

# NIBA

*National Insurance Brokers Association.*



18 February 2009

Ms Liz Atkins  
General Manager, Regulatory Policy  
AUSTRAC  
PO Box 5516  
WEST CHATSWOOD  
NSW 1515 by email to [aml\\_ctf\\_rules@austrac.gov.au](mailto:aml_ctf_rules@austrac.gov.au)

Dear Ms Atkins,

**Draft AML / CTF Rules relating to premium funding loans for a general insurance policy**

We refer to the submission of the Insurance Premium Financers Association Australia (IPFAA) dated 13 February 2009.

Given the significant impact of this proposed Rules on insurance brokers we have considered it carefully.

We support the submissions made by IPFAA which would address the key concerns of insurance brokers in relation to the draft Rules and in NIBAs view represent an appropriate solution.

We are more than happy to discuss this further with you.

Kind regards

A handwritten signature in black ink, appearing to read 'Noel Pettersen'.

Noel Pettersen  
Chief Executive