

Attn: Lauren Hogan  
Financial System Division  
The Treasury  
Langton Crescent  
Parkes ACT 2600

Via email: ABSF@treasury.gov.au

The FBAA welcomes the opportunity to provide a submission in relation to the Australian Business Securitisation Fund Bill 2018.

We acknowledge the Bill, Explanatory Memorandum and Investment Mandate and support initiatives such as this to assist micro, small and medium businesses gain access to finance on fair and competitive terms.

## Submissions

### **Include micro businesses in the instruments**

We have only one suggested alteration which is to expand the definition of SME to include Micro businesses. This would entail a change to the definition of SME and the inclusion of the word *micro* wherever references to small and medium enterprises are made in the EM, the Act or the Investment Mandate. For example, the change would need to be effected to the glossary of the Explanatory Memorandum and the reference to small to medium enterprises on line 15 under section 3 (Objects of this Act) of the Bill.

### **Appointment of External Expert**

The FBAA recognises that sound investment principles and carefully developed eligibility criteria will be critical to the effectiveness of this legislation. Decisions around eligibility and access must be underpinned by a deep-set understanding of small business and small business finance. This type of knowledge can only be acquired through extensive first-hand experience. The FBAA recommends that the Government appoint an external expert to provide input from an industry perspective. Small business funding is a key area of interest for the FBAA as many of our more than 9,000 members arrange finance for small businesses. As the peak body representing the diverse finance interests of micro, small and medium businesses in Australia, the FBAA is ideally placed to provide expert input. We propose that the Government gives consideration to appointing Peter White to this role.

Peter has over 40 years Australian banking and finance experience and has specialised in small business and commercial lending areas and if you wish to consider this further he is able to supply details outlining his 40+ years experience in banking and finance and specialisations in securitisation as well as business and commercial lending, all of which would be well suited to the Fund's objectives.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Peter J White', written over a horizontal line.

Peter J White MAICD  
Managing Director