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ENABLING CONSUMER MOBILITY BY IMPROVING ACCESS TO ELECTRICITY PRODUCT DATA

Introduction

Thank you for the opportunity to make a submission on the Enabling consumer mobility by improving access to electricity product data consultation paper.

This submission is from Consumer NZ, an independent, non-profit organisation dedicated to championing and empowering consumers in Aotearoa.

Consumer NZ has a reputation for being fair, impartial and providing comprehensive consumer information and advice.

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Comments on the consultation in general

Consumer NZ welcomes the proposal to improve access to electricity product data. However, our support is tempered by disappointment and frustration at the years of delay. We have long advocated for these obvious, low-cost, high-impact reforms. In the face of rising power prices and growing energy hardship, this inaction has been detrimental to the interests of consumers.

For 25 years, Consumer NZ has been operating Powerswitch, the country's most comprehensive electricity and gas comparison tool. Our ability to deliver accurate, personalised savings has, despite years of requests to the Authority, been undermined by the lack of access to essential data.

Why data access matters

Consumers have long been denied the benefits of full retail competition because key data remains needlessly inaccessible. This data is necessary to make accurate comparisons, a fact confirmed by independent research.¹ Without access to electricity product data, consumers must attempt to manually extract details from power bills that are often confusing, incomplete or inconsistent. This level of friction causes many to abandon the comparison and switching process because they find it too confusing and difficult.

Due to inaction on the data access issue, we have been forced to rely on ever more complex workarounds, estimates and assumptions – undermining site performance and making comparisons less compelling. The stakes are significant: a mere 1% increase in switching would save households around \$8 million annually.² Instead, unnecessary complexity and missing data keep switching rates far below their potential, weakening competitive pressure and keeping prices higher than they should be.

Conclusion

This reform is years overdue. For too long, consumers have been denied choice, savings and the benefits of genuine competition because access to essential data has not been enabled, for no good reason.

The proposal is a chance to remove the barriers, improve competition and return millions of dollars to household budgets. Inaction has already cost New Zealanders too much. We cannot delay any longer: New Zealanders are losing out, and the Authority must act now.

Our answers to specific questions are contained in Appendix A.

¹ Powerswitch Strategic Review, Energy Link, January 2023

² \$7,984,568. Average savings = \$400 (Powerswitch). Number of residential households = 1,996,142 (EMI, 30 June).

Appendix A Format for submissions

Submitter	Consumer New Zealand
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Questions	Comments
Q1. Do you agree that improving access to product data will support consumer mobility through enabling innovation and informed choice?	<p>Yes. Improving access to product data is essential to enabling innovation, supporting informed consumer choice and increasing mobility.</p> <p>Providing comparison tools, like Powerswitch, with direct access to accurate, standardised product and usage data would dramatically improve the ease, accuracy and relevance of comparisons. This, in turn, would reduce friction for consumers, increase switching rates and help households save money.</p> <p>Greater consumer mobility drives competition, encouraging providers to innovate and reduce prices.</p> <p>Currently, one of the biggest challenges in offering accurate comparisons is the lack of direct access to data. We often need to rely on incomplete or inconsistent information, which undermines the quality of the comparison results – as the adage goes, ‘bad data in = bad data out’. Frustratingly, much of the necessary data already exists; it’s just not accessible to those who could use it to empower consumers.</p>

	Unlocking this data would unlock real benefits for households and the market alike.
Q2. Are there any other aspects of improving access to data that the Authority should be considering? Are there further benefits that we have not articulated?	<p>No. We believe the Authority has thoroughly explored the key aspects of improving access to data.</p> <p>This issue has been the subject of extensive discussion and consultation over several years. In our view, the Authority has clearly identified the relevant challenges, opportunities and benefits associated with improving data access.</p> <p>We support the current direction and encourage the Authority to now focus on implementation and ensuring delivery.</p>
Q3. Do you agree that creating standards for the exchanging of product data should be aligned with a potential future electricity Consumer Data Right (CDR)? Why, or why not?	<p>Yes. Aligning product data exchange standards with a potential future electricity Consumer Data Right (CDR) makes sense and should be pursued.</p> <p>There are two key data components required for effective electricity plan comparisons: pricing plan information and consumption data. While comparisons can technically be made using only one component, it is far better to have both to deliver the most accurate and compelling results.</p> <p>To maximise efficiency and reduce duplication, we believe the most effective approach is to enable access to pricing plan data via industry code provisions and access to consumption data via the CDR framework.</p>
Q4. Are there additional opportunities or risks the Authority should consider in aligning improved access to electricity product data with a potential CDR	<p>Yes. There are important risks and opportunities the Authority should consider when aligning improved access to product data with a potential CDR.</p> <p>One key risk is the potential for unintended consequences. If compliance with new data exchange frameworks imposes significant administrative or technical overheads, some retailers may choose to withdraw certain offers or simplify their pricing</p>

