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**From:** Peter Fletcher  
**Sent:** Monday, 30 June 2014 11:47 AM  
**To:** Policy\_Consultation  
**Subject:** Submission to Discussion Paper - AUSTRAC Industry Contribution

Dear Sir / Madam,

I wish to advise that the Australian Bookmakers' Association ("ABA"), representing on-course bookmakers throughout Australia, fully supports the recommendations contained in the recently released "*AUSTRAC Industry Contributions Discussion Paper*".

The "ABA" has consistently argued that the previous "base fee" cost recovery arrangements provided a significant and in our view unnecessary costs and administrative impost on small businesses such as those of our members. Despite exemptions that were individually assessed for certain bookmakers with limited staff numbers, the "base fee" has been a burden for a number of our members who did not qualify for this exemption. This adds additional red-tape to their business requirements, along with significant compliance obligations provided in AUSTRAC's AML/ATF requirements.

We are most supportive of the "based fee" component now being effectively removed via the insertion of an annual payment threshold, below which no contribution fees will be levied.

This is a sound policy recommendation that reduces the cost and administration burden on small businesses such as those conducted by on-course bookmakers who traditionally operate as sole traders or limited partnerships.

The ABA would be pleased to provide any further assistance in your current review of this issue as may be helpful.

Yours Sincerely,

**Peter Fletcher**  
**Chief Executive Officer**  
**Australian Bookmakers' Association Limited**

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