

27 May 2026

The Treasury
Langton Crescent
PARKES ACT 2600

Via online form.

Re: Regulatory Data Standards Development Reforms

To Whom It May Concern:

Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to comment on the Data Standards Body's consultation on Regulatory Data Standards Development Reforms.

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.

DSPANZ broadly supports the proposed reforms and the Data Standards Body's objective of improving transparency, predictability, proportionality and stakeholder engagement in the development of regulatory data standards.

DSPANZ members have extensive experience implementing regulatory standards across major government and industry initiatives including SuperStream, Single Touch Payroll (STP), STP Phase 2, eInvoicing, Consumer Data Right (CDR), Digital Identity and payments modernisation programs. Through these initiatives, software providers have served as the practical implementation channel through which policy objectives have been delivered to businesses, intermediaries and consumers.

This experience has consistently demonstrated that the success of regulatory standards depends not only on technical design, but also on governance arrangements, implementation readiness, release management, stakeholder engagement, supporting infrastructure and ecosystem-wide coordination.

DSPANZ supports the proposed reforms because they move toward a more mature standards governance model. In particular, DSPANZ supports:

- clearer articulation of the purpose and scope of regulatory data standards
- a structured and transparent standards development lifecycle
- greater emphasis on evidence-based decision making
- improved consideration of implementation costs and impacts
- more predictable release management and implementation periods
- enhanced transparency regarding standards decisions and future obligations.

However, DSPANZ considers several enhancements would further strengthen the framework, including:

- introducing an explicit implementation or "implementability" foundation
- embedding implementation readiness assessments throughout the lifecycle
- expanding consideration of cumulative regulatory burden
- strengthening software provider participation during early design phases
- maintaining transparent public issue tracking mechanisms
- providing longer-term standards roadmaps and implementation visibility.

DSPANZ welcomes continued engagement with the Data Standards Body as these reforms progress.

Regards,

Chris Denney,
Interim CEO & Executive Director
DSPANZ.



Overall Position

DSPANZ is supportive of the proposed reforms.

The proposed framework reflects many lessons learned from the implementation of major standards-based reforms over the past decade. In particular, the reforms recognise that frequent change, limited visibility of future requirements and insufficient consideration of implementation impacts can create significant compliance costs for participants without necessarily improving policy outcomes.

DSPANZ's experience across SuperStream and Single Touch Payroll demonstrates that standards achieve the greatest success when supported by stable governance, clear problem definition, early stakeholder engagement, predictable release management and practical implementation support.

DSPANZ therefore supports the overall direction of the reforms while recommending a stronger focus on implementation practicality, ecosystem readiness and cumulative regulatory impacts.

Question 1 - *Do the proposed foundations provide sufficient confidence in the intention and role of regulatory standards?*

DSPANZ broadly supports the proposed characteristic and strategic foundations. The proposed focus on harmonisation, efficiency, technology neutrality, clarity and enforceability reflects many of the attributes that have underpinned successful regulatory standards programs in Australia.

DSPANZ particularly supports harmonisation as a guiding principle. Our experience from SuperStream, STP and eInvoicing demonstrates that implementation costs are significantly reduced when standards align with existing frameworks, identifiers, messaging structures and assurance models. Conversely, divergence between frameworks often creates unnecessary complexity for software providers, businesses and regulators alike.

DSPANZ also supports the proposed emphasis on clarity and enforceability. Software systems require precise and unambiguous requirements. Where obligations, calculations, reporting requirements or workflows are unclear, software providers are often required to make implementation assumptions, creating the risk of inconsistent outcomes across the market.

While DSPANZ supports the proposed foundations, we recommend the inclusion of an additional characteristic foundation focused on implementation practicality or implementability.

Our lived experience over the past decade supporting SuperStream and STP has demonstrated that standards may be technically correct and legally enforceable while still proving difficult or costly to implement in practice. Challenges often arise where standards assume particular data availability, business processes, system architectures or user behaviours that differ across participants.

DSPANZ recommends a foundation recognising that standards should be capable of practical implementation through software systems, business processes and operational workflows. Such a principle would strengthen consideration of real-world implementation impacts throughout the standards lifecycle.

Question 2 - *What types of change might be excluded?*

DSPANZ's primary concern is that implementation-related considerations may receive insufficient attention if future standards development becomes too narrowly focused on the proposed foundation areas.

Experience from major regulatory programs demonstrates that successful implementation depends on more than the technical standards alone. Some of the most significant challenges encountered relate to onboarding processes, identity verification, exception management, data quality, guidance materials, validation services, implementation support and transition arrangements.

These factors often determine whether standards can be successfully adopted at scale and whether policy objectives are ultimately achieved.

DSPANZ therefore recommends that the framework continue to support consideration of implementation enablers, supporting services, reference data assets, testing environments, validation services and guidance materials where these are necessary to achieve regulatory objectives.

DSPANZ would be concerned if future standards development became disconnected from these broader implementation considerations.

Question 3 - *Does the proposed standards development framework provide sufficient clarity?*

DSPANZ strongly supports the introduction of the proposed lifecycle framework. One of the most valuable aspects of the framework is the recognition that standards development should begin with clear problem identification rather than solution design.

Across many regulatory initiatives, successful outcomes were supported by a shared understanding of the problem being addressed, the impacts of that problem and the benefits expected from intervention. The proposed Assess phase provides an opportunity to formalise this discipline and improve transparency regarding the rationale for change.

We are particularly supportive of the proposal to consider alternatives to standards changes before progressing technical solutions. In practice, not all ecosystem problems require standards amendments. Some issues may be better addressed through guidance, operational support, improved reference data, validation services, onboarding improvements or regulatory communications.