<p>designation and implementation?</p>	<p>structures to fit neatly within prescribed formats. This could particularly affect innovative or non-standard products (for example, Powershop's 'powerpacks' or spot price-based plans and plans not yet envisaged) and inadvertently stifle innovation in the retail market.</p> <p>In our experience, the most effective and pragmatic approach is one that allows flexibility between two willing parties. For the past 25 years, we have successfully worked with retailers who have voluntarily agreed to data exchange with us under agreed formats. This has allowed them to provide data that best suits their products and systems. Efficient data provision for spot price plans or power packs will differ from those for more traditional flat-rate plans. A regulatory backstop – such as the proposed code provisions – is important as a safeguard but should not replace the value of cooperative, outcomes-focused relationships between retailers and third-party providers.</p> <p>Another area of opportunity lies in creating efficient data-sharing mechanisms. Once product data repositories or registers are established, retailers should only need to update third parties when prices change. Many plans are only adjusted once or twice a year, so requiring formal, repeated data requests to try to capture infrequent changes would add unnecessary cost and administrative burden. A more efficient model is for trusted third parties to receive timely updates from retailers as changes occur. Again, something that has worked well in our experience through good-faith relationships.</p> <p>We support regulation as an important backstop, but not as the sole foundation for third-party access. The best outcomes for consumers will come from trusted partnerships between retailers and third-party providers, enabling innovation and</p>
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flexibility through cooperation, rather than relying solely on rigid, rules-based compliance.

Opportunity: Introduce a unique pricing plan code to replace reliance on pricing plan names

There is currently no robust mechanism for uniquely identifying electricity retail tariff sets. Relying on pricing plan names to differentiate them is increasingly impractical due to the complexity and volume of offerings in the market.

For example, Powerswitch currently holds 17,058 unique tariff sets across 3,464 electricity pricing plans and 569 gas plans. This complexity arises because pricing plans often vary by network region (of which there are around 70) and typically have separate tariff structures for low and standard user options. As a result, one pricing plan name can correspond to dozens, or even hundreds, of different tariff sets.

In addition, some retailers reuse pricing plan names over time. This leads to confusion when a plan name today refers to a different set of prices than it did several years ago, even though the older prices remain valid for consumers still on fixed-term contracts with residual term.

Plan names are also limited by language. Over time plan names become repetitive, harder to distinguish and less useful for analysis or system integration. There is a tendency for retailers to recycle and reuse pricing plan names for marketing purposes.

A more effective solution is to assign a unique, immutable code to each tariff set.

	<p>This would:</p> <ul style="list-style-type: none"> • enable precise identification of tariff structures • improve comparison accuracy and support analysis of pricing changes over time • reduce consumer confusion by clearly distinguishing plans with similar or reused names • allow for more robust AI bill reader automation (if the tariff code were added to retailer bills) • enable the development of a historical database of prices for policy and monitoring purposes. <p>We see strong merit in moving toward a system where each tariff set is tagged with a unique code, creating a practical and scalable foundation for a modern, digitalised energy market.</p> <p>It's entirely possible and has been done successfully here before. For example, the publishing industry uses ISBNs (International Standard Book Numbers), unique 13-digit identifiers that allow libraries and retailers to catalogue, track and manage publications. Each format, edition and publisher gets a distinct ISBN, managed in New Zealand by the National Library.</p>
<p>Q5. Do you have any views on the interaction between the definitions of "generally available retail tariff plan" within the Code and "product</p>	<p>There seems to be some overlap between the definition of a "generally available retail tariff plan" and "product data", but they are not fully aligned and may not always capture the same scope of information.</p>

