



19 February 2025

Mandating cash acceptance  
Australian Government  
The Treasury

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WESTERN DOWNS REGIONAL  
COUNCIL SUBMISSION

19 February 2025

Sent via email

Dear Katie,

**RE: SUBMISSION OF THE TREASURY CONSULTATION ON THE ACCEPTANCE OF CASH FOR ESSENTIAL ITEMS.**

Western Downs Region Council (Council) oversees a vibrant local government area spanning 37,937 square kilometres, serving a diverse population of approximately 35,000 residents. Our region thrives on a robust foundation of agriculture, intensive agriculture, energy, and manufacturing industries.

We sincerely thank The Treasury for seeking feedback on the Mandating Cash Acceptance Consultation Paper remains a critical part of our regional communities and an essential aspect for the support of a strong, vibrant growing businesses and communities across Australia, which is of strong interest to our Council and our residents.

Enclosed is Council's comprehensive submission for your consideration, detailing out perspectives and recommendations on the framework. We believe that the insights provided will offer valuable contributions to the review process and help shape the proposal that foster growth and inclusivity in regional areas like ours.

For any further information or questions, please do not hesitate to contact me or alternatively Lidewij Koene-Sloss, Economic Development Manager, via email [lidewij.koene-sloss@wdrc.qld.gov.au](mailto:lidewij.koene-sloss@wdrc.qld.gov.au) or M: 0409 786 759.

Yours Sincerely,

Jodie Taylor  
**CHIEF EXECUTIVE OFFICER**

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## About the Western Downs Regional Council

The Western Downs is located on the Darling Downs, approximately 207 kilometres north-west of Brisbane and 83 kilometres north-west of Toowoomba. The region encompasses the centres of Dalby, Chinchilla, Jandowae, Miles, Tara, and Wandoan, covering nearly 38,000 square kilometres. Combining country lifestyle with modern living, excellent retail offerings and conveniences, the area is home to a population of around 35,000 people and has a large working age population of 60.9% aged 15-64 years.

Built on agriculture and thriving in the intensive agriculture, energy and manufacturing industries, Western Downs Regional Council is focused on making our region a great place to live, work, visit and invest and to ensure our future generation have the opportunity to do what they love whilst enjoying a regional lifestyle and continue the strong economic growth of the region.

Council manage Australia's second largest road network with highways leading into the region including the Bunya, Leichhardt, Warrego & Moonie, an extensive water, gas, and sewage network, and one of Australia's largest cattle saleyards. Located in the heart of the resource rich Surat Basin, the Western Downs has a diversified energy portfolio with five pillars of energy generation: Coal, Gas, Wind, Solar and BESS cementing our reputation as the Energy Capital of Queensland. This contributes to the region's strong economic growth, investment, and consistently high employment with a GRP of \$5.91Billion.

Council's five-year [Economic Development Strategy](#) (2023 to 2028) addresses critical issues and clearly articulates a strategic pathway for the Western Downs to diversify and grow its economy, building on the region's competitive advantage and further attracting business and investment in value-adding opportunities and emerging markets. The Economic Development Strategy focuses on five key pillars:

- **Jobs & Skills** - The Western Downs workforce is growing, optimised and fit for the future.
- **Liveability & Infrastructure** - The Western Downs is equipped with modern infrastructure and quality essential services across the region to enable liveability and wellbeing, whilst sustaining population growth.
- **Population** - The Western Downs demonstrates population growth to meet workforce demands.
- **Productivity & Innovation** - The Western Downs is a recognised leader in agribusiness, energy and manufacturing, and local productivity continues to increase.
- **Sustainability & Resilience** - The Western Downs is future-proofed for a changing climate and transitioning economies, and circular economy principles are stimulated.

This strategy aligns closely with Council's [Corporate Plan](#) and supports one of Queensland's most progressive [Planning Schemes](#) which is committed to attracting and enabling development and ensure the Western Downs is a diverse region at the forefront of the changing world.

## Executive Summary

Western Downs Regional Council (Council) welcomes the opportunity to provide feedback on The Treasury's Mandating Cash Acceptance Consultation Paper. Our submission underscores the critical importance of maintaining cash as a payment option, particularly for regional, rural, and remote communities. These areas face unique challenges, including natural risks, communication difficulties, and limited access to essential services, which make cash an indispensable part of daily life.

