



# Record of oral submission to the ACCC

<b>Matter name:</b>	Linfox Armaguard Pty Ltd ( <b>AG</b> ) and Prosegur Australia Holdings Pty Limited ( <b>Prosegur</b> ) application for merger authorisation		
<b>ACCC participants</b>	MEAD: Lyn Camilleri, Simon Pomery, Asa Tan, Nissa Burns, Lynette Lynders MEADLU: Sita McTavish, Claudia Crause, Nik Tumbri CCEU: Rajat Sood		
<b>Other parties</b>	Westpac Banking Corporation ( <b>Westpac</b> ) - [REDACTED] - [REDACTED] - [REDACTED] - [REDACTED]		
<b>Merger authorisation number</b>	MA1000022		
<b>Date</b>	15 November 2022		
<b>Time</b>	8.30am AEST		
<b>Phone to</b> <input type="checkbox"/>	<b>Phone from</b> <input type="checkbox"/>	<b>Meeting</b> <input type="checkbox"/>	<b>Other</b> <input checked="" type="checkbox"/>

The ACCC met with staff from Westpac [REDACTED] [REDACTED] The following topics were discussed.

### Westpac’s current role in cash distribution

Westpac’s role in cash distribution is unique due to Westpac being:

- one of the only major banks using Prosegur
- the largest provider of cash on a wholesale basis nationally
- [REDACTED]

Westpac’s role in cash involves the movement of cash around the country and with the RBA, supplying cash to other banks via a bailment facility.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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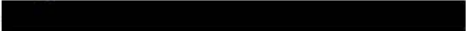
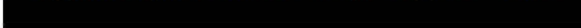
[REDACTED]

[REDACTED]



### Other parties' submissions

Westpac identified points made in submissions on the Public Register that it found particularly relevant:

- Ability of the RBA to regulate CIT services. NAB and the RBA both made points about the scope of the RBA's powers which Westpac agrees with. CBA said the RBA would need time to implement controls on pricing. Westpac agrees with this as the RBA does not currently have the powers that the applicants suggest they have.
- NAB and NCR reported on the risks around private ownership of a national merged company managing cash supply for the economy. Westpac agrees with this comment.
- Westpac agrees with comments that there are prohibitive barriers to entry and that this will have significant impacts on competition. CBA and NCR both reported on the impact the merger would have on services. A merger could remove motivation for competition, innovation and pricing incentives.   

- Counterfactual: NCR does not think that Prosegur's timeline to exit in 2 years is realistic. NAB submit that if one applicant were to exit, then remediation would need to be discussed on an industry level. Westpac agrees with these comments.