023 to 30 June 2024.

⁸ See <<https://www.rba.gov.au/payments-and-infrastructure/review-of-card-payments-regulation/q-and-a/card-payments-regulation-qa-conclusions-paper.html#surcharging-consumers-q4>>.

- providing discounts off the represented prices for their goods or services if people purchased with cash
- levying a surcharge for payments made by cash, or
- charging a public holiday surcharge on a day that is not a public holiday (for example, when a business charges a public holiday surcharge across a long weekend, but only one day of the long weekend is a public holiday).

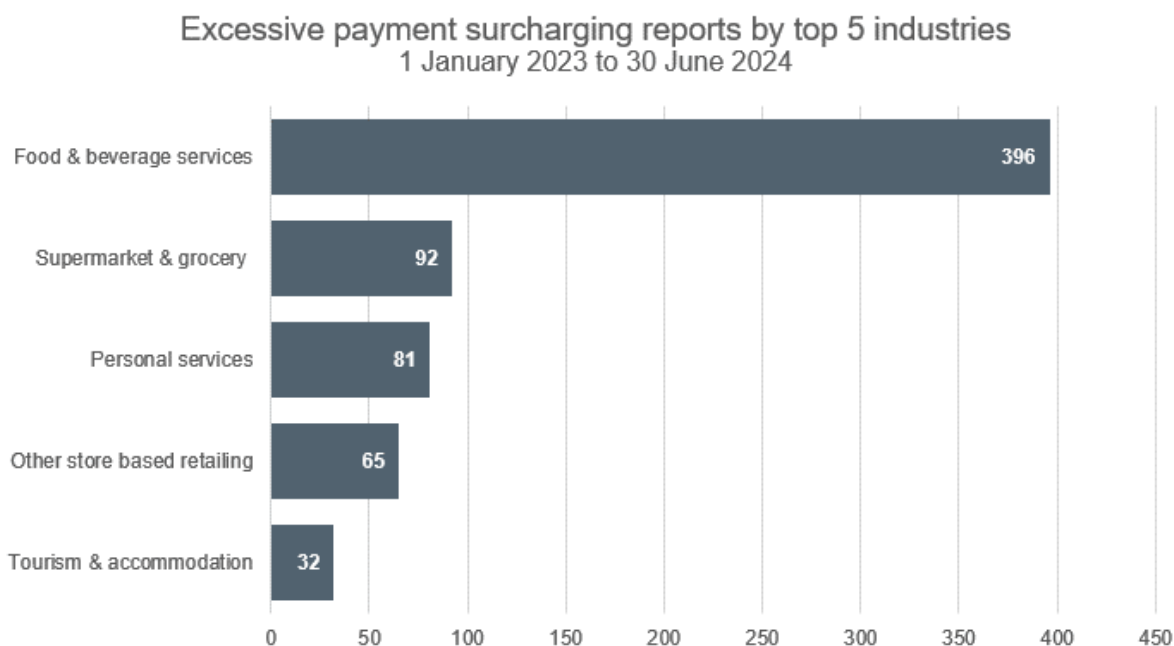
Figure 3 below shows that the food and beverage services sector is once again a standout, accounting for the largest proportion of reports about alleged excessive surcharging.

Figure 2 – Issue categorisation of reports from consumers to the ACCC on payment surcharging or other add-on costs from 1 January 2023 to 30 June 2024⁹



⁹ Note that reports have been categorised according to the main issue the consumer had raised. However, reports may relate to multiple issues.

Figure 3 – Consumer reports to the ACCC about excessive payment surcharging by top 5 industries from 1 January 2023 to 30 June 2024¹⁰



Excessive surcharging issues are more prevalent in small and micro businesses

The data from reports to the ACCC indicates that alleged excessive surcharging issues are most common in sectors that have a high proportion of small and micro businesses operating in localised areas, in particular the food and beverage services sector. This aligns with data quoted in the RBA’s consultation issues paper as indicating that the hospitality sector is the biggest adopter of card payment surcharges in recent times.

