

22 May 2026

Via email: [REDACTED]

## Re: Account to Account Vision Consultation

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 supports the development of a modern, real-time account-to-account (A2A) payments ecosystem in Australia and welcomes the opportunity to provide feedback on the draft A2A payments vision consultation. We recognise the importance of establishing a trusted, resilient and future-focused payments framework that supports innovation, competition and productivity across the Australian economy.

DSPANZ members facilitate critical payment and business processes across payroll, superannuation, onboarding, taxation and business administration software. These systems underpin the payment of salaries and wages, superannuation contributions and business obligations for the majority of Australian employers.

Previous DSPANZ submissions have consistently highlighted that the transition away from the Bulk Electronic Clearing System (BECS) must not compromise the efficiency, affordability or reliability of these high-volume and economically significant payment flows. We reiterate these concerns in this submission.

DSPANZ supports the transition toward real-time payments and broader modernisation of Australia's A2A ecosystem. DSPANZ views the New Payments Platform (NPP) as the preferred future payment rails for Australia – however, we would highlight that bulk payment capability, standardised implementation, commercially viable pricing models (vs BECS) and consistent banking infrastructure remain unresolved issues that must be addressed ..

The current cost structure associated with NPP services is a significant barrier to transition. Payroll and superannuation payments represent legally mandated, high-volume and low-risk transactions that are foundational to the Australian economy. Current transaction pricing

models risk materially increasing costs for employers, payroll providers and software platforms. DSPANZ believes NPP pricing parity with BECS is essential for regulated, mandatory high -volume payment flows and that pricing frameworks should differentiate between these activities and discretionary or ad -hoc payment activity.

DSPANZ also believes the Reserve Bank of Australia (RBA), Australian Payments Network (AusPayNet) and Australian Payments Plus (AP+) must show greater collective leadership in coordinating industry transition efforts and directing banks and financial institutions to remove barriers to adoption. This includes ensuring consistent timeframes, interoperability, implementation of NPP functional capabilities and standardised technical frameworks across all banking participants.

It should also be recognised that the future of payments will also extend beyond the payment methods specifically identified in the consultation paper. DSPANZ expects future payment ecosystems to incorporate emerging models and technologies including programmable payments, embedded finance, payment orchestration providers, digital wallets, tokenised assets and Central Bank Digital Currencies (CBDCs). The A2A vision should therefore remain technology -neutral, interoperable and sufficiently flexible to accommodate future innovation.

DSPANZ supports the overarching objectives contained within the draft vision, particularly the focus on reliability, accessibility, commercial viability and standardisation. However, achieving these objectives will require stronger emphasis on:

- commercially sustainable pricing;
- support for bulk processing and payroll use cases;
- interoperability and implementation consistency;
- resilience and contingency arrangements for critical economic payments; and
- practical transition planning aligned to employer and software development cycles.

DSPANZ welcomes the opportunity to provide further feedback on our submission.

Regards,

[Redacted Signature]

[Redacted Name],  
**CEO & Executive Director**  
**DSPANZ.**



# Response to Consultation Questions

## 1. Vision Resonance

DSPANZ rates the draft A2A vision a **6/7** in terms of resonance with the future needs of the business software industry.

DSPANZ supports the consultation paper's vision for "a trusted A2A payments system that meets the evolving needs of consumers, businesses and government agencies". The proposed objectives of safety, reliability, accessibility and innovation broadly align with the requirements of payroll, superannuation and business software providers.

DSPANZ particularly supports:

- the focus on reliability for essential payment flows;
- the emphasis on commercially viable infrastructure;
- the recognition that different payment types require tailored capabilities;
- the commitment to interoperability and standardisation; and
- the technology-neutral approach to future infrastructure development.

However, DSPANZ believes the consultation could place stronger emphasis on the operational realities of high-volume business payment processing. Payroll and superannuation are not discretionary consumer payments — they are legally mandated obligations that support the functioning of the Australian economy. These payment types require specialised treatment within future A2A infrastructure.

DSPANZ also believes the draft vision could more explicitly recognise the role of Digital Service Providers (DSPs) as a critical intermediary layer between businesses and payment infrastructure. Business software platforms are increasingly becoming the operational interface through which employers manage payroll, tax and superannuation obligations.

## 2. End-User Objectives

For DSPANZ members and the broader payroll and superannuation ecosystem, the highest priorities are:

### Reliability

The ability to process payments accurately, consistently and on time is critical. Payroll and superannuation payments are highly sensitive, high-frequency and economically significant transactions. Delays or failures can have direct financial and compliance consequences for employers and employees.

The consultation paper appropriately identifies wages, welfare and supplier payments as essential flows requiring resilience arrangements. DSPANZ strongly supports this principle and believes payroll and superannuation should be treated as nationally significant payment categories.

## Low Cost

DSPANZ strongly supports the objective that A2A payments remain affordable and commercially sustainable.

Current NPP transaction pricing structures present a major barrier to transition for high-volume payroll and superannuation processing. DSPANZ members collectively facilitate:

- approximately \$1.3 trillion in annual salary and wage payments; and
- approximately \$120 billion in annual superannuation contributions.

Even small increases in transaction costs can create substantial aggregate economic impacts at this scale.

