



*A voice for the millions of Australian consumers
and businesses who trust and rely on cash every day.*

Friday 15th August 2025

Council of Financial Regulators

CashDistributionRegulationConsultation@cfr.gov.au

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Re: Submission to Cash Distribution Regulation Consultation

Dear CFR,

I understand this consultation seeks the views of industry participants (primarily) regarding your proposed new regulatory framework for cash distribution.

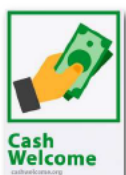
Background

I started campaigning about cash access and acceptance in 2020 when my local bank branch and three ATMs suddenly disappeared, despite long queues every morning.

It was clear to all of us standing outside the closed branch that banks are not 'responding to changing consumer behaviour,' they're actively discouraging cash access and 'herding' customers toward digital banking and payment options.

My local supermarket also went 'cashless' for a short time before returning to cash acceptance following customer complaints.

More than [200,000 Australians have signed my petition](#) calling for a cash and banking guarantee.



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Responding to your proposed regulatory framework

Your consultation paper proposes a new regulatory regime with reporting and compliance requirements on designated businesses in the cash system.

Many people who have signed my petition have commented or emailed me to emphasise that the big banks are expected to ensure cash access.

Most Australians believe that, in principle, the big banks have a responsibility to provide cash services (including consumer and business deposits and withdrawals) in all communities.

Consultation questions:

2.1. Is the overarching objective for the proposed regulatory framework – to ensure the cash distribution system operates in the public interest – appropriate? If not, why?

A: YES, the objective for the regulatory framework is appropriate because the cash system is essential for millions of Australians and businesses.

However, “public interest” in this context means low or no-cost access to cash services in all local areas.

The only way to achieve this is to incentivise and support a thriving, competitive industry where demand is strong.

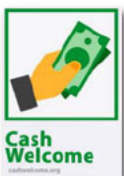
Currently the cash industry is private companies operating for profit providing services to consumers, banks and retailers. This market system works well when demand is strong.

Low or no-cost cash services can’t be provided in local communities, in the absence of strong demand for cash, without significant funding from taxpayers or banks.

2.2. Are the four policy principles (access, sustainability, resilience and efficiency) for the proposed regulatory framework appropriate? If not, why?

A: NO, these principles raise the possibility of extensive compliance reporting for cash industry entities without a corresponding public benefit.

The anticipated crisis is (presumably) a disorganised exit from the market by Armaguard. How other private-sector vendors of cash services can be expected to prove their resilience in this context is unclear.



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The efficiency of a private business entity is most effectively determined by market forces. Inefficient players will be weeded out by more effective competitors.

The regulatory regime needs to plan for a competitive and thriving C.I.T. sector to ensure efficiency throughout the system.

The four policy principles don't seem to anticipate the development of a thriving, competitive, profitable cash in transit industry.

3.1. The proposed framework distinguishes between registration (for general oversight) and designation (that applies more substantial regulatory obligations and powers reflecting the critical cash services being provided). Is this two-tiered approach proportionate to the challenges facing the cash distribution sector? Are there alternative models that should be considered?

A: YES, Many vendors in the cash industry are not providing critical services and don't need to be captured by additional regulation.

3.2. What baseline obligations should apply to all registered entities to support sector transparency? What additional reporting obligations should designated entities have, particularly in relation to service continuity, crisis preparedness, performance reporting, and/or compliance with industry codes of practice?

A: Banknote Distribution Agreement holders (the big banks) need to be required to report much more extensively on how they are maintaining cash and banking networks, systems and infrastructure.

All Authorised Deposit-Taking Institutions should be required to report on:

Publish how their personal and business customers can access cash services for low or no cost.

Report how they are providing cash services in all communities.

Publish a new plan for local customer cash access if they intend to close a branch or ATM.

Report how they are ensuring resilience in the cash system.



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3.3. What factors should be considered when determining whether a cash distribution provider should be designated (e.g., criticality of services provided, market share and/or geographic coverage)?

Should designation be the responsibility of a regulator or the Minister? What protections should be in place to ensure the designation process is fair?

A: Responsibility for cash distribution must be firmly placed on the Banknote Distribution Agreement holders, not Armaguard or any other C.I.T. operator.

Armaguard and other cash in transit operators are contracted by banks, retailers or other businesses.

Ultimately cash distribution in Australia is generally understood to be the responsibility of the Banknote Distribution Agreement holders (the big banks).

These highly profitable businesses are the appropriate entities to be designated as responsible for critical cash services.

4.1. What key indicators or thresholds should trigger crisis resolution powers, to support the continued operation of cash distribution services critical to the functioning of the cash system?

A: Intervention is required at an earlier stage than collapse of the major C.I.T. operator.

If regulatory intervention is being contemplated to ensure critical cash services, the intervention must occur at the community level when the services are being withdrawn.

Key indicators for action include:

Closure of a major bank branch.

Closure of the last bank branch in a community.

Closure of the last bank-owned ATM in a town or community.

Closure of an Australia Post Bank@Post outlet.



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4.2. Are the proposed powers and interventions appropriate for the cash distribution sector?

A: POSSIBLY. A designated entity engaging in conduct that threatens the continuity of the cash system could describe a business unable to meet its trading obligations or a business with a product that competes with the cash system.

Banks and retailers have (arguably) engaged in conduct undermining the cash system because they favour cashless payment systems.

Most Australians would support regulatory powers to ensure banks support the cash system, rather than continue to undermine the cash system.

5.1. Under what circumstances should the regulator intervene on price and non-price terms in cash distribution agreements of designated entities to ensure they are in line with the objectives of enabling adequate access and being industry-led, sustainable and efficient?

A: When a Banknote Distribution Agreement holder intends to discontinue support for, or pay less for, cash supply services to a local community.

Price controls are a high level of intervention clearly anticipating the possibility of anti-competitive pricing by critical designated operators in the cash industry.

While there is a dominant player in the C.I.T. industry, there is little or no evidence to suggest that price controls are required right now.

The issue has been unsustainably low funding and contract pricing for Armaguard (and Prosegur) from banks since about 2017.

5.2. In the instance that a regulator applies a pricing model, what is the most appropriate approach for setting prices?

A: Price setting should not be required. There is growing evidence of new competitors emerging in Cash In Transit.

If required, price setting must recognise the large fixed component of cash supply costs.



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5.3. Should dispute resolution processes for designated entities be regulated by a regulator or a third party?

A: UNSURE. It's difficult to conceive of a dispute resolution process applying to the cash industry that is superior or preferable to the regulatory and legal processes available now.

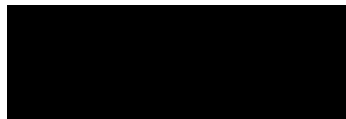
In general, this consultation conceives of a crisis in the cash industry that can be avoided by clarifying the role of the Banknote Distribution Agreement holders.

The big banks can (and are expected by the Australian public to) support the continued distribution of cash to all communities. Banks have become incentivised to undermine the cash system by their investment in cashless payment systems.

Confirming the (widely assumed) right of Australians to use legal tender cash whenever we choose would be enormously popular and support demand for cash throughout the country.

Thank you for the opportunity to make a submission to this consultation.

Yours sincerely,



Jason Bryce

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ph: 



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