Council's submission highlights the need for a balanced approach that supports both cash and cashless payment methods. Council emphasises the importance of cash for financial inclusion, privacy, and resilience during natural disasters. Our recommendations are informed by engagement with our business community, chambers of commerce, industry representatives, and community groups.

Council supports the proposed mandate with specific recommendations to exempt small businesses, ensure clear definitions of essential goods and services, and maintain social inclusion. Council would go beyond and advocate for all businesses to accept cash regardless of their size and regardless of the item. Cash should be an accepted currency that is carried in all businesses. While this mandate is a step towards this direction, Council does not see it as going far enough towards cash acceptance. We trust The Treasury and relevant authorities to implement and enforce the mandate effectively, considering the diverse needs of both urban and regional communities. Council would like to see continued efforts made by The Treasury and State Authorities and Departments towards cash acceptance everywhere.

## Recommendations

1. **Greater Ambitions:** While Council has engaged and discussed with our regional business community who are generally supportive of this mandate, Council wishes to advocate for the acceptance of cash regardless of whether an item is essential or not. Council would see all businesses, regardless of their turnover accept cash as a form of payment. Council sees this as progress towards greater certainty for regional consumers.
2. **Maintain Social Inclusion:** Council strongly agrees with the importance of maintaining social inclusion by mandating the acceptance of cash. This is particularly crucial for residents in regional, rural, and remote areas who may not have reliable access to high-speed internet and physical bank branch services.

3. **Support During Natural Disasters:** Council highlights the vital role of cash during natural disasters, where internet connectivity may be compromised. Ensuring businesses can operate using cash during such events is essential for community resilience.
4. **Effective Communication and Education:** Council recommends that The Treasury and relevant governmental bodies implement effective communication and education campaigns to explain the Cash Acceptance Mandate to businesses and consumers.
5. **Simplify Compliance:** Council advocates for a clear, simple, and easy-to-understand Cash Acceptance Mandate, limiting conditions that would complicate compliance for businesses with an aggregated turnover of \$10 million or greater.
6. **Monitor and Evaluate:** Council trusts The Treasury to establish thorough metrics and data points to review the effectiveness of the mandate. These metrics should focus on the availability and accessibility of cash services, the frequency of cash transactions, and the impact on businesses and consumers in regional areas.

Council looks forward to seeing our feedback incorporated into the legislative process and remains committed to advocating for the needs of our community. For any further information or questions, please do not hesitate to contact us.



## Submission

Western Downs Regional Council (Council) is continuously engaging and communicating with our regional businesses and communities to understand their needs and difficulties. Our region benefits from vibrant and successful businesses that have managed to overcome challenges associated with working in a region disproportionately affected by natural risks, communication difficulties, and hiring challenges. Council's Economic Development Strategy 2023-2028 and Communities Partnering Strategy were created to improve the lives of our residents and grow our region into a sustainable, successful, and desirable area.

In Australia, 69% of small businesses are registered in the greater capital city area, while 31% are in regional areas (ASBFEO, 2022). Regional areas have specific needs and requirements that do not exist in urban areas or do not impact their day-to-day business. Tasks as simple as going to the bank might only require a few minutes in the cities, while regionally, many business owners must drive for half a day to reach their nearest bank, impacting their businesses, lives, and families.

Council is pleased to have the opportunity to review the proposal of mandating cash acceptance and gladly shares its perspective to provide a regional viewpoint that will benefit the successful adaptation of the proposal to fit the needs of greater Australia. Our answers and recommendations are made following engagement with our business community and their respective chambers of commerce and industry, and community groups. Council looks forward to seeing our answers and feedback incorporated as this project progresses towards legislative change.

### **1. Are there other important reasons for people relying on cash payment?**

Council shares the observations made in this document regarding the importance of people continuing to use cash. Cash has been the foundation of payment and remains an easy, simple, and practical way for Australians to use their money, including educating our younger population through budgeting. Physical forms of payment have been part of our landscape for centuries, and while cashless payments have offered previously unthought-of services, cashless provides additional services that have contributed to additional economic growth. It should not be viewed as a replacement for physical means of payment since, although the popularity of cash has decreased (Reserve Bank, 2023), it is still an essential service in many regional areas and a practical way of understanding money exchange and avoiding third-parties fees. Council advocates for cash to be supported for the purchasing of all goods, regardless of whether they are essential and to be accepted within all businesses, small, medium and large alike.

