

Director  
CDR Framework Unit  
Treasury  
Langton Cres  
Parkes ACT 2600  
Sent by email: [CDRRules@treasury.gov.au](mailto:CDRRules@treasury.gov.au)

19 December 2024

To whom it may concern

I am pleased to share MYOB's perspective on the Federal Government's proposed changes to the Consumer Data Right (CDR) Rules – non-bank lending and banking data scope.

For more than 30 years, MYOB has been a trusted partner to Australian and New Zealand businesses, helping them to start, survive and succeed. We see firsthand the behaviour and needs of Australia's more than 2.5 million small and medium businesses, many of whom use our software to manage the essential workflows of their business. We bring that insight to the conversations we have with government in exploring how best to serve this important segment of the Australia economy.

The CDR is at a critical point in its design. Its ability to properly assist business consumers understand and manage their finances will be influenced by many of the themes raised in Treasury's exposure draft and explanatory materials. MYOB champions digital democratisation, and consumers having access to their data and using it to improve their lives is a fundamental part of that. For that reason, we are strong supporters of the CDR being as broad and inclusive as possible.

### **Narrowing the scope of banking and non-bank lending products**

While we acknowledge the large investment the banking sector has made in the CDR thus far, and that compliance costs for both the banking sector and non-bank lenders are a concern, we believe that the more data is made available through the CDR, the stronger financial outcomes will be for business consumers. We are also of the view that there is insufficient incentive for banks to share this data with CDR consumers should any aspect of it be made voluntary.

MYOB's customers rely on our software to take bank account data and transform it into valuable business insights. For example, using bank feed data, MYOB can provide cash flow projections, categorise and reconcile payments and set up rules for withdrawals, deposits and

expenses. MYOB's SME customers are also able to securely share their software with their trusted accountant for ease of reporting and compliance. Given bank data is a one-for-one match with accounting data, it is vital that any banking product used by a business be included in the CDR's scope of banking products.

Not every business is using a typical 'business banking' product and may even be combining different types of banking products to conduct their business. This can (and often does) include 'personal' accounts, charge cards, reverse mortgages, margin loans, foreign currency and trust accounts. It is for this reason we would prefer all product types be covered in the CDR's in-scope data. However, acknowledging concerns about the cost of CDR compliance for banks and non-bank lenders, we support voluntary data sharing in relation to products for which there are less than 1,000 eligible CDR consumers. We also suggest a more staggered introduction of these products to allow investment to spread over a longer period.

### **Historical consumer data**

Section 286 of the Corporations Act requires businesses to keep financial records for at least seven years after the transactions covered by the records are complete. Having access to this historical data via the CDR is important for businesses to comply with these obligations.

While our software can save these records for seven years or more (regardless of whether the CDR requires historical data to be shared for the previous seven—or two—years), for customers switching between accounting or business management software providers, data older than two years could potentially be lost to the consumer.

However, this data does not need to be accessible to consumers 24 hours a day, 365 days a year. We believe that rather than revising down the number of years data holders are required to share data with consumers, a better approach would be to increase SLAs associated with this kind of data so that it is accessible at-call (for example, in the event a business consumer is audited) rather than always available.

Should you have any questions about the issues we have raised, please contact MYOB's Government Relations Lead, Courtney Sloane at [Courtney.sloane@myob.com](mailto:Courtney.sloane@myob.com).

Yours sincerely,

**Paul Robson**  
CEO