

28 August 2025

Council of Financial Regulators
Australian Competition and Consumer Commission

Via email: CashDistributionRegulationConsultation@cfr.gov.au

To whom it may concern

Re: Regulating Cash Distribution

Clubs Australia appreciates the opportunity to provide a submission on the regulation cash distribution.

Clubs Australia represents over 5,000 not-for-profit licensed clubs across the country which directly employ 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 their wider community.

Clubs accept both cash and digital payments for various services, including food and beverage, live entertainment, gambling and sporting events. For most Australian jurisdictions, services such as electronic gaming machines (EGMs), must legally accept cash only. This places clubs in a unique position, as they are unable to transition to digital payment systems for gaming operations. While several jurisdictions have announced plans to introduce account-based gaming, the implementation timelines have not been confirmed. In the absence of reform, clubs will continue to rely heavily on cash, and demand for cash distribution infrastructure is expected to remain high.

Further, many clubs, particularly in regional and rural areas, provide the only ATM in the town for the community to use and access. It is critical that there are reliable cash-in-transit services to ensure clubs can continue to provide this service to patrons and allow for patrons to use cash.

Clubs, particularly medium to large ones, rely on third-party cash-in-transit providers for transporting cash and reducing robbery risks. However, clubs are continuing to face increased costs from inflation, fuel and staffing issues along with service reliability in regional areas. Clubs have expressed concerns about monopolistic pricing, especially in remote areas where there are limited provider options.



Clubs Australia:

- Supports the Government's commitment to maintaining adequate access to cash and exploring regulatory arrangements to support these objectives.
- Supports the overarching objective and four principles for the proposed regulatory framework for cash distribution.
- Notes that any arrangements and/or new frameworks must:
 - Actively encourage competition and innovation.
 - Ensure equitable access to cash distribution between regional and metropolitan Australia as well as small and large businesses.
 - Not create additional cost or compliance burdens for small businesses.

Clubs Australia also wishes to convey its support for the Independent Payment Forum's submission to this consultation.

For further information about Clubs Australia submission, please contact Daniel Mitchell, at

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Sincerely,

Daniel Mitchell
Clubs Australia