

19 August 2024

Government Response and Reform Unit  
Small and Family Business Division  
Treasury  
Langton Cres  
Parkes ACT 2600

Via email: [PaymentTimesReformSMB@treasury.gov.au](mailto:PaymentTimesReformSMB@treasury.gov.au).

**Re: Payment Times Reporting Rules Amendments**

To Whom It May Concern:

The Association of Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to make this submission on behalf of our members and the business software industry.

**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 has been vital in progressing eInvoicing in Australia and Aotearoa New Zealand since 2015. We work alongside the Australian and New Zealand Peppol Authorities - the Australian Taxation Office and the Ministry of Business, Innovation and Employment - to support the eInvoicing community. A number of our members are eInvoicing enabled or provide eInvoicing services.

DSPANZ supports identifying Peppol enabled entities in the Payment Times Reports Register and requiring large businesses to report the proportion of payments to small business suppliers relating to Peppol enabled invoices. We believe that eInvoicing data from payment times reporting will provide valuable information and demonstrate the tangible benefits of eInvoicing for both small and large businesses.

While this is a commendable first step, more can be done to integrate eInvoicing within the Payment Times Reporting Scheme. DSPANZ encourages the government to consider additional measures, such as requiring large businesses covered by the scheme to be eInvoicing enabled. This requirement would allow small businesses to send eInvoices to these large businesses readily.

The successes that large businesses such as BOC Gas, Bunnings and Woolworths have experienced in implementing eInvoicing set a strong precedent for other large businesses to follow.

DSPANZ welcomes the opportunity to provide further feedback on our submission. Please contact Maggie Leese at [maggie@dspanz.org](mailto:maggie@dspanz.org) | +61 487 641 702 for more information.

Yours faithfully,

Signed by:  
  
ED8AD53CFD101751

**Matthew Prouse,**  
**President & Director**  
**DSPANZ.**

