



14<sup>th</sup> August 2024

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](mailto:cashdistributionregulationconsultation@cfr.gov.au)

Dear Sir/Madam,

Streamcorp Armoured welcomes the opportunity to provide this formal submission in response to the Consultation Paper issued by the Council of Financial Regulators (CFR) and the Australian Competition and Consumer Commission (ACCC) concerning the proposed regulatory framework for cash distribution in Australia.

We acknowledge and endorse the Paper's stated objectives to:

- Preserve universal access to cash as a public good
- Maintain systemic resilience in the cash cycle; and
- Fostering competition within the Cash in Transit market

However, the rapidly evolving payments ecosystem marked by a structural decline in cash usage, escalating operational costs, and increasing market concentration, necessitates a regulatory approach that is not merely reactive, but anticipatory, technology enabled, and innovation led. The current framework, heavily reliant on legacy operational methodologies and concentrated infrastructure, risks perpetuating inefficiencies and systemic vulnerabilities.

In this context, Streamcorp Armoured recommends that the CFR and ACCC adopt a future-facing policy stance grounded in the following principles:



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

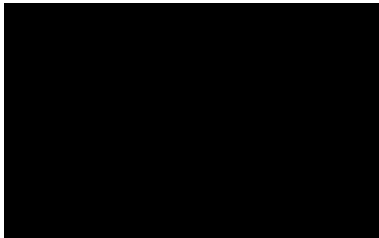
[REDACTED]

[REDACTED]

Streamcorp Armoured submits that the next phase of regulatory reform must move beyond preservation of the existing system towards the creation of a dynamic, competitive, and adaptive cash ecosystem. By embedding interoperability, decentralisation, and security innovation into the legislative framework, the CFR and ACCC can ensure that the Australian community retains equitable access to cash while securing a resilient and cost-effective supply chain for decades to come.

Please feel free to contact me if you require any further information regarding our submission.

Your Sincerely,



**Huseyin Memis**

Chief Executive Officer

