

14 February 2025

Director, Digital Competition Unit
Market Conduct and Digital Division
Treasury
Langton Cres
Parkes ACT 2600

Via email: digitalcompetition@treasury.gov.au.

Re: Digital Platforms - A Proposed New Digital Competition Regime

To Whom It May Concern:

The Association of Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to make this submission on behalf of our members and the business software industry.

About DSPANZ

Digital Service Providers Australia New Zealand is the gateway for the government into the dynamic, world-class business software sector in Australia and Aotearoa New Zealand. [Our members](#) range from large, well-established companies to new and nimble innovators working at the cutting edge of business software and app development on both sides of the Tasman.

DSPANZ broadly supports the new digital competition regime and its opportunities to make it easier for software developers to make their apps available on app marketplaces.

Establishing a Digital Economy Regulator

As part of introducing this regime, DSPANZ encourages the government to consider establishing a "Digital Economy Regulator" as a central source for digital platforms to meet their obligations under these reforms. Such a regulator could play a critical role in overseeing digital economy initiatives (such as Digital ID and the Consumer Data Right) and providing guidance on security, certification, data standards and other requirements that digital platforms, including those who leverage Commonwealth Government APIs and interactive digital services, must typically meet.

Protecting Customer Data

DSPANZ is concerned that security measures may be viewed as barriers to interoperability or anti-competitive conduct under the digital competition regime. We recognise that our members, Digital Service Providers, adhere to high level security standards to protect the sensitive personal and financial data they may collect, store or share.

DSPANZ recommends that the government explicitly consider the role and importance of security requirements when determining the regulatory obligations for app marketplaces. Protecting customer data should be a core principle of the digital competition regime rather than being seen as a restriction on competition.

DSPANZ welcomes the opportunity to provide further feedback on our submission. For more information, please contact Maggie Leese at maggie@dspanz.org.

Yours faithfully,

Chris Denney,
President & Director
DSPANZ.