Physical means of payment have also ensured a high level of privacy, safety, and trust. Council agrees with the observations and would add that the collection, handling, and usage of personal information linked to online payments have contributed to the unfair targeting of our older generation in online scams, which have had tragic consequences for families (ACCC, 2024). The continued use of physical forms of payment ensures our older generation is not

further marginalised and can continue to use cash if they wish, despite our society's move towards an increasingly cashless society.

Our region remains vulnerable to natural hazards like floods, droughts, bushfires, and extreme storms. Over the past years, several townships in our region were all directly impacted by severe natural hazards like bushfires, floods and hail. Council has experience in helping our community prepare for, respond to, and recover from disasters. Our first-hand experience in accompanying our residents through these difficulties has highlighted the crucial importance of cash during such events. During a disaster, while maintaining communication remains a priority, the ability for businesses to continue operating using a method of payment that does not require an internet connection is vital.

Furthermore, as Council identified and continues to advocate for, our regional connectivity does not provide the same coverage or speed that capital cities and urban areas enjoy. The viability of a cashless society is hard to imagine for many of our residents who do not have a high-speed, reliable, and affordable internet connection. As such, we agree with the importance of maintaining social inclusion by mandating the acceptance of cash in Australia.

Banking services regionally are often very different from what you can have in cities. It is often that branch, in the few regional town that enjoy physical banking branch, for them to only be open certain days in the week. Working on a rotational basis covering several branches with the same workforce. This inequality of services continues to highlight the divide in services between urban and regional Australia. Cash ensures fairness and equality in the means of purchase for all residents in our area. Council will continue to advocate for the opening of regional branch and increasing the services provided to regional areas so that services may be on par with what is found in cities.

**2. Do you support the proposed mandate scope and application as described in Box 3.1? If not, what are alternative approaches?**

Council is generally supportive of exempting small businesses from this cash mandate, specifically because Council does not wish to add further legislative obligations for small businesses and wishes to advocate for and support the creation and continued success of small businesses. Council supports the Commonwealth in continuing to support this objective.

**3. Do you support the proposed application of the mandate to “corporations in trade or commerce”? If not, what are alternative approaches?**

Council does not have any alternative approaches for the proposed application of the mandate to "corporations in trade or commerce" and trusts the relevant authorities to ensure this mandate does not interfere with business as usual and that economic growth can be maintained.



**4. Do you support the proposed definition of “essential good or service”? If not, what are alternative approaches?**

Council wishes to express some comments regarding the definition of an essential good or service. Council does not wish to see businesses having to define whether a product or service is of essential use. Additionally, Council does not want this definition to be arbitrary or on a case-by-case basis. Council advocates for the mandate of cash for every goods and services.

Regional and urban areas do not share the same definition of what is an essential good or service, purely due to the physical and real differences that exist between the two living areas. Our legislative system has recognised this difference, providing specific legislation for regional areas to address the unique challenges and opportunities of regional areas. Policies such as the Regional Investment Corporation Act 2018, or, the Queensland Rural and Regional Adjustment Act 1994 have provided for specific arrangements supporting regional development working with specific constraints.

Council would recommend a clearer definition of what is an essential good or service for this definition to be more easily understood by the public and businesses. Unless this can be achieved, perhaps a wider scope should be pursued by the federal government, covering all goods and services.

**5. Do you support the proposed classification into “essential goods and services” and “non-essential goods and services” in Table 3.1? If not, what are alternative approaches?**

As stated in previous answers, Council would ensure that this definition of essential goods and services is widely understood by both businesses and the public to avoid any arbitrary or case-by-case judgment. Council would recommend The Commonwealth engages directly with business community representatives and the public separately to determine whether this definition has a universal understanding.

**6. Do you support the proposed definition of an “in-person payment”? If not, what are alternative approaches?**

Council is generally supportive of the definition given for an "in-person payment."

