

28 April 2025

General Manager, Policy
Australian Prudential Regulation Authority
Level 12, 1 Martin Place
Sydney, NSW 2000

By email: PolicyDevelopment@apra.gov.au

Dear Sir/Madam

APRA Consultation related to HELP Debts in DTI and Serviceability

We refer to APRA's recent consultation related to Help Debts in DTI and Serviceability.

Suncorp Bank ('Suncorp') has further considered the the proposals and would like to provide for APRA's consideration, the following comments. We acknowledge this consultation closed on 20 March 2025, and appreciate APRA's support in allowing our late feedback.

APRA Proposal: Removal of HELP debt from DTI reporting.

Suncorp supports the proposed definition change to remove HELP debt from DTI reporting. This includes the proposed change to the definition of DTI in ARS 223. Alternatively, APRA could consider removing the reference to HELP debt in the DTI definition without including the additional information expressly stating to exclude HELP from DTI. Suncorp would also anticipate that this change is also intended to apply to loan assessments and all uses of DTI ratio in the customer lifecycle. Establishing and applying a single and consistent DTI definition for HELP debt customers would enable a faster and lower complexity change (including systems, processes and loan management) as well as remove any management or complexity for Suncorp to hold multiple DTI definitions.

We would be pleased to further discuss any aspect of this submission. Please contact [REDACTED] from our Bank Regulatory Affairs team ([REDACTED]) in the first instance. Again, thank you for the opportunity to provide late comment to the APRA's consultation.

Yours sincerely

[REDACTED]
[REDACTED]
EGM Home Lending

CC: [REDACTED] CRO Suncorp Bank
[REDACTED], Head of Home Lending Product
[REDACTED], Advisor, Bank Regulatory Affairs