

7 August 2026

Our ref: HF:C&C

Consumer Policy Unit
The Treasury
Langton Crescent
Parkes ACT 2600

By email: [REDACTED]

Dear Consumer Policy Unit

Exposure Draft – Deferred Sales Model Class Exemption Extension

Thank you for the opportunity to contribute to the Deferred Sales Model for add-on insurance class exemptions – exposure draft regulations.

This submission has been informed by members of the Queensland Law Society's (QLS) Competition and Consumer Law Committee.

QLS supports the proposed extension of the existing class exemptions.

The exemptions have now been in place for around five years. During that period, we are not aware of evidence demonstrating that they have resulted in significant consumer harm. In our view, the continuation of the exemptions is justified given the benefits for consumers.

The exemptions allow certain insurance products, such as home insurance and comprehensive motor vehicle insurance to be sold at the time a consumer purchases a home or vehicle. The ability to purchase insurance before completing their transactions is an important safeguard for consumers.

From a consumer perspective, this is a positive outcome and encourages consumers to obtain appropriate insurance when they need it most and reduce the risk of being uninsured in vulnerable periods.

We agree that competition remains an important policy objective to promote better outcomes for consumers over the long term. At the same time, there is a strong public interest in ensuring consumers have practical access to essential products at the point of purchase.

In our view, the operation of the exemptions over the past five years suggests that the exemptions have maintained an appropriate balance between these competing considerations.

For these reasons, QLS supports extending the Deferred Sales Model class exemptions until 5 October 2031.

Exposure Draft – Deferred Sales Model Class Exemption Extension

If you have any queries regarding the contents of this letter, please do not hesitate to contact our Legal Policy team via policy@qls.com.au or by phone on [REDACTED] [REDACTED]

Yours faithfully

A large black rectangular box redacting the signature of Peter Jolly.

Peter Jolly
President