DSPANZ recommends that implementation readiness assessments become an explicit component of the Assess and Discover phases. These assessments should consider software development lead times, interoperability requirements, testing needs, ecosystem dependencies, third-party supplier impacts and market readiness.

This would help ensure standards changes are not only technically sound but also practically achievable.

Question 4 - Does the proposed stakeholder engagement approach support meaningful participation?

DSPANZ supports the proposed approach to stakeholder engagement and welcomes the emphasis on engagement throughout the lifecycle rather than relying solely on formal consultation processes.

In our experience early engagement consistently produces better implementation outcomes than consultation that occurs after solution design has largely been completed.

Software providers frequently identify workflow impacts, operational dependencies and implementation constraints that may not be visible during policy development or technical design. Early engagement provides an opportunity to identify these issues before they become embedded in standards requirements.

DSPANZ recommends the establishment of structured implementation forums or advisory groups involving software providers, regulated entities and implementation specialists. Such forums could provide practical implementation insights during the Observe, Assess and Discover phases and help identify ecosystem impacts before formal consultation occurs. DSPANZ also supports maintaining multiple engagement channels to accommodate both technical and non-technical stakeholders.

Question 5 - Are the proposed cost factors sufficient?

DSPANZ strongly supports the proposed expansion of cost-benefit analysis and the recognition of both financial and non-financial implementation costs. The proposed categories appropriately recognise many of the costs experienced by regulated entities and software providers.

However, we would recommend greater consideration of cumulative regulatory burden.

Software providers rarely implement a single reform in isolation. At any given time, DSPANZ members may be delivering concurrent changes across taxation, payroll, superannuation, payments, digital identity, cybersecurity and privacy frameworks.

Our experience of implementing standard based reforms is that implementation effort is often driven as much by competing resource demands and overlapping reform programs as by the complexity of any individual standards change.

We recommend that cumulative reform impacts become an explicit component of the DSB's impact assessment methodology. Consideration should be given to:

- concurrent regulatory reforms

- resource competition across implementation programs
- cumulative testing requirements
- customer support impacts
- regulatory fatigue
- ongoing maintenance obligations arising from multiple frameworks.

DSPANZ also recommends greater consideration of long-term operational and support costs, which frequently extend beyond initial implementation activities.

Question 6 - *How should issues and change proposals be raised?*

DSPANZ supports maintaining transparent mechanisms for issue identification and ecosystem participation.

A publicly visible backlog provides significant benefits. It improves transparency, reduces duplication, enables collaborative discussion and allows participants to identify common issues affecting multiple organisations.

Experience across standards-based ecosystems suggests transparency contributes to stakeholder confidence and improves the quality of issue identification.

We are supportive of retaining a publicly visible backlog, provided appropriate status indicators are introduced to distinguish between:

- issues raised
- issues under assessment
- prioritised issues
- issues progressing through standards development
- completed issues.

DSPANZ agrees that backlog visibility should not create an expectation that every issue will result in standards change. The proposed lifecycle framework provides a useful mechanism for managing these expectations.

Question 7 - *Risks and benefits of two standards releases per year*

DSPANZ broadly supports reducing release frequency and introducing a maximum of two standards releases per year.

Experience from other standards-based programs demonstrates that frequent change can create significant implementation overhead regardless of the scale of individual amendments.

Software providers require sufficient lead time to analyse requirements, design solutions, build and test functionality, coordinate dependencies, update documentation and support customers through change.

More predictable release cycles support better planning, more efficient resource allocation and reduced implementation costs.

The primary risk is that beneficial changes may take longer to reach the market. However, we consider this risk can be effectively managed through publication of Decision Documents when approved and the continued availability of exceptional release mechanisms where genuinely necessary.

Overall, DSPANZ considers the benefits of increased predictability outweigh the risks.

Question 8 - Are May and November appropriate release periods?

DSPANZ considers May and November broadly appropriate release windows. The proposed timing provides reasonable spacing between release cycles and should support implementation planning across the year. However, predictability is likely to be more important than the specific months selected.

We would recommend publication of a longer-term standards roadmap identifying anticipated priorities, potential future changes and indicative release planning over a multi-year horizon where possible.

Experience from SuperStream and STP demonstrates that implementation planning improves significantly when participants have visibility of future direction, even where detailed specifications are not yet available.

Question 9 - Appropriate implementation periods

DSPANZ supports the introduction of standardised implementation periods and agrees that implementation timing should reflect the scale and complexity of change. The proposed 12, 18 and 24-month periods provide a useful starting point and are likely to improve planning certainty.

However, implementation complexity is influenced by more than technical scope alone.

Factors that should be considered include:

- ecosystem dependencies
- interoperability testing requirements
- customer migration effort
- third-party supplier readiness
- certification and assurance requirements
- cross-program implementation conflicts.

DSPANZ recommends that implementation periods continue to be informed by structured readiness assessments rather than relying solely on predefined change classifications.

This will help ensure implementation obligations remain realistic and proportionate.

Question 10 - Publication and communication expectations

DSPANZ supports the proposed publication framework. Experience across multiple regulatory programs demonstrates that consultation is more effective when stakeholders understand the problem being addressed, why intervention is required and what outcomes are being sought before solution design is finalised.

Greater transparency during the Assess phase should improve stakeholder participation and lead to higher quality feedback throughout the standards lifecycle.

DSPANZ also recommends publication of:

- forward standards roadmaps
- indicative future release content
- implementation impact summaries
- implementation readiness guidance
- regular ecosystem updates on prioritised work.

These measures would further strengthen transparency and improve participants' ability to allocate implementation and compliance resources effectively.