



# A2A Payments Roundtable - Submission

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## About this submission

The Department of Industry, Science and Resources (DISR) welcomes the opportunity to provide feedback on the draft Account-to-Account (A2A) Payments Vision published by the A2A Payments Roundtable in April 2026.

DISR is a significant end-user of A2A payment services in its capacity as an Australian Government agency and, notably, as a shared service grants and payroll hubs for the Commonwealth. The Department processes high volumes of bulk/batch payments through the Bulk Electronic Clearing System (BECS), including grants to industry, supplier payments and payroll. These payment flows are operationally critical, high in volume, and subject to Australian Government financial management requirements including integration with enterprise resource planning (ERP) systems.

This submission focuses specifically on the adequacy of the draft vision's treatment of bulk/batch payment needs for business and government end-users. Our overarching concern is that, as currently drafted, the vision does not provide a sufficiently clear or distinct pathway for developing a cost-effective, ISO 20022 compliant bulk/batch payment solution that meets the genuine needs of large-scale government and business payers.

We note that the consultation paper does not require responses to all questions. This submission addresses the questions most relevant to our concerns.

## Question 1 — Vision resonance

Rating: 4 out of 7

DISR broadly supports the intent of the A2A vision. A trusted, safe, reliable and low-cost A2A payments system is important to the Commonwealth's ability to efficiently disburse grants, pay suppliers and meet its payroll obligations. The vision's emphasis on end-user outcomes, ISO 20022 standardisation, and structured data capabilities is welcomed.

However, the vision as currently drafted **does not adequately distinguish between the different needs of single real-time payments and bulk/batch payments**. This

creates a risk that future system design and investment will be driven primarily by the requirements of real-time, single payment use cases, resulting in solutions that are unnecessarily complex and costly for high-volume batch payers such as government agencies.

Until the vision more clearly articulates a distinct and cost-effective pathway for bulk/batch payments, it does not fully resonate with DISR as a large-scale government end-user.

## Question 2 — End-user objectives

The five end-user objectives, Safe, Reliable, Low Cost, Easy to Use and Inclusive, are broadly appropriate. From DISR's perspective as a bulk/batch payer, we offer the following observations:

**Low Cost** is our highest priority end-user objective. For government agencies processing large volumes of payments, including Commonwealth grants disbursements, the per-transaction cost of the payment system has a direct impact on the efficiency of public expenditure. Current indications suggest that bulk/batch solutions built on bundled real-time payment infrastructure could be more expensive than purpose-built bulk solutions. This is not consistent with the vision's stated commitment to affordability for businesses and government agencies of all sizes.

**Reliable** is our second priority. Government disbursements such as grants, welfare payments and supplier payments must be processed correctly, on time and to the right recipients. For bulk/batch payments, reliability means predictable processing windows and consistent outcomes, not necessarily instant settlement.

**Easy to Use** is important in the context of smooth integration with government ERP and financial management systems. Rich, structured ISO 20022 data is essential to support reconciliation, compliance and reporting obligations under the Commonwealth's financial management framework.

What is missing: The end-user objectives do not sufficiently differentiate between consumer, and small business payment needs (which may prioritise real-time availability and convenience) and large-scale government and business payer needs (which prioritise cost efficiency, structured data, predictable processing and ERP integration). We recommend the vision explicitly acknowledge this distinction.

## Question 3 — System characteristics

DISR's specific concerns relate to sections 2.3, 4.2, 4.3 and 4.5 of the draft vision.

### 2.3 Scope — Item 2 (Single or multiple payments)

The vision describes scope item 2 as covering payments that can be executed as either a single payment or as multiple payments in a batch payment instruction. While we support including both in scope, we are concerned that by **combining single and multiple payment requirements without distinction**, the vision may lead to system

design and infrastructure investment that conflates the very different operational characteristics of these payment types.

A single real-time payment and a batch payroll run of thousands of transactions have fundamentally different requirements in terms of processing architecture, settlement timing, availability windows, data structures and cost drivers. **Treating them as variations of the same requirement risks producing a solution optimised for neither.**

We recommend the vision explicitly recognise that bulk/batch payments warrant a **distinct set of system requirements**, and that the industry roadmap develop a specific pathway for bulk/batch that is separate from single real-time payment infrastructure where appropriate.

## 4.2 Highly available and resilient

The vision states that the system must target very high availability for executing A2A payment services, including during peak processing periods, and weekends and holidays.

DISR notes that bulk/batch payments, including government grants, payroll and supplier payments, do not require weekend or public holiday availability. These payments are initiated within standard business processing cycles and are typically scheduled in advance. Requiring bulk/batch infrastructure to maintain the same availability standards as real-time payment systems would impose unnecessary cost and complexity without delivering corresponding benefit to bulk/batch end-users.

Furthermore, overnight batch processing is an operationally efficient model for high-volume payment runs. Processing bulk payments outside business hours distributes system load, reduces peak processing pressure, and supports orderly reconciliation and settlement. The vision should explicitly support this as a valid and desirable operating model for bulk/batch payments, rather than implying that deferred or overnight processing represents a lower standard of service.

We recommend the vision clarify that **availability requirements should be calibrated to payment type**, with real-time availability required for instant payment use cases, and scheduled/deferred processing recognised as appropriate and sufficient for bulk/batch use cases.