**7. Do you support the proposed definition of an “exempt small business,” including the treatment of franchise arrangements? If not, what are alternative approaches?**

Council is generally satisfied with the definition of an "exempt small business." Council believes that aggregate turnover remains a stronger threshold than an employee count for the case of a cash acceptance mandate. Council also highlights the importance of noting that this cash acceptance mandate would only impact 1.8% of Australian businesses. Council does not have anything to add regarding the treatment of franchise arrangements and partnerships.

Council would note that while businesses are familiar with the ATO and tax law, Council does not seek to complicate or add administrative tasks to small business owners. Council supports the observation that businesses with an aggregated turnover of \$10 million or greater would have the required systems in place to support this mandate.

Council would also advocate for cash to be accepted in all businesses. Council does not see the size of a business dictating how the consumer aims to pay for his purchase. As such, we continue to advocate for all businesses to be included and encouraged to accept cash for all their product.

#### **8. Do you think any other exemptions aside from “small businesses” are appropriate?**

Council trusts The Treasury's capability to identify other exemptions and trusts in their ability to ensure the vision in support of this cash acceptance mandate is delivered for the benefit of our residents, Queenslanders, and all Australians.

#### **9. Should the mandate be subject to a dollar limit, time limit, or combination limit? If so, what dollar and time limits should be imposed? If not, what are alternative approaches?**

While Council is generally supportive of this mandate, the implementation of a dollar limit would undermine the goals and objectives of this proposal. The 1.8% of businesses currently subject to the Cash Acceptance Mandate should accept cash for essential goods and services regardless of a dollar limit. While concerns raised about logistical, technical, and security issues are legitimate, businesses above the threshold should have the ability to ensure their compliance with this mandate. Council would propose limiting conditions to this mandate to simplify its comprehension for both businesses and the public.

Council would associate its concerns with a dollar limit to a time or combination limit. Council would advocate for a clearer, simpler, and easy-to-understand Cash Acceptance Mandate, limiting conditions that would see businesses with an aggregated turnover of \$10 million or greater refusing cash.

#### **10. Do you have any other comments on the proposed mandate scope and application, including its impact on regional, rural, and remote communities?**

Council is pleased to see that The Treasury is investigating this mandate. Regional, rural, and remote communities do not have the choice, proximity, or availability of services that urban areas and capitals benefit from. Our community has shared that often, they have seen services closing and forcing them to drive further and further to access the same level of goods and services. Council strongly advocates for sustainable regional development and improving the liveability of those choosing to live in regional, rural, and remote areas.

Ensuring that large businesses in our region continue to carry cash and allow our residents to choose their preferred payment method aligns with our Economic Development Strategy and several pillars aimed at developing a strong and resilient economy, as well as improving the liveability for our residents.

Council would also note that some large businesses have expressed that they oppose this mandate, wanting instead for the federal government to invest in infrastructure and support the phase out of cash towards a cashless society. Their views expressed cash as a costly and dangerous form of payment that has supported illegal activities in both rural communities and cities. Their experience seeing the phase out of cash in the past 20 years supports their confidence in only allowing cashless forms of payment. While Council is not supportive of the complete phase-out of cash, Council continues to strongly advocate for investment made in telecommunications and enabling infrastructure that enable the digitalisation of processes. Alongside investment made to expand the presence of banks in regional and remote areas, Australians who decided to live in those areas will be able to enjoy both the benefits of digitalisation and the guarantee of continuing to be able to use cash.

### **11. What is the most effective way to educate businesses and consumers about the mandate?**

Council is confident in The Treasury's ability to find effective communication and education methods to reach businesses and explain the Cash Acceptance Mandate. Council would recommend that the appropriate governmental body takes this opportunity to demonstrate the benefits of ensuring that cash remains available for our residents.

### **12. How should the mandate be enforced?**

Council trusts the relevant agencies and departments to ensure that this mandate is followed by businesses to ensure its smooth and effective implementation, including in regional, rural, and remote areas.

### **13. Are supporting measures required in the cash-in-transit sector?**

Council trusts The Treasury's ability to assess whether supporting measures are required in the cash-in-transit sector.

