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Ref Consultation Paper: Supporting business adoption of electronic invoicing

Sir,

On behalf of Celtrino, I am pleased to share our contribution to your consultation paper. Congratulations on both the quality of this initiative and on the consultation.

ID	Question	Celtrino Contribution
1	Should a Business eInvoicing Right (BER) be introduced to accelerate business adoption of Peppol eInvoicing?	Yes
2	Are there other regulatory methods that might increase eInvoicing adoption?	Mandating b2b eInvoicing for all enterprises by a specific date.
3	What key implementation challenges or issues would businesses face if the Government introduces a BER?	Unlikely to be a stampede. Big business as first cohort probably already enabled for EDI invoicing. Peppol based e-Invoicing might be an effort but hardly material.
4	Would Option 1 or Option 2 be more appropriate to set the scope for participation in the BER and why? Are there other approaches that may be appropriate?	Not qualified to say. Either way Government sector should be included in this obligation
5	What, if any, exemptions would a BER need to include (e.g. for on-the-spot or point-of-sale business-to-business transactions, not-for-profit organisations, newly created businesses, entities supplying taxi travel, recipient created tax invoices (RCTIs))?	Interesting. Not sure
6a	Should the Government create a public register of businesses covered by the BER?	Hardly
6b	Are there any other approaches that would be appropriate to identify businesses covered by the BER?	Turnover and/or number of employees. There will probably be some diehards holding out for no good reason. Some latitude
7a	Would businesses be comfortable with being publicly identified as small, medium-sized, or large?	Why wouldn't they. Hardly an issue for most even any. It's not exactly a crime.

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7b	What key sensitivities or risks would such an approach present?	Exceptional cases will arise. Common sense should prevail (an extra few months of latitude),
8	Which of the potential approaches to create a register of small, medium-sized, and large businesses covered by the BER would be appropriate?	Any, name and shame
9	What regulatory costs may be involved for businesses for these options?	There exists a strong and convincing case for the benefits to the economy of e-invoicing and the digital innovation that this will unleash. Perhaps there is a transitory period where cost out ways benefit ,,,
10	Should the BER apply to differently sized businesses at the different times?	Staggered introduction along identified lines seems fine
11a	Should turnover-based thresholds be used to differentiate business size under the BER? What alternative thresholds are available and would be appropriate and administratively feasible?	Common sense should prevail.
11b	What levels of annual turnover would be most appropriate to differentiate small, medium-sized, and large businesses under the BER?	Any widely known and accepted classification will work
12a	Would a framework for turnover aggregation and related grouping rules be required for the BER?	Remember the kiss principle
12b	If required, would a framework for turnover aggregation and related grouping rules like those in current tax laws be appropriate for the BER?	Yes
13a	What would be the appropriate implementation timeframes for the BER?	Phasing in consultation paper looks right
13b	How much advance notice would covered businesses need to be ready by their corresponding deadlines under the BER?	Phasing in consultation paper looks right
13c	What alternative timing approaches might also be feasible and appropriate?	Phasing in consultation paper looks right
14a	What should a valid request to receive Peppol eInvoices involve or include?	An email with a valid Peppol participant Id
14b	What communication and record-keeping requirements would the BER require for covered businesses, particularly in relation to communicating requests to receive eInvoices?	Email history. Didn't think it would get to this
15	What mechanisms should be put in place to protect businesses that choose to exercise their BER (e.g. whistle blower protections)?	Court of public opinion

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16	What key factors does the Government need to consider in relation to enabling Peppol-compatible EDI networks?	EDI invoicing is a significant limitation of Peppol e-invoicing. In practice this may be irrelevant in most cases. EDI invoicing works best for goods rather than services. There may well be a genuine need to accommodate needs of some sectors in Peppol specifications but these can be managed through change management process and/or implementation guidelines.
17a	How could the Government target a potential intervention on the procurement functions of EDIs, without affecting or targeting the non-procurement functions?	Don't understand the question
17b	What definitions or criteria would be required to limit any requirement to only those EDIs operated by businesses that the Commonwealth can regulate and EDIs that are only used	Don't understand the question
18	What are the key business considerations and impacts relevant to expanding from eInvoicing to a broader integrated P2P process (such as Peppol P2P)?	Peppol Billing, (advanced) ordering and despatch advices will be a good fit for most sectors and probably all small and medium enterprises. EDI has been around for long time and now accommodates many supply chains variants.
19	What are the barriers, if any, to businesses adopting more efficient and standardised P2P processes, including Peppol P2P?	Government agencies can lead by example and start using Peppol orders at little material expense once change inertia is overcome. Peppol orders is much easier than invoicing and captures significant business value
20a	Would broader adoption of Peppol P2P as a standard in Australia help businesses adopt more efficient and interoperable procurement processes?	Of course
20b	What different approaches are available that may also be appropriate for Australia?	Inclined to think that little benefit in straying from what seems like the obvious option – Peppol P2P
21	What is the level of impact on business adoption that the integration of eInvoicing and payments would have?	Hard to quantify. Seems like an obvious step.
22	Given the market is currently working to deliver solutions that enable integrated eInvoicing and payments, what (if any) further action or intervention is required to address any current barriers to greater integration and help drive this process?	Government agencies should lead by example

*Ken Halpin*

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