

# Consultation on the Draft Account-to-Account Payments Vision

1. SAP Australia welcomes the opportunity to comment on the draft vision for Australia's account-to-account (A2A) payments system.
2. This submission is provided from the perspective of a system-level enabler for enterprises and government agencies. SAP does not operate payment rails or payment schemes. Its contribution is insight from end-to-end payment initiation, automation, data, controls and resilience across large-scale enterprise and public sector payment environments.
3. SAP supports the consultation's overarching direction and agrees that a trusted A2A payments system should meet the evolving needs of consumers, businesses and government agencies, while supporting competition, innovation and productivity in the broader economy. SAP's view is that the system will be stronger if it recognises the importance of where payments originate: in enterprise systems that process invoices, manage suppliers, execute treasury operations and reconcile at scale. SAP's perspective is also informed by existing enterprise payment infrastructure and capabilities -including cloud-based bank connectivity and structured data processing as the common foundation for embedded payment workflows and AI-assisted payment operations that are already being developed and deployed in global and Australian contexts.

## Vision resonance

4. The draft vision resonates strongly because it is anchored in end-user outcomes, is technology-neutral, and recognises that A2A payments must remain a trusted national asset in a changing environment shaped by fraud, cyber risks, automation and emerging technologies. SAP also supports the consultation paper's framing that the vision should guide the development of products, services, infrastructure, governance and the future industry roadmap, rather than prescribe a specific technical solution upfront.
5. The paper explicitly recognises that business and government users may initiate payments through accounting, payroll and ERP software; treats structured data, safety, resilience and innovation as core ingredients of the future system; and acknowledges that the future A2A ecosystem will need to accommodate both current and emerging payment mechanisms.



6. In that context, SAP views AI as a set of tools that can assist people to manage payment operations more safely and efficiently, not as a substitute for governance, accountability or regulatory safeguards.
7. However, the draft vision remains more rail-centric than enterprise-centric. While the paper recognises that many business and government payments are initiated through ERP and payroll software, that insight is not yet fully carried through to the end-user objectives and system characteristics. In SAP's view, the future vision should more clearly recognise the origination layer – the enterprise systems where payment instructions are created and authorised – as part of the system that shapes payment quality, safety, resilience, traceability and innovation outcomes.
8. The draft does not yet explicitly adopt "decision-to-payment integration" as a design principle – that is, designing processes so that the business or policy decision and the resulting payment execution happen as one integrated, traceable flow, rather than as separate steps across multiple systems. For high-volume business and government payments, the transformative opportunity is not only faster rails, but a tighter connection between the underlying business or policy decision and the payment execution itself. Where these are separated across systems and handoffs, auditability weakens, reconciliation becomes more complex and fraud controls may be less effective.
9. For operators, integrating decision and payment in one platform creates a single audit trail and reduces manual handoffs; for end-users, it can deliver faster and more predictable outcomes. Public examples already demonstrate three recurring patterns relevant to the future A2A system: eligibility-to-payment in government, integrated payroll processing, and enterprise-scale automated payment allocation and reconciliation. In Spain, the State Public Employment Service has implemented SAP S/4HANA Public Sector to support social services and payment processing within a unified platform, illustrating how social services eligibility and payment processing can operate within a single unified system. In Queensland, the Department of Transport and Main Roads has integrated governance, attendance and payroll processing in one platform, showing how payroll can operate as a decision-to-payment flow within a single system.

## End-user objectives

10. SAP considers the five proposed end-user objectives — safe, reliable, low cost, easy to use and inclusive — to be a sound and public-interest aligned foundation for the future A2A system. They reflect the outcomes that matter to enterprise and government users as well as to consumers, and are broadly consistent with SAP's position in the previous consultation round, where reliability, safety, structured data, interoperability and seamless integration were highlighted as priorities.



