



Our ref: AA100664
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Dear Interested Party

Australian Banking Association - application for authorisation [AA100664] – interested party consultation

On 27 March 2024, the Australian Competition and Consumer Commission (the **ACCC**) received an application for authorisation from the Australian Banking Association. This letter is to invite you to comment. You are welcome to pass this letter on to others who may wish to make submissions.

The ABA is seeking authorisation¹ under the *Competition and Consumer Act 2010* (Cth). Authorisation would enable the ABA, its member banks, and other industry participants who distribute and/or utilise cash in their businesses to discuss, share information, reach agreement on and/or implement business continuity measures to be followed in the event of, or in reasonable anticipation of a suspension, disruption or exit of Armaguard's services to:

- i. support the continued and safe distribution and availability of cash to banks, retailers, other businesses and/or members of the public in metropolitan and regional non-metropolitan locations in the short-term and prior to the development of a longer term regulatory or industry solution and/or
- ii. to support customers and businesses who use cash in the event of any such suspension, disruption or exit.

A full copy of the application for authorisation is available on the ACCC's [authorisations public register](#).

Late last year, the ACCC granted interim authorisation (AA100654) to the ABA and other industry and regulatory stakeholders to collaborate on development of short, medium and longer-term responses to support ongoing access to cash, the implementation of which would be the subject of separate applications to the ACCC. This application is an anticipated outcome of those discussions.

Authorisation is sought until 30 June 2025.

Interim authorisation decision

The ABA has also requested interim authorisation to enable industry participants to engage in the proposed conduct while the substantive application for authorisation is being assessed by the ACCC.

On 28 March 2024, the ACCC granted interim authorisation with conditions. A copy of the ACCC's interim authorisation decision is [attached](#) and is also available on the [ACCC's public register](#).

As noted in the attached decision, the ACCC may review its decision on interim authorisation at any time. The ACCC's decision in relation to interim authorisation should not be taken to be indicative of whether or not final authorisation will ultimately be granted.

¹ For information about Authorisations, please see <https://www.accc.gov.au/business/exemptions/authorisation>

Making a submission

The ACCC invites you to make a submission on the application for authorisation. In making your submission, please provide information, evidence and views about the likely public benefits, effects on competition and any other public detriment that you consider will result from the proposed conduct.

If you intend to provide a submission, please do so by **18 April 2024**.

If you wish to request an extension, please contact us on the details below as early as possible. Submissions after the due date (or after any extension granted) may not be taken into account.

Submissions should be lodged via the web form accessible on the public register page for this matter. Alternatively, if you would like to provide comments orally, please contact Elizabeth Batten via the details at the end of this letter.

Your submission **will** be placed on the ACCC's [authorisations public register on the internet](#) unless you have made a request (with reasons) for us to exclude part or all of the submission from the public register. (see [Guidelines for Excluding Information from the Public Register for more information on how to make a request and how we assess requests](#)).

Timetable

The ACCC will progress its assessment of the application in a timely manner. An indicative timetable is set out below for your information, and an up to date version (including any changes) will be posted on the public register.

Indicative date	Stage in assessment process
27 March 2024	Lodgement of application and supporting submission.
28 March 2024	ACCC decision regarding interim authorisation. Public consultation process begins.
18 April 2024	Closing date for submissions from interested parties.
May/June 2024	Draft determination.
June 2024	Public consultation on draft determination including any conference if called.
July/August 2024	Final determination.

This letter has been placed on the ACCC's public register. If you have any questions or wish to discuss any aspect of this matter, please do not hesitate to contact Elizabeth Batten on 02 6243 1359 or exemptions@acc.gov.au.

Yours sincerely



Anthony Hilton
Director
Competition Exemptions