



18 October 2022

Mr Bruce Mikkelsen  
A/g General Manager  
Competition Exemptions  
[Armaguard-Prosecur-Merger@acc.gov.au](mailto:Armaguard-Prosecur-Merger@acc.gov.au)

Dear Mr Mikkelsen,

**ARMAGUARD/PROSEGUR APPLICATION FOR MERGER AUTHORISATION**

The Australian Finance Industry Association (AFIA)<sup>1</sup> thanks the ACCC for the invitation to comment on the application for authorisation from Armaguard and Prosegur Australia to combine their cash distribution and management, device monitoring and maintenance and ATM business in Australia (the **Proposed Transaction**).

We note that cash distribution services including cash storage, transport and processing are predominantly provided to banks and both large and small retailers. On this occasion we defer to stakeholders in these sectors to provide their views about potential impacts on competition issues relevant to this issue.

If you or your office have any questions or wish to follow up on any matter, please do not hesitate to contact me on [REDACTED].

Yours faithfully



Diane Tate  
**Chief Executive Officer**

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<sup>1</sup> AFIA is the only peak body representing the entire finance industry in Australia.

We represent 158 members, including bank and non-bank lenders, neobanks, finance companies, fintechs, providers of vehicle and equipment finance, car rental and fleet providers, and service providers in the finance industry.

We are the voice for advancing a world-class finance industry, with our members who are at the forefront of innovation in consumer and business finance in Australia. Our members finance Australia's future.

We collaborate with our members, governments, regulators and customer representatives to promote competition and innovation, deliver better customer outcomes, and create a resilient, inclusive and sustainable future.

We provide new policy, data and insights to support our advocacy in building a more prosperous Australia.  
[Australian Finance Industry Association \(afia.asn.au\)](http://afia.asn.au)