



14 August 2025

Ms Samantha Gilliland
Australian Payments Network
Suite 2, Level 1 225 George Street
Sydney NSW 2000

via email to: a2avisionconsultation@auspaynet.com.au

Dear Ms Gilliland

Future vision for account-to-account payments in Australia

The Australian Small Business and Family Enterprise Ombudsman (ASBFEO) welcomes the opportunity to provide feedback on the future vision of account-to-account (A2A) payments in Australia.

As an overarching principle, for Australia's payment system to be effective it must be designed with the needs of end users at its core; including the 2.5 million small businesses that rely on secure, reliable, affordable and accessible payment infrastructure to meet their obligations.

Crucially, we consider – as does the Reserve Bank of Australia (RBA) – the success of the future A2A system will be measured by the extent to which end users trust it and the value they derive from it for their everyday economic activities.¹

While we note that Australian Payments Network (AusPayNet) and Australian Payments Plus (AP+) propose similar strategic objectives to those in the RBA framework, we consider the detail set out by the RBA, and reflected in Appendix A, is crucial. We encourage both AusPayNet and AP+ to consider the RBA framework for a A2A payment system and reflect it in the future vision. Against the specific objectives we offer the following feedback.

Safety (Security)

This proposed objective addresses critical concerns such as ensuring funds in transit, transaction details, and personal data are secure and protected, and that end users are safeguarded against fraud and scam activity.²

For clarity and emphasis, we would recommend that if this objective is adopted as one of the framework's objectives it should be renamed 'Security'.

Many small businesses are yet to adopt digital technologies, including artificial intelligence, and have in place only limited protections against cyber security risks. They may also face cash flow challenges and are generally more vulnerable to scams than larger organisations. Confidence in the security of the payment system they rely on is therefore essential; not only for meeting their business obligations but also for fostering confidence and trust in using the system.

¹ Reserve Bank of Australia (RBA), *Public Interest Framework for a Successful Account-to-Account Payments System*, RBA, July 2025, p 4

² Reserve Bank of Australia (RBA), *Public Interest Framework for a Successful Account-to-Account Payments System*, RBA, July 2025, p 6



Cost effectiveness and Accessibility

Given many small businesses have limited resources and capacity, it is necessary that the new payment system be affordable in absolute terms, and cost-effective relative to comparable payment systems. Equally importantly any user should – particularly if there is a cost differential – be able to exercise choice over their payment service provider.

Small businesses typically face significant time and resource constraints, and in many cases the owner is from a culturally and linguistically diverse background. Therefore, it is vital that the vision for the new system prioritises universal access, ensuring that all end users – regardless of their circumstances – can engage with and benefit from the system.

Reliability and Capability

Changes to regulatory obligations affecting business payments, such as the introduction of Payday Super, impose new requirements on small business. To support compliance and business continuity, we need a payment system which *inter alia* allows for the continuous execution of core payment functions in a timely manner, and that has robust contingency and recoverability arrangements to ensure small business owners are not penalised for events outside of their control.

We therefore support the RBA framework's proposal that the system be capable of both performing all the key payment functions and meeting user needs such as timely payments (see above).³ We also consider it crucial that the future A2A system be scalable and able to cope with increased activity and integration of new services.

In preparing our submission we have consulted widely with our stakeholders. As part of the development of the vision for any future A2A system, we would encourage you to examine in detail the arguments and suggestions made by organisations such as the Independent Payments Forum.

If you require any further information, please do not hesitate to contact us via email at advocacy@asbfeo.gov.au.

Yours sincerely

The Hon Bruce Billson

Australian Small Business and Family Enterprise Ombudsman

³ Reserve Bank of Australia (RBA), *Public Interest Framework for a Successful Account-to-Account Payments System*, RBA, July 2025, p 6