

14 April 2022

Sectoral Assessments  
Consumer Data Right Division  
The Treasury  
Langton Crescent  
Parkes ACT 2600

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

**Re: Consumer Data Right Open Finance Sectoral Assessment: Non-bank lending**

To Whom it May Concern:

DSPANZ welcomes the opportunity to make this submission on behalf of our members and the business software industry.

While we broadly support the expansion of the Consumer Data Right to Open Finance data and complementary government-held datasets, DSPANZ is concerned about the unintended consequences and impacts for our members. In the rollout of Open Banking, the definition of derived data meant that the rules may have added significant, yet unintended, regulatory burden to our accounting software members and their ecosystems. Given this prior experience, we are anticipating impacts to our members who offer accounting, payroll and superannuation services.

To help mitigate any potential impacts in the rolling out of Open Finance, we recommend working with DSPANZ and similar industry bodies such as professional accounting associations and superannuation associations.

DSPANZ has heard from members who are interested in consuming non-bank lending data, particularly lease and hire purchase datasets, to provide their customers with a better experience. Currently, it is difficult to get a schedule from a company that is suitable for accounting purposes (i.e. it includes GST components). We can see benefits for both accounting software providers and end user businesses here.

DSPANZ would appreciate the opportunity to engage further on this submission. For further information, please contact Maggie Leese.



**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 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.

Yours faithfully,

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