The state of play on open banking

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The door to open banking is open and significant milestones in key workstreams are approaching in the coming months. This snapshot sets out the key dates to look out for across each workstream.

Customer and Product Data Bill (CPD Bill)	MBIE consultation on designation under the CPD Bill	The API Centre's Minimum Open Banking Implementation Plan	Designation of the interbank payment network	Payments NZ's authorisation application	Commerce Commission market study into personal banking services	Select Committee Inquiry into banking competition
The CPD Bill will bring in a consumer data right on a sector-by-sector basis, beginning with the banking industry. It will require designated data-holding businesses, with the consent of the consumer, to share certain personal data with accredited third parties. The Bill has been referred to the Economic Development, Science and Innovation Select Committee.	 MBIE is currently consulting on open banking designation standards under the CPD Bill. It has proposed that ANZ, ASB, BNZ and Westpac are designated as data holders from 1 December 2025, and Kiwibank from 1 June 2026. MBIE proposes that other banks may opt-in. MBIE is also consulting on: The scope of open banking designation regulations under the CPD Bill. Criteria required for accredited requestors to access data. Fees and relevant standards necessary for a functioning regime. Costs, benefits and risk associated with a designation. 	Industry has committed to minimum requirements under the Implementation Plan (as we previously set out <u>here</u>), which are currently being implemented. The first deadline was 30 May, by which time ANZ, ASB, BNZ and Westpac committed to have the API Centre's standardised payment initiation API ready for use. The next target is account information API ready for use.	In August, the Commerce Commission recommended that the Minister of Commerce and Consumer Affairs designates the interbank payment network. The Commission believes designation will allow it to actively engage with industry, drive progress consistently with the CPD Bill and regulate, through network standards and rules, where needed. The Minister is currently considering designation.	In August, the Commerce Commission granted Payments NZ's application for authorisation to develop a third party access accreditation scheme and default contractual terms and conditions to apply between banks (as API providers) and accredited third parties. The Commission's authorisation was granted for a period of 18 months, and subject to conditions aimed at addressing potential conflicts of interest that may inhibit the benefits of the arrangement.	 The Commission's Final report, published on 20 August 2024, included a two recommendations on open banking: Industry and the Government should commit to ensuring open banking is fully operational by June 2026. The Government should support open banking by being an early adopter. The Minister has confirmed that the Government will act on all of the Commission's recommendations. 	 The Finance and Expenditure Select Committee, in conjunction with the Primary Production Committee is undertaking an inquiry into banking competition – which also covers business and rural banking. The terms of reference for the Select Committee include: Barriers preventing competition in banking, including any outstanding constraints on the use of technology and open banking. Submissions were due on 25 September 2024.

Key dates

30 November 2024	Q4 2024	23 January 2025	2025?	1 December 2025	1 June 2026
ANZ, ASB, BNZ and Westpac have committed, under the Implementation Plan, to have the API Centre's standardised account information API ready by this date.	Inquiry into banking competition by the Finance and Expenditure Committee and Primary Production Committee.	Due date for the Select Committee report on the CPD Bill.	Potential passing of the CPD Bill. Exact timing is still TBC, and supporting technical standards will still need to be developed.	Proposed date for ANZ, ASB, BNZ and Westpac to be designated as data holders under the CPD Bill.	Proposed date for Kiwibank to be designated as a data holder under the CPD Bill (aligning with the Commerce Commission's recommended timeframe for open banking to be fully operational).