



24 July 2024

Anthony Hilton  
Director  
Competition Exemptions  
Australian Competition and Consumer Commission

Sent by email: [exemptions@accc.gov.au](mailto: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**