

15 August 2025

CFR and ACCC Cash Distribution Consultation Submissions
c/o Note Issue Dept,
Reserve Bank of Australia
GPO Box 3947
Sydney NSW 2001

BY EMAIL: CashDistributionRegulationConsultation@cfr.gov.au

Dear Sir / Madam,

**Subject: SUBMISSION BY BANKTECH AUSTRALIA PTY LTD –
REGULATING CASH DISTRIBUTION COUNCIL OF FINANCIAL REGULATORS (CFR)
AND AUSTRALIAN COMPETITION AND CONSUMER COMMISSION (ACCC)
CONSULTATION PAPER (JULY 2025)**

1. Introduction and Background

Banktech Australia appreciates the opportunity to provide feedback on the proposed regulatory framework for cash distribution. As a long-standing participant in Australia's payments ecosystem, we recognise the critical role cash plays in supporting financial inclusion, particularly in regional and remote communities.

Banktech has been operating as an Independent ATM Deployer (IAD) for over 27 years, as the owner of the CashConnect ATM network. Today our network of machines dispenses over \$900 million in cash to Australian consumers each month. We therefore understand the importance that ongoing access to cash has to many sectors of the Australian community.

In addition, our international operations also provide valuable insights. In India, we are the largest IAD, dispensing over INR 86.4 billion (AU\$1.6 billion) monthly as part of the Government's Financial Inclusion initiative. In the Philippines, we operate the largest Payment Kiosk network, providing millions of Filipinos with convenient self-service terminals to pay bills and deposit funds, accepting PHP 6.8 billion (AU\$184 million) in cash each month. These experiences reinforce our understanding of how efficient cash distribution supports financial access and inclusion.

For more than 30 years, we have worked closely with our customers to help them navigate the changing payments landscape. While we acknowledge the global trend towards cashless transactions, the effectiveness of our operations both locally and across the region depends on the efficient distribution and utilisation of cash.

2. General Support and Position

Banktech supports the introduction of a new regulatory framework for cash distribution as proposed in the Consultation Paper. However, as discussed in the ATM Round Time held on Thursday 14 August, we would like to confirm that it is not intended to include ATM deployers

in this framework. ATM deployers are not part of the upstream cash distribution infrastructure and therefore we don't believe they should be subject to the same regulatory obligations.

While supporting the new framework, we encourage the CFR and ACCC to adopt a broader approach to improving cash access in regional communities. This includes recognising the important role of self-cashing locations, venues that use their own cash to replenish the ATMs, and help support a sustainable local cash cycle rather than relying solely on costly cash-in-transit solutions.

Although ATMs provide essential access to cash withdrawals, the ability for businesses and the public to deposit cash remains limited. Currently, there is no multi-bank deposit service available to enable banks or independent ATM operators to accept cash deposits. In regional communities, the ability to deposit cash is just as important as withdrawing it, in order to support a more efficient and sustainable cash cycle.

3. Additional Recommendations for Regulating Cash Distribution

In addition to the framework proposed, Banktech would like to highlight the following solutions:

- Enable banks and independent operators to offer multi-bank deposit services, allowing regional communities to deposit and recycle excess cash locally.
- Encourage the Reserve Bank of Australia (RBA) to play a more active role in the Cash value chain, including:
 - Establishing regional cash hubs for ATM operators to source and clear cash directly.
 - Addressing the current monopoly held by Westpac in the provision (sourcing) of commercial cash by broadening access to RBA facilities.
 - Considering a cash bailment facility fully funded by the RBA to support the cost of cash in ATMs, especially in underserved areas.

4. Conclusion

Banktech appreciates the opportunity to contribute to this important consultation. We are committed to working with regulators and industry partners to ensure that Australians continue to have reliable, affordable, and equitable access to cash.

We would welcome the opportunity to discuss our submission further and contribute to the development of the regulatory framework.

Yours sincerely



DAVID GLEN

Group Managing Director