



6 November 2025

Payments Licensing Consultation Secretariat
Treasury

Submission uploaded via the submission portal

To whom it may concern,

Re: Regulation of Payment Service Providers- Tranche 1a draft legislation

Clubs Australia appreciates the opportunity to provide a submission on the draft legislation that provides a new regulatory framework for payment service providers.

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 accept both cash and digital payments 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.

Several jurisdictions have announced the proposed introduction or trials of account-based gaming for EGMs. As these trials continue to proceed, it is important that payment services and the broader regulatory framework support clubs in providing service offerings. Clubs must be able access and rely on a secure and trusted payment systems.

Clubs Australia supports the Government's intent to modernise the regulatory framework for payment service providers to ensure it is fit-for-purpose and promote regulatory certainty and competition.

Clubs Australia is looking forward to providing further feedback on additional aspects of the framework that will be covered in tranche 1b of the legislation.

Should you have any questions, please do not hesitate to reach out at

[REDACTED]

Kind regards,

Dan Mitchell
Clubs Australia



Supplementary Information provided to consultation:

“Clubs Australia supports that the Single Payee Australia Finance Service Licence (AFSL) exemption in the Corporations Act is intended to be kept as part of the draft regulation. This exemption ensures that clubs do not need to apply to for an AFSL where patrons can deposit funds onto a card to use in the venue.

Clubs Australia seeks confirmation that it is the intent of the draft regulation to preserve this exemption.”