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File Name: 2013/45

24 October 2013

Director
AML/CTF Rules
AUSTRAC
PO Box 13173
Law Courts
Melbourne VIC 8010

Email: aml_ctf_rules@austrac.gov.au

RE: Draft amendments to Chapter 1 of the AML/CTF Rules

Dear Director,

The Association of Superannuation Funds of Australia (ASFA) is pleased to lodge this submission on the proposed amendments to Chapter 1 of the AML/CTF Rules regarding the definition of 'primary non-photographic identification document'.

About ASFA

ASFA is a non-profit, non-politically aligned national organisation. We are the peak policy and research body for the superannuation sector. Our mandate is to develop and advocate policy in the best long-term interest of fund members. Our membership, which includes corporate, public sector, industry and retail superannuation funds, plus self-managed superannuation funds and small APRA funds through its service provider membership, represent over 90% of the 12 million Australians with superannuation.

Comments

ASFA has reviewed the Draft Rules amending Chapter 1 of the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)*, as well as the accompanying explanatory note, and is supportive of proposed amendment to the definition of 'primary non-photographic identification document' of replacing the term 'pension card' with the new term 'concession card' (as defined by the *Social Security Act 1991*).

On our reading, the proposed amendment, as drafted, is sufficient to achieve the objective of removing any doubt that health care cards are included within the scope of the definition. It will also ensure that any future amendments to the *Social Security Act 1991* definition of 'concession card' will automatically flow to the AML/CTF Rules' definition of 'primary non-photographic identification document'.

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We thank you for providing us with the opportunity to make this submission and to participate in the consultation process.

If you have any queries or comments regarding the contents of our submission, please contact our Senior Policy Adviser, Jon Echevarria on (02) 8079 0859 or via e-mail to jechevarria@superannuation.asn.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Fiona Galbraith', is positioned above the printed name.

Fiona Galbraith
Director, Policy