



Australian Government



# Consumer Data Right

## Data Standards Advisory Committee (DSAC)

### Minutes of the Meeting

**Date:** Tuesday 31 March 2026

**Location:** Online – MS Teams

**Time:** 10:30am to 12:00pm

**Meeting:** Committee Meeting # 75

## Attendees

### Committee Members

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Scott Farrell, Chair

Lyria Bennett Moses, UNSW Sydney

Andrew Black, Connect ID

Jessica Booth, Biza

Brenton Charnley, Mastercard

Ted Dunstone, Biometix Pty Ltd

Nicholas Harrap, NAB

Dan Jovevski, WeMoney

Gavin Leon, CBA

Peter Leonard, Data Synergies

Madeline Oldfield, Independent

Heidi Richards, Better Regulation Advisory

Ric Richardson, Independent

Tim Ryan, Ready Energy

Lisa Schutz, Verifier

Johanna Weaver, Tech Policy Design Institute

Andy White, AusPayNet

Stephen Wilson, Lockstep Consulting

### Observer

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Naomi Gilbert, Data Standards Body (DSB)

Syeda Haider, DSB

Mudhita Lawania, DSB

Clare McGrath, DSB

Rob Sorrentino, DSB

Duncan Anderson, Dept of Finance

Matt Sedgwick, Finance

Sara Croxall, ACCC

Sara Lane, ACCC

Kym Malycha, Treasury

Fiona Walker, Treasury

## Apologies

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## 1. Chair Introduction

### 1.1 Welcome and apologies

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The Chair acknowledged the Traditional Custodians of the land on which members were meeting and paid respects to Elders past, present and emerging.

The Chair noted that he was in the process of meeting smaller regional data holders as part of broader engagement with participants in the ecosystem. The Chair thanked members for their time and noted the intention for the meeting to be shorter in recognition of members' competing commitments.

### 1.2 Confirmation of previous minutes

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The minutes of the previous meeting were affirmed, subject to the correction of Professor Lyria Bennett Moses's affiliation to UNSW Sydney (or UNSW School of Law, Society and Criminology) from the current UNSW Law School.

### 1.3 Action items

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No specific update was provided on prior action items. Discussion moved directly to the forward agenda and the DSAC Standards material.

### 1.4 Forward Agenda

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The Chair advised that the DSAC's future work program would await communication of the Government's direction for the Consumer Data Right (CDR) and Digital ID. This was expected before the next DSAC meeting, when the role and priorities of DSAC could be discussed.

Members commented on participation in discussions matters related to forthcoming broader policy decisions. The Chair noted that whilst members may participate in those discussions in their own capacity, DSAC did not have a formal role in those processes. The DSB noted that parallel policy work is underway on the CDR side to improve data gathering and oversight of issues across the system, and that this may inform how the role of a standards committee is understood relative to the wider regulatory framework. It was also noted that related work is occurring in the Digital ID context with Finance.

## 2. Standards Foundations – targeted discussion to inform consultation paper

The Chair advised and thanked the members, noting that the targeted consultation had been well received and benefitted from the input of DSAC members. This input has been well considered and

has informed the further development of the consultation paper. The Chair noted that the consultation paper would shortly be revised and issued, and that the purpose of this DSAC discussion was to test updated framing before wider publication.

The DSB explained that the revised material was intended to move away from an over-emphasis on 'priorities' and instead provide a clearer articulation of the scope, boundaries and purpose of standards. The discussion focused on proposed 'Standards Foundations', including both characteristics of good quality standards and scheme-specific foundations intended to guide the future development and assessment of standards.

## 2.1 Regulatory standards and the nature of the standards function

The Chair introduced the discussion by drawing a distinction between voluntary industry standards and the standards made for the CDR and Digital ID regimes. He noted that unlike industry technical standards, the standards in these schemes create binding legal and contractual obligations for participants and may expose them not only to regulatory action but also to contractual consequences. Members broadly agreed that this distinction was important and helpful.

