

20 October 2025

NZBA CIT Authorisation
Commerce Commission
registrar@comcom.govt.nz

Kia ora

Retail NZ submission: NZBA CIT Authorisation

Retail NZ is grateful for the opportunity to submit a response to the New Zealand Banking Association (NZBA) Authorisation Application for collective bargaining in relation to Cash-in-Transit (CIT) services.

Retail NZ supports the application in principle and agrees that the proposed Arrangement should be permitted to proceed.

Following the merger of Armourguard and ACM New Zealand Ltd, the New Zealand market for CIT services is now a monopoly. As recognised in the application, customers negotiating individually with the sole provider may lack the necessary bargaining power to secure fair terms or influence service quality. Collective negotiations go some way to redressing this imbalance and will ensure fair and sustainable terms for retailers.

Despite the reduction in cash transactions in recent years, cash remains a vital component of the retail ecosystem and is critical for financial inclusion, vulnerable populations, and national resilience, particularly during emergencies. Reliable, efficient, and affordable CIT services are therefore essential infrastructure for all retailers.

We note the precedent set by the Australian Competition & Consumer Commission (ACCC), who recently approved a similar application for joint negotiations to take place with Australia's major CIT provider.

Retail NZ's support for the NZBA application is conditional on the arrangement being open, transparent, and protecting the interests of non-bank CIT customers.

New Zealand retailers operate under range of business models, including owner-operator, franchise and corporate. Therefore, different retailers will seek different approaches to their relationship with CIT service provider. We strongly support the right for any eligible retailer to voluntarily join the collective negotiation arrangement with the NZBA and other parties, while also retaining the right to opt out at any time or to negotiate individual bilateral agreements with Armourguard if preferred.

Any proposed pricing mechanism and standardisation of services must be developed in consultation with retailers, representative bodies such as Retail NZ and other interested parties. This is to ensure negotiations do not disadvantage smaller retailers by creating a 'one size fits all' CIT service.

Retail NZ would welcome future opportunities to provide input prior to the final decision on this proposal.

No part of this submission should be withheld under the OIA.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Young'.

Carolyn Young
CHIEF EXECUTIVE