<p>data” within the CPD Act? Are these definitions easily reconciled? Do they capture the same information?</p>	<p>The Code definition is well understood and focuses on publicly available plans. In contrast, “product data” is broader and potentially covers additional product attributes.</p> <p>To avoid confusion and duplication, we recommend the definitions of the two terms be made more distinct and presented side by side.</p> <p>This would support consistency and provide greater clarity for all parties.</p>
<p>Q6. Do you agree that the current data access arrangements (e.g., clause 11.32G, non-regulated EIEP14 and bilateral agreements) are no longer fit for purpose to promote a digitalised electricity industry that enables the on-demand sharing of electricity information?</p>	<p>Yes, we agree. The current data access arrangements were developed at a time when electricity plans were simpler and the need for real-time, digital data sharing was not anticipated.</p> <p>As the industry becomes more digitalised and consumer expectations shift toward on-demand services, these legacy arrangements are no longer suitable. A more modern, standardised and regulated framework is needed to support efficient, secure and consistent data access across the energy sector.</p>
<p>Q7. Have you encountered specific operational or compliance barriers when trying to access or share product data?</p>	<p>No, we have not encountered significant operational or compliance barriers when accessing or sharing product data, but this is largely due to the strong relationships we’ve built with retailers over the past 25 years.</p> <p>We’ve invested considerable time in developing cooperative partnerships with retailers, many of whom see Powerswitch as a positive tool for consumers and the energy market. As a result, data has consistently been provided voluntarily. In 25 years,</p>

	<p>we have never had recourse to revert to demand data from retailers via code provisions.</p> <p>This collaborative approach has allowed for flexibility, particularly in accommodating more complex or innovative plans. Due to the strength of these working relationships, on the few occasions where issues have arisen, they have been resolved through direct communication.</p> <p>We are keen for this cooperative model to continue, with improved regulatory provisions as a backstop, as it fosters innovation, trust and better outcomes for consumers.</p>
Q8. What are the most significant friction points for consumers when comparing and switching electricity plans today?	<p>Key friction points</p> <ol style="list-style-type: none"> 1. Consumers struggle to enter billing data due to non-standardised power bills. 2. Comparison tools must rely on estimates without accurate data, reducing their effectiveness. 3. Early termination fees on fixed-term contracts are often unexpected and deter switching. 4. Lack of visibility into contract terms during the switching process creates uncertainty.

1. Inability to enter accurate billing data due to non-standardised bills

The most significant friction point is consumers' inability, or reluctance, to enter their billing data when using price comparison tools. This is largely caused by the lack of standardisation in electricity bills in New Zealand.

Retailers use inconsistent formats and different terminology and often omit key information. This makes it difficult for consumers to accurately extract and enter the relevant data, resulting in confusion, frustration and data-entry errors. Inaccurate inputs lead to less reliable or erroneous comparison results, reducing trust and confidence in the switching process.

2. Reliance on estimates instead of actual data

Without access to actual billing or usage data, comparison tools must rely on assumptions and estimates. While these can provide indicative results, they are not as persuasive or accurate as personalised comparisons based on real data. This reduces the effectiveness of switching tools and undermines their role in driving consumer action.

The lack of automated data access remains a long-standing missed opportunity

It has been technically feasible for years to access a consumer's billing or usage data (with their permission), either via smart meters or directly from retailers. If enabled, this would dramatically reduce friction and improve the quality of comparisons. The fact

	<p>that this hasn't been implemented remains a source of ongoing frustration for both consumers and advocacy organisations.</p> <p>3. Early termination fees are poorly understood and discourage switching</p> <p>Many consumers remain unaware that they are on a fixed-term contract, particularly when another household member has signed up. This lack of awareness often leads to unpleasant surprises in the form of early termination fees, sometimes only discovered after a switch has already been made.</p> <p>Even in cases where no fee applies, the <i>perceived risk</i> of penalties can deter consumers from switching, especially when they are unclear about the terms of their current contract.</p> <p>4. Lack of visibility of contract status at the point of switching</p> <p>Much of this uncertainty could be resolved if, during the switching process, consumers were clearly shown whether they are currently on a fixed-term contract and whether a termination fee may apply. Providing this information upfront would give households greater confidence and enable more informed switching decisions.</p>
<p>Q9. How would better access to standardised and on-demand product data improve outcomes for consumers and/or your organisation?</p>	<p>Key consumer benefits of better access to standardised, on-demand product data</p> <ol style="list-style-type: none"> 1. Enables automation of comparisons and switching 2. Delivers faster, more accurate and more compelling comparisons 3. Increases switching rates and drives greater consumer engagement and could generate millions in annual savings for New Zealand households 4. Unlocks missed opportunities that have existed for many years.

