



15 August 2024

Anthony Hilton
Director
Competition Exemptions
Australian Competition and Consumer Commission

Dear Mr Hilton,

Re: Australian Banking Association Limited- Application for Authorisation AA1000664

We refer to Application AA1000664 from the Australian Banking Association Limited (**ABA**). Clubs Australia notes that the Australian Competition & Consumer Commission (**ACCC**) in their draft determination and interim authorisation decision:

- Recognises the importance of maintaining access to cash in regional and remote areas.
- Expressed a clear expectation that the ABA, the Funding Parties and Armaguard will commit to involving other users of cash-in-transit services in a meaningful way in respect of business continuity measures.
- Listed, at a minimum, other affected parties that they would expect to be involved in consultation and providing transparency about proposed business continuity measures.

Clubs Australia strongly recommends that it be specifically listed in the final determination and interim authorisation as a party to be involved in consultation and provided information on proposed measures on cash-in-transit services.

Clubs Australia represents over 5,000 licensed clubs and employs more than 140,000 people. Clubs are not-for-profit, member-owned organisations whose central activity is to provide sporting and recreation infrastructure to their members and the wider community.

Clubs across Australia must have access to reliable, ongoing distribution cash-in-transit services to:

- Facilitate their service offerings (for example, cash remains the legal form of tender for most electronic gaming machines (EGMs) nationally across clubs).
- Ensure that patrons who make purchases in cash can continue to do so.
- Help clubs avoid keeping excess cash on premises, which reduces the risk of theft and provides a safer workplace for employees.
- Continue to provide cash to the local community, where the club (or pub) is the only cash provider in town (which is prominent in regional and rural areas).

Yours sincerely,

Alison Tehan

Alison Tehan
Deputy Executive Director
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