

8 July 2020

Dear Australian and New Zealand Peppol Authorities,

RE: E-invoicing Discussion Paper Invoice Status Communication

In representing many e-invoicing providers across Australia and New Zealand, ABSIA found it fitting to respond to this discussion paper on behalf of the industry. We have had discussions with local providers and have summarised our collective position, along with other feedback, below.

1. The industry agrees that fast confirmation of status is vital to the success of the network. Invoice Level Response (ILR) and out-of-band responses work together and a coordinated approach where Section 2 is implemented together is required. We suggest that Section 2 is implemented over the coming months. For example, ensuring that an existing, defined, element in the A-NZ extension is mandatory to support the out-of-band communication and describing best practice implementations that are a combination of ILR, out-of-band and use of supplier portals to augment or correct invoice data.
2. When making decisions around receiver-specific requirements the industry would like to voice our concern about placing a significant burden on C1 (Seller) to meet these requirements, when the majority of e-invoicing benefits lie with C4 (Buyer). Where possible, the mapping of receiver-specific requirements should occur between C3 and C4.
3. Work on option *1B - Advice about common government requirements* should be started immediately and managed alongside the interoperability working group mentioned in point 6, below. The industry should then work towards 1A as the next step within 6 months.
4. Australia and New Zealand should learn from other Peppol jurisdictions that have trod this path already - that is Europe and Singapore. While business and regulatory structures may differ, they are addressing similar issues. The industry understands that for A-NZ, this will be a compromise between the industry and government. The groups mentioned in points 5 and 6 should be utilised for this.
5. The industry would like the ATO and MBIE to co-chair, with ABSIA, a working group to discuss these issues and work together to achieve the best outcome possible. It would be counterproductive for the ATO and MBIE to make decisions based solely on discussion paper responses, and individual feedback.

6. The ATO and MBIE should set up regular interoperability discussions with service providers, accounting and ERP providers, appropriate industry bodies and procurement professionals. This would allow for the ATO and MBIE to better understand the industry's experience and their roles as regulatory bodies as they begin to regulate the system.

Overall, the industry looks forward to more collaboration between e-invoicing providers and the Australian and New Zealand Peppol Authorities. We understand there is still work to be done and are prepared to work together to produce interoperable solutions.

For more information about any of the points in this submission, please contact me on simon.foster@absia.asn.au.

Kind regards,
Simon Foster
ABSIA Director & Vice President.