Members noted that because the standards operate within a regulatory framework, the process for setting them cannot simply mirror a consensus-based industry standards model. Several members emphasised that standards in this context can create incentives and enforceability outcomes for participants who may not otherwise wish to comply, particularly in an access regime such as CDR. It was observed that equivalent regimes exist in other contexts internationally, even where they are not labelled as standards.

## 2.2 Standards Foundations and quality of standards

Members responded positively to the proposed Standards Foundations as a useful way to clarify what standards are for, when standards are the right policy instrument, and what good standards look like. Members saw value in using the foundations both prospectively, to guide future work, and retrospectively, as a diagnostic overlay to assess current standards.

Feedback focused on the need to tighten ambiguous terms such as 'where appropriate', 'where applicable' and 'minimum measurable requirements'. Members also asked that the materials make clearer the trade-offs between principles, rather than presenting them as if they operate without tension. In particular, members noted that balancing harmonisation, efficiency, security, innovation and implementation burden should be made explicit.

Several members emphasised that implementation impacts need stronger recognition. It was noted that good ideas in principle may prove difficult or costly in practice and that implementation feedback

loops are essential. Members described this as a more lifecycle-based view of standards development, extending beyond initial design to testing, adaptation and eventual retirement where necessary

## 2.3 Legislative objectives, public benefit and programme context

Members stressed that programme objectives are set by legislation and by Government, not by DSAC or the DSB. In the CDR context, members highlighted that the legislative objects include competition and enabling consumers to access and use information. It was suggested that the consultation paper should more clearly anchor the proposed foundations to those statutory objectives and explain more directly the public and consumer benefit that standards are intended to support.

The Chair agreed that standards cannot redefine legislative objectives and noted that the role of the standards framework is to help clarify what should be done next within that broader statutory setting. Discussion also reinforced that standards must remain within the rules and broader regulatory architecture, and that one of the core questions is when a matter is best addressed through standards, as opposed to rules, guidance or other parts of the framework.

## 2.4 Interoperability, harmonisation and futureproofing

Members welcomed the emphasis on openness and interoperability but cautioned that these concepts need to be handled carefully, particularly in Digital ID. It was noted that interoperability should not be assumed to mean equivalence and that concepts such as harmonised or consistent identity verification may carry unintended assumptions rooted in older single sign-on models.

Members emphasised the importance of technology neutrality, innovation enablement and 'setting the floor, not the ceiling'. Discussion highlighted the need for standards to leave room for new solutions and future developments, including decentralised credentials and other emerging approaches, while remaining careful not to hardwire the country into a model that may still be evolving.

## 2.5 CDR and Digital ID foundations

Discussion around the foundations noted that while some distinctions exist, both the CDR and the Digital ID program share a common intent to support trusted, secure, and user-centric data sharing.

This paper adopts an approach that highlights shared foundational principles where they are consistent across both schemes, while recognising that scheme-specific considerations may apply in limited areas (for example, in relation to security settings or legislative purpose). This is intended to support coherence and interoperability across the digital ecosystem, while ensuring each scheme can operate effectively within its legislative and policy context.

## 2.6 Broader observations on standards development

Members reiterated that standards should be understood in the context of the broader regulatory framework and not in isolation. They noted that standards can become the site of disagreement over how policy is given effect, particularly where the ‘how’ materially affects commercial and operational outcomes for participants. This reinforced the importance of cost-benefit analysis, implementation feasibility and transparency about why standards are being proposed.

Discussion also recognised that standards should support mature, stable ecosystems while still allowing improvement over time. Members supported using the foundations as a tool for better conversations with industry about trade-offs and impacts, while avoiding unnecessary or costly re-engineering where existing arrangements are functioning adequately.

## 3. Other Business

No additional substantive business was raised under items 1 and 2. The Chair thanked members for a strategic and constructive discussion. He noted that the meeting had provided a useful basis for refining the consultation paper and that further clarity on the Government’s direction following the Budget would inform discussion at the next meeting.

## 4. Closing and next steps

The next regular meeting is expected to be held in late May 2026, online, with the precise date to be confirmed. The meeting closed at 12:00pm.