



14 July 2025

Brendan Thomas

Chief Executive Officer

Australian Transaction Reports and Analysis Centre

PO BOX K534

Haymarket NSW 1240

via email: [reform@austrac.gov.au](mailto:reform@austrac.gov.au)

Dear Mr Thomas,

**AUSTRAC exposure draft Anti-Money Laundering and Counter-Terrorism Financing Rules 2025**

The Australian Small Business and Family Enterprise Ombudsman (the ASBFEO) welcomes the opportunity to make a submission to the Australian Transaction Reports and Analysis Centre (AUSTRAC) second stage consultation on the rules supporting Australia's anti-money laundering and counter-terrorism financing regime (AML/CTF). We acknowledge that reforms to the AML/CTF regime are essential to safeguarding the integrity of the Australian economy and in meeting Australia's international obligations under the Financial Action Task Force.

However, we remain concerned about the potential impact of these reforms on small businesses, particularly those newly captured under Tranche Two. These businesses—such as lawyers, accountants, real estate professionals, and dealers in precious metals and stones—often have limited resources for regulatory compliance and may struggle to meet new obligations without targeted support.

To ensure a smooth and effective transition, the ASBFEO recommends that AUSTRAC prioritise two key areas: public awareness and ongoing, responsive education support.

**Recommendation 1: AUSTRAC should undertake a national consumer awareness campaign regarding the rollout of the AML/CTF regime to the accounting, legal and real estate sectors.**

To support the successful expansion of the AML/CTF regime, AUSTRAC should lead a national consumer awareness campaign covering the newly captured sectors. We have heard from stakeholders who have concerns that clients may resist providing sensitive information—such as the source of funds—due to their lack of knowledge regarding the introduction of AML/CTF obligations for the professional services sector. Without clear public messaging these interactions risk creating friction during property transactions and annual tax reporting activities, which could result in small business owners and their employees being placed in vulnerable positions.

The campaign should aim to normalise these information requests by explaining their legal basis and importance in countering financial crime. Messaging should be clear, accessible, and tailored to the consumer, using plain language and case studies. It should also reassure consumers that their personal information will be handled securely and in accordance with privacy laws. Delivery should be multi-channel, including digital platforms, printed materials, and in-office resources that agents can share with clients.



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By proactively educating the public, AUSTRAC can help reduce resistance, build trust in the compliance process, and support the professional services sector in fulfilling their obligations. This approach will not only improve compliance outcomes but also protect the reputation and operational stability of small businesses in the sector.

**Recommendation 2: AUSTRAC should provide ongoing, responsive education and tailored assistance to help small businesses understand and meet their AML/CTF obligations.**

Small businesses, particularly those newly captured under the Tranche Two reforms, face significant challenges in understanding and implementing complex compliance requirements. Many small businesses have limited resources including access to administrative personnel who have compliance and reporting expertise, making it essential that regulatory support be accessible, practical, and tailored to their needs.

To ensure small businesses can meet their AML/CTF obligations effectively, AUSTRAC should provide ongoing, responsive education and tailored assistance. This includes developing practical, sector-specific guidance tailored to the unique needs of small businesses in tranche two sectors. Resources should be designed with simplicity and accessibility in mind, incorporating examples, checklists, case studies, and templates that reflect the operational realities of small businesses.<sup>1</sup>

In addition to written guidance, AUSTRAC should offer accessible training tools such as free online modules, webinars, and multilingual materials. Establishing a dedicated small business helpdesk or liaison team would further enhance support, providing direct assistance and clarifying obligations for businesses that may have limited access to legal or compliance expertise.

Finally, AUSTRAC should maintain regular engagement with industry associations and small business stakeholders to ensure that guidance remains relevant and responsive to evolving needs, help identify gaps in understanding and allow AUSTRAC to refine its support strategies, fostering a more informed and compliant small business community.

If you require any further information, please do not hesitate to contact the Policy and Advocacy team via email at [advocacy@asbfeo.gov.au](mailto:advocacy@asbfeo.gov.au)

Yours sincerely

**The Hon. Bruce Billson**

Australian Small Business and Family Enterprise Ombudsman

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<sup>1</sup> Chartered Accountants Australia and New Zealand (CA ANZ), *AML/CTF Reforms Survey*, CA ANZ, Industry Association, June 2024, p 3.