11. From SAP's perspective, the top priorities across the five objectives are:

- **Reliable.** Reliability is the prerequisite that makes speed trustworthy for critical flows such as payroll, welfare, supplier payments and treasury operations.
- **Safe.** Real-time payments can increase exposure to fraud, scams and errors unless strong pre-execution controls, validation and dispute processes are in place.
- **Easy to use.** For business and government users, ease of use depends heavily on smooth integration into enterprise workflows, clear status visibility and straight-through processing.
- **Low cost.** Cost matters, but should be understood on an end-to-end basis, including operational costs of initiation, reconciliation, compliance, connectivity and switching, not just rail pricing.
- **Inclusive.** Inclusion remains important, especially around provider choice, transition pathways and the ability to switch with minimal friction, though for enterprise users it is less central than reliability and safety.

12. The objective of “easy to use” should be read not only through the lens of consumer-facing interfaces, but also through the integration of A2A payments into enterprise and government systems of work. SAP strongly supports that framing and suggests it be carried through more explicitly in the roadmap and capability priorities, especially in relation to APIs, structured data and payment status visibility.

13. The vision paper could say more clearly that structured data and interoperability are foundational enablers across all five end-user objectives rather than merely technical implementation details. SAP's previous consultation response highlighted interoperability and standardisation as cross-cutting needs for high-volume use cases. In practical terms rich structured data is the enabling layer that supports safety, reliability, reconciliation, traceability, lower cost-to-serve and downstream innovation simultaneously.

14. SAP also suggests a stronger recognition that economic productivity is an important policy lens for these objectives. For enterprise and government users, A2A performance is not only about convenience; it is also about reducing reconciliation burdens, preventing payment failures, improving working capital outcomes and supporting essential public and business operations at scale.

## System characteristics

15. SAP broadly supports the six proposed system characteristics - secure and protected, highly available and resilient, feature and capability rich, accessible, commercially viable and



appropriately standardised - and agrees that they provide a useful bridge between the end-user objectives and the future state of the A2A system.

### Secure and protected

16. SAP strongly supports the emphasis on safety-by-design, payee validation, fraud and scam detection, baseline safeguards and clear dispute and liability arrangements. This is closely aligned with SAP's current view that pre-execution controls are especially important in a real-time environment, because fraud losses and errors become harder to recover once a payment has been executed.
17. The main addition SAP would propose is that the paper should make more explicit that these controls need to operate at all relevant layers of the A2A system, including the origination layer. SAP suggests clarifying that enterprise initiation systems – such as ERP, payroll and procurement platforms that generate payment instructions – are one of those relevant layers, especially for business and government flows.

### Highly available and resilient

18. SAP strongly supports the consultation paper's emphasis on redundancy, contingency arrangements, prioritisation of critical flows, interoperability of backup arrangements, service levels and transparent resilience metrics. This is highly relevant for enterprise and government use cases, where outages affecting wages, welfare or supplier payments can have immediate operational and social consequences.
19. SAP's additional perspective is that resilience should include event-driven recovery – where queued payments and status updates resume automatically in response to system events rather than manual intervention – and enterprise-aware fallback arrangements. In practice, resilience is not only about restoring a rail, but also about preserving the integrity of the end-to-end payment process, including queues, status updates, retries, reconciliation and prioritisation based on criticality. In this context, enterprise platforms, liquidity tools and operational telemetry are part of the resilience architecture, rather than sitting outside it.

### Feature and capability rich

20. SAP agrees with the paper's premise that the future A2A system should support both core payment functions and value-added innovation over time. In SAP's view, the most important capability areas for enterprise and government users include structured remittance data, confirmation of payee, real-time status feedback, request-to-pay functionality, support for



both single and batch initiation, and interoperability across schemes, providers and enterprise platforms.

