



24 July 2024

Anthony Hilton
Director
Competition Exemptions
Australian Competition and Consumer Commission

Sent by email: exemptions@accc.gov.au

Dear Mr Hilton,

Australian Banking Association Ltd (ABA) – Application for Authorisation AA1000674

We refer to Application AA1000674 the interim authorisation of 3 July 2024. The AHA has no objection to the interim authorisation but makes submissions below.

Obligation to consult needs to be strengthened

There are commercial and consumer interests that are not represented by the ABA and the Funding Parties. The obligation upon the ABA, the Funding Parties and Armaguard to “commit to involving other users of cash in transit services in a meaningful way” needs to be strengthened and made more transparent.

Submission

We propose that the AHA be specifically named in the interim authorisation as a party to be involved and consulted, much in the same way as the Customer Owned Banking Association is already listed.

Background of AHA

The Australian Hotels Association (AHA) is an organisation of employers with over 6,000 members in the hotel, accommodation and hospitality industry registered under the *Fair Work (Registered Organisations) Act 2009*. We note:

- While some AHA members use the services of Armaguard, other AHA members utilise the services of cash-in-transit providers that are not aligned with the Funding Parties set out in the Interim Authorisation.
- We note the commitment of the ACCC to maintain cash in regional and remote areas and that many AHA members are in towns not serviced with cash by the Funding Parties. In many cases, the local pub (or club) is the only provider of cash in the town.

A snapshot of the cash availability in some NSW towns is set out below.

NSW Town	ATM provider	Population
Smithtown	No bank. Pub has the only ATM	590
Gladstone	No bank. Pub and general store have only ATMs	437
Valla Beach	No bank. Tavern has only ATM	1,314

Bellbrook	No bank. Pub has the only ATM.	339
Ebor	No bank. Pub has the only ATM.	149
Robertson	No bank. Pub and club have the only ATMs.	2,017
Shoalhaven Heads	No bank. Pub and club have the only ATMs.	3,059
Marulan	No bank. Pub has the only ATM.	1,178
Tarago	No bank. Pub has the only ATM.	510
Quandialla	No bank. Pub has the only ATM.	349
Dunedoo	No bank. Pub has ATM. Club has ATM but only opens after 4pm.	1,215
Gulgong	One bank but closes daily at 1pm. Two pubs and two clubs have only ATMs.	2,680
Rylstone	No bank. Pub and shopfront have the only ATMs.	904

Thank you for your consideration of this submission.

Yours faithfully,



STEPHEN FERGUSON
NATIONAL CEO