1. Enables automation and proactive support for consumers

Better access to standardised and real-time product data would allow us to automate much of the comparison and switching process. With the consumer's permission, we could conduct regular comparisons on their behalf and deliver tailored result, without requiring the consumer to manually input information or even visit our site.

Given that nearly one-quarter of New Zealand households are registered with Powerswitch, this would represent a transformational shift in how consumers engage with the market.

2. Delivers faster, more accurate and more compelling comparisons

Access to structured product data would significantly improve both the speed and accuracy of comparisons. More importantly, it would make results more compelling. Powerswitch data shows that users who enter their actual usage data, or upload a bill via Powerswitch's new AI bill reader, are twice as likely to take action as those who rely on default estimates. This confirms the idea that better data leads to better outcomes.

3. Increases switching rates and cost savings

Switching rates remain lower than they could be, and a key barrier is the difficulty of obtaining and comparing up-to-date product data. Removing this barrier would increase switching rates, leading to substantial financial benefits. We estimate that every 1% increase in switching rate currently equates to approximately \$8 million per year in cumulative savings for New Zealand households.*

	<p>4. A long-standing missed opportunity</p> <p>We have long advocated for better data access. Unfortunately, historic inaction has meant that this opportunity has not been realised, and New Zealand households have paid the price through higher bills than they otherwise would have had. The tools and technologies now exist to enable better access to standardised and on-demand product data, but regulatory support is needed to unlock the full potential of automated, data-driven switching.</p> <p>*Average savings on Powerswitch through switching to the cheapest option are currently around \$400/household/pa. 1% of residential households (approx. 20,000) x \$400 = \$8M.</p>
Q10. Do you agree with the proposed assessment criteria (effectiveness, efficiency, feasibility, and strategic alignment)? Are there other criteria we should consider?	<p>We agree with the proposed assessment criteria of effectiveness, efficiency, feasibility and strategic alignment. Together, these provide a comprehensive and balanced framework for evaluating options.</p> <p>At this stage, we do not propose any additional criteria. The proposed framework appears to adequately reflect the needs of consumers, regulators and the broader energy system.</p>
Q11. Do you have a view on which option (status quo, regulated EIEP14, new modular EIEPs) would deliver the most benefit and why?	<p>We support option 3: The introduction of new modular EIEPs, as we believe this option offers the most benefit for consumers and the market.</p> <p>A modular framework provides the flexibility to adapt to evolving data needs while improving consistency, clarity and standardisation across the industry. It also supports automation and innovation, both of which are essential to improving consumer outcomes.</p>

	<p>However, as noted in our response to question 4, we believe it is important that parties retain the ability to agree on the most efficient formats and methods of data exchange between themselves, where appropriate to their specific offers or operational requirements. Regulated data exchange pathways should be available and reliable but used primarily as a fallback, only necessary when retailers or other parties are unwilling to engage cooperatively.</p> <p>This approach strikes the right balance between enabling standardisation and preserving the flexibility needed for innovation and efficiency.</p>
Q12. Do you agree with our preliminary assessment of the options presented above?	Yes, we agree with the Authority's preliminary assessment. It appears to be a robust and methodical evaluation of the options.
Q13. Are there elements of the existing EIEP14 that could be adapted or strengthened rather than replaced?	No comment.
Q14. Are there any other barriers to using EIEP14 that we have not identified?	No comment.
Q15. If option 3 (new modular EIEPs) is pursued, how should we best sequence implementation to	No comment.

