

24 October 2022

Future Directions Unit  
Consumer Data and Digital Division  
Treasury  
Langton Cres  
Parkes ACT 2600

**Re: Consumer Data Right - Exposure draft legislation to enable action initiation**

Via email: [data@treasury.gov.au](mailto:data@treasury.gov.au)

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 New Zealand. Our 90+ members range from large, well-established companies through to new and nimble innovators who are working at the cutting edge of business software and app development on both sides of the Tasman.

DSPANZ broadly supports the introduction of action initiation within the Consumer Data Right (CDR) giving consumers and businesses even more control over their data. Our feedback on the proposed changes is limited at this time as we work to better understand potential impacts for Digital Service Providers (DSPs) in terms of how they operate and support interactions for their end users.

However, we note that action initiation will add further complexity to the CDR ecosystem when there are still significant issues with Open Banking as outlined in the *Statutory Review of the Consumer Data Right*. We highly recommend undertaking the necessary work to ensure that core foundational elements of the CDR are working as intended while also working on the roll out of action initiation.

Throughout the consultation, design and implementation process for action initiation, we encourage the CDR regulators to consult regularly with DSPs to avoid any unintended consequences.

DSPANZ welcomes the opportunity to provide further feedback on our submission. For more information, please contact Maggie Leese on [REDACTED] | [REDACTED].

Yours faithfully,



**Simon Foster,**  
**President & Director,**  
**DSPANZ**



**Maggie Leese,**  
**Manager - Communications & Advocacy,**  
**DSPANZ**

