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**Submission to AUSTRAC on draft amendments to Chapter 1
of the AML/CTF Rules**

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*).

In our view, 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'.