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4 November 2026

Committee Secretariat
Finance and Expenditure Committee
Parliament Buildings
Wellington

Via online form.

Re: Taxation (Annual Rates for 2026-27, FBT Simplification, Foreign Investment Funds, and Remedial Measures) Bill

Dear Committee Members,

The Association of Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to provide feedback on the Taxation (Annual Rates for 2026-27, FBT Simplification, Foreign Investment Funds and Remedial Measures) Bill.

DSPANZ supports the inclusion of the formal recognition of Digital Service Providers (DSPs) as intermediaries under the *Tax Administration Act 1994* in this bill. This recognition acknowledges the important role DSPs play in supporting the administration of tax and social policy obligations through business software and provides a legislative foundation for their ongoing engagement with Inland Revenue.

We particularly welcome the transitional arrangements under proposed section 124ZJ(9), which recognises existing DSPs as approved providers. This inclusion will support continuity and minimise disruption for DSPs already accessing Inland Revenue's digital services.

DSPANZ recommends two minor refinements to support the clarity and transparency of DSPs as intermediaries within the tax and social policy ecosystem.

1. Adopt consistent terminology for digital service providers
DSPANZ recommends replacing the term 'digital services provider' with 'digital service provider' throughout the bill.

The singular term is already used by the Australian Taxation Office (ATO) and the United Kingdom's HM Revenue & Customs (HMRC). Adopting consistent terminology would support international alignment and reduce potential confusion for DSPs operating across multiple jurisdictions.

DSPANZ also encourages consistent use of this terminology across New Zealand government agencies.

2. Publicly publish security and accreditation requirements

DSPANZ recommends that Inland Revenue make the security, accreditation and other general requirements for DSP approval and ongoing access to its Gateway Services publicly available.

Currently, this information is accessible only after completing an initial registration process. Publicly available requirements would provide greater transparency about the obligations associated with participation in Inland Revenue's digital ecosystem and enable prospective DSPs to assess their readiness and make informed decisions before commencing registration.

This approach would also align with practices in other jurisdictions, where security and access requirements are available on publicly accessible website pages.

DSPANZ considers that the publication of these requirements would complement the Commissioner's powers to impose conditions of approval under proposed section 124ZJ(3), without limiting the ability to apply additional conditions where appropriate.

Ongoing engagement with Inland Revenue
DSPANZ looks forward to continuing to work with Inland Revenue as the new legislation commences. In particular, DSPANZ welcomes further engagement on how the approval conditions, ongoing requirements and access arrangements will operate in practice, ensuring they are clear, proportionate and workable for both Inland Revenue and DSPs.

DSPANZ welcomes the opportunity to provide further feedback or discuss this submission. Please contact Maggie Leese at maggie@dspanz.org.

Yours faithfully,

Signed by:
Chris Denney
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Chris Denney,
Interim CEO & Executive Director
DSPANZ.

About DSPANZ
Digital Service Providers Australia New Zealand is the gateway for the government into the dynamic, world-class business software sector in Australia and Aotearoa New Zealand. Our members range from large, well-established companies to new and nimble innovators working at the cutting edge of business software and app development on both sides of the Tasman.