This presents a regulatory challenge for the ACCC, as under the ‘one law, multiple regulator’ model for the ACL, state and territory consumer protection agencies typically address localised conduct while the ACCC focuses on addressing more systemic and national matters. However, as the excessive surcharging regime is in the CCA, it is only enforced by the ACCC.

The ACCC considers that the government should review whether the excessive payment surcharging framework (however it may be amended from the RBA’s current review) should be included in the ACL rather than the CCA, as this would enable state and territory ACL regulators to take proportionate compliance and enforcement action against localised businesses. Given this would expand the functions of the state and territory ACL regulators, we note they would also need a proportionate increase in their funding to undertake such work.

Ensuring the surcharging framework is fit-for-purpose

The ACCC notes the original intent of the surcharging framework was to provide price signals to consumers about which payment methods were more expensive, encouraging

¹⁰ Other broad industry classifications make up of 25% of reports from consumers to the ACCC on excessive payment surcharging from 1 January 2023 to 30 June 2024. There were also 109 reports to the ACCC on excessive payment surcharging that did not have an industry code assigned to them. These account for 14% of excessive payment surcharging reports to the ACCC from 1 January to 30 June 2024.

them to switch to cheaper payment methods, or ensure that those who wanted to pay by cards that incurred higher acceptance costs in order to accrue other benefits (like frequent flyer points) were the ones paying for the more expensive payment method, rather than that cost being spread across all customers. This was also intended to encourage competition in payment systems and put competitive pressure on card schemes to lower their wholesale fees.

However, the current retail payments system appears to have shifted the greatest costs to small businesses and consumers, who are the actors in the system with the least bargaining power.

The ACCC considers there have been some key changes since the surcharging framework was introduced that make it a timely opportunity to review whether the arrangements are fit-for-purpose. These changes include:

1. Cash payments are in decline and the increase in card payments has changed business practices.

As set out in the issues paper, there has been a strong uptake of card and digital payments over recent years, which accelerated during the COVID-19 pandemic. Consumers have increasingly used contactless payments, as consumers generally value the convenience of this method.

As also noted in the issues paper, these factors have contributed to the increased use of payment surcharging generally in recent times. The rise of contactless payments has also meant that many businesses are unable to easily provide consumers with the actual dollar amount of any surcharge before the payment is finalised, as it can depend on what type of card is 'tapped' at the terminal.

2. Fixed and "blended" pricing models are increasingly common.

Fixed pricing models are plans that charge merchants one single rate for all transactions. Blended pricing plans have some transaction types "blended" together and charged at the same rate, such as a single rate for all Visa transactions (debit and credit), a single rate for Mastercard transactions (debit and credit), and a different rate for EFPTOS transactions. Some of these models also include bundling other unrelated services or benefits (for example, reward schemes) into the plans.

The ACCC notes that small and micro businesses have increasingly taken up fixed or blended card payment plans since newer entrant payment service providers introduced these offerings, because they can be convenient and provide forward visibility of operating costs. However, fixed and blended pricing arrangements mean that merchants can be charged more for lower cost payment methods, thereby increasing their costs of acceptance, which in turn increases the level of their surcharges levied to consumers. This has somewhat undermined the policy rationale for allowing businesses to surcharge card payments. It means that customers using a less expensive payment method, such as a debit card, are effectively subsidising the cost of processing a more expensive payment method.

Reforms to the retail payments framework need to be considered holistically

Given the highly interconnected nature of the retail payments framework, the ACCC considers that it is essential to consider any potential reforms in a holistic manner.

Transparency of merchant service fees

As recognised in the issues paper, the ACCC considers there can be a lack of transparency for merchants about the fees set by card schemes and payment service providers. This makes it difficult for merchants to meaningfully choose the payment offering that best serves their needs at the least cost. Card scheme fees in particular involve huge variances and there is a lack of transparency in how they are calculated.

Members of the ACCC's Small Business and Franchising Consultative Committee have described the current fee structures as complex and lacking transparency, which has resulted in higher costs for small business.¹¹ This is exacerbated by the reality that small businesses generally lack the means, including time and resources, to be able to engage with the complexity of the current system.