21. The draft could be strengthened by explicitly recognising that feature richness must include support for origination-side capabilities such as instant reconciliation callbacks, embedded payment services, and AI-assisted exception handling, which depend on structured remittance data and standardised interfaces to work at scale. These are not peripheral enhancements; they are how many enterprise users will realise the value of faster A2A rails.
22. SAP is developing and deploying Business AI capabilities to support human judgement at scale, for example, by triaging and explaining payment exceptions rather than replacing accountable decision-makers. These tools operate within defined business rules and controls; they do not execute payments, change entitlements or make regulatory judgements on their own. Relevant examples include AI-Assisted Payment Exception Analysis and the Receivable & Payable Clearing Agent, which are designed to reduce manual intervention, improve reconciliation and support straight-through processing in high-volume payment environments. These capabilities reinforce that the value of real-time A2A payments depends not only on faster rails, but on AI-enabled exception handling, reconciliation and validation as supporting capabilities for safe adoption at scale.

### Accessible and commercially viable

23. SAP supports the paper's recognition that the future system should enable broad participation, proportionate access arrangements and sustainable economic models. This aligns with SAP's previous submission, which called for more consistent access to infrastructure, APIs and standards for enterprise platforms and regulated non-banks, as well as clearer participation models for technical initiators.
24. One useful refinement would be to recognise more explicitly that accessibility for enterprise platforms is not only about formal infrastructure access. It is also about clear interface standards, certification pathways, predictable onboarding models and reduced switching and integration friction.

### Appropriately standardised

25. SAP strongly supports this characteristic and considers it central to the success of the vision. SAP supports targeted baseline standardisation, particularly for core payment data elements, fraud and mistake safeguards, resilience expectations and technical interfaces between enterprise systems and payment infrastructure.
26. SAP submits that ISO 20022 structured data should be treated as a foundational requirement for future A2A payments because it provides the common data layer needed



for straight-through processing, AI-assisted exception handling, automated reconciliation and embedded finance services to operate reliably at scale, alongside human oversight and existing control frameworks. Without that structured foundation, these capabilities depend on manual intervention, unstructured references and bespoke integration.

### Priorities for delivering the vision

27. SAP agrees that the next critical step is development of the industry roadmap, including prioritisation, sequencing, trade-offs, success measures, governance arrangements and transition approaches. SAP proposes the following as near-term priorities:

### Mandate structured data and baseline standards

28. A near-term priority should be agreement on the core structured data elements, formats and baseline rules needed to support safe and efficient A2A payments across the economy. This includes ISO 20022-based data structures, standard identifiers and reference fields that improve reconciliation, compliance and automation.
29. Standardisation is the precondition for straight-through processing, AI-assisted exception handling, scalable embedded finance and lower end-to-end operational cost, without changing the need for clear governance, accountability and regulatory safeguards. The main risks are fragmentation, inconsistent implementation and transition complexity if standards are adopted only partially or unevenly.

### Establish open and consistent API-based connectivity

30. The roadmap should prioritise clear, open interface standards and API-based connectivity models that allow enterprise systems to initiate payments, receive status updates and integrate validation services natively via supported, vendor-approved APIs, rather than relying primarily on file-based handoffs.
31. This can unlock higher-volume business and government migration to modern A2A services. The barriers include legacy integration models, fragmented market practices, unclear roles for technical initiators and commercial uncertainty around who funds transition and onboarding. SAP Multi-Bank Connectivity provides a relevant example of the kind of cloud-native infrastructure the future system should accommodate: it connects enterprise ERP environments to the banking network through a single managed hub, supports standard protocols including SWIFT, EBICS and host-to-host connectivity, and has around 20 member banks publicly listed, including Commonwealth Bank of Australia.

### **Prioritise pre-execution protections**

32. The roadmap should prioritise confirmation of payee and other upstream protections, including validation, fraud intelligence and clearer baseline safeguards against mistakes, scams and fraud. In SAP's view, this is one of the highest-impact changes for building trust in real-time A2A payments, particularly for enterprise users managing large volumes and higher-consequence transactions.
33. This should support stronger trust and lower losses. The challenge will be balancing protection with friction, particularly where user experience, privacy, liability and implementation cost need to be managed together.