ensure deliverability and minimise disruption?	
Q16. If option 3 is pursued, do you think the proposed EIEP14B (all electricity plans) should capture historic offers to capture all current and legacy plans?	<p>Yes. EIEP14B should include historic offers to ensure accurate comparisons for all consumers.</p> <p>Our experience with Powerswitch shows it is common for households to remain on legacy plans that are still active but no longer available to new customers. Excluding these historic offers from the dataset would make it difficult to deliver accurate and meaningful comparisons for a significant portion of consumers.</p> <p>Limiting the dataset to only currently available plans would create gaps in comparison tools, particularly when trying to assess the value of switching away from a legacy plan. Including historic plans ensures those consumers are not left behind.</p> <p>As noted in our earlier responses, issues identifying a household's exact current pricing could be addressed by introducing a unique and permanent pricing plan identifier (see question 4), rather than relying on plan names, which are often marketing-driven constructs and frequently reused by retailers with updated pricing. This creates confusion and inconsistency, especially when legacy and current pricing plans share the same name but represent different tariff sets, leading to matching and comparison errors. A stable and unchanging identifier would enable accurate tracking of plans over time, even after they move from being generally available to legacy status, supporting more reliable comparisons.</p>

<p>Q17. If option 3 is pursued, are there practical limitations the Authority should consider? (For example, should plans that have no active customers, or highly specialised plans such as internal staff discounts, be included?)</p> <p>Q17a. If limitations are appropriate, how should these be defined to ensure the protocol remains comprehensive and useful for consumers and third-party service providers?</p>	<p>While we support the comprehensive capture of plans under option 3, we acknowledge that there will inevitably be unusual or highly specialised cases that do not need to be included.</p> <p>The framework should allow a for a degree of discretion and flexibility to exclude such outliers where it is clearly in the best interests of consumers and the system overall. A common-sense mechanism should be in place to manage these exceptions, without undermining the overall intent of completeness and standardisation.</p> <p>In our experience retailers, consumers and third-party providers are generally reasonable and practical. What they need is the flexibility to apply judgment when dealing with the inevitable edge cases that fall outside the norm.</p>
<p>Q18. What practical limitations (if any) should apply to third-party requests for tariff data?</p> <p>Q18a. Do you think any interim measures should be considered as part of the new protocols, to facilitate the transition to the on-demand</p>	<p>Flexibility, cooperation and proportionality are key to managing third-party access and transitional arrangements effectively.</p> <p>Summary</p> <ul style="list-style-type: none"> • Retailers change prices infrequently. Constant formal requests as a means of ascertaining price changes would be inefficient and burdensome. • Mutually agreed processes between retailers and trusted third parties are more effective than rigid regulatory requirements.

<p>access to product data? If so, what are your suggestions?</p> <p>Q.18b. What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?</p>	<ul style="list-style-type: none"> • Regulatory mechanisms should ideally act as a fallback, not the default approach. • The best way of ensuring effective data continuity during market changes is through third parties establishing cooperative industry relationships. • Third parties being overly demanding and reliant on excessive rule-based approaches risk creating unnecessary cost, inefficiency and tension. <p>What practical limitations should apply to third-party requests for tariff data?</p> <p>Retailers typically change their pricing infrequently during the year. In our experience operating Powerswitch, we have established efficient, collaborative processes with retailers where they notify us of any pricing changes. This has removed the need for us to continually formally request updates, which would be inefficient and time consuming for both parties.</p> <p>Requiring third parties to rely solely on formal regulatory requests would create an unnecessary administrative burden, increase costs and lead to repetitive, redundant data exchanges. A more efficient approach is to allow trusted third parties and retailers to agree on data exchange processes directly, tailored to their specific needs. While these may follow official formats, in some cases, alternative methods may be more practical and mutually beneficial.</p> <p>Do you think any interim measures should be considered as part of the new protocols, to facilitate the transition to on-demand access to product data?</p> <p>Yes. Interim arrangements should support continued collaboration between trusted parties and retailers, maintaining existing processes during the transition. These</p>
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	<p>processes, which already function effectively, should not be disrupted by new regulatory protocols that may not yet be fully operational or adapted to all use cases.</p> <p>Our preference is to continue operating under mutually agreed processes during the transition, with fallback to the new regulated approach only where cooperation breaks down or access is denied. This allows for a smooth transition without compromising current service levels or efficiency.</p> <p>What additional provisions are needed to maintain data continuity during retailer exits, mergers, or other significant business changes?</p> <p>We currently manage data continuity well through strong relationships and regular engagement with industry participants. Retailers proactively keep us informed of upcoming changes, and we routinely meet, both formally and informally, to discuss product or structural changes well in advance. This trusted, open communication ensures continuity during events such as exits, acquisitions or product line changes.</p> <p>Maintaining these relationships is far more effective than relying solely on strict rules or adversarial enforcement mechanisms. Overly prescriptive approaches can erode trust and create a compliance mindset rather than one of collaboration. Any regulatory framework should recognise and support the value of existing industry cooperation in managing continuity and transitions effectively.</p>
Q19. Should each electricity plan be required to have a unique identifier to help consumers and third parties distinguish	<p>Should each electricity plan be required to have a unique identifier to help consumers and third parties distinguish between plans with the same or similar names?</p> <p>Yes. See our response to question 4.</p>

