

Our ref: QSBC-4010

28 January 2022

Data Economy Unit
Consumer Data Right Division
Treasury
(via email to regmod@treasury.gov.au)

Dear Sir / Madam

Re: Modernising Registry Fees (December 2021)

I welcome the opportunity to provide feedback on how registry fees will apply in the new system being delivered through the Modernising Business Registers (MBR) program.

A key function of my office is to advocate on behalf of small businesses in Queensland. There are more than 452,000 small businesses in Queensland – representing over 97% of all businesses. Small businesses contribute around \$120 billion to the Queensland economy, and employ more than 914,000 people, which is around 42% of the private sector workforce¹.

I support the modernisation of the fee structures for the Australian Business Registry Services (ABRS) through the MBR program.

Search fees

I support the removal of digital retail search fees, noting that when the registers are transitioned to the ABRS the cost to deliver digital searches is expected to fall substantially. Where the information is not available digitally or is required in a certified document format etc, a nominal search fee proportionate to the agency administrative effort required to produce the data could be applied. To address any concerns about data misuse, a simple registration process could be introduced for searches that contain more detailed personal information. The removal of digital retail search fees and introduction of proportionate fees for non-digital searches will broaden small business access to this information and support them to make data-driven business decisions.

Infrastructure fees

If it is not viable to offer as a free service, levying a modest subscription fee for access to this type of data service for wholesale users is reasonable - the subscription fee should be cancellable at any time so that small business users are not locked in. A user-pays on-boarding *support* fee (only for users who require one-to-one or advanced on-boarding support) may also be appropriate and support the ongoing infrastructure costs. Enhancements to the registry data will provide meaningful data and encourage innovative uses, and the one-off on-boarding support fee might also broaden the use case scenarios and increase access by small business.

¹ Department of Employment, Small Business and Training, [Big Plans for Small Business Strategy 2021-2023](#)

Late fees

I support the simplification of the late fee regime and the move to a single late fee that is not disproportionate to the original lodgement fee. A grace period (for example, 5 business days) should be introduced to allow for periods of business disruption, and a discretionary late fee waiver should be introduced for small businesses experiencing hardship. While late fees may be seen as a mechanism to encourage timely lodgements, they disproportionately disadvantage small businesses. Other mechanisms such as improvements to due date notifications etc, should be prioritised over late fees.

Lifecycle fees

I support the rationalisation of lifecycle fees into tiered cost levels, proportionate to the agency effort required to administer the changes. Reduced complexity and fees will encourage small businesses to keep their registry information up-to-date, ensuring the integrity and currency of registry information.

Thank you for the opportunity to provide feedback. If you would like to discuss this matter further, please contact my office on 07 3334 2300 or by email to QSBC@desbt.qld.gov.au.

Yours sincerely,



Maree Adshead
Queensland Small Business Commissioner