

27 January 2023

Sent by email: [Armaguard-Prosegur-Merger@acc.gov.au](mailto:Armaguard-Prosegur-Merger@acc.gov.au)

**Australian Security Industry Association Limited (ASIAL)  
MA100022 – submission**



The Australian Security Industry Association Limited (ASIAL) welcomes the opportunity to respond to the ACCC's Statement of Preliminary Views regarding the proposed merger of Linfox Armaguard Pty Ltd (Armaguard) and Prosegur Australia Holdings Pty Limited (Prosegur).

In responding, ASIAL reaffirms the position expounded in its submission dated 27 October 2022.

- **Access and availability to cash** – whilst acknowledging that cash transactions have fallen, cash remains an important method of payment not only for vulnerable consumers and regional communities, but as an important back-up form of payment not tied to the digital economy should there be cyber-attacks, natural disasters or power outages. Cash is a core part of Australia's national infrastructure and not just a commercial issue.

Consumers should have freedom of choice when it comes to whether or not they use cash. This choice is predicated on access to cash, acceptance of cash and a viable cash infrastructure.

- **Sustainability** - maintaining sustainable access to cash as a cost-effective alternative to digital payment options is important in providing consumers with greater choice. As the Reserve Bank acknowledges in its submission, the environment of declining volumes of banknotes being transported and processed is placing significant pressure on industry participants.

Maintaining a sustainable and high level of service to customers requires significant investment, at a time cash usage is declining. Given this, and the large geographic areas that require servicing there is a strong case for change. Ensuring there is a managed rather than disrupted transition is in the public interest.

A significant shift in thinking is required to ensure there is a safe, viable, robust and efficient cash distribution system capable of meeting the future needs of the Australian community.

Yours sincerely



Bryan de Caires  
Chief Executive Officer