



14 November 2025

Anthony Hilton
Director
Competition Exemptions
Australian Competition and Consumer Commission

Dear Mr Hilton,

Re: Australian Banking Association (CIT Initiatives and Business Continuity Planning) Draft Determination

Clubs Australia refers to Application AA1000680-1 from the Australian Banking Association Limited (**ABA**). Clubs Australia notes that the Australian Competition & Consumer Commission (**ACCC**) in their draft determination decision:

- Recognise the importance of maintaining access to cash in regional and remote areas.
- Per Proposed Condition 2, require that the ABA must provide a report monthly to the ACCC, Treasury and Reserve Bank that sets out various matters, including, a description of the nature and timing of consultation that occurred pursuant to the consultation plan.
 - This includes a non-confidential version of each report will be provided for publication on the ACCC's authorisations public register.
- Per Proposed Condition 3, require that the ABA will provide a report within 30 days of the authorisation coming into effect provide a report to the ACCC, the Reserve Bank and Treasury that sets out a consultation plan, which:
 - Details the nature and timetable for reasonable consultation during the authorisation period.
 - Ensures each stakeholder has at least one opportunity to provide input for consideration.
 - Third Party Stakeholders that must be consulted with, including Clubs Australia.

Clubs Australia appreciates and supports that continued consultation with third parties continues as part of the CIT initiatives and business continuity planning. However, to date this engagement has been sporadic at best. Clubs Australia suggests that more regular engagement and further consultation opportunities would be more productive in the development of this work.

Additionally, Clubs Australia also recommends that the draft determination include a provision whereby Third Party Stakeholders who have been consulted or whose feedback is being reported under Proposed Condition 2 are provided with a copy of the report. This would enhance transparency and support accurate reporting of consultation outcomes with Third Party Stakeholders.

Clubs Australia continues to advocate for a pricing mechanism that is fair, transparent and predictable, which could be achieved through a tiered pricing structure. This would better support clubs, particularly those who are small to medium in size.

CIT services are essential for clubs to securely handle cash from gaming and hospitality operations, despite rising costs and evolving payment technologies. Clubs continue to face challenges including service reliability, security, and limited competition. Clubs across Australia must have access to reliable, ongoing distribution cash-in-transit services to:

- Facilitate their service offerings (for example, cash remains the only 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,

Dan Mitchell
Clubs Australia