

11 August 2017

Manager  
Banking, Insurance and Capital Markets Unit  
Financial System Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600  
By email to: useofbank@treasury.gov.au

Dear Sir/Madam,

**Re: *Treasury Laws Amendment (2017 Measures No. 8) Bill 2017: amendment to section 66 of Banking Act***

Novatti Group Limited (**Novatti**) is an award-winning global software technology and financial services provider. Novatti is based in Australia and listed on the ASX. Flexewallet Pty Ltd, a subsidiary of Novatti, holds an AFSL for Non Cash Payments and is a registered Remittance Network Provider under Austrac.

In amongst other services Novatti provides remittance services. Further, the company provides niche services to disenfranchised consumers that are not adequately served by existing banking structures.

Novatti commends the present government's efforts to promote innovation and new growth in the banking sector. In that same spirit of innovation, Novatti aspires to provide financial services as an Authorised Deposit-taking Institution (ADI).

The present proposal to remove restrictions on the terms 'bank', 'banking', and 'banker' would be of substantial benefit in this endeavour. These are powerful terms; ones which promote trust in potential customers.

Obtaining consumer confidence is a vital part of entering any new market. Removing the \$50M capital requirement attached to these terms is a sensible reduction of the barriers to entry in Australia's tightly knit banking sector.

This change would mean one less obstacle for Australian institutions like Novatti to be able to bring equitable new services to the market. As such, Novatti expresses its strong support for the proposed legislation.

Yours sincerely,



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