The ACCC considers that increased transparency of the different elements of merchant service fees has the potential to result in behaviour change by merchants, assisting them to choose the most cost-effective payment arrangements. Increased transparency can allow merchants to more easily identify and switch to a cheaper payment services provider, which would ultimately result in lower costs for consumers.

The RBA issues paper notes the significant difference identified in merchant cost of acceptance between larger merchants and small merchants. While some of this difference can be explained by economies of scale, including larger merchants spreading out fixed payment costs, the ACCC is concerned the current system may be placing small businesses at an unfair competitive disadvantage.

The ACCC considers there is merit in the RBA considering measures that would enable merchants to meaningfully compare merchant service fee arrangements, which will improve the efficiency and competitiveness of the market.

Should the RBA and the government consider pricing regulation (such as caps) is needed in relation to scheme fees or interchange fees, consideration should be given to whether there will need to be additional safeguards implemented to prevent avoidance behaviour.

Least-cost routing

The ACCC supports least cost routing (LCR) as an important means to promote competition in the domestic payments market. As set out in the issues paper, LCR allows merchants to choose the payment scheme that processes transactions when consumers use a dual network debit card.

A widespread take-up of LCR by merchants ensures that card schemes compete vigorously and places downward pressure on merchant services fees. It can help to reduce the fees merchants pay for the processing of debit card payments and enables them to lower prices for their customers. An increased take-up of LCR is especially important given the increase in usage of debit cards in Australia. As recent research conducted by the RBA has shown, LCR reduces merchant payment costs. The costs of accepting debit card transactions is nearly 20% lower for merchants that have LCR turned on compared with merchants with LCR turned off, with results differing across the size of the merchant and the choice of pricing plan.¹²

¹¹ Council of Small Business Organisations Australia, 2021, [Submission to Review of Retail Payments Regulation](#), accessed 15 November 2024.

¹² Benjamin Dobie and Benjamin Watson, Reserve Bank of Australia, 2024, Bulletin – April 2024, [The Effect of Least-cost Routing on Merchant Payment Costs](#), accessed 15 November 2024.

In addition to measures that would ensure LCR is fully rolled out to in-person transactions, the ACCC supports consideration of LCR functionality being fully rolled out for online transactions and digital wallets. This is especially important given the growth of online transactions, and transactions used in digital wallets.

The ACCC also supports consideration of the RBA facilitating the implementation and uptake of dynamic LCR, where the lowest cost network is assessed and chosen for each individual transaction, across all transactions whether via in-person card, online or digital wallets.

Merchant surcharging reforms

As stated earlier, the “cost of acceptance” can include a broad range of costs in addition to the merchant service fees set out in the statements that payment service providers give to merchants. It can be difficult for merchants, particularly small business merchants, to accurately calculate their costs of acceptance. In addition, it becomes questionable how directly related to payment processing some of these costs are, and where they should instead be considered as general operating costs of a business and treated in the same way. The ACCC considers there is merit in the RBA considering whether to tighten the definition of the cost of acceptance, perhaps to the pure cost of payment processing. As the issues paper notes, this would likely improve the price signalling effect of surcharging.

The ACCC notes the Federal Government has committed to ban debit card surcharging by 1 January 2026, subject to the findings of this current RBA consultation.¹³ Consumers are experiencing detriment from the increased use of payment surcharges and there is a significant need to reform the system so that there are lower costs and less complexity for consumers. Given the complexity and interconnectedness of the retail payment system, any proposed reforms to merchant surcharging also need to be considered holistically and accompanied by complementary measures at other points in the retail payments system.

Policymakers need to focus on the objectives of enabling competition and prioritising simplicity and transparency (as discussed earlier) to deliver the intended benefits of any proposed reform to the retail payments system, and ensure there are no adverse consequences on competition, or for merchants, particularly small business merchants, and consumers.

¹³ Prime Minister of Australia, 2024, [‘Reducing card surcharges for Australians and small businesses’](#), accessed 15 November 2024.