## 4.3 Feature and capability rich

Figure 4 of the draft vision indicates that the system should support "Flexible and real-time payment clearing" as an enhanced feature under the Clearing column.

DISR is concerned that framing real-time and flexible clearing as a universal aspiration, even at the "should" level, may drive infrastructure and product design toward unnecessarily complex and costly clearing models for bulk/batch use cases.

For an efficient, cost-effective bulk/batch payment solution, **some degree of rigidity in processing timing is a reasonable and desirable trade-off**. Scheduled clearing windows, deferred settlement and predictable processing cycles are not limitations, they are features that enable efficient liquidity management, reconciliation and system stability for large-scale payers.

We recommend the vision make clear that **feature and capability requirements should be tailored to payment type**, and that a simpler, scheduled processing model is explicitly recognised as appropriate and sufficient for bulk/batch payments, rather than being treated as a lesser or transitional capability.

## 4.5 Commercially viable

DISR supports the vision's recognition that there may be a trade-off between keeping costs low and delivering a modern, feature-rich system. The proposed distinction between "core" and "value-adding" features is a sound framework. However, we consider that the definition of "core" must explicitly differentiate between bulk/batch and single real-time payments.

Specifically, we recommend that:

1. **Core requirements for bulk/batch payments** be defined separately from core requirements for single real-time payments, reflecting the different cost structures, processing models, data requirements and operational characteristics of each.
2. **Bulk/batch payment infrastructure should be designed and priced as a standalone core financial service**, without requiring end-users to consume or fund overlay services (such as real-time notifications, alias-based addressing or other value-added features) that are not required for bulk/batch use cases. Bundling these services into bulk/batch solutions unnecessarily inflates costs for large-scale payers such as government agencies.
3. The industry roadmap should actively explore whether a **purpose-built, ISO 20022-compliant bulk/batch solution**, architecturally distinct from real-time payment infrastructure, could deliver materially lower per-transaction costs while fully meeting the needs of government and business bulk payers. Based on DISR's experience, current indications suggest that bulk/batch solutions built on real-time payment infrastructure bundles could be substantially more expensive than a purpose-built alternative. This cost differential has direct implications for the efficiency of public expenditure.

## Question 4 — Priorities for delivering the vision

DISR recommends the following near-term priorities for the industry roadmap, specifically in relation to bulk/batch payments:

1. **Establish a distinct bulk/batch workstream** within the industry roadmap, with dedicated consideration of the requirements, cost structures, availability standards and ISO 20022 data needs of high-volume government and business payers.
2. **Prioritise ISO 20022 adoption for bulk/batch payments** from the outset of the roadmap. Any successor to BECS should be built on ISO 20022 messaging standards to support structured data, ERP integration, reconciliation and compliance reporting. DISR strongly cautions against a staged or optional approach to ISO 20022 for bulk/batch that defers structured data capability to a later phase.

**3. Conduct a transparent cost analysis** of bulk/batch payment solution options, including purpose-built bulk/batch infrastructure versus bundled real-time payment solutions, with findings shared with government and business end-users as part of the roadmap development process.

**4. Define availability and processing standards for bulk/batch separately** from real-time payment standards, recognising that scheduled, deferred and overnight processing models are appropriate and efficient for bulk/batch use cases.

Key risks and barriers:

- If the industry roadmap does not establish a distinct bulk/batch pathway, there is a significant risk that infrastructure investment and standards development will be driven primarily by real-time payment use cases, leaving bulk/batch end-users with a solution that is over-engineered, expensive and poorly suited to their needs.
- Government agencies, as large-scale bulk/batch payers, may face higher payment processing costs under a bundled real-time infrastructure model, with direct implications for the efficiency of public expenditure and the cost of administering Commonwealth programs.
- Delayed or deferred adoption of ISO 20022 for bulk/batch payments would undermine the Commonwealth's ability to realise the structured data, reconciliation and compliance benefits that the vision rightly identifies as critical to Australia's digital economy.

## Question 5 — Additional comments

DISR encourages the A2A Payments Roundtable to ensure that the voices of large-scale government and business end-users are actively represented in the industry roadmap development process. Government agencies are among the highest-volume users of bulk/batch A2A payment services in Australia, and the design of future bulk/batch infrastructure will have direct consequences for the cost and efficiency of Commonwealth service delivery. However, the importance of getting this right extends well beyond government. Businesses across Australia, including those in the superannuation, payroll, energy, insurance, healthcare and retail sectors, rely on efficient, low-cost bulk/batch payment infrastructure as a foundational input to their operations. The cost of making payments is an operational cost borne across the entire economy. A bulk/batch solution that is unnecessarily expensive, poorly standardised or inadequately integrated with business systems will impose a productivity burden on Australian industry at scale. Conversely, a well-designed, ISO 20022 compliant bulk/batch solution, built with the needs of large-volume payers in mind, has the potential to unlock productivity gains through improved reconciliation, automation, reduced manual processing and better integration with enterprise systems. The A2A vision rightly identifies the integration of payments data into business systems as playing a key role in supporting Australia's digital transformation. Realising this potential depends on bulk/batch payments being treated as a strategic priority, not as an afterthought to real-time single payment design.