



Australian Business Software
Industry Association (ABSIA)
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Dear Mark and Brent,

ABSIA are pleased to see the continued progress on making trans-Tasman e-invoicing a reality through the adoption of the PEPPOL standards. We have reviewed the Consultation Paper, and the attached draft BIS specifications, and have provided comments on each of the two questions posed in the Consultation Paper below.

Overall, and speaking on behalf of the business software industry, ABSIA support the proposed inclusions and specifications outlined and are happy to provide any additional commentary or supplementary information to our submission.

Question 1

Annex 5: ABSIA agrees with the proposed inclusions to Annex 5 in the PEPPOL Transport Infrastructure Agreements for A-NZ.

Many existing PEPPOL APs support the ongoing use of the PEPPOL SMK to effectively operate a test network. This is currently voluntary, and interoperability testing must be coordinated between various parties. Mandating continuous support of the PEPPOL SMK and publication of active PEPPOL identifiers, would enable easier interoperability testing for new and existing providers.

BIS Billing Extension: We agree with the specifications laid out for the A-NZ Invoice and Self-Billing specifications as a workable solution. However, we note that it still requires text based fields (eg including the words "Tax Invoice") which could impact interoperability and the ability to automate invoice processing. We understand that legislation places requirements on the format of the invoice and forces these analogue artefacts, but it is very important that legislation and regulation is updated to enable the full productivity gains of e-Invoicing to be realised. The PEPPOL twice yearly update cadence gives government & industry the opportunity to partner to ensure continuous improvement of the BIS Billing Extension.

Question 2

ABSIA has not had the opportunity to fully survey our membership regarding the inclusion of Service Providers reporting to the A-NZ PEPPOL Authorities the number of e-invoices sent and received by each identifiable end user. However, we are concerned about the commercial and privacy sensitivity of this data being held and potentially released, if it is not subject to suitable

regulatory constraints similar to that which applies to the data collection by other parts of government.

If the purpose is to drive adoption then it should not be necessary to collect data at this level of detail, but it could be achieved by providing average data by ANZSIC code (although we note that the Australian Business Registry is not currently permitted to make public the ANZSIC relating to an ABN), or by providing usage bands (eg inactive, <20 per month, >20 per month).

In discussions with our colleagues in Europe, it has become apparent that the biggest drivers of adoption are government procurement mandates, along with the existing requirement for VAT Registration Numbers of both suppliers and customers to be on every invoice. Neither of these scenarios currently exist in Australia or New Zealand.

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In summary, as an association representing key players in the e-invoicing space, we broadly support the proposed inclusions and specifications outlined in the Consultation Paper. We look forward to the ATO and MBIE's response to this consultation and to continue working alongside one another to support trans-Tasman e-invoicing.