**From:** Dale Cohen <dale@dale-cohen.com>   
**Sent:** Friday, 2 August 2019 9:51 PM  
**To:** RG - Black Economy <Blackeconomy@treasury.gov.au>  
**Subject:** Submission: Currency (Restrictions on the Use of Cash) Bill 2019

Hi, there is a significant systemic flaw in the proposal that needs to be addressed as part of the bill.

Cash is an effective real time settlement mechanism between untrusted counter-parties to a transaction. That is literally the purpose of cash. The state is the trusted counterparty. That is the whole basis of modern commerce and currency.

The proposal has merit in reducing illegal transactions but does not adequately consider the legitimate role of cash in real time transaction settlement over $10k. The obvious example is selling a car.

It is not acceptable to ignore this for the sake of legislative convenience. It needs to be resolved as part of the bill. I propose a simple approach. Make real time transaction settlement a compulsory obligation for the banks as part of the bill.

The National Payments Platform has been operational for some time now, and was supposed to provide this settlement infrastructure. My bank (St George) still does not offer real time settlement. It is very common for bank transfers to take 1-2 business days. There is no incentive for banks to reduce this delay, especially given they earn money on the balance transferred.

If citizens will be compelled to use bank transfers for amounts over $10k, an equivalent obligation MUST be placed on the banks to settle those transactions in real time, as was proposed through the NPP. Until this is legislated, it will not be possible to legitimately ban the use of cash for transactions over $10k.

Regards, Dale Cohen

55 Samuel Street, Mona Vale NSW 2103