

aml

From: [REDACTED]@harcourts.hoverd.co.nz>
Sent: Friday, 3 December 2021 9:59 am
To: aml
Subject: AML/CFT Statutory Review

Hello,

As a real estate agency, we are particularly concerned about the possibility of having to do CDD on both the purchaser as well as the vendor. We see several issues that will arise if this proposed change is implemented.

1. The vendor is our customer; the purchaser is not. Currently the due diligence on the purchaser is performed by the purchaser's lawyer, whose client they are.
2. As the current laws stand, the purchaser engages the lawyer prior to the purchase of a property which enables them to perform CDD prior to any transactions. Should we have to begin performing CDD on a purchaser when a Sale & Purchase contract is received, the processing of that contract will have to cease until CDD/EDD is completed causing unnecessary delays.
3. The proposed changes will at least double our workload. This will place extra load/stress not only on the administration team, but the sales agents also. It will also incur extra costs to the business.

We oppose this proposed change, which we believe is the general opinion of the industry, and we think lawyers should be doing the CDD on their customer, the purchaser.

With regards,

[REDACTED]