### **Define resilience expectations for critical flows**

34. The roadmap should set clear resilience expectations for critical payment flows, including payroll, welfare and essential supplier payments, with defined service levels, fallback processes and recovery priorities.
35. This should support greater national and economic resilience. The barriers are that these arrangements require coordination across schemes, participants and service providers, including agreement on contingency roles, interoperability and funding.

### **Bring enterprise and technical initiators into the roadmap process**

36. The roadmap and supporting working groups should more explicitly include enterprise software providers and other technical initiators in standards and transition discussions. This is consistent with SAP's previous position that cross-sector technical working groups are needed to co-develop standards, transition paths and interface models that reflect enterprise-scale use cases.
37. This should support a more practical and adoptable roadmap. The risk of not doing so is that the system may be redesigned around rail and provider perspectives alone, leaving unresolved gaps at the point where high-volume payments actually originate.
38. SAP would welcome the opportunity to contribute technical expertise to working groups developing standards for enterprise payment origination, structured data requirements and API specifications.



## Other feedback

### Measuring success

39. SAP supports the proposal to establish success measures for the delivery of the A2A vision. A useful approach would be to focus on categories of outcomes rather than hard targets at this stage. Metrics could include:
- operational efficiency such as reconciliation effort and exception rates
  - reliability and resilience such as time to recover critical flows
  - safety and trust such as misdirected payments and dispute resolution times
  - end-to-end cost-to-serve including switching and integration friction.
40. This would help ensure the system is assessed not only on infrastructure performance, but also on whether it improves real enterprise, government and consumer outcomes in practice.

### Future-proofing the vision

41. Recent discovery work with major financial institutions and large enterprises has reinforced that organisations are already moving towards embedded, event-driven payment patterns, where payment initiation, validation and status updates are triggered automatically by underlying business events (rather than separate batch files or manual runs) and integrated more closely with ERP, onboarding and lifecycle workflows. This supports the consultation's direction of travel and underlines the need for the future system to accommodate these enterprise origination models.
42. While cross-border payments and digital currencies sit outside the immediate scope of this consultation, SAP notes this as a future-proofing consideration only. SAP Digital Currency Hub demonstrates that enterprise platforms are already preparing to make and receive payments in digital currencies and to manage related accounting and custody requirements, which may become increasingly relevant as domestic and cross-border payment models evolve.

### Ecosystem connectivity

43. Partnerships such as SAP's Multi-Bank Connectivity program and its work with JP Morgan demonstrate how standardised cloud connectivity can expose payment and treasury services within ERP workflows, reducing the handoff between business decision-making and financial execution. These examples are best understood as evidence of market direction



and technical readiness rather than proof of universal at-scale deployment: many embedded and AI-enabled payment patterns remain in early stages, focused on assisting existing processes rather than introducing fully autonomous decision-making. This underlines the importance of locking in standards and roles now, so embedded and API-based payment services mature within a coherent A2A framework rather than through isolated bespoke connections.

44. Zalando Payments GmbH provides a strong example of enterprise-scale payment automation in practice. Processing payments for more than 250 million orders per year, it has used SAP solutions to achieve 100 per cent automated payment allocation forecasts, demonstrating the value of structured data, automation and end-to-end reconciliation at scale.

### Consistency with SAP's earlier consultation position

45. This submission is consistent with SAP's previous consultation position. In the earlier round, SAP supported public-interest aligned objectives, stronger interoperability and standardisation, open and consistent access to infrastructure and APIs, recognition of enterprise-scale payment needs, and a more explicit role for technical initiators and cross-sector coordination. This submission builds on those themes while responding to the more developed framework in the draft vision paper.

### Final observation

46. Overall, SAP supports the draft vision and sees a strong foundation for the next phase of industry planning. The key refinement is to carry the paper's own end-to-end framing further by recognising that the future A2A system includes not only the rails and participant arrangements, but also the enterprise origination environments where business and government payments begin. That is where standardisation, safety, resilience and innovation can translate into real economy-wide productivity gains.