**From:** Jeremy Crossland <jcrossland343@gmail.com>   
**Sent:** Friday, 2 August 2019 1:47 PM  
**To:** RG - Black Economy <Blackeconomy@treasury.gov.au>  
**Subject:** Submission on Draft bill : Currency (Restrictions on the Use of Cash) Bill 2019

The following in an anonymous submission.

Objection to the bill on general principles.

a) The bill purports to be a means of controlling the black economy.  This is a huge topic worthy of a dissertation.  If cash were to be banned altogether, then this would undoubtedly bring a small number of transactions from the black into the formal economy.  However the $10,000 limit implies the legislation is aimed at the big end of town and large scale money laundering.  My understanding of money laundering is that it is a sophisticated operation requiring financial experts and complex financial tools, often crossing national boundaries.  Making cash transactions illegal is unlikely to disrupt these operations, meaning the bill is not serving the purpose it is designed for.

b) Cash transactions offer members of the public anonymity when making purchases.  Curtailing cash transactions will limit the privacy of law abiding citizens who will obey the law, while doing nothing for black market transactions where the law will be ignored.  A more fit for purpose law would require citizens to explain all accumulated wealth including cash hordes.

c) If the purpose of the law is the eventual abolishment of cash to facilitate the implementation of deeply negative interest rates, then my objections become more pronounced.  Deeply negative interest rates have profound implications for savings rates, superannuation and consumerism.  If money is reduced merely to 1s and 0s in an electronic account, it could undermine peoples faith in money as a concept and participation in the formal economy.

Objection to the specific architecture of the bill.

a) The cash limit of $10,000 is by regulation, meaning that this threshold could be significantly lowered without the need for oversight required for changes to the actual act.  Compare this with the safegaurds for varying the level of GST which requires approval by all the States.

b) Basic protections for consumers as regards the scope of the law are also controlled by regulation.

c) Using cash becomes a criminal offence with a lenghty prison sentence.  Would a civil penalty not be a more proportionate response.  Driving a car is a legal activity, parking illegally does not attract a prison sentence, neither should spending $10,001 in cash.