### **14. Are supporting measures required to maintain access to cash for businesses and consumers?**

Council trusts The Treasury's ability to assess whether supporting measures are required to maintain access to cash for businesses and consumers. Council would, however, note that in regional, rural, and remote areas, banks and ATMs are still a necessity, and Council continues to advocate for banks to keep services accessible, including in far-reaching areas and smaller population centres. While Council understands that economic settings might have pushed for the closure of rural branches and ATMs, their replacements

Regional areas cannot be forgotten and should continue to have access to physical branch to ensure that both individuals and businesses can physically go to their branch and talk to a person. Furthermore, the disappearance of regional and remote branch risks banking services

to become more and more foreign to issues faced by regional communities and businesses. Council will continue to advocate for, and support our existing physical branch, as well as assist interests in opening new branch in our region.

**15. What metrics or data points are important to help monitor a cash acceptance mandate?**

Council trusts The Treasury and other federal agencies and departments to establish thorough metrics and data points to review the effectiveness of the mandate. It is important to note that the performance of such a program should not be compared to cashless forms of payment. Metrics could include the availability and accessibility of cash services, the frequency of cash transactions, and the impact on businesses and consumers in regional, rural, and remote areas.

**16. If you are able, please assist in quantifying the potential benefits of the mandate for consumers. If you are able, please assist in quantifying the potential costs of the mandate for businesses.**

The Western Downs recorded 5,089 local businesses (ABS, 2024) and 18,719 local jobs (NIEIR, 2023). Our population of 34,991 (ABS ERP, 2023) supports a region with a GRP of \$5.91 billion. The median age of our population is 38, with people over the age of 75 representing 7.2% of our population (ABS, 2021). Around 36% of our population lives outside major town centres and in rural areas (Informed Decisions, 2023).

Our demographic and economic profile makes our region highly susceptible to benefit from this mandate, ensuring that cash remains available in areas where connectivity, costs, and implications of going cashless would negatively impact our residents. The potential benefits for consumers include increased accessibility to essential goods and services, enhanced financial inclusion, and greater resilience during natural disasters. The potential costs for businesses may include the need for secure cash handling and storage, potential increases in insurance premiums, and the administrative burden of managing cash transactions.

**17. Do you have views on the appropriate lead times required for the implementation of the proposed legislation? What are the considerations that may impact these lead times?**

Council does not have specific recommendations regarding the proposed legislation's lead times and trusts The Treasury's plan and assessments. Considerations that may impact these lead times include the readiness of businesses to comply with the mandate, the availability of necessary infrastructure and support services, and the need for comprehensive communication and education campaigns to ensure smooth implementation

## Conclusion

Western Downs Regional Council (Council) appreciates the opportunity to provide feedback on the Mandating Cash Acceptance Consultation Paper. Our submission highlights the unique challenges and needs of regional areas, emphasising the importance of maintaining cash as a viable payment option to ensure financial inclusion, privacy, and resilience, particularly during natural disasters.

Council supports the continued support of cash for all purchases in all businesses. The proposed mandate, with specific recommendations to exempt small businesses and ensure clear definitions of essential goods and services is a step towards this direction, Council feels further actions are needed to provide for regional and remote communities. We trust The Treasury and relevant authorities to implement and enforce the mandate effectively, considering the diverse needs of both urban and regional communities.

By mandating cash acceptance, we can safeguard the interests of our residents, support the continued success of regional businesses, and promote sustainable development across Australia. Council will continue to support efforts to improve connectivity to advance the digitalisation of payment processes, as well as to advocate for cash to continue being accepted in all purchases regardless of the good or service, and location. Council looks forward to seeing our feedback incorporated into the legislative process and remains committed to advocating for the needs of our community.

## Contact Details

Please do not hesitate to contact either myself or Lidewij Koene-Sloss, Economic Development Manager via email via email [lidewij.koene-sloss@wdrc.qld.gov.au](mailto:lidewij.koene-sloss@wdrc.qld.gov.au) or phone (07) 4679 4526 should you wish to discuss any aspect of this submission.

## Appendix

1. Western Downs Council, Economic Development Strategy 2023 – 2028, [economic-development-strategy-document-ver-22.02.23.pdf \(wdrc.qld.gov.au\)](#)
2. Western Downs Regional Council, Corporate Plan 2021 – 2026, [Plans & Publications Western Downs Regional Council \(wdrc.qld.gov.au\)](#)

3. [Western Downs Regional Council Communities Partnering Framework](#)