<p>between plans with the same or similar names?</p> <p>Q19a. If yes, how should the unique identifier system be designed and administered to ensure that is practical, consistent and does not add unnecessary compliance costs?</p>	<p>If yes, how should the unique identifier system be designed and administered to ensure that it is practical, consistent, and does not add unnecessary compliance costs?</p> <p>We propose that each distinct tariff pricing be assigned a unique and permanent identifier. This could be administered through an agreed industry protocol, with each retailer responsible for generating and assigning their own codes in line with that protocol. A practical approach would be to base the code on the retailer's existing four-letter identifier, followed by a standard structured combination of letters and numbers that indicate plan type and the relevant network pricing region, standard versus low user, along with other attributes, which in combination will create a code unique to that pricing tariff set. This approach would allow for consistency and clarity without introducing a significant additional compliance burden. The code could also be included on customer bills to enable detection and auto-comparisons by new AI-powered bill reader tools.</p>
<p>Q20. Do you have any feedback on how these new protocols could be implemented?</p>	<p>See our response to question 19. We suggest that an industry working group be formed to develop an appropriate protocol for unique plan coding. This could be done relatively quickly, leveraging existing identifiers and retailer input to ensure the system is both practical and efficient.</p>

<p>Q21. What are the likely implementation costs (systems, processes, resourcing) for your organisation, and how could these be minimised?</p>	<p>Powerswitch is already well established, with existing systems and APIs in place. As a result, the cost to implement new APIs or adjust to new protocols would be relatively low for our organisation. Any upfront investment would be more than offset by the resulting operational efficiencies and the anticipated increase in consumer switching.</p>
<p>Q22. What support, if any, would you find helpful during implementation (e.g., technical guidance, test environments)?</p>	<p>We do not anticipate needing any implementation support. Powerswitch has well-established relationships with retailers, built through existing collaborative development efforts. Our in-house and contracted development team is highly experienced and has worked on the platform for many years. With over 25 years of industry knowledge and connections, we are confident in our ability to implement any required changes independently.</p>
<p>Q23. What compliance or assurance mechanisms (beyond Code compliance monitoring) would support effective data quality and adherence?</p>	<p>We currently undertake a quarterly audit process in which all participating retailers are asked to confirm that the prices we hold are accurate and remain valid. This process will continue to be an integral part of our quality assurance framework.</p> <p>We would recommend that third-party data users establish and maintain their own validation processes, tailored to their operational needs and agreed with their retailer partners, to provide an appropriate layer of assurance specific to their application.</p>

<p>Q24. How would you like to be involved in co-designing the new product data protocols? Are there any specific parties that the Authority should be consulting with to help design these protocols?</p>	<p>As the operator of a long-established national price comparison service, we would be a regular and high-volume user of product data. We would welcome active involvement in the co-design process, particularly in shaping the detailed technical and operational requirements, to ensure the protocols are practical, accurate and appropriate.</p> <p>We also recommend the Authority engage with a broad range of stakeholders, including other consumer comparison services, consumer advocacy organisations and a representative mix of retailers, to capture diverse perspectives and operational needs.</p>
<p>Q25. Are there specific technical standards, platforms, or international practices the Authority should consider in designing API-based access?</p>	<p>No comment.</p>
<p>Q26. Do you have any feedback on the proposed implementation timeline, or additional risks or dependencies we should factor in?</p>	<p>Implementation is both urgent and long overdue. We strongly recommend that the new protocols be introduced as soon as practicable to prevent further loss to consumers.</p>