DSPANZ therefore believes:

- NPP pricing must achieve parity with BECS pricing;
- pricing should distinguish between mandatory high-volume payments and ad-hoc consumer payments; and
- wholesale pricing arrangements should support economically critical payment categories.

## Easy to Use

DSPANZ supports the focus on traceability, simplicity and consistency.

Employers require:

- standardised payment experiences;
- consistent banking implementation;
- clear error handling and payment status visibility; and
- integrated reconciliation capabilities.

These capabilities become increasingly important in a real-time environment.

## Additional Consideration:

DSPANZ believes the vision should more explicitly recognise that certain payment types carry regulatory and statutory obligations. Payroll tax, superannuation, wages and taxation payments differ materially from discretionary consumer payment activity and should be prioritised within resilience and contingency frameworks.

## 3. System Characteristics

Several characteristics are particularly important for the payroll and business software sector.

Feature and Capability Rich

DSPANZ strongly supports recognition that the future system must support:

- bulk payment functionality;

- recurring and scheduled payments;
- richer structured data;
- payment initiation capabilities; and
- interoperability across providers.

Bulk processing remains essential for payroll and superannuation ecosystems. DSPANZ has consistently highlighted the need for:

- standardised bulk payment specifications;
- high-volume processing capability;
- richer payment messaging;
- fast rejection notifications; and
- account validation services.

Current NPP capabilities do not yet fully replicate BECS bulk processing functionality.

### **Commercial Viability**

DSPANZ strongly supports inclusion of commercial viability as a core system characteristic.

The consultation appropriately recognises:

- onboarding costs;
- connectivity costs;
- compliance obligations;
- transaction fees; and
- implementation investment requirements.

DSPANZ believes this section should more explicitly acknowledge that:

- payroll and superannuation are low-risk, high-volume use cases;
- current NPP pricing remains a transition barrier;
- mandatory payment categories require economically sustainable pricing models; and
- wholesale payment arrangements may be necessary to support these sectors.

### **Appropriate Standardisation**

DSPANZ strongly supports standardisation to avoid inconsistent implementation across banks and financial institutions.

Inconsistent approaches to:

- PayTo;
- Confirmation of Payee;
- API implementation;
- bulk processing; and

- reconciliation frameworks

would create significant complexity and cost for DSPs and employers.

### **Highly Available and Resilient**

DSPANZ supports the inclusion of contingency arrangements and prioritisation of critical flows during outages.

Payroll and superannuation payments should be classified as priority payment categories within contingency frameworks.

## **4. Priorities for Delivering the Vision**

DSPANZ considers the following priorities essential for successful delivery of the A2A vision.

### **Bulk Payments Capability**

A standardised bulk payment capability through the NPP remains the highest priority for the payroll and superannuation sector. Without scalable bulk processing functionality, the transition from BECS cannot be achieved efficiently.

### **Pricing Reform**

NPP pricing structures must support affordable high-volume payment processing.

DSPANZ strongly recommends:

- wholesale pricing arrangements for payroll and superannuation;
- pricing parity with BECS;
- reduced transaction costs for mandatory payment flows; and
- greater pricing transparency across providers.

### **Consistent Banking Implementation**

RBA, AusPayNet and AP+ should coordinate industry-wide implementation standards and actively drive consistency across financial institutions.

This includes:

- PayTo implementation;
- bulk processing;
- Confirmation of Payee;
- API standards; and
- reconciliation messaging.

### **Transition Governance and Industry Coordination**

DSPANZ believes strong leadership from RBA, AusPayNet and AP+ is essential.

The industry requires:

- clear implementation milestones;
- firm transition dates;
- coordinated rollout planning;
- sector-based transition pathways; and
- ongoing industry consultation.

DSPANZ has previously noted that uncertainty regarding transition timeframes materially affects investment decisions and development prioritisation.

## **Support for Emerging Payment Technologies**

The future A2A ecosystem should remain flexible and interoperable with:

- embedded payment providers;
- payment orchestration services such as Stripe;
- digital wallets;
- tokenised payment infrastructure;
- programmable payments; and
- Central Bank Digital Currencies (CBDCs).

## **Additional Feedback**

DSPANZ also notes:

- real-time payment expectations are increasing globally;
- employers increasingly expect integrated digital payment experiences;
- Payday Super reforms will accelerate demand for real-time infrastructure amongst employers especially related to processing of salaries/wages and payroll deductions;
- payment systems are becoming increasingly embedded within business software ecosystems.

The success of Australia's future A2A ecosystem will depend on ensuring:

- infrastructure remains commercially sustainable;
  - transition pathways are practical and coordinated;
  - software providers can implement consistently across banks; and
  - critical economic payment flows remain reliable and affordable.
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## Conclusion

DSPANZ supports the long-term vision for a modern, trusted and innovative A2A payments ecosystem in Australia, provided the transition from BECS to NPP is practical, affordable and fit for high-volume business payments.

However, the transition from BECS to NPP must be undertaken carefully to ensure that:

- high-volume payroll and superannuation processing remains commercially viable;
- bulk processing functionality is fully developed;
- pricing barriers are removed;
- banking implementation is standardised; and
- employers and DSPs are adequately supported through transition.

DSPANZ considers a strong and effective governance framework underpinned by the RBA, AusPayNet and AP+ critical to leading a coordinated transition and ensuring these outcomes are delivered.