

## Submission template

### Information for submitters

We welcome your written feedback. The deadline for submissions is **5:00pm on Friday 16 November 2018**.

Your submission may become publicly available information. For this reason, you should indicate clearly in your covering email if your comments are commercially sensitive or if, for some other reason, you do not consider that they should be disclosed. Any request for non-disclosure will be considered under relevant Official Information and/or Privacy legislation in the receiving jurisdiction.

We strongly prefer submissions using this template. Please open and save your own copy, make submissions on any of the proposals and email it to us at:

**Australia:** [BRRSecretariat@ato.gov.au](mailto:BRRSecretariat@ato.gov.au)

**New Zealand:** [e-Invoicing@nzbn.govt.nz](mailto:e-Invoicing@nzbn.govt.nz)

If you cannot use the template for any reason, you can email your responses to us. To help with our analysis, please clearly indicate which of the consultation questions your submission is responding to.

After the deadline has passed, we will analyse all submissions. The views expressed in the submissions will be considered when the final proposals are developed for and reviewed by the responsible Ministers.

### Your name and details

Please type in your details in the table below. We suggest that you save a copy before emailing it to us.

<b>Name of the person completing this submission</b>	Melanie McIver
<b>Name of the organisation you represent</b>	Brick and Blocklayers Federation NZ
<b>If your organisation has an ABN or an NZBN, please enter your ABN or NZBN here</b>	9429042710530
<b>Daytime phone number</b>	████████
<b>Email</b>	████████████████████
<b>Postal Address</b>	PO Box 50137, Porirua.

### Consultation questions

This submission template enables you to provide general feedback on the information in the October 2018 discussion paper *'Early thinking: Operational governance for trans-Tasman e-Invoicing'* and to answer specific consultation questions. Please type in your responses below each question.

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## QUESTION 1: Legal Considerations

What do you consider to be significant policy or legal barriers to the implementation of e-Invoicing in Australia and/or New Zealand (including nil confirmation)?

Nil

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## QUESTION 2: Legal personality, continuity and limited liability

What do you think would be the best legal structure for the operational governance body? Please explain your answer.

An Incorporated Society – Relatively easy to set up with transparency on rules and memberships. It is a not-for-profit entity...

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## QUESTION 3: Government and industry participation in operational governance

3(a) Beyond the initial establishment phase, who do you think should lead the operational governance of trans-Tasman e-Invoicing; what functions and roles should the operational governance arrangement include? Please explain your answer.

Who – an incorporated society made up of members from financial, insurance, banking and legal institutions.

Monitoring, reporting and providing advice on any supporting regulations (like any governance group does).

3(b) Do you see sufficient incentive in our proposal for you to consider participating in the operational governance body? No as it is not an area of proficiency.

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## QUESTION 4: Operational sustainability

How do you think the long-term sustainability of the operational governance of trans-Tasman e-Invoicing, with appropriate cost allocations, can best be assured; and what funding models do you suggest? Please explain your answer.

User pays – add a fee onto the e-invoices that benefit from the governance.

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## QUESTION 5: A preferred option

Do you have any additional comments or information to help us with reviewing and further developing our early thinking and conclusions about a preferred option for operational governance of trans-Tasman e-Invoicing? If so, please provide your comments here and/or direct us to the additional information you would like us to consider.

It is important to ensure equal representation from each country.

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