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6 October 2023

Louise Staker  
Market Conduct and Digital Division  
Treasury  
Langton Crescent  
PARKS ACT 2600  
by email: CDRRules@treasury.gov.au

Dear Ms. Staker,

**Consumer Data Right rules – Expansion to the Non-Bank lending Sector: NBL**

Thank you for the opportunity to comment on the Consumer Data Right rules – Expansion to the Non-Bank Lending Sector. Due to the significant difference in target audience, we have chosen to provide two sets of feedback, one focused on the headline Non-Bank Lending (NBL) Sector changes and the other focused on the expansion of Energy Retailer obligations for Product Reference Data. The responses provided are the outputs of the Biza Industry Advisory Committee, an internal group of Biza personnel.

Biza.io (Biza) are the market leaders in Data Holder solutions to the Consumer Data Right and are the only pure-play CDR vendor in Australia providing these solutions. Biza.io has been involved in the Data Standards setting process since the very beginning and its personnel remain the largest non-government contributors to consultations. By November 2023, Biza will be responsible for providing the Data Holder infrastructure for more than 50% of the mandated Energy Retailers as recently published by the ACCC<sup>1</sup> accounting for more than 75% of the entire Australian Consumer market within the Energy sector. In addition, Biza delivers the Data Holder obligations for approximately 20% of the Data Holders within the Banking sector.

Biza strongly supports the expansion of the Consumer Data Right into the Non-bank lending sector. Through this expansion we believe Consumers will now have access to a complete range of lending choices. The enablement of NBL should pave the way for a more vibrant competition environment at a time when housing affordability is at an all-time low, occupancy is at an all-time high and people are struggling to enter the housing market.

The inclusion of broader NBL products than the obvious use cases related to mortgages will facilitate Consumers ability to gain a single view of their financial health. We think this will build on the benefits already realised in the banking sector and expand across the full breadth of the financial scope that most Consumers engage with.

With respect to the proposed dates Biza believes the benefits of earlier activation are significant to Consumers. Further, our observation having participated in both banking and energy sector activations are that organisations rarely accelerate the development of their solution until approximately 6 months

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<sup>1</sup> <https://cdr-support.zendesk.com/hc/en-us/articles/7975868764431-Energy-Data-Holders-with-Consumer-Data-Sharing-Obligations-Commencing-1-November>



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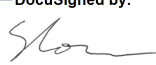
before the mandated date. To date we have *never* been approached to activate *earlier* than the mandated commencement dates.

Based on the above Biza.io suggests the commencement schedule should in fact be accelerated as follows:

|   |                        |
|---|------------------------|
| <b>Tranche 1<br/>Tranche 2 (Merged)</b> | <b>1 November 2024</b> |
| <b>Tranche 3</b>                        | 1 February 2025        |
| <b>Tranche 4</b>                        | 1 May 2025             |
| <b>Tranche 5</b>                        | 1 August 2025          |

We thank you once again for the opportunity to comment on these proposals. If you have any questions or concerns regarding this submission, please do not hesitate to contact Stuart Low, Founder & CEO on 1300 692 265 or at [industry@biza.io](mailto:industry@biza.io).

Kind Regards

DocuSigned by:  
  
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Stuart Low on behalf of Biza Industry Advisory Committee  
Founder & CEO  
Biza.io