

# Submission to the A2A Payments Vision Consultation

Public consultation on the future of account-to-account payments in Australia

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Confidentiality: This submission may be made public.

## About Scan & Pay

Scan & Pay is an Australian fintech delivering QR code-based instant PayID/PayTo verification at POS and ecommerce checkout. We hold a current Integration Compliance Certificate with Global Payments Oceania's Single API and offer merchants a flat \$0.90 per transaction — independent of sale value.

We are a working example of the future this vision describes: A2A payments at retail, without cards, without terminals.

## Question 1 — Vision Resonance: 7/7

The vision aligns precisely with the market gap we are addressing. The explicit recognition that A2A payments will expand into "*in-store, online, in-app purchases and other digital commerce environments*" (s.2.2) is critical. The technology-neutral framing protects future innovation across PayTo, PayID, NPP and emerging mechanisms.

## Question 2 — End-User Objectives

### Top priority: Low Cost

This is the single greatest driver for merchant adoption. Australian SMBs pay 1.5–2.9% in card interchange. A flat-fee A2A model delivers predictable, transparent costs — particularly above \$60 average transaction value. The vision's emphasis on "*affordable, competitive, predictable, transparent*" pricing is correct.

### Second: Easy to Use

A2A payments must match or exceed tap-and-pay speed at checkout. QR-code initiation achieves this — but only with standardised flows. The vision should explicitly recognise that retail A2A payments compete on UX, not just price.

### Third: Safe

PayTo's irrevocable model eliminates chargebacks — a meaningful merchant benefit. Consumer confidence requires clear dispute resolution. The vision addresses this correctly.

### Gap Identified

The end-user objectives do not separate **merchant** needs from consumer needs. Merchants are the adoption bottleneck for A2A at retail. Their priorities — settlement timing, reconciliation, POS/ecommerce integration, total cost of acceptance — differ materially from consumers'. A dedicated merchant lens within "Easy to use" and "Low cost" would strengthen the vision.

## Question 3 — System Characteristics

### Feature and Capability Rich (s.4.3)

The following should be classified as **core** for retail A2A adoption:

- Sub-3-second payment confirmation
- Standardised QR code / deep-link initiation
- Structured remittance data for automated reconciliation
- PayTo mandate management for subscription billing

### Accessible (s.4.4)

The most important characteristic for fintechs. We strongly support "*clear and transparent pathways for non-ADI participants.*" Today, fintechs access PayTo/PayID through layered intermediary relationships. Standardising and simplifying these pathways will accelerate merchant-facing innovation.

### Commercially Viable (s.4.5)

A2A payments at retail must remain cost-competitive with cards end-to-end. If infrastructure costs make A2A more expensive than cards for merchants, adoption will stall regardless of vision quality.

## Question 4 — Near-Term Priorities for Industry

### 1. Standardise QR / Deep-Link Payment Initiation

Australia needs an open standard for QR-based A2A initiation at POS — equivalent to how contactless cards work across all terminals. Without it, every provider builds proprietary flows, fragmenting the merchant and consumer experience.

### 2. Mandate Real-Time Payment Confirmation

Sub-3-second confirmation should be a baseline system requirement, not an enhanced feature.

### 3. Simplify Fintech Access

Tiered access framework for merchant-facing distribution layers (such as Scan & Pay), with proportionate compliance requirements relative to risk profile.

### 4. Industry-Led Merchant Education

Most Australian SMBs do not know A2A checkout exists. Coordinated education — beyond individual provider marketing — is essential.

### Opportunities

- Multi-billion-dollar reduction in payment cost across the Australian economy
- NPP is world-class infrastructure currently underutilised at POS
- Asia-Pacific QR adoption (WeChat Pay, Alipay, PromptPay) confirms consumer behaviour at scale

### Barriers

- Entrenched tap-and-pay habit
- Low merchant awareness
- Multi-layered intermediary access for fintechs
- Settlement timing expectations set by card schemes

## Question 5 — Additional Comments

The technology already works. We have a certified, production-ready A2A payment product running on Australian infrastructure today, with active integration on dual-screen POS terminals — proving A2A payments can be delivered at the physical checkout experience merchants and consumers already expect.

The remaining challenge is ecosystem coordination: standardised initiation, equitable fintech access, merchant education, and competitive infrastructure economics.

This vision creates the framework to address those gaps. We support its finalisation and welcome the opportunity to contribute to the industry roadmap as a builder, not just a commentator.

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