



March 4, 2022

Data Economy Unit
Consumer Data Right Division
The Treasury

Submitted: eInvoicing@treasury.gov.au

Subject: Consultation Paper: Supporting business adoption of electronic invoicing(e-invoicing)

To whom it may concern:

Thank you for the additional time to provide comments. Apple enthusiastically welcomes Australian's implementation of e-invoicing. It saves companies time and money in their day-to-day business transactions.

Apple has implemented e-invoicing globally and looks forward to seeing the details of Australia's implementation. We wish to provide high level comments to consider as the Treasury takes steps to implement.

As noted, Apple has implemented e-invoicing in different jurisdictions. To ensure compliance and system interfaces it takes time to review technical specifications, identify technical requirements. Finally, it will take time to complete the third-party vendor procurement before we are able to build and integrate our systems with the e-Invoicing accredited service provider. Based on our experience, large companies with different lines of business and complicated system infrastructures, like Apple, require 18 months to two years to implement.

Using the example from the consultation paper of a July 1, 2023 target for Phase 1. It would be extremely difficult to implement. As Australia moves forward with its e-invoicing requirements we recommend providing sufficient time of 18months to two years for companies to implement.

Can Treasury advise when the final implementation guidance or system specification will be made available? Will these be open to comment?

As previously noted, we applaud the implementation of e-invoicing. We provide these comments to ensure the success of the project.

Thank you

A handwritten signature in blue ink that reads "Heather Grell".

Heather Grell
Government Affairs
Apple