

12 August 2019

Manager
Black Economy Division
Langton Cres
Parkes ACT 2600

By Email: blackeconomy@treasury.gov.au

Dear Sir/Madam

Re: Currency (Restrictions on the use of Cash) Bill 2019

Thank you for providing the Australian Dental Association (ADA) with the opportunity to contribute to the consultation on the draft legislation – Currency (Restrictions on the use of Cash) Bill 2019.

The ADA is the peak body representing dentistry in Australia. It has over 16,000 members working across public and private sectors operating more than 7,5000 small business across Australia.

It is the ADA's understanding that this legislation if enacted makes it an offence to make or accept a payment or series of connected payments in cash in excess of \$10,000 between two parties other than those circumstances where an exemption exists.

The ADA understands the reason behind the government's intention in introducing such legislation but wishes to draw attention to situations that may not have been considered to date.

Where once, older Australians were losing their teeth and relying on dentures, more and more people are keeping their teeth or having complex restorations such as crown and bridge and dental implants. The latter is an expensive option and can reach prices around and above \$10,000. Similarly, complex orthodontic and orthognathic surgery also attracts high costs to consumers. While most of these treatments are paid for using digital currency, many older Australians don't use online banking facilities and want to pay with cash for their treatment at the dentist's surgery.

This legislation, therefore, has the potential to impact on the dentist accepting one-off or regular payments where the total cost of treatment exceeds the maximum amount of \$10,000.

The ADA is aware that many accounting professionals are calling for the proposed cap to be reduced to \$5,000 and even \$2,000 in the future. If this were to eventuate, this would significantly impact on many dental practices.

Therefore, the ADA is requesting that further consideration is given to exemption medical and dental treatment within the legislation so as to avoid any unintended consequences.

Should you have any further questions in relation to this matter, please do not hesitate to contact Ms Eithne Irving, Deputy CEO on eithne.irving@ada.org.au

Yours sincerely,



Dr Carmelo Bonanno
President