



Australian Government



Australian  
**Small Business and  
Family Enterprise**  
Ombudsman

1 September 2021

Consumer Data Right Division  
Treasury  
Langton Cres  
PARKES ACT 2600

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

Dear Sir/Madam

**Consumer Data Right (CDR) Strategic Assessment consultation paper**

The premise for this strategic assessment is for implementation of the CDR to be guided by focusing on consumer value. To that end, we suggest that consumers, including small businesses, have more say in shaping how the CDR is expanded. Where consumers see value in the CDR can be identified through processes such as:

- Analysis on the areas of uptake by consumers in the initial period of the CDR's roll-out.
- Analysis of which use cases have been popular with consumers in other jurisdictions where open financial data arrangements have already been implemented.
- Surveys of which CDR use cases consumers are interested in, recognising that the needs of businesses differ and are often more complicated than of individuals and households.

We support consideration being given to moving from a sector-centric approach towards more of a focus on consumer experience. In the business arena, the widespread acceptance of the Peppol framework is due in large part to it facilitating electronic data interchanges across sectors, industries and jurisdictions. The benefits of using e-Invoicing, which is enabled by the Peppol framework, are clear to users, which contributes to its broad uptake across more than 30 countries. We suggest that for the CDR roll-out there should be a similar focus on consumer-facing solutions as much as on the framework enabling those solutions.

We query the focus on "significant decision points and events on a consumer's life journey", as is raised in the consultation paper. Significant events such as applying for loans are crucial for small businesses but so are daily activities such as managing cashflows, invoices or supply lines.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mike Kearney on 02 6213 7443 or at [michael.kearney@asbfeo.gov.au](mailto:michael.kearney@asbfeo.gov.au).

Yours sincerely

**The Hon Bruce Billson**

Australian Small Business and Family Enterprise Ombudsman

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